

DCSA Implementation Roadmap: Contractor Open Storage Area Self-Approval Authorization

To improve efficiency, reduce approval timelines, and enable contractors to rapidly respond to new or changing contract requirements, DCSA authorizes cleared industry security professionals to self-approve classified storage within designated open storage areas (OSAs). This delegation of self-approval authority to qualified Facility Security Officers (FSOs), or their designees, is permitted by national industrial security policy and based on the following:

- DoDM 5220.32 Volume 1, Section 2.2.f: This policy leverages contractor security expertise by granting self-approval authority to designated personnel who meet specific criteria demonstrating appropriate security education, training, and experience.
- The delegation of self-approval authority allows contractor personnel to approve new OSAs within their corporate facilities to increase efficiency and timeliness to meet contractual requirements.
- Self-approval authority is a partnership between DCSA and contractor to increase efficiency in classified contract performance.
- DCSA retains the ultimate authority to authorize, inspect, or withdraw self-approval for any classified storage area.

1. Self-approval Authorization Eligibility Requirements

Cleared contractors wishing to have an OSA self-approval authority for safeguarding classified information during the performance of a classified contract **may voluntarily request self-approval authority**, provided they meet all the following criteria:

- DCSA has approved an OSA at the facility prior to granting self-approval authority to an individual. This may be a new OSA, or transition of a legacy closed area to an OSA.
- Senior Management Official (SMO), Director of Security, or FSO submitted a request for OSA Self-Approval authority for themselves or staff to the facility's assigned DCSA ISR (See Self-Approval Request Template).
- The request must include the name of the FSO or security staff member, to include directly hired consultants assigned security related duties, seeking self-approval authority. Security service providers and subcontractors are not authorized to be self-approvers.
- Must complete the IS109.16, Safeguarding Classified Information in the NISP as the designated training course to meet minimum requirements.
NOTE: IS109.16 is a course in the curriculum for "FSO Program Management for Possessing Facilities (IS030.CU).
- The facility must state their operational need for self-approval authority, such as:
 - A recurring need to approve OSAs, construct OSAs, or update existing areas (i.e., older closed areas transitioned to an OSA).
 - Contractor is unable to meet contract timelines or the assigned ISR requires TDY to approve OSAs.

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- Contract timelines involving short notice taskings from the Government Contracting Activity (GCA).
- The facility must have maintained Satisfactory or higher security ratings for three consecutive security reviews or security reviews within the previous three years.
- The individual seeking self-approval authority must be employed by the cleared contractor.

Self-approval authority is limited to the facilities/sites under the cognizance of the security program of the corporate entity (i.e., multi-facility organization) being represented meaning an approver cannot self-approve OSAs in other cleared contractor facilities, to include parent or subsidiary companies.

2. DCSA Authorization of Self-approval

The ISR will complete the following:

- Review the contractor's request to verify the need for self-approval and determine if self-approval is appropriate.
- Verify that the named individual has completed the required training.
- Provide the contractor with a written letter granting self-approval authority to the individual, including the designated location(s) under their authority.

3. Self-approval Process

Once the FSO or designee is authorized by the ISR, they may begin approving OSAs within the corporate structure. Corporate structure refers to all facilities/locations associated with a specific FCL or DD Form 441, Department of Defense Security Agreement. For each OSA self-approved, the approver will:

- Record the OSA information on DCSA Form 147. (Note: A DCSA Form 147 is required for each individual approved OSA).
- If the approver is not the FSO, coordinate with the designated FSO for the location where the OSA is being established.
- Certify by signing DCSA Form 147 that the space meets the construction requirements outlined in 32 CFR 2001.43 (Storage) and 2001.53 (Open Storage Areas).
- Include all pertinent DCSA 147 attachments:
 - DD Form 254 indicating safeguarding is required
 - Security-in-Depth (SID) Plan & Approval Letter
 - UL 2050 Certificate
 - Alarm Description Worksheet
 - Floor Plan showing IDS, doors/windows, HVAC duct work map, other miscellaneous openings, and controls associated with layers of security
 - Copy of any exceptions to the NISPOM related to the area

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- ISR self-approval authorization letter if the OSA being approved is not the approvers facility within an MFO
- Consolidate the DCSA Form 147 with additional attachments into a PDF file(s)
- Log into NISS, open a new message, attach the PDF file(s) and send the message to the assigned ISR through NISS messenger and pick DCSA FORM 147 document title from dropdown pick list as the document type.

Notify the assigned ISR via email that a new OSA approval has been completed and the DCSA Form 147 package has been submitted via NISS messages to be reviewed for document retention in the system of record. This is the best practice to minimize delays.

The new OSA **will not** be used to openly store classified material until the contractor has formally updated the DCSA 147 into NISS as the system of record. This serves as an official record, indicating the contractor's attestation that the OSA meets the requirements to properly safeguard classified material.

Upon notification of a new DCSA 147 package, the ISR will:

- Review the DCSA Form 147 and associated documents.
- Contact the contractor's FSO if any concerns or questions arise.
- Acknowledge receipt of the DCSA Form 147 package via NISS email or written confirmation through regular email.
- During the next security review:
 - Review OSA(s) self-approved since the last review.
 - Review the contractor's self-approval procedures and provide the best practice recommendations as needed.

These completed actions will ensure a thorough review of the contractor's request, ensure open communication between the ISR and FSO, or designee, and provide a standardized process to grant self-approval authority to our industry partners.

4. Rescinding Self-Approval Authority

Situations may arise requiring the temporary rescission of a contractor's self-approval authority. Any removal of self-approval authority *must* be done in writing. Identified issues can restrict or provide reason to rescind self-approval. The following are examples (not an exhaustive list):

- Receiving a marginal or unsatisfactory security review rating.
- FCL Invalidation.
- Significant physical security vulnerabilities identified in contractor self-approved OSA(s).
- Self-approver departs the company resulting in the rescission of the individual's approval.

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If the need arises to rescind the authorization, the ISR will:

- Notify the FSO or designee *in writing* to immediately cease self-approving actions.
- Clarify that the rescission is temporary and based on the identified vulnerability.
- Clarify that self-approval may be reapproved pending successful mitigation.
- Follow up with the FSO or designee regarding pending mitigation actions.
- Reauthorize self-approval once corrections are complete and the contractor submits a new request.

Resources:

- Job aids are available at [DCSA.mil](https://www.dcsa.mil)
- [DCSA Form 147 \(January 2025\)](#)
- [DCSA 147 Process Overview Guide \(June 2025\)](#)
- Open Storage Area Self-Approval Tasks Workflow Job Aid