

DCSA FOREIGN OWNERSHIP, CONTROL OR INFLUENCE UPDATE

DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY

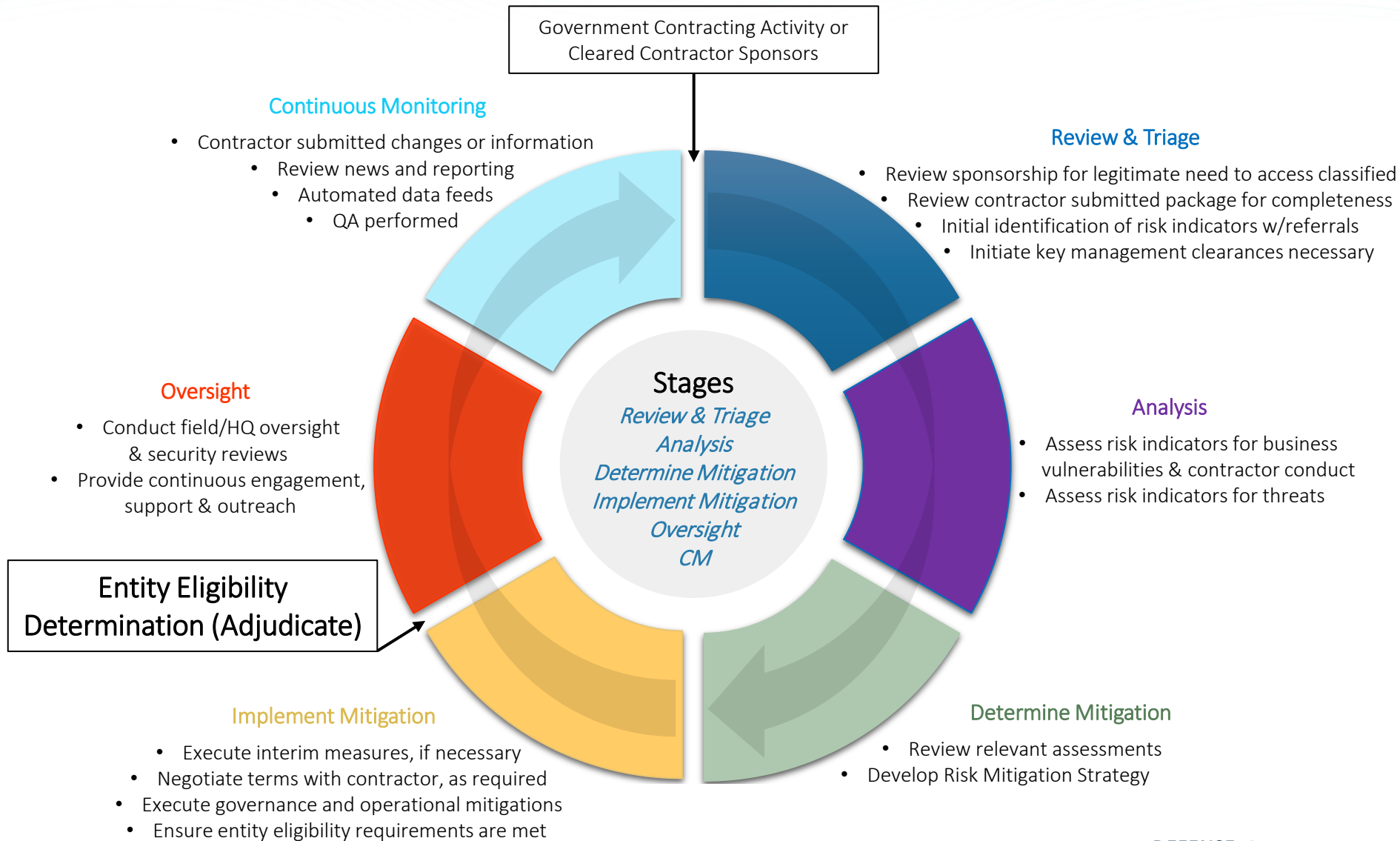


May 8, 2023

Mr. Matthew Kitzman, Chief, Entity Vetting Division



DCSA Facility Clearance Lifecycle





Non-Exhaustive Risk Treatment Tools

MITIGATION	OWNERSHIP	AND/OR	CONTROL	DETAILS
Board Resolution	Minority	AND	No Control	<ul style="list-style-type: none"> Foreign interest has minority ownership <i>insufficient</i> to control the cleared company, e.g. appointing Board Directors or making managerial decisions.
Special Board Resolution	Minority	AND	No Control	<ul style="list-style-type: none"> Foreign interest has minority ownership and control over the cleared company Existing risk indicators requiring mitigation are operational and related to influence
Security Control Agreement	Minority	AND	Right to representation	<ul style="list-style-type: none"> Foreign interest has minority ownership <i>sufficient</i> to control Requires nomination of disinterested, cleared, U.S. citizen approved by DCSA (Outside Directors), to balance Inside Directors
Special Security Agreement	Majority	OR	Effective control	<ul style="list-style-type: none"> Foreign interest has majority ownership and/or effective control Requires Outside Directors, to outnumber Inside Directors National Interest Determinations (NIDs) required
Proxy Agreement	Majority	OR	Effective control	<ul style="list-style-type: none"> Requires foreign interest to convey most voting rights Requires complete independence from foreign interest Requires Proxy Holders Does not allow Inside Directors
Voting Trust Agreement	Majority	OR	Effective control	<ul style="list-style-type: none"> Requires foreign interest to convey legal title, independence Requires cleared, disinterested, U.S. citizen Trustees
Affiliated Operations Plan	Any	OR	Any	<ul style="list-style-type: none"> Details corporate operations and integration with any Affiliate Outlines risk and mitigations required for operational security
Electronic Communications Plan	Any	OR	Any	<ul style="list-style-type: none"> Details unclassified network protections and configuration Provides an ability to monitor all communications between company and Affiliates
Facility Location Plan	Any	OR	Any	<ul style="list-style-type: none"> Details the physical layout of company, and any proximately-located Affiliates Provides information on adequate separations between company and Affiliates
Technology Control Plan	Any	OR	Any	<ul style="list-style-type: none"> Details the physical and logical safeguards regarding protection of export-controlled information from non-U.S. persons



Customer Service Contact Information

- For general questions related to Sponsorship Packages and FCL Packages
 - DSS.FCB@mail.mil
 - 1-888-282-7682, Option 3
 - For questions related to FOCI and FOCI Mitigation
 - dcsa.quantico.dcsa-hq.mbx.foci-operations@mail.mil
 - DCSA strives to respond to emails or messages received through the above methods within 3 business days
 - Information on sponsorship and FCL requirements*
 - <https://www.dcsa.mil/mc/isd/fc/>
 - Information on FOCI*
 - <https://www.dcsa.mil/mc/isd/foci/>
- * DCSA is in the process of reviewing these materials to ensure accuracy and effectiveness