

YOUR FCL PACKAGE PREPARATION CHECKLIST: WHAT TO VERIFY BEFORE YOU SUBMIT TO DCSA

This checklist is organized around the core components of an FCL package. It's designed to be used as a pre-submission self-audit: a final verification pass before you transmit your package through NISS.

None of these checks replace the guidance of an experienced FSO or compliance advisor, but they address the most common deficiency triggers and give contractors a structured way to catch errors before DCSA does.

DD-441: Security Agreement

Confirm that the correct individual has signed the DD-441. This must be the senior management official or the corporate officer authorized to bind the company to a security agreement.

Verify that supporting documentation (such as a board resolution or operating agreement) confirms the signatory's authority to bind the company.

Verify that the form is dated and that no signature blocks are left blank.

If the company's legal name has changed since the last filing, ensure the DD-441 reflects the current legal name as registered with the state.

SF-328: Certificate Pertaining to Foreign Interests

Confirm that all questions on the SF-328 have been answered completely. Unanswered or ambiguous responses to Questions 10-13 regarding foreign interests, beneficial ownership, and voting rights are among the most common deficiency triggers.

If any foreign interest is disclosed, verify that the appropriate FOICI mitigation instrument (SSA, SCA, or proxy agreement) has been identified and is referenced in the submission.

Ensure the SF-328 is signed by the same authorized official who signed the DD-441.

Key Management Personnel (KMP) Roster

Review the KMP list against DCSA's determination of who qualifies as KMP for the company's business structure.

Verify that all officers, directors, partners, and owners with 5% or greater equity are included.

Confirm that the FSO and ITPSO are listed.

Ensure that all KMP data in NISS is current: check for any personnel changes (departures, new hires, title changes) that occurred after the initial KMP determination.

Verify that all KMP have been submitted for personnel security clearance (PCL) processing and that their e-QIP submissions and fingerprints are complete.

Insider Threat Program

Confirm that the company has established a written insider threat program policy that meets the requirements of NISPOM Rule 32 CFR Part 117.

Verify that an Insider Threat Program Senior Official (ITPSO) has been designated and is reflected in the KMP roster.

Ensure that insider threat awareness training records are current for all cleared personnel, as DCSA may request evidence of program implementation during the review process.

Legal Organization Chart

Compare the organization chart being submitted to DCSA against the company's current filings with its state of incorporation.

Verify that parent companies, subsidiaries, and any foreign ownership relationships are accurately represented.

Cross-reference the org chart against the SF-328 and KMP documentation to confirm consistency; any discrepancy across these three documents is a deficiency trigger.

If the company has recently undergone a merger, acquisition, or reorganization, confirm that the structural changes have been legally completed and are reflected in both state filings and the DCSA submission.

NISS Submission and Formatting

Verify that all required documents have been uploaded to NISS in supported formats.

Confirm that KMP records are properly linked within the system.

Before transmitting, review the complete package in NISS to ensure no sections are flagged as incomplete.

If this is a resubmission following a package return, verify that every deficiency identified in DCSA's return-reason letter has been addressed.