



Job Aid: FCL Package Common Errors List

This Job Aid lists common errors that may occur upon submission of an FCL Package. This is not an exhaustive list of all errors. This list is intended to assist facilities in avoiding common reasons for rejection of the FCL package.

Basic Information and Documentation

1. On the basic information tab, please confirm the business structure selected is correct
2. On the basic information tab, include all prior legal facility names and prior legal addresses
3. Confirm all required documentation is provided for the appropriate business structure
4. Do not use zip files and do not upload documents altogether under one file - each specific document should be uploaded under corresponding document type/tab, within the FCL package
5. Confirm the principal place of business listed in System for Award Management (SAM), the Secretary of State website(s), and ensure provided business documentation matches, or the discrepancy is addressed
6. Confirm the facility is registered to conduct business within the state it is/will be operating in, even if organized in different state (i.e., principal address located in Virginia, although organized in Delaware)
7. Provide documentation reflecting business structure conversion, if applicable (i.e., LLC to an Inc.)
8. Ensure all authorized stock shares are accounted for, including un-issued shares, ESOPs, etc.
9. The Legal Organizational Chart shall reflect all U.S. and foreign parent companies, subsidiaries, branch/division offices, sister companies, and other affiliates. It shall identify the associations between the cleared facilities and the tiered parents, including the percentages of ownership, percentages of control, FCL status, CAGE codes and other helpful information explaining the relationship among the companies in the chain of ownership

SF-328 and DD Form 441

1. As referenced in the instructions, please provide detailed explanation(s) to affirmative answers on the SF-328
2. Ensure the SF-328 & DD-441 are signed by the SMO, witnessed, and dated the same day
3. On the SF-328 & DD-441, ensure the titles for Authorized Contractor Representative and the certifying official match
4. On the DD-441, ensure the date field is blank on the first page
5. On the DD-441 signature block, ensure the facility name is on the line titled "typed name of contractor entering agreement"
6. Do not leave the very last line blank on either the SF-328, or the DD-441

To create eAPP accounts, provide personal email address for all KMP.

KMP Information and KMP List

1. Confirm the Personally Identifiable Information (PII) (spelling of names, Social Security Number, date of birth, etc.) is correct
2. Provide the FSO appointment date on the KMP list
3. Do not identify the Assistant/Alternate Facility Security Officer (AFSO) on the KMP List. The AFSO is not a KMP nor is the position required to be cleared in connection with the FCL
4. Identify everyone only once and include all designated titles associated with that individual
5. Confirm the designated titles are supported by the governance documents (Operating Agreement/By-laws etc.). Provide documentation reflecting the election/appointment of the Officers/Board Members,



etc.

6. All required positions as defined in the business documents **MUST** be on the KMP list. If the required position is currently not filled, list as VACANT on the KMP list
 - a. Example: First Name: VACANT; Last Name: VACANT: Essential KMP (Required to be cleared in connection with FCL): NO; Title: INSERT VACANT POSITION TITLE
7. Confirm SMO is identified on the KMP list. The SMO is not a position that can be appointed but is determined based on the facility's governance documents. NOTE: there are rare circumstances in which there may be more than one SMO (i.e., two individuals both have 50% ownership, and control of the facility).
8. Provide the exclusion resolution for any non-essential KMP.

If a non-essential KMP requires access to classified information in support of the classified contract, please have the SMO provide a letter on company letterhead stating that (KMP NAME) can be effectively and formally excluded from adversely effecting policies and procedures of the facility and that (KMP NAME) will require PCL eligibility to access classified information in the course of assigned duties on the classified contract.
9. Upload proof of citizenship for those essential KMP that don't already possess a PCL.
10. Companies are not to be included on the KMP list.

Excluded Parent Information (if applicable)

1. Provide business records for each tiered parent based on their business structure as outlined in section 5.1 [Business Structure Required Documents](#) of the FCL Orientation Handbook.
2. Provide the documentation reflecting the election/appointment of the Officers/Board Members, etc.
3. Provide KMP list for each tiered parent to include individual name and citizenship.
4. The highest excluded parent facility shall execute a consolidated SF-328 that includes information for all excluded entities.
5. The highest excluded parent facility should execute an exclusion resolution on behalf of its facility and all intermediate/tiered parents to be excluded (for [LLC](#) or [Corporation](#)).
6. The sponsored facility should execute an exclusion resolution acknowledging the excluded tiered entities' consolidated exclusion resolution.