



Job Aid: SF-328 Form and Signature Page

This Job Aid assists in understanding and completing the SF-328 form, a 9-question document used to identify foreign ownership, control, or influence (FOCI) within a facility, including the form and signature page.

SF-328 Certification

Certificate Pertaining to Foreign Interests (SF-328), is a 9-question form in which a facility identifies foreign ownership, control, or influence (FOCI) in its organization. Answer yes or no, as applicable to your facility, any “yes” answers require additional details. Please see the SF-328 Completion Instructions for the information required. [Blank SF-328 https://www.dcsa.mil/Portals/128/Documents/CTP/FOCI/SF 328 \(May 2025\).pdf](https://www.dcsa.mil/Portals/128/Documents/CTP/FOCI/SF 328 (May 2025).pdf)

Consolidated SF-328s

- Highest cleared U.S. entity: The highest cleared entity in the corporate chain is required to submit a consolidated SF-328 including information from itself and all other cleared subsidiaries, branches, or divisions beneath it. This entity is also responsible for ensuring timely reporting of changed conditions impacting the corporate chain.
- Highest uncleared U.S. parent: Facilities with uncleared U.S. parent facilities in their ownership and control structure will be required to submit a parent SF-328. This SF-328 will include the consolidated information for all uncleared U.S. entities in the cleared facility’s corporate chain.

	YES	NO
1. Does any foreign person(s), directly or indirectly, own, beneficially own, or subscribe to 5 percent or more of the outstanding shares of any class of stock, participation interest, units, or total capital commitment for your organization?	☐	☐
2. Does your organization directly or indirectly through your subsidiaries and/or affiliates, own 10 percent or more of any foreign interest(s)?	☐	☐
3. Do any foreign persons serve as a member of your organization's governing body, or hold a management position?	☐	☐
4. Does any foreign person(s) have binding authority or the power, direct or indirect, whether or not exercised, to control the election, appointment, or tenure of members of your organization's governing body or other management positions of your organization, or have the power to control or direct any decisions or activities of your organization?	☐	☐
5. Does your organization have any contracts, agreements, understandings, grants, side letters, or arrangements with a foreign person(s)?	☐	☐
6. Does your organization, whether as borrower, surety, guarantor, or other, have any indebtedness, liabilities, or obligations to a foreign person(s)?	☐	☐
7. During your organization's last fiscal year, did it derive:		
a. 5 percent or more of its total revenue, net income, tuition, gifts, or endowments from any single foreign person?	☐	☐
b. In the aggregate, 15 percent or more of its revenue, net income, gifts, tuition, or endowments from foreign persons?	☐	☐
8. Does any individual(s) holding management positions within your organization hold positions with, or serve as consultants or representatives for any foreign person(s)?	☐	☐
9. Is there any information, not provided in response to previous questions on this form, indicating that a foreign person(s) could control or influence the operations or management of your organization in a manner that allows unauthorized access to U.S. government information or that may adversely affect performance of U.S. government contracts?	☐	☐



SF-328 Certification (Signature Block) Example

CERTIFICATION	
I CERTIFY that the entries made by me above are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I CERTIFY that I have been duly appointed to the position title below of the business entity and have the authority to bind the business entity to the terms of this form.	
WITNESS:	
Digital or ink signature of witness	Date certified, should match the witness signature date
	(Date Certified)
Date of witness signature	Digital or ink signature of the Authorized Contractor Representative (typically the SMO)
	By
(Date)	
NOTE: The witness must be a person who personally observed the Contractor Representative sign this form. The witness cannot be the same person who accepts this form as the Government Representative. The name of the witness should be typed or printed under the witness' signature and date.	Typed name of the Authorized Contractor Representative
	(Typed Name of Contractor)
	Title(s) of Authorized Contractor Representative
	(Title of Authorized Contractor Representative)
	Full Legal Name and Address of Facility
	(Address)

Page of CUI (when filled in) STANDARD FORM 328 (REV. 5/2025)
PREVIOUS EDITION IS OBSOLETE.

Instructions for Completing the Standard Form 328 and Supporting Documents are included and begin after the signature block. Please review the instructions in full and answer all subsequent questions for all affirmative answers.

Instructions for Completing the Standard Form 328, "Certificate Pertaining To Foreign Interests" and Submitting Supporting Documents

This document explains how to appropriately respond to Standard Form 328 (SF-328) questions and supporting document requirements for each response. The instructions below are not exhaustive and may require the organization to determine what similar or equivalent information will meet the spirit and intent of the question. SF-328s not addressing the mandatory items set forth in this document will be treated as incomplete and could lengthen processing times.

Material Change: Updates to the SF-328 are required in accordance with applicable Industrial Security Letters or U.S. government requirements. Organizations reporting a material change to the SF-328 must include a complete explanation of how the organization's foreign ownership, control or influence has changed since its last submission.

NOTE: All responses referencing supporting documentation must include the name and date of the document, and specific page number, section, or paragraph supporting each response.

NOTE regarding definitions: Unless otherwise stated, the definitions of terms in this form are the same as those found in 32 CFR 117.3