



# Open Storage Area Self-Approval Tasks Workflow Job Aid



**This is a step-by-step guide designed to assist Facility Security Officers (FSOs) and physical security professionals in self-approving an Open Storage Area (OSA). It provides a start-to-finish workflow for conducting the physical security review, completing all necessary documentation, and submitting the self-approved DCSA Form 147. This guide simplifies the self-approval process, ensuring compliance with regulations while streamlining administrative tasks.**



## Introduction:

This guide provides a step-by-step workflow for Facility Security Officers (FSOs) and physical security professionals seeking to self-approve an OSA for storage of Confidential and Secret classified information. DCSA is responsible for approving all OSA spaces for storage of Top Secret classified information. The job aid is designed to aid in managing and tracking progress from start to finish, ensuring adherence to physical security requirements. While experienced security professionals may utilize their own established methods, this guide serves as a comprehensive resource, emphasizing the critical attention to detail required to approve an OSA. This includes thorough documentation of elements such as doors, locks, walls, ceilings, floors, and supplemental controls like Intrusion Detection Systems (IDS). For any questions regarding OSA protection measures, please contact your Industrial Security Representative (ISR) or Field Office. Effective communication between DCSA ISRs and industry security professionals is essential for the protection of classified information.

This job aid is developed to assist security professionals. It is not part of the official approval process, is not required by DCSA, and does not need to be reviewed by DCSA.

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## **Task 1: Review of Open Storage Area Policy**

Review basic Safeguarding & OSA requirements in:

- 32 CFR, Part 117 (National Industrial Security Program Operating Manual (NISPOM) Section 117.15 (Safeguarding Classified Information)
- 32 CFR, Part 2001 (Classified National Security Information) and Part 2001.43 (Storage) and 32 CFR 2001.53 (Open Storage Areas)
- DoDM 5220.32 Vol. 1, National Industrial Security Program: Industrial Security Procedures for Government Activities, Section

## **Task 2: Verify OSA Self-Approval Baseline Requirements Are Met**

1. Has a DCSA ISR previously approved an OSA at the facility? This could be a new OSA or transition of a closed area to an OSA.  
 Yes     No
2. Has your facility had a marginal or unsatisfactory rating(s) in the last 3 consecutive years?  
 Yes     No
3. Are there documented safeguarding procedures in place (i.e., SPP, SOP, etc.)?  
 Yes     No
4. SPP clearly outlines open storage capabilities and the process for managing classified information?  
 Yes     No
5. Are continuous monitoring procedures in place?  
 Yes     No
6. Management supports the establishment of the OSA to meet contract requirements?  
 Yes     No
7. Appropriate number of security staff are in place to accomplish this additional task, based on the complexity of the local Industrial Security program?  
 Yes     No

## **Task 3: OSA Approver Meets Qualifications**

1. Self-approver has completed the DCSA designated training course [Safeguarding Classified Information in the NISP](#) (IS109.16, 2.5hrs)?  
 Yes     No  
Note: IS109.16 is a course in the curriculum for "FSO Program Management for Possessing Facilities" (IS030.CU).



2. Possesses the authority to perform role for the company (32 CFR Part 117.7(b))?  
 Yes     No
3. Senior Management Official (SMO), Director of Security, or FSO submitted the request for OSA Self-Approval authority for themselves or staff to the facility's assigned DCSA ISR?  
 Yes     No
4. DCSA letter granting OSA Self-Approval authority has been returned approved?  
 Yes     No

## **Task 4: Review Open Storage Area Construction Requirements**

### **1. Construction Requirements Review (32 CFR Part 2001.53(a)):**

- 1.1. Perimeter construction (32 CFR Part 2001.53) requirements are permanently constructed to provide visual evidence of unauthorized entry?  
 Yes     No
- 1.2. Are walls, floors, and ceiling construction built to show visual evidence of unauthorized entry?  
 Yes     No
- 1.3. Are walls, floors, and ceilings permanently (i.e., cannot not be easily altered) constructed and attached to each other?
  - 1.3.1. Walls:     Yes    No
  - 1.3.2. Floors:     Yes    No
  - 1.3.3. Ceilings:     Yes    No

### **2. Perimeter Doors (32 CFR Part 2001.53(b)):**

- 2.1. Constructed of wood, metal, or other solid material (i.e., no glass)  
 Yes    No
  - 2.2. Secured with a built-in GSA-approved three-position combination lock  
 Yes    No
  - 2.3. Are other doors (other than the main entrance) secured from the inside with either deadbolt emergency egress hardware, deadbolts, or rigid wood or metal bar which extends across the width of the door?  
 Yes    No    Not Applicable
- NOTE: Ensure only GSA-Approved locks are utilized

### **3. Vents, Ducts, and Miscellaneous Openings (32 CFR Part 2001.53(c)):**

- 3.1. Are there vents, ducts, or other openings more than 96 square inches (and over 6 inches in its smallest dimension) that enter or pass through the open storage area perimeter?  
 Yes    No    Not Applicable
- 3.2. If so, how many openings pass through the OSA? \_\_\_\_\_
- 3.3. Openings are protected with either:



- 3.3.1. Bars  Yes  No  Not Applicable
- 3.3.2. Metal grills  Yes  No  Not Applicable
- 3.3.3. Sound baffles  Yes  No  Not Applicable
- 3.3.4. IDS  Yes  No  Not Applicable

**4. Windows (32 CFR Part 2001.53(d)):**

- 4.1. Is protection strength equivalent to the contiguous wall?  
 Yes  No  Not Applicable
- 4.2. If within 18 feet of the ground, windows must be constructed from or covered with material which provides protection from forced entry: Do they meet the 32 CFR 2001.53 requirement?  
 Yes  No  Not Applicable
- 4.3. Windows that allow for visual observation of classified activities, are made opaque or equipped with blinds, drapes, or other appropriate covering?  
 Yes  No  Not Applicable
- 4.4. This open storage area is located within a controlled compound or equivalent, the forced entry requirement is waived; however, in these instances windows must be permanently sealed or equipped with an inside lock and covered by an Intrusion Detection System (IDS). Is this open storage area on a compound?  
 Yes  No  Not Applicable

**5. Flooring and Ceilings (NISPOM, Section 117.15(c)):**

- 5.1. Raised floors utilized (32 CFR Part 117.15(c))?  
 Yes  No (If no, move to question 5.5)
- 5.2. Is the floor permanently constructed?  
 Yes  No
- 5.3. Are IDS sensors used below a raised floor?  
 Yes  No
- 5.4. Is the SPP updated to reflect implement procedures to ensure their structural integrity (NISPOM 117.15(c))?  
 Yes  No
- 5.5. False ceilings utilized (NISPOM 117.15(c))?  
 Yes  No (If no, move to question Task 5)
- 5.6. If yes, are the ceiling tiles permanently secured?  
 Yes  No  
Note: Tiles may be screwed, clipped or other method
- 5.7. Are IDS Sensors used above the false ceiling?  
 Yes  No
- 5.8. Is the SPP updated to reflect implement procedures to ensure the structural integrity of the space (NISPOM 117.15(c))?  
 Yes  No



## **Task 5: Verify Security In-Depth (SID) & Supplemental Control Requirements**

### **1. Security In-Depth (32 CFR Part 117.3 (b) Description**

- 1.1. Verified local ISR has approved SID for CAGE code?  
 Yes    No
- 1.2. Verified SID includes multiple layers (i.e., two or more) of security is provided for OSA?  
 Yes    No    Not Applicable
- 1.3. Are detailed written Standard Practices & Procedures (SPP) in place?  
 Yes    No    Not Applicable
- 1.4. Is the FSO prepared to describe and demonstrate to an ISR, specifically how each layer works complimenting the other?  
 Verified    Unverified    Not Applicable

Examples: Fencing, barriers, facility access control, guards, CCTV, doors, locks, proximity readers, alarms, lighting. All or some may be used based on the location. Layers must consist of two or more complimentary layers unassociated with the OSA protection measures such as GSA approved three combination lock or solid door. Additional measures such as access control device installed (i.e., card reader, card & pin, biometrics), on-site/subcontracted guards, CCTV, locks, doors, proximity readers, alarms, lighting are also considered SID layers.

### **2. Supplemental Controls (Top Secret & Secret Storage Only)**

- 2.1. Is Intrusion Detection System (IDS) installed and operational?  
 Yes    No    Not Applicable  
Note: Review safeguarding requirements and response requirements outlined in NISPOM 117.15(b) and 32 CFR 2001.43.
- 2.2. DCSA approval prior to installation?  
 Yes    No
- 2.3. Alarm System Description Form Completed?  
 Yes    No    Not Applicable  
Note: There are two National Industrial Listing Certifications: National Industrial Security Systems (CRZH) and National Industrial Monitoring Station (CRZM) provided by the installer/monitoring company.
- 2.4. UL 2050 certificate on file?  
 Verified    Unverified    Not Applicable
- 2.5. National Recognized Testing Laboratory (NRTL) approved alarm service company contracted to install?  
 Yes    No    Not Applicable



**3. Are alarm response times being met and documented?**

- 3.1. Top Secret Safeguarding (32 CFR Part 2001.43(a))
  - 3.1.1. Approved SID – IDS & 15-minute response time  
 Yes  No  Not Applicable
  - 3.1.2. No SID in place –IDS & 5-minute response time  
 Yes  No  Not Applicable
- 3.2. Secret Safeguarding (32 CFR Part 2001.43(b))
  - 3.2.1. Approved SID – IDS & 30-minute response time  
 Yes  No  Not Applicable
  - 3.2.2. No SID in place –IDS & 5-minute response time  
 Yes  No  Not Applicable
- 3.3. Confidential (32 CFR Part 2001.43(c))  
No Supplemental controls are required

**Task 6: Documenting the Open Storage Area**

- 1. Downloaded & reviewed “DCSA 147 Process Overview Guide”  
 Completed  Incomplete  Not Applicable
- 2. Downloaded latest template DCSA Form 147  
 Completed  Incomplete  Not Applicable
- 3. Downloaded & review “Open Storage Approval Checklist”  
 Completed  Incomplete  Not Applicable

**Task 7: Complete & Acknowledge the DCSA 147**

- 1. Includes all pertinent elements within the DCSA Form 147 & attachments?
  - DD Form 254
  - Security-in-Depth (SID) Plan & Approval Letter
  - UL 2050 Certificate
  - Alarm Description Worksheet
  - Floor Plan showing IDS, doors/windows, HVAC duct work map, and controls associated with layers of security
  - Copy of any exceptions to the NISPOM associated to space if applicable Completed  Incomplete  Not Applicable
- 2. Utilized DCSA Open Storage Approval Checklist Job Aid?  
 Completed  Incomplete  Not Applicable
- 3. Complete & Acknowledge the DCSA Form 147 Section F?  
 Completed  Incomplete  Not Applicable



## Task 8: Prepare Completed DCSA 147 for Submission

1. Consolidated the DCSA Form 147 and supporting artifacts into a single consolidated PDF?  
 Completed  Incomplete  Not Applicable
2. Upload DCSA 147 into NISS under Documents tab using the following naming convention as title/subject line.  
**DCSA\_147\_CAGE\_ROOM#\_DATE**  
 Completed  Incomplete  Not Applicable

## Task 9: DCSA Notification

1. Notify local ISR via NISS Messaging with follow-up e-email if there is a delayed response from DCSA
2. Indicate the # of new OSAs (i.e., new DCSA 147 packages uploaded to NISS)
3. Ensure the total # of Open Storage Areas are provided to the ISR and appropriately added to the facility profile via a profile update request
4. Sent the ISR NISS messenger for official communication of submission?  
 Completed  Incomplete  Not Applicable

NOTE: Recommend follow-up with official email to the assigned DCSA ISR if no response is received to minimize delays.