

Open Storage Area Approval Checklist, DCSA Form 147

Completion Process

DCSA approves safeguarding under the National Industrial Security Program (NISP) for contracts upon which the Department of Defense maintains security cognizance. This includes approving Open Storage Areas (formerly called Closed Areas) in accordance with 32 CFR, Part 117 (the NISPOM Rule) requirements and Part 2001 references.

Open Storage Area approval is documented and maintained on DCSA Form 147, April 2022. This form is approved by OMB No. 0705-0006 for the collection of the information. The form documents physical and procedural security information, security measures, entrances, emergency exits, and intrusion detection systems.

UNCLASSIFIED (Unless directed)
Document is Unclassified unless required by contract or security classification guide.

OMB No. 0705-0006
OMB approval expires 20250331

OPEN STORAGE APPROVAL CHECKLIST

The public reporting burden for this collection of information is estimated to average 60 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to the Department of Defense, Washington Headquarters Services, at wha.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

CLASSIFY ACCORDING TO CLASSIFICATION AUTHORITY

CHECK APPLICABLE BLOCKS

<input type="checkbox"/> Pre-construction, Complete Sections as Required by DCSA	<input type="checkbox"/> Update/Change to previous Open Storage area	<input type="checkbox"/> Interim Open Storage Approval	<input type="checkbox"/> Final Open Storage Approval
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Annotate action being requested. Refer to Section F, Acknowledgments and Approval Signatures for final approval status.

List of Contents:

Section A: Facility General Information

Section B: Security-in-Depth

Section C: Open Storage Area Security

Section D: Open Storage Area Doors

Section E: Intrusion Detection System (IDS)

Section F: Acknowledgments and Approval Signatures

Explain the reason for Open Storage Area and List of Attachments if necessary:

DCSA FORM 147, APR 2022

UNCLASSIFIED (Unless directed)

Page 1 of 15

Completing the Form

from the Contractor Perspective

- ☐ Take a moment and review NISPOM Rule, Paragraph 117.15 Safeguarding, and Part 2001 for storage, equipment, locks, transmission, destruction, and minimum construction requirements.
- ☐ The DCSA147 form was designed to cover multiple operating situations which may or may not apply to your Open Storage Area. It is important to provide as much relevant information as possible when completing the form. Leave non-relevant sections blank when they are not applicable. DCSA will identify items requiring completion for approval during our review. We encourage companies to direct specific questions to their ISR as the form is being completed.
- ☐ Identify the contractual requirement for the Open Storage Area. A prime contract number is mandatory for DCSA approval even when the contractor is a subcontractor.
- ☐ Implement an internal security plan for the construction process if applicable. The plan should be detailed and meet Paragraph 117.15 and Part 2001 requirements.
- ☐ Coordinate with your assigned DCSA representative early and often during the construction and/or modification processes.





Completing the Form

from the Contractor Perspective

☐ Section A: Facility General Information

- Provide general basic facility information to give a clear and detailed description of the facility and information being stored.

☐ Section B: Security-in-Depth (SID)

- Provide the layered approach at the facility. SID can vary from card access to on-site guards. Provide as detailed information as possible to address SID. SID or no SID can impact the response times for Open Storage Area approval.
- **NISPOM Rule Definition:** *Security in Depth* means a determination was made by the CSA that a contractor's security program consists of layered and complementary security controls sufficient to deter and detect unauthorized entry and movement within the facility.

☐ Section C: Open Storage Area Security Measures

- Provide as much detail as possible on the physical security measures being installed or used at the facility. In some cases, the questions may not apply. Add additional information not referred to in a question in the remarks section.

☐ Section D: Open Storage Doors

- Provide information relating to all entry/exit doors to the facility. Ensure the doors meet minimum requirements for size and type.

☐ Section E: Intrusion Detection Systems (IDS)

- Provide the information regarding the IDS being installed in the space. Refer to Paragraph 117.15.
- IDS must be approved by DCSA prior to installation. Coordinate with your assigned DCSA representative.

☐ Section F: Acknowledgements and Approval Signatures

- This is the final step. The contractor will sign the DCSA147 verifying the facility meets minimum security requirements.
- DCSA will review the DCSA147, and request more information if needed, or issue an interim approval if DCSA pending an onsite security review for final approval. Interim approvals are valid for one year. Final approvals are only granted when DCSA conducts an onsite review.
- Upon final approval, the contractor will maintain the facility in accordance with established requirements.

Conducting a Compliance Review

from the DCSA Perspective

- ☐ Confirm the contractor completed the construction process, security measures are in place, and all requirements are met to effectively protect classified information and classified information systems in the Open Storage Area.
- ☐ Validate procedures are adequate to prevent a decline in security measure to provide long term and continued protection.
- ☐ When conditions change or the ability to protect classified is in question, remove safeguarding approval and determine disposition of classified material in coordination with the impacted GCA(s).





DCSA Open Storage Area Approval Process Map

