Security and Policy Review Handbook

Fourth Edition

AIA
AEROSPACE INDUSTRIES ASSOCIATION

Security and Policy Review Handbook

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Foreword

Every company doing business with the Department of Defense has, at one time or another, run into the requirement of getting information cleared for presentation to the public. At times this process is frustrating, confusing, and lengthy. From whom do you request permission? How long will it take? What do you have to submit? This handbook attempts to answer those questions and much more.

The requirement to review national defense information prior to public release is not new. It was first recognized by President Harry Truman and was initially codified into a process during the Eisenhower Administration. Now called the Security and Policy Review Program, it is governed by Department of Defense directives and corresponding regulations in all services and other government agencies. The program has grown from the clearance of a handful of documents to the thousands reviewed each day throughout the system.

The purpose of security and policy review, today as it was then, is to foster a free and open exchange of ideas and issues without giving away sensitive, classified, technical information that could be detrimental to the interests of the United States. The increase in terrorist activities and the development of weapons of mass destruction by rogue states further increase the scrutiny required prior to the release of information.

Use this handbook as a guide and a reference. It can significantly shorten the review process, saving you time and money while ensuring the information released adheres to U.S. government policy and security guidelines.

The Aerospace Industries Association would like to thank the Washington Headquarters Service, Office of Security Review, and the Secretary of the Air Force, Public Affairs Security and Policy Review Branch, for their assistance in publishing the fourth edition of this handbook. Their initiative in updating the handbook to provide the defense industry with a definitive guide is greatly appreciated.

Aerospace Industries Association (AIA)

AIA is the nonprofit trade association representing the nation'sleading designers, manufacturers, and providers of civil, military, and business aircraft, helicopters, unmanned aerial vehicles, space systems, aircraft engines, missiles, materiel and related components, equipment, services, and information technology.

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Why Safeguard Information?

National Security

The primary reason for clearing defense information prior to public release is to safeguard our national security. The technology and program data contained in technical papers, marketing brochures, or news releases could reveal national secrets if not properly cleared. The information on which the material is based often comes from defense contracts or projects. A simple association of programs or hardware could provide the missing piece needed to complete an intelligence puzzle being assembled by individuals or countries whose interests are counter to those of the United States.

Economic Security

American industrial technologies and competitive strategies are growing targets of foreign intelligence organizations. Not only does this endanger national security but also the loss of this information damages the nation's industrial capability to compete in the world market.

Critical Technology

The review process identifies and stops critical military technology transfer out of proper channels. Since World War II the United States has made great strides in military technologies. These technologies have allowed the United States to maintain a strong national security and technological leadership role throughout the world. But military strength is a delicate balance. During the period of world change, the Departments of State, Commerce, and Defense are striving to maintain that strong defense posture and still allow industry to compete in a rapidly expanding world technology market. These continually evolving policies and trade decisions make review and clearance essential.

Sensitivities

The information review process identifies economic and diplomatic sensitivities that could unknowingly enter the material. The program described in the paper could represent or be the result of a national policy decision. Such programs as space, missile defense, and weapons of mass destruction might have added sensitivities because of diplomatic activities and world events.

Contractor Proprietary

Submitting defense-related material for review forces companies to create internal procedures to make judgments on proprietary or company sensitive information to include subcontractors. By establishing a review system preceding public release, the contractor has created safeguards against the inadvertent release of technology advances or business strategies that would harm national defense or market competitiveness.

What Information Needs To Be Cleared?

Definitions

The general answer is that information intended for the public and derived from or based on a classified defense contract or related to Independent Research and Development (IR&D) of a militarily critical program or technology must be reviewed and cleared by the Department of Defense prior to release. A few definitions will help.

• The Public

"The public" means any open, unrestricted audience. This could range from a technical conference to the readers of a daily newspaper. The size or location of the audience is not a consideration; the public could be one person or an entire population. The public could be in the United States or overseas.

• Types of Information

The information can range from a simple program description in a marketing brochure to a full technical review. It can be folded into a variety of formats including technical papers, videos, fact sheets, marketing brochures, news media materials, and internal newsletter articles. It also can mean an advertisement or a speech by a company official. The key is that any information derived from defense work and intended for the public release must be reviewed for clearance.

• DD Form 254, DoD Contract Security Classification Specifications

Not all Department of Defense contracts, however, require that information be cleared for release. The first indication of a security review requirement would be found in the instructions on DD Form 254, attached to all defense contracts with a security classification. This indicates the highest classification level of the program or project and which office to submit the material for review.

In unclassified contracts (those with no classification requirements or those with no DD Form 254), security and policy review requirements might be written into the body of the contract. A contract with no security involvement might still have policy sensitivities necessitating review. Read and understand every contract before releasing information based on it through proper channels.

• Independent Research and Development

One of the most difficult areas of security and policy review is Independent Research and Development. Every year DoD supports contractor IR&D with millions of dollars. Much of the research is not directly associated with a current program but could become the foundation for a future technology or weapon system. The decision of whether to clear and release IR&D information often rests with the contractor.

When in Doubt, Check the ITAR – Information generated from IR&D first should be checked against the State Department's International Traffic-In-Arms Regulations (ITAR). This is a document detailing the United States munitions and procedures for export of defense articles and defense services. If the information in the material to be released is specified in the ITAR, then it could be subject to Department of State licensing. Technical papers intended for public release may be submitted to the Washington Headquarters Service, Office of Security Review (WHS/ESD/OSR) located in the Pentagon. If cleared for release and placed in the public domain by the contractor, the technical paper is exempt from export licensing requirements. This review authority has not been delegated to the individual military services.

Non-Technical Information – If the material is generic and does not contain specific technical detail, application, or results, then it need not be submitted for review. If there is a question, contact WHS/ESD/OSR. The Office of Security Review also will review unsolicited, or not contractually required, material which might be of a militarily critical nature. Examples of such material include technical articles for national publications and presentations at international

conferences. When in doubt, it is a good idea to submit material to OSR for their release determination.

What Information Does Not Need To Be Cleared?

Not all defense information needs to be reviewed for clearance by DoD or the services. The basic rule is that material not intended for public release does not need defense review. This includes:

• Classified Information

Instead of working the material through the security and policy review process, which handles only information for public release, send the material directly to the contracting customer's security office. They, in turn, will pass it to the appropriate program office for a classification, technical, and issue review.

• Contractually Required Materials

Materials such as proposals and contractually required reports and briefings do not have to be reviewed by the customer because they are not intended for public release. However, if the need arises for public release, they should be cleared through the normal security and policy review system.

• Information Destined for DoD Closed Conferences

This is the exception of the security and policy review arena. There are a number of conferences that are not open to the public, and attendance is controlled by the Department of Defense or the military services. These conferences are considered closed, and military program material doesn't have to be cleared for presentation. Many customers, however, still require material intended for these conferences to be reviewed for classification and sensitivities. Remember, a "review" is not the same as a "clearance," which grants public release. The customer, before any future public release, must still clear material given at these events. Examples of closed conferences include the Government Microcircuit Applications Conference, the Joint Army-Navy-NASA-Air Force Conference, and MILASM.

• Fundamental Research, Even If DoD Funded

This is most commonly found at universities holding DoD research contracts. Check with the contracting agency clearance office for details.

• Previously Cleared Material

If the content has not been changed, see Reusing Cleared Material on page 14.

DoD Security and Policy Review System

Right To Know

The American public has the right to know the military capability and potential of our nation. This, however, is limited by the need to prevent compromise of national security and policies. The military security and policy review system was created to safeguard both the public's rights and our national security. It is a service provided to ensure that information regarding our national security is released quickly but without divulging classified or policy data. It also ensures that information will be technically accurate, free of information about critical military technology, and conforms to Department of Defense and military service polices.

Clear at Lowest Possible Level

Information review and clearance is performed at Department of Defense and all levels of command within the military services. It is the goal, however, that whenever possible the final review and clearance authority is kept at the lowest possible command level within a military service.

Unfortunately, it is not always possible to clear material at a low command level. Some material requires higher headquarters review. Subjects requiring the highest review are those of national or foreign policy interest, including new programs, information intended for release at the "seat of the government" or Washington level, military operations, space systems, chemical and biological warfare, and high-energy lasers.

This list of actual subjects destined for review is not static. Even information about an "old" program may require a full Pentagon review if it is in the budget or FYDP, at an important milestone, or has become politically or economically sensitive.

Review vs. Clearance

It is a common mistake to confuse the review process with the resulting clearance. Just because information has been reviewed by a segment of the defense customer doesn't mean it has been cleared. The authority to clear material is delegated from the Office of the Secretary of Defense (OSD) to the military services. They, in turn, delegate the authority to certain offices within the commands. For example, the Air Force places the clearance authority in the public affairs office.

The Public Affairs Office

The defense security and review process is usually in the military public affairs office as system administrator. This is a safeguard to the public's right to obtain unclassified defense information. Although the public affairs office is the clearing agency, it incorporates comments of reviewers who might be in program offices, policy positions, or security offices.

Review Entry Points

Generally, send material to be reviewed for clearance to the customer public affairs office listed on the DD Form 254. Sometimes, as discussed in the Military Service Security Review Systems section in this handbook, other offices are directed as entry points into the system. As material progresses through the clearance system from the public affairs office, it is reviewed by both technical and policy experts. The technical review is often done at lower levels with policy review at the higher levels.

Multiple Reviewers

Experts in many areas perform the actual review. Review offices may include technical, operational, security, legal, political or diplomatic, critical technology, and intelligence staffs. While a low-level, routine review may go only to technical and security offices, a high-level review may be seen by a half dozen or more agencies. The corresponding time required for review then increases from a few weeks to several months. Before estimating review time, consider program sensitivities and the desired public exposure of the material.

Parallel Review

To speed the administrative process, reviews at each defense customer level are performed in a "shotgun" or parallel fashion with all reviewers looking at the material at the same time.

Sequential review is rare. Thus, one reviewer's questions do not stop a review. Also, a group of positive reviews can override a negative review when considered in the aggregate.

Questioned or Negative Review

A questioned or negative review usually does not stop a case from being sent to higher headquarters for continued review. However, it carries the negative review with it and possibly influences the outcome. Items denied public release may be appealed for reconsideration.

Clearance Notification

After the material has been cleared or in some cases denied by the customer, a letter is sent to the submitting office notifying it of the decision. The individual author usually is not notified. It is the responsibility of the submitting office to pass the word along. The customer public affairs office might first notify the contractor by telephone and follow-up with a letter.

Classified Material

Many technical conferences host classified sessions. Information intended for these sessions need not be cleared because the sessions are not public. It is common, however, that the defense customer requires the information to be reviewed for accuracy and policy sensitivities before presentation. Use the customer security chain of command for a classified review.

Note: Specific step-by-step procedures are detailed in the **Guidelines** section on page 8.

Technology Transfer

Although the term "technology transfer" is commonly used, few understand its meaning and ramifications. It can mean either an economic or technical triumph or a loss of a technical advantage.

For the Security and Policy Review program, improper technology transfer is defined as the uncontrolled export or disclosure of advanced technology from the United States to unauthorized foreign hands. The loss might be a deliberate or an inadvertent transfer within the United States or abroad. A disclosure might take place at an overseas conference or at a local seminar attended by foreign representatives. An article placed in a local association journal will be read by those interested in the technology both here and abroad, especially if posted on the Internet.

If the information is militarily critical and released to the public, the United States stands to lose its critical edge in that defense area. To guard against this, the government has created a series of controls. Military reviewers throughout the clearance process use these mechanisms. Authors and contractor technology review managers should be familiar with these controls before presenting material to the customer for review.

The Military Critical Technologies List

This is published by DoD and used as a reference document, not a strict regulation or decision tool. It is a guideline listing of those technologies that are critical to the security of our nation. Reviewing authorities will look at this list for background information and an indication of sensitivity.

International Traffic-In-Arms Regulations

This is a State Department document that lists technical data about defense articles including arms and munitions that require export control. This guidance, used by both DoD and State reviewers, is broad and subject to interpretation and appeal.

Commodity Control List

This is a series of Commerce Department export control laws governing commodities requiring an export license. The list recognizes economic, national security, foreign policy, and domestic supply impact of the commodities. Like the other lists, it is under constant review.

Technology Questions

For technology transfer, reviewers consider a number of questions. Is the technology still theoretical or is it nearing application? What is the military value? Is the United States the leader in the field? Is this information considered state-of-the-art in the technology? Is there a high level of detail presented in the information? Does it disclose a process or procedure? Before the material is sent to the customer, the contractor technology review process must examine the same questions.

Technology Justification

If the submitted material appears to address topics on the control lists, include a thorough technology justification with the submission. This justification may include previously cleared references in open publications, statements that other countries openly offer the same technology, or a statement of why the publication of the technology will not harm national defense technology. Use the same justification for an appeal if the material has been denied clearance because of critical technology.

Clearance and Distribution Statements

The desired result of a security and policy review is a clearance to distribute material to anyone, anytime, and anywhere. Sometimes that is not possible due to issues of critical technology, policy, or timing. What appears to be an open or unclassified program to a defense contractor could be sensitive to the government due to current international conditions.

A denial of clearance for public release could result in return of the material with a restrictive distribution statement. Although not a "clearance," it does allow the material to be presented to a specific, limited audience. Also, unlike a security classification, it imposes only an administrative need-to-know requirement. Classified technical documentation might also be assigned Distribution Statement A, B, C, D, E, or F.

Based on DoD Directive 5230.24, *Distribution Statements on Technical Documents*, each statement defines the audience approved to receive the material. Statements are progressively restrictive from A to X. In brief, the statements read as follows (see DoDD 5230.24 for additional information):

Statement A: Approved for public release; distribution is unlimited.
Statement B: Distribution authorized to U.S. government agencies only.
Statement C: Distribution authorized to U.S. government agencies and their contractors.

Statement D: Distribution authorized to Department of Defense and DoD contractors only.
Statement E: Distribution to components of DoD only.
Statement F: Further dissemination only as directed by (insert controlling DoD office) (date of determination) or higher DoD authority. This is normally only used on classified documents.
Statement X: Distribution authorized to government agencies and private individuals or enterprises eligible to obtain export-controlled technical data.

The actual restrictive distribution statement will include reasons for the limitation. Distribution limitation statements may be downgraded or removed from reviewed material by eliminating the militarily critical information. Also, material denied for open distribution may be reconsidered for a narrow distribution statement. This is negotiated through the appeal process with the original customer public affairs office handling the case.

The Military Services Security Review Systems

All military services provide a system for the clearance of national security information intended for public release. To accomplish this goal, the services established security review programs at every level of command. These programs, usually administered by the public affairs office, subscribe to the practice of submitting and clearing information at the lowest possible level in the shortest possible time.

Clearance criteria are similar for each of the military services. Common areas include security classification, critical technology, and policy issues. Areas such as new programs, space applications, Washington-level release of information, and intelligence-related information raise equal concerns for all services.

DoD Directives prescribe that each military service and DoD component establish a procedure for the clearance of national security information. Each military service, however, has its own procedures and emphasis. These differences exist even at varying levels and organizations within the same service. It is the responsibility of the contractor to be familiar with the requirements of the contract and the associated security review process for each service.

The Army security and policy review system is organized through the public affairs chain of command with multiple entry points assigned according to contractual requirements. Reviews are done at the lowest level whenever possible. Lower levels, however, can send cases back to contractors or other offices for additional information or discussion (see also AR 360-1, Army Public Affairs).

The Navy considers the clearance process as a security matter usually coordinated through the appropriate security review and public affairs offices within a command. The Navy views the loss of technical data as a security threat. Again, material is worked at the lowest possible level with access into the review system through various entry points, including the public affairs office.

The Air Force security and policy review system is the most public affairs-oriented military service, with entry control points usually through the public affairs office. The Air Force also considers the contractor's public affairs office as the preferred submitting authority. Like the other services, the Air Force clears information at the lowest possible level.

The Marine Corps operates its security and policy review system through counterintelligence channels. Like the Navy, it views information clearances as security issues. Technology and program reviews usually are processed through other military services because Marines share weapons systems procurements. This means a joint review and extended review time. Policy issues stay within the Marine Corps system.

The differences in the service programs revolve around the point of entry for the initial submission of the material, administrative requirements, and the review route to final clearance.

Entry Points

The initial entry into the security and policy review system is critical. If the material starts at the wrong place in the customer organization, it will delay or make impossible a valid review. The entry point is listed on the DD Form 254 attached to the classified customer contract. If not there, then it will be in special instructions within the body of the contract. Although the public affairs office is usually the entry point for the material, some contracts list the customer's contracts, security, or even the program office. Always enter the system through the designated office. In all services the review will eventually end up at the public affairs office for management of the appropriate clearance.

Administrative Differences

Administrative requirements are confusing and sometimes conflicting. Although each local security review office follows the same command procedures, most add or change the process to fit their situation. For example, some offices within the same service request four copies of the material while others request eleven copies. Photographs are handled differently. Some offices request a mix of original prints and photocopies while other offices want only original prints. It is the responsibility of the contractor to be familiar with the administrative requirements of each security and policy review system.

Review Requirements

Routing of the material through the customer reviewing authorities varies as does the time needed for review. One large organization accepts material through the program office and passes it to the contracts office, security office, and on to public affairs at its next higher headquarters for final review. Another large organization in the same service simplified the review process down to accepting review materials through the public affairs office and passing them to the program and security offices. Some public affairs offices send the majority of their review cases to higher headquarters for further review. Others send very little. The extra step of involving the next level headquarters adds time and complexity and should be anticipated by the contractor.

Guidelines

Security and policy review is an administrative process, guided by sets of rules and regulations. While requirements vary in detail from service to service and organization to organization, the basic process remains the same across the Department of Defense. It is the responsibility of the contractor to understand the requirements of each customer. The result will be a faster clearance and an uncomplaining customer.

The Cover Letter

The first step toward a successful clearance is a complete cover letter attached to the material submitted for review. It will guide the material through the review process. The cover letter should:

• **List** the full name of the author and title of the material. If there are multiple authors, all names do not have to be listed.

• **Certify** the company believes the material is unclassified, technically accurate, *not company proprietary,* and doesn't contain critical technology. The government customer won't consider material without this statement. *If it contains company proprietary information, don't submit it for review.* Remember, reviewed material is subject to Freedom of Information Act laws.

• **Identify** the related contract by the Department of Defense number. Do not use the company purchase number or any other local designator. If a subcontractor, include both the subcontract and prime contract numbers. *(The subcontractor must route materials to the government via the prime contractor.)* The review routing, including who must see the material, initially depends on the contract.

• **Identify** the technical monitor of the program. If there is no formal technical monitor, identify who is your program point of contact. Because the technical monitor usually is one of the reviewers, it benefits the contractor to name the correct individual. The technical monitor often helps determine further steps in the review process. The phone number and office symbol of the technical monitor speed the administrative process.

• **Specify** when the material is needed, but be reasonable about the desired date. Anything less than two weeks usually means a rush for the customer and will either be rejected or leave a poor impression. For higher-level clearances add a month, but the time might be influenced by other events at the headquarters and in the system. If there is a question about sufficient time to clear the material, call the customer public affairs office before submitting the material.

• **Identify** where and when the material is to be presented. If it is for a conference, be specific about the title and location of the conference and the sponsoring organization. Also, specify if the material is to be published in the conference proceedings.

• **Identify** teaming arrangements. The team leader should submit the material for review. Indicate what other team members have reviewed the material.

• **List** previously cleared materials that impact the case. This includes previously submitted and approved abstracts. Whenever possible, list the clearing organization, the clearance case number, and the date cleared.

• **Submit** a cover letter for each case. *Do not submit a group of cases under a single cover letter.* The cases won't be reviewed as a group nor will they complete the process at the same time. Grouping the cases mean that they will be returned only after completing the slowest case.

Final Form Submission

The submitted material must be in final form. A draft is unacceptable. After review and clearance, the material cannot be changed. This does not mean that printed brochures or final production videos are required for review. It means that the information presented for review is typed neatly in final form and laid out in orderly fashion, including all titles, captions, and photographs. Once cleared, information only requires review for major revisions, not minor editing.

Numbers of Copies

Submit the correct number of copies to the customer security and policy review office. This varies by organization. Within the same service, numbers of required copies of text could range from four to eleven. If in doubt, ask the customer. *Don't send too few copies.* It's irritating and time-consuming for the customer who might be processing a hundred cases, and photocopying material is an extra administrative step.

Abstracts and Other Preliminary Material

A cleared abstract doesn't mean a cleared final paper. Each is considered a new document. Reference the cleared abstract, including the case control number, in the cover letter for the final paper. It saves review time.

Number the Pages

Number all the pages, pictures, charts, and slides. Make sure figures match the numbering in the text. A reviewer may be handling many papers at the same time and numbering reduces the confusion.

Photography

Photography requirements vary from command to command. Call ahead to find out the needed number and types of photographs. Some customers accept only original photo prints. Others accept one print, and the rest may be clear photocopies. A common element among the services, however, is that all pictures must have explanatory captions.

Videos

The script must accompany every videotape submitted for review. The services will not review video footage that is not part of a production even if the production is a 30-second television news release. This relates to the requirement for submission of final form products. Again, due to differing command requirements, check for correct numbers of copies and format.

Viewgraphs or Slides

Viewgraph presentation requirements are consistent within the Department of Defense. Although no agency requires the actual slide for review, they all require clear photocopies. *Each slide must have accompanying explanatory text.* The text need not be a script but should give a summary of points the briefer intends to emphasize.

News Releases

Due to time sensitivity, news media materials generally move rapidly through the review process. Like other material, news information must be in final form with the correct numbers of copies. It is accepted practice to submit contract or program announcements in advance for an

"embargoed" approval. It also saves time to submit questions and answers pertaining to the subject that would likely arise in subsequent interviews.

Multiple Commands

Marketing material and technical papers often contain information of interest to more than one command or military service. Submit this material to the public affairs office of the main program or service represented in the information. In the cover letter mention the other commands or services involved and request their joint review. If the document is complex with different materials mixed together, it helps to highlight the areas of responsibility for each reviewing command. Do not submit individual review requests to each command. The clearance results would be uncoordinated and of questionable validity.

MDA Information

Submit Missile Defense Agency (MDA) material to the review office listed in the contract. Unless it specifies, do not send it directly to the MDA. Work is usually contracted by the military services, and the clearance authority rests with those commands. It is the responsibility of the command to forward the material to the MDA for further review where appropriate. For contracts issued directly by the MDA, final clearance authority rests with the Office of the Secretary of Defense, not the MDA.

DoD Submission

Many contractors believe that a review is speeded by sending material directly to the OSD, bypassing the services. On the contrary, this slows a review because the material will be sent back to the contracting command for the technical and program review. Often, that focal review level can clear material without submittal to higher headquarters.

Subcontractor Submission

The subcontractor must submit information for review through the prime. The procedural details are spelled out in the contract.

Common Customer Concerns

The defense customer, through its commands, offices, and agencies, receives thousands of security and policy review cases each month. Only a quarter of these come from contractors. An orderly and timely review of all of these cases depends upon understanding and following the process. Disrupting the process means all material in the process is delayed. The most common concerns of the customer are:

• Late Submissions

Materials submitted late cause turmoil and backup in the system. Although the customer rarely refuses a late submission, it requires special, time-consuming handling. This could mean that somebody else's material (submitted on time) is delayed.

Last minute submissions usually occur around special events, such as the Washington exhibitions for the Navy League, Air Force Association, and the Association of the U.S. Army. Contractors submit thousands of exhibit panels, technical papers, speeches, and videos every year. All receive full review at higher headquarters due to the national prominence of the shows. Although the service review offices make every effort to clear the material in time for the event, a missed

deadline could mean an incomplete display and a loss of marketing dollars.

The most congested time for review at the Washington-level headquarters is during the first few months of the year. Service budgets, congressional hearings, posture statements, and other internal government documents monopolize most of the reviewer's time.

• Review Time

The defense customer likes to have a month to review and clear material at the entry level. It usually does not take that long, but it could if conflicting events are underway. Material requiring multiple review levels with several agencies could take more than a month to clear. As a practical guide, allow two to three weeks per review level. Check with the original customer submission office for an estimate.

• Reviewer's Workload

Reviewers have duties other than security and policy review. Except for system administrators in the public affairs area, security and policy review is an additional duty. Often, if a reviewer is traveling, the review is delayed until his or her return, causing delays in the final clearance. As always, contact the customer submission office if there is a question.

• Multiple Submitting Offices wthin the Same Contractor

Customers sometimes receive material for review from a contractor's security, program, contracts, and public relations offices. Even individual engineers or administrators from the contractor submit materials for review. Each submitter might use a different form and procedure. The result is a continual process of contractor education and correction, adding time to the review cycle. A central contractor review office reduces both customer and contractor review time. Multiple submission of the same document are common and waste resources.

• Calling the Defense Customer

Contractors often call the customer submission office to check on materials before the review has had a chance to run its course. They will also call individual reviewers to see if they have looked at the material. All are irritating to the customer and hinder the process. Make it a rule to hold calls until a reasonable review time has elapsed.

Speeding the Process

The security and policy review system, like any administrative process, can be shortened. Sometimes it takes a little expert knowledge of the system; sometimes it takes common sense. A few of the ideas that have worked are:

• E-mail

Sending a request via unclassified e-mail is authorized if: 1) the body of the e-mail claims the request is unclassified, 2) a letter on company letterhead is attached as a PDF document, or 3) the document requiring a security review is attached as a PDF document. PDF is preferred, but Word-compatible documents are also acceptable.

• Express Mail

It may help to send materials to the customer's office by express mail. However, because some express mail is delivered to a mailroom and not the specific office, it might not save time. Call

ahead to find out. Ensure that the delivery service you use has access to the facility you are sending an item to; do not ask your customer to become your courier.

• FAX

Many consider the FAX to be the shortest route between two points but do not use it unless told to by the customer. The FAX is not considered a secure means of communication. It also puts the administrative burden of copying on the customer. When FAX is authorized, use a forwarding letter or form in addition to the FAX cover form.

• Hand Delivery

Have your local company representative deliver the materials to the customer office. Unless it's a highly unusual case, the customer will not allow it to be carried further into the review system.

• Control Numbers

Ask the customer for the case control number. This is a number assigned to each document received for review and can be used to track the material through the system. Be careful, however, because the same case will be given a new number by each successive headquarters as it travels up the review chain.

• Administrative Details

Learn and follow the administrative details. Although this sounds simple, it is not because of variations in organizations and individual requirements. For example, send the correct number of copies and pictures. Make sure all references are numbered and have been previously cleared or are an open source. It is not uncommon to find uncleared program-related references in a paper under review. As a rule, do not reference classified or FOUO source material.

• Public References

If your material contains previously cleared items or information that is in the public domain, provide a citation in the cover letter. This will speed up the review and clearance process.

The Appeal Process

It is common for the customer to clear material with required amendments or to deny material for critical technology or classification. This does not mean the material is lost forever. The Department of Defense accepts appeals. Although there is no set process for appeals, a few key points include:

• Identify Technology Available

List all other places where the denied technology, products, or information is available in open sources (preferably previously cleared). The key to the appeal is that similar material is widely available in open sources, not in a brief paper published in an obscure technical journal. Also, list countries already marketing the same system or program.

• Technology Not Process

Separate the basic technology from the process or use. Listing the specific military program application or detailing the technical process often causes the paper to be denied. The basic facts or ideas might be acceptable for clearance, but do not tell "how to build the watch." This

is a basic tenet of technology transfer.

• Advantages to the United States

Explain what the United States would gain by the release of the denied information. Perhaps it would demonstrate a superiority where, in the past, there has been none. This argument must be guided by national security needs, not company needs.

If the material is denied, the contractor has the right to know why. If it is not provided with the denial, request the specific reason. The term "critical technology" is not sufficient.

Start the appeal at the original customer office. Do not send to the higher headquarters unless instructed to do so. Bypassing the lower customer levels could mean going around the office that would support your appeal.

Reusing Cleared Material

There are always questions about reusing previously cleared material. The basic rule is that material cleared with a Distribution Statement A, or open clearance, can be reused in its original form at any time and any place. Unless the material was sensitive from the outset, the customer will accept release with minor editorial changes.

Technical changes, however, such as adding new results, methods, data, or application to a new system, require that the material be submitted for a new clearance. When resubmitting previously cleared material for review, include all old clearance data, including clearance date, case control number, and usage.

Be careful about combining cleared material to create a new document. Under the defense security regulations this combination creates a new document needing a new clearance. Like updated or changed material, submit the combined document with the past clearance documentation in the cover letter. It will speed the review.

Export License or a Clearance?

For defense technical information intended for overseas distribution, the Department of Defense clearance is a fast alternative to an export license. An export license from the State or Commerce Departments takes two or three months or more to acquire. It is usually valid only for a designated location and a specific end user. A deviation from either location or end user is a violation of the export regulations.

A clearance of technical information from the Department of Defense, however, usually takes one or two months to acquire and, if awarded Distribution Statement A (open clearance), allows the cleared material to be distributed anywhere and anytime.

There are also similarities in the processes of obtaining the export license and the clearance. For example, both license and clearance requests for national security-related material are reviewed by such agencies as the Defense Technology Security Administration (DTSA), the Defense Intelligence Agency (DIA), and the Defense Threat Reduction Agency (DTRA) as well as the

military service technology offices.

Sometimes a combination of the two materials is useful. A clearance may suffice and be faster for an initial concept proposal or briefing of the subject. However, as the matter grows in complexity or technology and a specific customer is determined, the export license may be the next necessary step.

For further details, check with the OSD Office of Security Review, the State Department's Directorate of Defense Trade Control, and the Commerce Department's Bureau of Industry and Security. All three departments and agencies operate under different regulations with different requirements. Also, see the following Web sites:

U.S. Department of Defense – **www.defenselink.mil**
Office of Defense Military Commission Order – **www.dtic.mil**
Office of Defense Trade Controls (U.S. Department of State) – **www.pmdtc.org**
Bureau of Industry and Security (U.S. Department of Commerce) – **www.bis.doc.gov**
Society for International Affairs – **www.siaed.org**
DoD Forms Program – **http://web1.whs.osd.mil**

Note: A contractor *cannot* make a determination that DoD technical information is Distribution Statement A — that is the authority of the DoD agency, e.g., originator. A contractor may go directly to WHS/OSR *for information originated under IR&D not funded by DoD.*

Other Government Departments and Agencies

The clearance process is used throughout local, state, and federal governments. Unlike the Department of Defense and NASA, other departments and agencies do not always have set policies and procedures to move information through the review process. Consult your contract for specific requirements and contact the entry point office for administrative details.

Because these reviews usually are more personal and do not include the defense security or intelligence communities, the review process is faster.

Footnote

The revised handbook represents the defense security and policy review system as of December 2006. Comments and suggestions on making this handbook more pertinent and effective are welcome. Send them to AIA, Office of Communications, 1000 Wilson Blvd., 17th Floor, Arlington, VA 22209-3928.

A PDF version of this handbook is available at **www.aia-aerospace.org**.

The views expressed herein are those of the author and might not necessarily reflect any changes in the security review process established by DoD or the services.

Selected Security and Policy Review Offices

ARMY

Government Agency Headquarters, Army Material Command
Office G-5, Office of Public Communications (AMCPC)
Address 5001 Eisenhower Avenue
Alexandria, VA 22333-0001
Telephone 703-617-8010
Copies 3
Copies-Video 1

Government Agency PM-Ground Combat Command and Control
Office Communications-Electronics Command
Address Public Affairs Office
Attn: AMSEL-IO
Ft. Monmouth, NJ 07703-5000
Telephone 732-532-1258
Copies 2
Copies-Video 1
Higher Headquarters Assistant Secretary of the Army (Acquisition, Logistics and Technology
Miscellaneous 2 copies of video script

Government Agency Army Research Laboratory
Office Public Affairs (AFSL-CS-PA)
Address Army Research Laboratory
ATTN: AMSL-CS-PA
2800 Powder Mill Road
Adelphi, MD 20783-1197
Telephone 301-394-1178
Higher Headquarters Headquarters, Army Material Command

Government Agency U.S. Army Strategic Missile Defense Command
Office Public Affairs
Address USASMDC-Huntsville
ATTN: SMDC-PA
Huntsville, AL 35807-3801
Telephone 256-955-2158
Copies 3
Copies-Video 2

Government Agency U.S. Army Aviation and Missile Command
Office Public Affairs
Address Commander U.S. Army Aviation and Missile Command
ATTN: Public Affairs Office
Redstone Arsenal, AL 35898-5020
Telephone 256-876-4161
Copies 3
Copies-Video 2
Higher Headquarters Headquarters, Army Material Command

NAVY

Government Agency Naval Air Systems Command
Office Public Affairs (AIR-07D2)
Address Naval Air Systems Command Headquarters
B-2272 Unit IPT, Suite 075
47123 Buse Road
Patuxent River, MD 20670-1547
Telephone 301-757-1487
Copies 6
Copies-Video 6
Average Review Time 14 to 20 days local
Cases Per Year 120+
Higher Headquarters Chief of Naval Operations
Miscellaneous fl" video, 6 copies of script

Government Agency Naval Research Laboratory
Office Information Security Section (Code 1226)
Address 41555 Overlook Avenue, SW
Washington, DC 20375-5233
Telephone 202-767-2576
Copies 2
Copies-Video 2
Average Review Time 2 to 3 weeks local review
Higher Headquarters Office of Naval Research
Miscellaneous fi" or fl" video, 2 copies of script

Government Agency Naval Sea Systems Command
Office Office of Corporate Communication
Address Naval Sea Systems Command
1333 Isaac Hull Avenue, SE
Washington Naval Yard, DC 20376
Telephone 202-781-4124
Copies 4
Copies-Video 2
Average Review Time 2 to 3 weeks local review
Cases Per Year Hundreds
Higher Headquarters Chief of Naval Operations
Miscellaneous fi" or fl" video, 4 copies of script

Government Agency Office of Naval Research
Office Office of Naval Research
Address ATTN: ONR – 43

	Ballston Tower One 875 N. Randolph Street Suite 626 Arlington, VA 22217-5660
Telephone	703-696-4618
Copies	2
Copies-Video	1
Average Review Time	2 weeks local review
Higher Headquarters	Office of Naval Operations
Miscellaneous	Call before sending video, 2 copies of script

Government Agency	Space and Naval Warfare Systems Command
Office	Public Affairs
Address	Public Affairs (Code OOP) Space and Naval Warfare Systems Command 4301 Pacific Highway San Diego, CA 92110-3127
Telephone	619-524-3432
Copies	Original and 5 copies
Copies-Video	2
Higher Headquarters	Chief of Naval Operations
Miscellaneous	fi" or fl", 5 copies of script

AIR FORCE

Government Agency	Aeronautical Systems Center
Office	Public Affairs (ASC/PA)
Address	Aeronautical Systems Center Public Affairs 1865 Fourth Sreett, Room 240 Wright-Patterson AFB, OH 45433-7133
Telephone	937-255-3334
Copies	3
Copies-Video	3
Average Review Time	14 business days local review
Cases Per Year	500
Higher Headquarters	Air Force Material Command
Miscellaneous	fl" video, 12 copies of script

Government Agency	Air Force Material Command
Office	Headquarters AFMC/PAX
Address	Bldg. 262, Room N-152 4375 Chidlaw Road Wright-Patterson AFB, OH 45433
Telephone	513-257-2185
Copies	10
Copies-Video	3
Average Review Time	15 days local review
Cases Per Year	500+
Higher Headquarters	Secretary of the Air Force, Office of Public Affairs

Government Agency	Electronic Systems Center
Office	Public Affairs (ESC/PAM)
Address	Building 1606 – Room 105 9 Eglin Street Hanscom AFB, MA 01731-5000
Telephone	781-377-4065
Copies	3
Copies-Video	1
Average Review Time	14 days local review
Cases Per Year	2000+
Higher Headquarters	Air Force Material Command
Miscellaneous	fl" video, 3 copies of script

Government Agency	Air Force Rome Research Site
Office	Public Affairs
Address	26 Electronic Parkway Rome, NY 13441-4514
Telephone	315-330-3053
Copies	8
Copies-Video	2
Average Review Time	7 days local review
Cases Per Year	900
Higher Headquarters	Air Force Material Command

Government Agency	Space & Missile Systems Center
Office	Public Affairs (SMC/PA)
Address	Space & Missile Systems Center/PA 2420 Vela Way, Suite 1467 El Segundo, CA 90245
Telephone	310-363-0030
Copies	10
Copies-Video	2
Average Review Time	14 to 20 days local review
Higher Headquarters	Air Force Material Command
Miscellaneous	fl" video, 10 copies of script

Government Agency	AF Research Laboratory – Directed Energy
Office	Public Affairs
Address	3550 Aberdeen Avenue, SE Kirtland AFB, NM 87117-5776
Telephone	505-846-6246
Copies	8
Copies-Video	2
Average Review Time	45 days local review
Higher Headquarters	Air Force Material Command

Government Agency	Air Force Research Laboratory
Office	Public Affairs (AFRL/PA)
Address	1864 4th St, Building 15, Room 005 Wright-Patterson AFB, OH 45433-7132
Telephone	937-656-9053
Copies	3
Copies-Video	3
Average Review Time	14 days local review

Cases Per Year 150
Higher Headquarters Air Force Material Command
Miscellaneous Include script with video

Government Agency AF Research Laboratory - Wright Site -
Office Public Affairs
Address Det 1 AFRL/WS PA
2130 8th St, Building 45, Room 205
WPAFB, OH 45433-7542
Telephone 937-255-0143
Copies 3
Copies-Video 2
Average Review Time 30 days
Higher Headquarters Air Force Material Command

Government Agency AF Research Laboratory - Space Vehicles Directorate Office
Office Public Affairs
Address 3550 Aberdeen Avenue, SE
Kirtland AFB, NM 87117-5778
Telephone 505-846-4321
Copies 2 for local review, 12 for higher headquarters review
Copies-Video 2 copies of video and script
Average Review Time 5 days or less for local review
Cases Per Year 700+
Higher Headquarters Air Force Material Command

Government Agency Oklahoma City Air Logistics Center-
Office Public Affairs
Address OC-ALC/PA
3001 Staff Drive
STE: 1AG78A
Tinker AFB, OK 73145
Telephone 405-739-5779
Copies 5
Copies-Video 5
Average Review Time 10 days
Higher Headquarters Air Force Material Command

Government Agency Air Force Office of Scientific Research
Office Public Affairs (AFOSR/PA)
Address 875 North Randolph Street
Suite 325, Room 3112
Arlington, VA 22203-1768
Telephone 703-696-1140
Copies 2
Copies-Video 2
Average Review Time 10 days
Cases Per Year 255
Higher Headquarters Air Force Material Command

NASA

Government Agency NASA HQ Office of External Relations
Office Export Control and Interagency Liaison Division
Address 300 E Street, SW
Washington, DC 20546-0001
Telephone 202-358-0535/0330
Copies 2 hard coppies; electronic media preferred
Copies-Video 2 plus 2 copies of script
Average Review Time 30 days local review
Miscellaneous If your company or prime contractor has a contract with NASA for this work or substantially related work, contact the NASA contracting officer at the appropriate NASA center for instructions. Documents should normally be submitted to the NASA center for review via the contracting officer or contact NASA HQ for instructions. If your documents have Department of Defense equities in them, contact DoD for clearance.

OTHER GOVERNMENT AGENCIES

Government Agency WHS/OSR
Office Office of Security Review
Address 1155 Defense Pentagon
Washington, DC 20301-1155
Telephone 703-696-4495

Government Agency Defense Advanced Research Projects Agency (DARPA)
Office Security and Intelligence Directorate
Address 3701 North Fairfax Drive
Arlington, VA 22203-1714
Telephone 703-696-2385

Government Agency National Reconnaissance Office (NRO)
Office Office of Corporate Communications
Address 14675 Lee Road
Chantilly, VA 20151-1715
Telephone 703-227-9103

Government Agency	U.S. Department of Commerce
Office	Office of Strategic Industry and Economic Security
Address	Rm - 3876 14th Street and Constitution Avenue, NW U.S. Department of Commerce Washington, DC 20230
Telephone	202-482-4506

Government Agency	U.S. Department of Energy
Office	Office of Security
Address	1000 Independence Avenue, SW Washington, DC 20585
Telephone	202-586-5000

Government Agency	U.S. Department of State
Office	Office of Defense Trade Controls
Address	PM/DTC, SA-1, 13th Floor Office of Defense Trade Controls Bureau of Political Military Affairs U.S. Department of State Washington, DC 20522-0112
Telephone	202-663-2700

WORKSHEET

Use this form for your own records.

Government Agency

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Position/Title

Office

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Higher Headquarters

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