

Classified Material Controls

*Overview of Inventory Management, Shipping & Receiving, Couriers,
and Classified Mail Control*

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Introduction

- CMC is governed by 32 CFR Part 117 NISPOM and 32 CFR Part 2001
 - 117 Section 115 Safeguarding classified information
 - 2001 Section 45 Information Controls, Section 46 Transmission
- Purpose
 - Ensure compliance and security to protect national security information
- Scope
 - Focus on systems and processes for managing and moving classified material

Inventory Management System

- CFR § 117.15(e) *Information Controls*
 - (i) A system to verify that classified information in their custody is used or retained only for a lawful and authorized USG purpose.
 - (ii) An information management system to protect and control the classified information in their possession regardless of media, to include information processed and stored on authorized information systems.
- Maintain a record of all classified material
 - Specific, stringent requirements for TS
- Key information for IMS
 - Material type
 - Location
 - Disposition
 - Unique identifier (control numbers)
- Methods used – no specific requirement
 - Manual vs automation
 - Tie in with records?
 - Keep it detailed, but simple
- Give DCSA confidence of your positive control
- High recommended - conduct annual inventories (TS requirement)
 - Self-Inspections; follow-up actions

Shipping Classified Material

- CFR § 117.15(f) *Transmission of classified information*
 - Contractors will **establish procedures** for transmitting and receiving classified information and material in accordance with 32 CFR 2001.46
 - CFR § 117.15(f)(3) *Commercial delivery entities*. The **CSA may approve contractors** to transmit SECRET or CONFIDENTIAL information within the United States and its territorial areas by means of a commercial delivery entity that is a current holder of the GSA contract for overnight delivery, and which provides nation-wide, overnight service with computer tracking and reporting features
 - **DCSA approval letter** for commercial delivery service
- Importance of protecting classified material in transit
 - Vulnerable state
 - DCSA observed trends, vulnerabilities
- Confirm recipient safeguarding level, address in NISS
- Coordinate with an actual person
 - When is a good time for them to receive?
 - POC for tracer actions/follow-up
- Package considerations - CFR 2001.46(b)
 - Tamper proof
 - Concealment
 - No external markings
 - Proper labeling

Shipping Classified Material (cont.)

- CFR 2001.46(f) *Receipt of classified information*
 - ...ensures timely acknowledgment of the receipt of Top Secret and Secret information by an authorized recipient
 - Like IMS, transmittal receipts are however you'd like
 - Keep it systematic
 - Records for assessment purposes, tracer action
- Positive control until drop-off (my preference)
- Keep delivery service receipt until transmittal receipt signed
- Tracer action if needed
- Report loss or compromise immediately
- Best practice: Send over classified networks if/when possible

Receiving Classified Material

- Prior to receiving, coordinate with the sending POC
 - Authorized to receive?
- Schedule/personnel considerations
- CFR 2001.46(f) *Receipt of classified information*
 - Agency heads shall establish procedures which ensure that classified information is received in a manner which precludes unauthorized access, provides for **inspection of all classified information received** for evidence of tampering and confirmation of contents, and ensures timely acknowledgment of the receipt of Top Secret and Secret information by an authorized recipient.
- Reception process
 - Only cleared and authorized personnel may receive classified shipments
 - Inspect for signs of tampering/damage
 - Match contents to transmittal receipt
 - Log received material into IMS immediately
 - Send receipt back promptly
- Designate alternates in your SOP who can receive, understand procedures
- Have proper storage available – consider afterhours/weekends
 - Security-in-Depth might help: cleared Guards can backup)
- Check USPS classified mailbox routinely

Courier Transport

- CFR § 117.15(f)(4) *Couriers and hand carriers*; CFR 2001.46(b)(2)
- Requirements
 - PCL at level of material & need-to-know
 - Brief employees on responsibility to safeguard classified information; keep classified material in their possession at all times
 - Provide employees with identification card/badge which contains the contractor's name and the name and photograph of the employee
 - Make arrangements in advance of departure for overnight storage at USG installation or a cleared contractor's facility that has appropriate storage capability, if needed
 - Conduct an inventory of the material prior to departure & upon return. The employee will carry a copy of the inventory with them
 - Ensure that the information remains under their constant and continuous protection and that direct point-to-point delivery is made
- Package reqs same as shipping, but locked briefcase may serve as the outer enclosure
- Types of courier travel
 - On foot/vehicular vs air travel – different req's
- Report loss, theft, or compromise to DCSA immediately

Key Takeaways

- Inventory Management
 - Use systematic process to track & audit classified material
- Shipping/receiving
 - Follow strict packaging, carrier protocols; have written procedures; tracking/receipts
- Courier transport
 - Ensure personnel are trained well & maintain constant control
- Compliance
 - Train staff routinely, report incidents, conduct regular audits
- References
 - 32 CFR Part 117 NISPOM
 - 32 CFR Part 2001