



DEPARTMENT OF DEFENSE  
DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY  
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## INDUSTRIAL SECURITY LETTER

Industrial security letters (ISLs) are issued as necessary to inform cleared contractors, Government contracting activities, and DoD Components of developments relating to the National Industrial Security Program. The contents of these letters are for information and clarification of existing policy and requirements. These ISLs only pertain to those entities for whom the Department of Defense is the Cognizant Security Agency. Suggestions for Industrial Security Letters are appreciated and should be submitted to the local Defense Counterintelligence and Security Agency industrial security office. Inquiries concerning specific information in ISLs should be addressed to the local DCSA industrial security office.

**ISL 2021-02**

**August 12, 2021**

On February 24, 2021, the rule at 32 CFR part 117, “National Industrial Security Program Operating Manual (NISPOM)” became effective. The rule provides that contractors must implement changes no later than 6-months from the effective date of the published rule, which is August 24, 2021 (“implementation date”). However, DoD has processed an amendment to the NISPOM rule to extend the compliance date solely for reporting and pre-approval of foreign travel reporting until no later than 18 months from the effective date of the rule for those contractors under DoD security cognizance.

**CLARIFICATION AND GUIDANCE ON REPORTABLE ACTIVITIES (NISPOM rule, § 117.8(a) and § 117.8(c)(1)).** This ISL provides guidance to contractors and covered individuals on the submission of adverse information and the reporting requirements of SEAD 3, “Reporting Requirements for Personnel with Access to Classified Information or Who Hold a Sensitive Position,”<sup>1</sup>

If a government contracting activity’s (GCA) contract requires additional reporting above the baseline 32 CFR part 117, NISPOM, the contractor should consult with the GCA on when and where to submit such reports.

**Covered individuals.** In the context of the NISPOM’s inclusion of SEAD 3 implementation and this ISL, “covered individuals” refers only to those contractor personnel who have been granted eligibility for access to classified information through the NISP, or are in the process of a determination for eligibility for access to classified information through the NISP. (32 CFR, part 117, Preamble, page 83303). Also, cleared employees are defined in the rule at 32 CFR § 117.3(b).

**Uncleared personnel who are subject to SEAD 3 reporting requirements due solely to their occupancy of a “sensitive position” as defined in SEAD 3, D.12., are not covered by the NISP or this ISL and should contact their Government customer for appropriate guidance concerning their SEAD 3 reporting responsibilities.**

Nothing in this ISL alters or supersedes the text of the published NISPOM final rule, 32 CFR part 117. This ISL also cancels, incorporates, and rescinds ISL 2011-04, which addressed and provided adverse information reporting examples.

<sup>1</sup> SEAD 3 is located at: <https://www.dni.gov/files/NCSC/documents/Regulations/SEAD-3-Reporting-U.pdf>

Required reporting related to cleared personnel, to include adverse information, should be reported via the DoD-designated personnel security system of record. The Defense Information System for Security (DISS) is the current DoD system of record for personnel security management. For technical questions concerning the submission of reports into DISS, please visit the DCSA website <https://www.dcsa.mil/is/diss/dissresources/> where numerous job aids and DISS contact information can be found.

Information required by 32 CFR part 117 or this ISL that has been previously submitted in an SF-86 or in DISS, is not required to be re-submitted.

**ADVERSE INFORMATION (NISPOM rule, § 117.8(c)(1)).** The NISPOM rule requires contractors to report to DCSA any adverse information coming to their attention concerning their covered individuals. Adverse information is defined by the rule as any information that adversely reflects on the integrity or character of a cleared employee, that suggests that his or her ability to safeguard classified information may be impaired, that his or her access to classified information clearly may not be in the interest of national security, or that the individual constitutes an insider threat..<sup>2, 3</sup>

Contractors should base their reporting on the 13 adjudicative guidelines in SEAD 4.<sup>4</sup> Guidance on the adjudicative guidelines, training videos, and other resources are available at the Center for Development of Security Excellence (CDSE) website. Please see the following Training and Resources section..

Contractors are reminded that any adverse information coming to their attention regarding cleared employees must be reported for the full duration of an individual's employment with the contractor. An individual's anticipated departure or termination of employment, for whatever reason, and whether imminent or not, does not change the contractor's reporting responsibility. For circumstances involving adverse information concerning employees who are no longer employed by the cleared contractor, contact DCSA for additional guidance at <https://www.dcsa.mil/mc/pv/fso/assistance/>.

## TRAINING AND RESOURCES

- Additional Training and Resources related to adverse information reporting are available within the FSO Toolkit from the Center for Development of Security Excellence at <https://www.cdse.edu/toolkits/fsos/reporting.html>.
- The 13 Adjudicative Guidelines and Adverse Information Reporting short videos can be found at <https://www.cdse.edu/shorts/personnel-security.html>.

*(See Table 1 on the next page.)*

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<sup>2</sup> This ISL does not provide guidance or clarification on whether to report use of cannabidiol products (also known as CBD products). As a reminder, the U.S. Food and Drug Administration does not determine or certify the tetrahydrocannabinol (THC) concentration of commercially available hemp products, such as CBD. These products may contain appreciable levels of THC, yet omit any reference to THC on the product label or also list an inaccurate THC concentration. Packaging labels cannot be relied upon to disclose if the product contains THC concentrations that could cause a urinalysis result that indicates THC use. A urinalysis result indicating illegal use of drugs may result in adverse action that may impact an individual's security clearance eligibility.

<sup>3</sup> This ISL does not provide guidance or clarification whether to report all willful and direct financial investments or holdings in companies that purchase, manufacture, cultivate, traffic, produce, transfer, shop, receive, handle, or sell schedule I substances (e.g. marijuana) as defined by 21 U.S. Code part 812 within the United States.

<sup>4</sup> <https://www.dni.gov/files/NCSC/documents/Regulations/SEAD-4-Adjudicative-Guidelines-U.pdf>

TABLE 1:

**ADVERSE INFORMATION REPORTING REQUIREMENTS.**

<p><b>ACTIVITY CATEGORIES</b></p>	<p><b>CONTRACTOR GUIDANCE &amp; CLARIFICATION FOR REPORTING BY <u>ALL</u> COVERED INDIVIDUALS</b></p> <p><i>(REMINDER: “Covered Individuals” refers only to those contractor personnel who have been granted eligibility for access to classified information through the NISP, or are in the process of a determination for eligibility for access to classified information through the NISP. Uncleared personnel who are subject to SEAD 3 reporting requirements due solely to their occupancy of a “sensitive position” as defined in SEAD 3, D.12., are not covered by the NISP or this ISL and should contact their Government customer for appropriate guidance concerning their SEAD 3 reporting responsibilities.)</i></p>	<p><b>TYPES OF REPORTING REQUIRED BY CLEARED CONTRACTOR (FSO OR ASSIGNED DESIGNEE) IN DISS OR SUCCESSOR SYSTEM</b></p>	<p><b>REQUIRED DATA ELEMENTS FOR SUBMITTED REPORTS</b></p>
<p><b>Psychological and Emotional Health</b></p>	<p>Consistent with Section 21 of the Questionnaire for National Security Positions (SF-86), covered individuals should report <b>psychological and emotional health conditions</b> that involves the following situations:</p> <ul style="list-style-type: none"> <li>• A court or administrative agency issued order declaring the individual to be mentally incompetent.</li> <li>• A court or administrative agency ordering the individual to consult with a mental health professional (psychiatrist, psychologist, licensed clinical social worker, etc.).</li> <li>• Hospitalization of the individual for a mental health condition.</li> <li>• Diagnosis of the individual by a mental health professional (psychiatrist, psychologist, licensed clinical social worker, etc.) of psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder, bipolar mood disorder, borderline personality disorder, or antisocial personality disorder.</li> <li>• Occasions within the last seven years where the individual did not consult with a medical professional before altering, discontinuing, or failing to start a prescribed course of treatment for any of the above diagnoses. Details of any current treatment for the above diagnoses must be reported.</li> <li>• Any mental health or other health condition that the employee feels substantially and adversely affects their judgment, reliability, or trustworthiness regardless of current symptoms.</li> </ul>	<p>Incident Customer Service Report entered</p>	<p>Provide applicable information.</p>

	<u>(See Standard Form(SF) 86, 21 - Psychological and Emotional Health)</u>		
<b>Personal Finance &amp; Business Interests</b>	<p><b>Cryptocurrency.</b> Ownership of foreign state-backed, hosted, or managed cryptocurrency and ownership of cryptocurrency wallets hosted by foreign exchanges.</p> <p>No reporting is required if the covered individual holds cryptocurrency, but is NOT aware that any such holdings are backed, hosted, or managed by a foreign state, or that a cryptocurrency wallet is hosted by a foreign exchange.</p> <p>No reporting is required if the covered individuals investments in cryptocurrency are held in a widely diversified fund (e.g. index funds), unless the investment instrument is entirely composed of holdings in cryptocurrency that is backed, hosted, or managed by a foreign state.</p>	Incident Customer Service Report entered	<ul style="list-style-type: none"> <li>• Name of cryptocurrency</li> <li>• Exchange host country</li> <li>• Dollar value of the asset</li> </ul>

**SEAD 3 REPORTING REQUIREMENTS (NISPOM rule, 32 CFR § 117.8). Contractors will comply with SEAD 3 reporting requirements for covered individuals no later than August 24, 2021.** Tables 2, 3, and 4 that follow this section provide guidance on specific areas of compliance with these requirements, as well as how reports are to be submitted in DISS.

Also, contractors under the security cognizance of the Defense Counterintelligence and Security Agency (DCSA) must have a written plan/standard practice procedures (SPP)<sup>5</sup> in place for implementation of SEAD 3 reporting requirements. This written plan/SPP must be available for review during scheduled assessments. DCSA will incorporate the assessment of compliance with SEAD 3 reporting requirements that began on August 24, 2021, into scheduled assessments no earlier than **March 1, 2022**.

The contractor's SPP will, at a minimum, establish the necessary processes and procedures to inform their cleared contractor personnel on reporting requirements related to SEAD 3 and the requirements for adverse information reporting as directed by the NISPOM rule at section 117.8(c)(1). The SPP will also include processes and procedures that address:

- How the contractor receives, processes, and manages the required reports from covered individuals as identified in this ISL.
- How these processes and procedures are to be implemented within the cleared contractor facility.
- How a covered individual will alert the cleared contractor (FSO or assigned designee) of the reportable actions concerning other covered individuals. (SEAD 3, F.3.)

*(See Tables 2, 3 and 4 that follow.)*

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<sup>5</sup> See 32 CFR §117.7(e)

**TABLE 2:**  
**GUIDANCE AND CLARIFICATION OF NISPOM RULE REPORTING REQUIREMENTS**  
**FOR ALL COVERED INDIVIDUALS.**

ACTIVITY CATEGORIES	<p style="text-align: center;"><b>CONTRACTOR GUIDANCE &amp; CLARIFICATION FOR REPORTING BY <u>ALL</u> COVERED INDIVIDUALS</b></p> <p><i>(REMINDER: “Covered Individuals” refers only to those contractor personnel who have been granted eligibility for access to classified information through the NISP, or are in the process of a determination for eligibility for access to classified information through the NISP. Uncleared personnel who are subject to SEAD 3 reporting requirements due solely to their occupancy of a “sensitive position” as defined in SEAD 3, D.12., are not covered by the NISP or this ISL and should contact their Government customer for appropriate guidance concerning their SEAD 3 reporting responsibilities.)</i></p>	<p style="text-align: center;"><b>TYPES OF REPORTING REQUIRED BY CLEARED CONTRACTOR (FSO OR ASSIGNED DESIGNEE) IN DISS OR SUCCESSOR SYSTEM</b></p>	<p style="text-align: center;"><b>REQUIRED DATA ELEMENTS FOR SUBMITTED REPORTS</b></p>
<b>Foreign Contacts - OFFICIAL</b>	<ul style="list-style-type: none"> <li>• Contact with foreign nationals occurring solely as part of a covered individual's official duties, and absent any bonds of affection or obligation, is <b><u>not required to be reported.</u></b></li> <li>• Contact with foreign nationals based solely on the obligations incurred as a result of a covered individual residing in a foreign country due to employment (payment of rent, utilities, etc.), and absent any additional bonds of affection or obligation, is <b><u>not required to be reported.</u></b></li> </ul> <p>(See SEAD 3, D.8 and F.2.a)</p>	N/A	N/A
	<p>In cases of an official foreign contact deemed by the cleared contractor (FSO or assigned designee) to be a security concern, an incident report shall be submitted into DISS.</p>	Incident Customer Service Report entered	See SEAD 3 Appendix A, 2. or 3.
<b>Foreign Contacts -UNOFFICIAL</b>	<p>Unofficial contact with a known or suspected <b>foreign intelligence entity</b>. In addition, the cleared contractor (FSO or assigned designee) should also report this activity directly to their DCSA Counterintelligence Special Agent (CISA). If you need assistance identifying or contacting your designated CISA please visit <a href="https://www.dcsa.mil/mc/ctp/locations/">https://www.dcsa.mil/mc/ctp/locations/</a>.</p>	Customer Service Report entered	See SEAD 3 Appendix A, 2.

	<p><b>Continuing association</b> with known foreign nationals that involves <b>bonds of affection, personal obligation, or intimate contact.</b> (See SEAD 3, D.8 and F.2.b.2))</p> <p>A covered individual employed by a cleared contractor with foreign affiliations (e.g. FOCI, multinational business structure) only needs to report such continuing associations if they involve bonds of affection, personal obligation, or intimate contact.</p>	Customer Service Report entered	See SEAD 3 Appendix A, 3.
	<p>Any contact with a foreign national involving the <b>exchange of personal information.</b> (See SEAD 3, D.8 and F.2.b.2))</p> <p>A reportable instance involving an exchange of personal information with a foreign national would meet the following criteria.</p> <ol style="list-style-type: none"> <li>1. The name and nationality of the foreign national are known by the covered individual during or after the exchange of personal information, and</li> <li>2. The nature of the personal information provided by the covered individual to the foreign national is not reasonably expected to be accessible by the general public, nor to be willingly released to the general public by the covered individual, and</li> <li>3. Contact with the foreign national is re-occurring or expected to re-occur.</li> </ol>	Customer Service Report entered	See SEAD 3 Appendix A, 3.
	<p><b>Updates</b> regarding continuing association with known foreign nationals (See SEAD 3, D.8 and F.2.b.2))</p>	Customer Service Report entered	See SEAD 3 Appendix A, 3.
<b>Behavior &amp; Conduct</b>	<p>See SEAD 3, F.3. for a list of actions or activities of covered individuals that are <b>reportable by other covered individuals</b> to the cleared contractor (FSO or assigned designee).</p>	Incident Customer Service Report entered	See SEAD 3 Appendix A, as applicable
	<p>Attempted <b>elicitation, exploitation, blackmail, coercion, or enticement</b> to obtain classified information or other information specifically prohibited by law from disclosure. (See SEAD 3, G.2.a)</p>	Incident Customer Service Report entered	See SEAD 3 Appendix A, 13.
<b>Foreign Affiliation</b>	<p>Application for or receipt of <b>foreign citizenship.</b> (See SEAD 3, G.1.a and H.1.d.)</p>	Incident Customer Service Report entered	See SEAD 3 Appendix A, 7.

	Application for, possession, or use of a <b>foreign passport or identity card</b> for travel. (See SEAD 3, G.1.b. and H.1.e.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 8. and 9.
<b>Media Contact</b>	Contact with the media: <ul style="list-style-type: none"> <li>• if the media seeks or shows interest in classified information or information otherwise prohibited from public disclosure<sup>6</sup>, and;</li> <li>• if an associated investigation/ inquiry reveals a mishandling and/or unauthorized disclosure of classified information.</li> </ul> (See SEAD 3, G.2.b. and H.2.b)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 14.
<b>Criminal Activity</b>	<b>Arrests.</b> (See SEAD 3, G.2.c. and H.2.c.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 15.
<b>Treatment and Counseling</b>	<b>Alcohol- and drug-related treatment.</b> (See SEAD 3, G.2.e., H.2.h.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 19.
<b>Personal Finance &amp; Business Interests</b>	<b>Bankruptcy</b> or over 120 days delinquent on any <b>debt.</b> (See SEAD 3, G.2.d. and H.2.d.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 16.

<sup>6</sup> Pursuant to NISPOM 32 CFR §117.15(h)(8). Disclosure to the Public. Contractors will not disclose classified information to the public. Contractors will not disclose unclassified information pertaining to a classified contract to the public without prior review and clearance as specified in the Contract Security Classification Specification (DD Form 254), or equivalent, for the contract or as otherwise specified by the GCA.



TABLE 3:

**GUIDANCE AND CLARIFICATION FOR NISPOM RULE REPORTING REQUIREMENTS SPECIFIC TO  
INDIVIDUALS WITH ACCESS TO TOP SECRET INFORMATION OR “Q” ACCESS**

ACTIVITY CATEGORIES	<p align="center"><b>GUIDANCE &amp; CLARIFICATION FOR REPORTING SPECIFIC TO COVERED INDIVIDUALS WITH TOP SECRET CLEARANCES OR “Q” ACCESS</b></p> <p><i>(REMINDER: “Covered Individuals” refers only to those contractor personnel who have been granted eligibility for access to classified information through the NISP, or are in the process of a determination for eligibility for access to classified information through the NISP. Uncleared personnel who are subject to SEAD 3 reporting requirements due solely to their occupancy of a “sensitive position” as defined in SEAD 3, D.12., are not covered by the NISP or this ISL and should contact their Government customer for appropriate guidance concerning their SEAD 3 reporting responsibilities.)</i></p>	<p align="center"><b>TYPES OF REPORTING REQUIRED BY CLEARED CONTRACTOR (FSO OR ASSIGNED DESIGNEE) IN DISS OR SUCCESSOR SYSTEM</b></p>	<p align="center"><b>REQUIRED DATA ELEMENTS FOR SUBMITTED REPORTS</b></p>
<b>Foreign Affiliation</b>	Voting in a <b>foreign election</b> . (See SEAD 3, H.1.f.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 11.
<b>Personal Finance &amp; Business Interests</b>	<b>Financial Anomalies</b> Examples include, but are not limited to, bankruptcy; garnishment; over 120 days delinquent on any debt; and any unusual infusion of assets of \$10,000 or greater such as an inheritance, winnings, or similar financial gain. (See SEAD 3, H.2.d.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 16.
	Direct involvement in <b>foreign business</b> . (See SEAD 3, H.1.a.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 4.
	Foreign <b>bank accounts</b> . (See SEAD 3, H.1.b.)	Incident Customer Service Report entered	See SEAD 3 Appendix A, 5.

	<p>Ownership of <b>foreign property</b>. (See SEAD 3, H.1.c.)</p> <p>Includes ownership interest in foreign real estate. For the purpose of ISL this includes land, any inherently permanent improvements to land (e.g. buildings, living spaces), or ownership of rights associated with the land or the inherently permanent improvements to the land, to include right-to-use time share agreements and natural resource rights.</p> <p>Diversified investments (e.g. index funds.) do not need to be reported unless they are entirely composed of property holdings in a foreign country or countries.</p>	Incident Customer Service Report entered	See SEAD 3 Appendix A, 6.
<b>Living Status/ Arrangements</b>	<b>Cohabitant(s)</b> : A person with whom the covered individual resides and shares bonds of affection, obligation, or other commitment as opposed to a person with whom the covered individual resides for reasons of convenience (e.g. a roommate). (See SEAD 3, D.3 and H.2.f.)	Customer Service Report entered	See SEAD 3 Appendix A, 17.
	<b>Marriage</b> : All civil marriages, legally recognized civil unions, and legally recognized domestic partnerships. (See SEAD 3, H.2.g.)	Customer Service Report entered	See SEAD 3 Appendix A, 18.
	<b>Adoption</b> of non-U.S. citizen children. (See SEAD 3, H.1.g.)	Customer Service Report entered	See SEAD 3 Appendix A, 12.
	Foreign National <b>Roommate(s)</b> (See SEAD 3, D.8 and H.2.e.)	Customer Service Report entered	See SEAD 3 Appendix A, 3.

*TABLE 4:*

**GUIDANCE AND CLARIFICATION FOR NISPOM RULE FOREIGN TRAVEL REPORTING  
FOR ALL COVERED INDIVIDUALS**

**FOREIGN TRAVEL REPORTING:** DoD has processed an amendment to the NISPOM rule to extend the compliance date solely for foreign travel reporting until no later than 18 months from the effective date of the rule (i.e., February 24, 2021) for those contractors under DoD security cognizance.

Guidance and procedures related to the requirements for foreign travel reporting are located in Table 4 of this ISL for planning purposes for contractors under DoD security cognizance to comply with the extended date for submissions when the rule amendment is published.

ACTIVITY CATEGORIES	CONTRACTOR GUIDANCE & CLARIFICATION FOR REPORTING BY <u>ALL</u> COVERED INDIVIDUALS  <i>(REMINDER: “Covered Individuals” refers only to those contractor personnel who have been granted eligibility for access to classified information through the NISP, or are in the process of a determination for eligibility for access to classified information through the NISP. Uncleared personnel who are subject to SEAD 3 reporting requirements due solely to their occupancy of a “sensitive position” as defined in SEAD 3, D.12., are not covered by the NISP or this ISL and should contact their Government customer for appropriate guidance concerning their SEAD 3 reporting responsibilities.)</i>	TYPES OF REPORTING REQUIRED BY CLEARED CONTRACTOR (FSO OR ASSIGNED DESIGNEE) IN DISS OR SUCCESSOR SYSTEM	REQUIRED DATA ELEMENTS FOR SUBMITTED REPORTS
<b>Foreign Travel - UNOFFICIAL</b>	<ul style="list-style-type: none"> <li>• Unofficial foreign travel <b>is required to be reported</b>. (See SEAD 3, F.1.b for exceptions.)</li> <li>• Unofficial foreign travel is defined as all travel other than that defined by “official foreign travel,” and includes any foreign travel conducted before, during, or after official foreign travel,</li> </ul>	Foreign Travel Module	<ul style="list-style-type: none"> <li>▪ Itinerary data:               <ul style="list-style-type: none"> <li>-Countries visited</li> </ul> </li> </ul>

	and that does not meet the criteria of “official foreign travel” as stipulated below.		-Travel dates -Travel modes & carriers
	<b>Deviations from submitted travel itinerary</b> must be reported by the covered individual to the cleared contractor (FSO or assigned designee) within five business days of return. (See SEAD 3, F.1.b.1))	Foreign Travel Module	▪ Passport data:
	<b>Unplanned day trips to Canada or Mexico</b> by persons residing in the U.S. must be reported to the cleared contractor (FSO or assigned designee) within five business days of return. (See SEAD 3, F.1.b.1)b))	Foreign Travel Module	-Full name -Issuing country -Passport #
	Unofficial foreign travel under <b>emergency circumstances</b> does not require pre-approval, however, the covered individual should advise their FSO of the emergency foreign travel prior to departure. Reporting, consisting of a complete travel itinerary, shall be accomplished within five business days of return. (See SEAD 3, F.1.b.1)d))	Foreign Travel Module	-Issuance date -Expiration
	Covered individuals who are employed by the contractor and who <b>reside abroad</b> are required to report all unofficial foreign travel outside of the foreign country in which they reside. If reports of aggregated unofficial foreign travel are submitted for such covered individuals, the reporting period for that covered individual must not exceed 120 days.	Foreign Travel Module	▪ See SEAD 3, Appendix A, 1: items e, f, h, and as needed g, i, and j.
	Unofficial foreign <b>travel that is not reported in advance</b> and does not fall under the above circumstances, shall be reported to the cleared contractor (FSO or assigned designee) as soon as possible after the travel occurs.	Foreign Travel Module	
<b>Foreign Travel – UNOFFICIAL (Related Cleared Contractor Actions)</b>	SEAD 3 requires pre-approval prior to unofficial foreign travel. DoD considers unofficial foreign travel by a covered individual under DoD NISP security cognizance as approved when the first set of items 1-4 occur as follows:  1. The covered individual (i.e., cleared employee) notifies the cleared contractor (e.g., Facility Security Officer or assigned designee) before foreign travel. If notification does not occur in advance, the covered individual must notify the cleared contractor as soon as possible after the travel occurs, not to exceed 5 business days;  2. The covered individual submits a complete travel itinerary to the cleared contractor. And, the cleared contractor reports the travel prior to the unofficial foreign travel as described (See columns titled “Required Reporting By Cleared Contractor” and “Required Data Elements” for requested itinerary data.);  3. The cleared contractor provides the covered individual with the NCSC “Safe Travels” resource link: <a href="https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence_Tips_Safe_Travels.pdf">https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence_Tips_Safe_Travels.pdf</a> for required review.  4. The cleared contractor coordinates with a DCSA Counterintelligence Special Agent (CISA) for appropriate <b>pre-foreign travel briefings</b> when the covered individual is traveling to a foreign	Foreign Travel Module	▪ Itinerary data: -Countries visited -Travel dates -Travel modes & carriers  ▪ Passport data: -Full name -Issuing country -Passport # -Issuance date -Expiration  • See SEAD 3, Appendix A, 1:

	<p>country listed in the Director of National Intelligence’s Worldwide Threat Assessment of the U.S. Intelligence Community which is available at <a href="https://www.dni.gov/index.php/newsroom/congressional-testimonies">https://www.dni.gov/index.php/newsroom/congressional-testimonies</a>; and</p> <p>Additionally, the cleared contractor (FSO or assigned designee) must follow the following guidance:</p> <ol style="list-style-type: none"> <li>1. Use travel resources to help inform and advise the covered individual of travel risk. <ul style="list-style-type: none"> <li>• If the covered individual is traveling to a foreign country on the Department of State Travel Advisories List available at <a href="https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories.html/">https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories.html/</a>, then cleared contractor should provide information from this advisory to the covered individual.</li> </ul> </li> <li>2. Coordinate with DCSA CISA for <b>post-foreign travel debriefings</b> when covered individual reports any contact with foreign intelligence entities or other foreign travel anomalies during the foreign travel event.</li> <li>3. If submitting <b>reports of aggregated unofficial foreign travel</b><sup>7</sup> for covered individuals who routinely travel, this reporting period must not exceed <b>120 days</b>. In this case, the travel is approved if the FSO refers the covered individual to the NCSC “Safe Travels” resource link: <a href="https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence_Tips_Safe_Travels.pdf">https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence_Tips_Safe_Travels.pdf</a> <b>at least annually for required review</b>.</li> <li>4. Cleared contractor must ensure that any foreign travel conducted by a covered individual who is terminating their relationship with the cleared contractor is reported immediately. (See SEAD 3, E. and F.)</li> </ol>		<p>items e, f, h, and as needed g, i, and j.</p>
<p><b>Foreign Travel - OFFICIAL</b></p>	<ul style="list-style-type: none"> <li>• Official foreign travel <b>is not required to be reported</b>.</li> <li>• Official foreign travel is defined as foreign travel by covered individuals that is in direct support of an established U.S. Government contract with the ultimate customer being the U.S. Government, whether as a prime contractor or a sub-contractor.</li> </ul> <p>(See SEAD 3, F.1.a.)</p>	<p>N/A</p>	<p>N/A</p>

<sup>7</sup> Aggregated unofficial foreign travel is defined as the consolidated reporting of foreign travel compiled over a period not to exceed 120 days.