

**COMMENTS MATRIX FOR DD FORM 254, "CONTRACT SECURITY CLASSIFICATION SPECIFICATION"**

#	CLASS	COMPONENT AND POC NAME, PHONE, AND E-MAIL	PAGE	PARA	COMMENT TYPE	COMMENTS, JUSTIFICATION, AND ORIGINATOR JUSTIFICATION FOR RESOLUTION	A/R/P
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Number	Tracking Number	Total Number of Comments	Comments
1	1k0-8n76-k8mk	04	1, 3, 8, 9
2	1k0-8nej-3z1e	07	4, 11, 23, 26, 29, 32, 33
3	1jz-8mfv-pzhn	02	2, 5
4	1jz-8mql-6f4u	13	6, 7, 12, 13, 14, 15, 18, 19, 21, 22, 24, 25, 34
5	1jz-8mm0-d61h	06	10, 20, 27, 30, 31, 35
6	1jz-8mki-wq6x	03	16, 17, 28
7	1jz-8mke-d2p7	01	36
8	1jz-8mla-k3kb	01	37
<b>Total # of Comments</b>		<b>37</b>	

1	U	DOD-2015-OS-0129-0010  Tracking Number: 1k0-8n76-k8mk	GEN	GEN	S	<p><b>Coordinator Comment:</b> Instructions General. The Instructions are very good to have. It would be good if they were attached as part of the actual form so that they do not get separated.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> DoD will request that the instructions be included with the automated system for the DD Form 254 by Defense Security Service and posted by DSS on its website and the DoD Forms website after approval.</p>	P
2	U	DOD-2015-OS-0129-0004	GEN	GEN	S	<p><b>Coordinator Comment:</b> This is more of an idea than anything else. Is there a way that creating a DD254 can be a feature that is added to ISFD? For Example you would create a DD254 in ISFD and it would prompt you</p>	P

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		Tracking Number: 1jz-8mfv-pzhn				<p>to add the cage codes(s) that apply to the prime or sub contract and ISFD could confirm at that time that they have an active facility clearance etc. Once added if you search for a location you can see all DD254's (if any) that your facility has in common with the cage code you looked up. This will provide real time access to a DD254 without waiting for parent locations to forward it on to a child location. Once a DD254 is added/submitted under a cage code it should prompt an email to the FSO that a new DD254 has been added to their account.</p> <p>This would also email FSOs if a facility loses their facility clearance, warning anyone that has a DD254 in place with them.</p> <p>Having ISFD and the DD254 program linked together will require the person adding the DD254 to be responsible for adding all the facilities that will be working on the contract. A Manager account can be set for folks like DSS that could see all DD254's that are under all facilities that they're responsible for.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> The comments relate to separate automation effort, not this information collection. OUSD(I) will provide the comments to Defense Security Service for consideration as DSS captures additional requirements for the National Classification Contract System (NCCS).</p>	
3	U	DOD-2015-OS-0129-0010  Tracking Number: 1k0-8n76-k8mk	1	Head ers & Foote rs	S	<p><b>Coordinator Comment:</b> DD 254 Pages 1 &amp; 2 Classification. If the form results in being classified, how are separate covers and classified forms intended to be distributed to contracts who do not have classified connections to Government Contracting Activity?</p> <p><b>Coordinator Justification:</b></p>	<b>R</b>

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						<b>Originator Justification for Resolution:</b> Question for implementation as opposed to a change to the information collection. If the actual DD Form 254 is classified, then the contractor with that classified contract would have to have approved safeguarding capability at its contractor physical location to receive the classified DD Form 254 as set forth in the DoD Industrial Security Regulation (DoD 5220.22-R and the NISPOM (DoD 5220.22-M).	
4	U	DOD-2015-OS-0129-0011  Tracking Number: 1k0-8nej-3z1e	1	Item 1A	S	<b>Coordinator Comment:</b> Section 1.a. Should an option be available in the dropdown for facilities that host an IC accredited secure area (SCIF) but do not have a DoD FCL?  <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> The primary purpose of the DD Form 254 is tied to a DoD(DSS)-granted facility security clearance. If there is a requirement for a SCIF at the cleared facility, that would be annotated/explained in the DD Form 254; but there has to be a facility security clearance. A SCIF would not stand alone in a DD Form 254; it would have to be tied to a contract requiring access to classified information which requires a facility security clearance.	<b>R</b>
5	U	DOD-2015-OS-0129-0004  Tracking Number: 1jz-8mfv-pzhn	1	Item 1A	S	<b>Coordinator Comment:</b> The layout looks good but it would be nice if when you selected a lower level in 1a it should not allow a higher level in 1b. As well as if you select 4 or 5 as yes that it requires you to add the follow on contract # or retention dates.  <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> These proposed requirements will be provided to DSS for the NCCS, automated system for the DD Form 254; but are not incorporated into the form itself.	<b>R</b>

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6		<div style="border: 1px solid black; width: 100%; height: 15px; margin-bottom: 5px;"></div> OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	1	Item 1A(1)	S	<p><b>Coordinator Comment:</b> Item 1a: Rightly or wrongly, the definition of FCL is widely misunderstood within some GCA's. Recommend the instructions state something like: "Insert the highest level of classified information to which contractor employees require access to perform on this contract/effort." Believe this language is more straight forward and instructive than the instructions currently on the form.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Will revise 1a(1) to add the following text to the final sentence: "...to perform in item 1a, i.e., insert the highest level of classified information to which contractor employees require access to perform on this contract/effort."</p>	P
7		<div style="border: 1px solid black; width: 100%; height: 15px; margin-bottom: 5px;"></div> OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	1	Item 1A(6)	S	<p><b>Coordinator Comment:</b> 1. Some of the instructions are specific to currently used systems and procedures -- which may change in the future. Recommend making the instructions more general in these instances, and refer to the website the most current guidance will be posted. I suspect those websites, or at least the agency who provides the guidance, will change less often than names of databases, systems, procedures, etc. For example:</p> <p>1a. Instruction 1.a(6) refers to using ISFD. What if the name of the ISFD changes? Suggest it would be better if the instructions were something along the lines of "use the CSA sanctioned database or system or official channels" and then list www.dss.mil as the place to go for specific and current guidance.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text in 1A(6) will be edited to read: "ISFD or its successor." Since, the DD Form 254 will have to be reappraised or certified every 3 years—so the instructions can also be</p>	P

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						updated with new CSA database info at that time.	
8	U	DOD-2015-OS-0129-0010  Tracking Number: 1k0-8n76-k8mk	1	Item 1A(7)	S	<p><b>Coordinator Comment:</b> Instructions. Page 1Block 1a (7)The paragraph starting with "(7)" Do not use to form DD254 with foreign contractors' - if this is for domestic contracts, instructions for item 1a should finish with this statement. The following three paragraphs are not necessary and should not be included.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Clarity provided since there are USG customers who have been using DD Forms 254 for classified contracts with foreign contractors. Paragraph renumbered. Text edited to read:</p> <p>“(7) Do not use the DD Form 254 for contracts with foreign contractors, foreign governments or North Atlantic Treaty Organization (NATO) activities that require access to classified information.</p> <p>(a) Foreign contractors will not normally be bound by the requirements of the National Industrial Security Program Operating Manual (NISPOM)(DoD 5220.22-M). See item 1a(7)(b) for instructions on completion of a security aspects letter to the foreign contractor, foreign government, or NATO activity which serves as an equivalent to the DD Form 254.</p> <p>(b) Issue a separate security aspects which serves as the .....email: iab@dss.mil”</p>	<b>P</b>
9	U	DOD-2015-OS-0129-0010  Tracking Number: 1k0-8n76-k8mk	1	Item 1a(7) (A)	S	<p><b>Coordinator Comment:</b> Instructions Page 1,Top of Column 2. The paragraph starting with "(a) Issue a separate..." should be indented since it is a subsection of 1a (7).</p> <p><b>Coordinator Justification:</b></p>	<b>A</b>

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						<b>Originator Justification for Resolution:</b> Accepted.	
10	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	2	Item 2A(3)	S	<b>Coordinator Comment:</b> My comments are all relating to the instruction that supports the completion of the DD254  2a. (3) NOTE : Security officers need clearances for other reasons besides 'supplemental protection' responsibilities such as responding to alarms, escorting uncleared staff, escorting classified information. Can no contractor hire a guard if they did not have one before 1995?  <b>Coordinator Justification:</b> There are a lot of items we could remind the reader about. This is distracting and out of context. Suggest removal of the NOTE.  <b>Originator Justification for Resolution:</b> Text for the "Note" edited for clarification to read: "(3)...explanation in item 13. NOTE: As a reminder, confirm compliance with any DoD 5220.22-M) NISPOM requirements about security guards."	P
11	U	DOD-2015-OS-0129-0008  Tracking Number: 1k0-8nej-3z1e	2	Item 2C	S	<b>Coordinator Comment:</b> Recommend the addition of a location somewhere on the DD Form 254 to annotate/cite the contract period of performance date.  <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> Period of performance is elsewhere in the contract, so no need to have it on the DD Form 254.	R
12		<input type="text" value="OS-0129-0009"/>	2	Item 3B	S	<b>Coordinator Comment:</b> Item 3b, Revised DD254's. Recommend mentioning the 2-year review cycle for reviewing DD254's that have not	A

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		Tracking Number: 1jz-8mql-6f4u				been revised sooner. Rightly or wrongly, the truth is DD254's are not always updated as timely as they should be when security-relevant changes occur. Including this guidance in the instructions can help trigger review/revision. <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> Added subparagraph (3) under item 3b. "... (3) Conduct review of classification requirements at least biennially."	
13		<input type="text" value="OS-0129-0009"/> Tracking Number: 1jz-8mql-6f4u	2	Item 4	S	<b>Coordinator Comment:</b> Item 4, Follow-On: The only time you should have to make comments in Block 13 about transferring information or material to the new contract is if less than all the information is authorized to follow to the new contract. Requiring or expecting a complete itemization for every follow-on is administratively burdensome.  <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> Text edited for clarity to read: "(2) The material or information transferred should be reflected in item 13 noting either that all classified material or information associated with this contract is authorized to be transferred to the contract number cited in item 2a or specifying a list of material or information to be transferred.	<b>P</b>
14		<input type="text" value="OS-0129-0009"/> Tracking Number: 1jz-8mql-6f4u	3	Item 5	S	<b>Coordinator Comment:</b> Item 5, Final: The instructions currently say "when the answers is no, Item 13 must contain final disposition instructions for the classified material".  Comment: It does not seem logical to make this a blanket instruction. At initial award on a 5 year contract, or on an IDIQ or BOA, this might not be known. The NISPOM already requires contractors to dispose of classified when it's no longer needed or when the government asks for it back.	<input type="checkbox"/>

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						<p><b>Coordinator Justification:</b> Guidance on disposition might not be known until some point in performance on the contract. A revised DD254 can provide the guidance as easily and perhaps more accurately, than an original.</p> <p><b>Originator Justification for Resolution:</b> Since item 5 is only issued and marked if the contract has been completed, the instructions at item 5 are revised to read:</p> <p>“(1) If this is not a FINAL DD Form 254, mark “NO.”</p> <p>(2) If this is a FINAL DD Form 254, mark “YES,” enter the date of the contractor’s formal request for retention in accordance with NISPOM (DoD 5220.22-M) and the GCA-authorized period of retention in the spaces provided. Item 13 must contain final disposition instructions for the classified material involved (a final specification is provided to show the retention period and to provide final disposition instructions for the classified material under the contract).”</p>	
15	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	3	Item 6A	S	<p><b>Coordinator Comment:</b> Item 6a: Listing the classified PO Box on the DD254 is a bad idea. Consider: The DD254 is written to give guidance to the contractor. The contractor already knows its classified mailing address. Anyone sending classified should verify the address through official channels, not refer to the DD254 for it. The only authorized place to get current classified mailing/delivery address information for a DoD cleared contractor is via the officially sanctioned system -- currently ISFD. Putting a classified mailing or delivery address on the DD254 is bad OPSEC and sets the stage for bad security practices (unauthorized shortcuts).</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text edited for clarity to read: “(1) Add the name and complete...If the contractor is already in the</p>	P



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						National Industrial Security Program (NISP) and has an authorized classified mailing address, confirm that authorized classified mailing address through the DSS authorized information system for such information (i.e., ISFD or its successor) before adding to this item.	
16		<div style="border: 1px solid black; width: 150px; height: 15px; margin-bottom: 5px;"></div> 0129-0006  Tracking Number: 1jz-8mki-wq6x	3	Item 6A	S	<p><b>Coordinator Comment:</b> Block 6a. Should auto populate based on the cage code entered in 6b. This would require that the DD254 system be able to automatically look up the cage code in ISFD.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Not for the information collection per se. Requirement will be provided to DSS for consideration for the NCCS.</p>	P
17		<div style="border: 1px solid black; width: 150px; height: 15px; margin-bottom: 5px;"></div> 0129-0006  Tracking Number: 1jz-8mki-wq6x	3	Item 6C	S	<p><b>Coordinator Comment:</b> Block 6c. Drop down, select the Cog Security Office vs. typing in the office name, address, city, state, etc.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Not for the information collection per se. Requirement will be provided to DSS for consideration for the NCCS.</p>	P
18		<div style="border: 1px solid black; width: 150px; height: 15px; margin-bottom: 5px;"></div> OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	1	Item 1B 6c	S	<p><b>Coordinator Comment:</b> 1b. Instructions for 6c - says CSO offices are listed at www.dss.mil. That's no longer the case. But the guidance on where/how to find them is there.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Item 6c revised to read:</p>	P

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						<p>6c. The appropriate CSO, name, address and phone number.</p> <p>Enter the DSS Cognizant Security Office (CSO) and its address and phone number.</p> <p>(1) If the information is in an automated system, it will populate automatically.</p> <p>(2) Or, if completing item 6c manually, obtain the address of a specific DSS Field Office by:</p> <p style="padding-left: 40px;">a. Going to the DSS website at <a href="http://www.dss.mil/isp/dss_oper_loc.html">http://www.dss.mil/isp/dss_oper_loc.html</a>, to confirm the geographical area in which the contractor identified in item 6c,</p> <p style="padding-left: 40px;">b. Then, sending an email from an authorized government or contractor email account to <a href="mailto:ISFO.Communication.Feedback@dss.mil">ISFO.Communication.Feedback@dss.mil</a> requesting this information, or</p> <p style="padding-left: 40px;">c. Contacting the contractor facility listed in item 6a.</p>	
19	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	3	Item 6C	S	<p><b>Coordinator Comment:</b> Item 6c: Instructions are already outdated, as the DSS field office addresses are no longer listed on the public facing <a href="http://www.dss.mil">www.dss.mil</a> page.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Revisions for clarity also noted in comment # 18 in this matrix.</p> <p>Enter the DSS Cognizant Security Office (CSO) and its address and phone number.</p>	P

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						<p>(1) If the information is in an automated system, it will populate automatically.</p> <p>(2) Or, if completing item 6c manually, obtain the address of a specific DSS Field Office by:</p> <p style="padding-left: 40px;">a. Going to the DSS website at <a href="http://www.dss.mil/isp/dss_oper_loc.html">http://www.dss.mil/isp/dss_oper_loc.html</a>, to confirm the geographical area in which the contractor identified in item 6c,</p> <p style="padding-left: 40px;">b. Then, sending an email from an authorized government or contractor email account to <a href="mailto:ISFO.Communication.Feedback@dss.mil">ISFO.Communication.Feedback@dss.mil</a> requesting this information, or</p> <p style="padding-left: 40px;">c. Contacting the contractor facility listed in item 6a</p>	
20	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	4	Item 8(3)	S	<p><b>Coordinator Comment:</b> 8(3): Performance may not be at either a prime or subcontractor. It could also be at an associate contractor. Suggest add associate contractor.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> NISPOM does not use the term "associate contractor."</p>	R
21	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	4	Item 9(3)	S	<p><b>Coordinator Comment:</b> Item 9: (3) Recommend that more security conscious wording might be "see attachment #xxx provided under separate cover."</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text now reads for clarity: "...</p>	P

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						and enter the words "See attachment # (insert identifier, e.g., number of attachment) for description provided under separate cover, if unable to provide an unclassified description."	
22	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	5	Item 10A (6)	S	<b>Coordinator Comment:</b> Item 10a (6) "required" should be "requires"  <b>Coordinator Justification:</b> <b>Originator Justification for Resolution:</b>	<b>A</b>
23	U	DOD-2015-OS-0129-0011  Tracking Number: 1k0-8nej-3z1e	5	Item 10e	S	<b>Coordinator Comment:</b> There is no Non-SCI Intelligence checkbox; is this intentional or an oversight?  <b>Coordinator Justification:</b>  <b>Originator Justification for Resolution:</b> Edited DD Form 254 and instructions as follows for clarity:  Revise item 10e on the DD Form 254 (bottom of first page) to read:  e. National Intelligence Information (1) Sensitive Compartmented Information (SCI) (2) Non-SCI  Revise item 10e in the Instructions to read:  10e. National Intelligence Information.  The Director of National Intelligence (DNI) has jurisdiction and control over National Intelligence Information.  (1) Sensitive Compartmented Information: check this item ONLY if the	<b>P</b>

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						<p>contractor requires access to SCI to perform. List specific SCI caveats in Items 13 or 14, as appropriate, keeping in mind that the DD Form 254 may need to be classified at the appropriate level. If SCI must be accessed, the GCA is responsible for ensuring that the additional security requirements outlined in applicable DNI and DCI Intelligence Community Directives are incorporated in the guidance provided to the contractor.</p> <p>(2) Non-SCI. check this item ONLY if the contractor requires access to non-SCI intelligence information. Cite the applicable requirements for protection of the non-SCI intelligence information in Items 13 or 14, as appropriate.</p> <p>(3) The DSS CSO does not conduct security reviews for SCI; but is still responsible for oversight of the standard contractor FCL, which may include access to non-SCI, depending upon the requirements in the DD Form 254.</p> <p>(4) A GCA must provide prior approval before a subcontract involving access to intelligence information (be it SCI or non-SCI) can be issued.</p>	
24	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	6	Item 10H	S	<p><b>Coordinator Comment:</b> Item 10h: clarify that FGI can include unclassified information, similar to our FOU or CUI (since 10j is still on the DD254).</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Definition of FGI is already in item (3) under 10h in the DD Form 254 instructions.</p>	R
25	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	6	Item 10J	S	<p><b>Coordinator Comment:</b> Item 10j CUI (would also apply to 11l): have to wonder why this was left on the DD254, since the DD254 is specific to classified contracts, but CUI is not unique to classified contracts.</p> <p><b>Recommendation/Question:</b> Would it not lead to more uniformity and consistency to address CUI requirements by a DFAR clause to be used in</p>	P

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						<p>any applicable contract rather than leave it on the DD254?</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text revised to read:</p> <p>10j. Controlled Unclassified Information (CUI).</p> <p>Do not select this item, unless the contract requiring access to classified information also includes a requirement for access to CUI, in accordance with GCA specific classification guidance, safeguards, and procedures necessary for the protection of any CUI required in the performance of this specific classified contract. The NISPOM...</p> <p>AND</p> <p>11l. Receive, Store, or Generate Controlled Unclassified Information (CUI).</p> <p>Do not select this item for a contract that only requires receipt, storage or generation of CUI. Check this item if item 10j is checked and one of the other items (i.e., 11a, 11b, 11c or 11d) is checked that specifically indicates that this contract requires access to classified information for performance. Item 11l and item 10j only pertain for the protection of any CUI required in the performance of this specific classified contract. The DoD 5220.22-M, NISPOM...</p>	
26	U	DOD-2015-OS-0129-0011  Tracking Number: 1k0-8nej-3z1e	6	Item 10J	S	<b>Coordinator Comment:</b> Sections 10j and 11.c. Can or will the DD Form 254 be utilized or required for unclassified contracts? If so, then the description involving classified information may need to be modified. Will Sections 1.a. & b. have Unclassified as a selection option? Will a cage code be required for CUI?	<b>R</b>

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						<p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Primary purpose of the DD Form 254 is for contracts requiring access to classified information.</p>	
27	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	6	Item 10K	S	<p><b>Coordinator Comment:</b> 10k: FOUO is a control system for exemptions to FOIA disclosure. Exemption b3 addresses disclosures restricted by statute. That is exactly what CUI is. Allowing FOUO here could result in conflicting guidance for the same information. It should be placed in 10j.</p> <p><b>Coordinator Justification: Accepted.</b> Text edited to remove the "lined out text below:</p> <p><del>"...by items 10a through 10j (e.g., For Official Use Only (FOUO) if the term is still in use and has not been superceded).</del></p> <p><b>Originator Justification for Resolution:</b> Accepted.</p>	A
28	U	DOD-2015-OS-0129-0006  Tracking Number: 1jz-8mki-wq6x	6	Item 11	S	<p><b>Coordinator Comment:</b> Block 11. System should prevent contradictory selections such as: 11d and 11e or 11b, c, or d if 1b is none.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Will be provided as proposed requirements for the automated system (NCCS) not for the information collection.</p>	P
29	U	DOD-2015-OS-0129-0008  Tracking Number: 1k0-8nej-3z1e	8	Item 11C	S	<p><b>Coordinator Comment:</b> Section 11.c. includes the word material. Is this necessary? We all assume that the information created today takes many different forms from hardcopy to electronic storage. I do not see the need to add material. It can be confused with 11.d. and the use of the term hardware.</p>	R

**COMMENTS MATRIX FOR DD FORM 254, "CONTRACT SECURITY CLASSIFICATION SPECIFICATION"**

#	CLASS	COMPONENT AND POC NAME, PHONE, AND E-MAIL	PAGE	PARA	COMMENT TYPE	COMMENTS, JUSTIFICATION, AND ORIGINATOR JUSTIFICATION FOR RESOLUTION	A/R/P
						<p>Recommend removal of material from 11.c.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Use of the term, "material" is needed as it covers any product or substance on which information is embodied. It is not the same as "hardware."</p>	
30	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	8	Item 11E (3) (C)	S	<p><b>Coordinator Comment:</b> 11e.(3)(c): Supplemental Protection is distinct from responding to an alarm, escorting, or couriering staff. Same concerns as expressed for item '2a. (3) NOTE' Above.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text edited to read: "Guard Services. "Contract is for guard services. Cleared personnel are required by the DoD 5220.22-M, NISPOM to provide supplemental protection." NOTE: As a reminder, confirm compliance with any DoD 5220.22-M) NISPOM requirements about security guards and be prepared to cite the specific requirement if requested by DSS."</p>	P
31	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	10	Item 11J	S	<p><b>Coordinator Comment:</b> 11j. This is an area where classified contracts and the CSA often fall down. The DFAR under Rights in Technical Data, 227.7103-1 Policy (3): "Establish separate contract line items, to the extent practicable, for the technical data to be delivered under a contract and require offerors and contractors to price separately each deliverable data item."</p> <p>That means a CDRL/SDRL must be put in the contract for the OPSEC Plan. A reminder about that here would be helpful.</p>	P



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						<p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text for clarification added to item "(1)...Also pertinent contract clauses should be identified and clarifying information added to item 13 to provide sufficient information and guidance to the contractor for compliance because the GCA is adding requirements for OPSEC requirements outside of the standard NISPOM requirements."</p>	
32	U	DOD-2015-OS-0129-0010  Tracking Number: 1k0-8nej-3z1e	10	Item 12	S	<p><b>Coordinator Comment:</b> DD 254 Block 12. Section for "Public Release Authority:" is not writable so this information cannot be filled in on the Form.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> When information collection is approved and form promulgated by DoD, users will be able to complete item 12.</p>	A
33	U	DOD-2015-OS-0129-0008  Tracking Number: 1k0-8nej-3z1e	10	Item 12	S	<p><b>Coordinator Comment:</b> Section 12 Recommend the addition of more space to accommodate some Government addresses that are 4-5 lines long.</p> <p>Accompanying instructions for DD FORM 254 should require Public Release Authority information to include name(s), e-mail, and phone contact information.</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Text edited to read in the item 12 on the DD Form 254:</p> <p>"12. PUBLIC RELEASE. ...Proposed public releases shall be submitted for review and approval prior to release to the appropriate government approval</p>	P

COMMENTS MATRIX FOR DD FORM 254, "CONTRACT SECURITY CLASSIFICATION SPECIFICATION"							
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						<p>authority identified here with at least office and phone contact information and if available, an email address. (See instructions)...</p> <p>In the DD Form 254 instructions for item 12...Text edited to read: "(1) Proposed public releases shall be submitted for review and approval prior to release to the appropriate government approval authority identified here with at least office and phone contact information and if available, an email address identified in item 12."</p>	
34	U	ID: DOD-2015-OS-0129-0009  Tracking Number: 1jz-8mql-6f4u	11	Item 13 (6) (F)	S	<p><b>Coordinator Comment:</b> Item 13 instructions (6)(f): I think I may understand the gist of what this paragraph of instructions is attempting to say, but I'm not sure because the first sentence reads like a run-on sentence.</p> <p><b>Coordinator Justification:</b> Recommend writing this sentence more clearly and with better sentence construction.</p> <p><b>Originator Justification for Resolution:</b> Rearranged and edited for clarity to read:</p> <p>"(f) The GCA should assure that specific classification guidance is provided to the contractor. The GCA should assure that requirements are not extracted from the NISPOM (DoD 5220.22-M) or its supplements as applicable, to go into the DD Form 254. The NISPOM does not provide classification guidance. It provides general guidance on marking of documents derivatively, classification, downgrading, and declassification, and procedures for classified information."</p>	A
35	U	DOD-2015-OS-0129-0008  Tracking Number: 1jz-8mm0-d61h	11	Item 14	S	<p><b>Coordinator Comment:</b> 14: This statement is incorrect. The NISPOM 'Supplement' addressing SAP/SCI was made a separate volume from the NISPOM to recognize that the requirements were outside of what was intended in the 441 agreement Section VI. The NISPOM supplement represents direct costs. As evidence, the supplement addresses DCID/ICD and OPSEC which we know are outside of the NISPOM. Suggest removing</p>	A

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						<p>the word "supplements."</p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> Accepted. Will remove "or its supplements" from the first sentence.</p>	
36		<div style="border: 1px solid black; width: 150px; height: 15px; margin-bottom: 5px;"></div> 0129-0005  Tracking Number: 1jz-8mke-d2p7	12	Item 16	S	<p><b>Coordinator Comment:</b> I suggest adding a place for the government contracting activity (GCA) to sign the DD254 in section 16. From an industrial security perspective, GCA approval is required to subcontract access to COMSEC, NATO, SCI, Non-SCI, or CNWDI. The GCA should sign the DD254 or provide written concurrence.</p> <p><b>Coordinator Justification:</b> In my experience the DD254 is usually signed somewhere in section 13. Having a designated place will help with consistency, ease of identification, and overall will look more professional.</p> <p><b>Originator Justification for Resolution:</b> Instructions for item 13 in subparagraph (i) note that item 13 can be used to record signatures. Thus there is no need for a place in item 16 for additional signatures.</p>	<input type="checkbox"/>
37		<div style="border: 1px solid black; width: 150px; height: 15px; margin-bottom: 5px;"></div> 0129-0007  Tracking Number: 1jz-8mla-k3kb	12	Items 16B; 17D	S	<p><b>Coordinator Comment: Reference Blocks 16b and Block 17d: The instructions explain an AAC is a distinct six-position code consisting of a combination of alpha and/or numeric characters assigned to identify specific agency offices, units, activities, or organizations by the General Services Administration for civilian agencies and DoD for defense agencies. Is this code the same as a SMO (Security Management Office) Code? If so, using a standard acronym/term is best for all.</b></p> <p><b>Coordinator Justification:</b></p> <p><b>Originator Justification for Resolution:</b> As noted in the instructions , the AAC is a distinct six position code consisting of a combination of alpha</p>	<b>R</b>

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						<p>and/or numeric characters assigned to identify specific agency offices, units, activities or organizations by the General Services Administration for civilian agencies and DoD for defense agencies.</p> <p>The AAC or DoD AAC is not the same as a SMO code used by DoD for its personnel security system of record.</p>	