



THE UNDER SECRETARY OF DEFENSE
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

ACQUISITION
AND SUSTAINMENT

MAR 27, 2024

MEMORANDUM FOR DEFENSE INDUSTRIAL BASE

SUBJECT: Update to Participant Criteria for the Corporate Portfolio Program

References: a) Under Secretary of Defense for Acquisition and Sustainment Memorandum
“Special Access Program Contactor Portfolio Program Establishment,”
December 15, 2020
b) Under Secretary of Defense for Acquisition and Sustainment Memorandum
“Structure Update to the Special Access Program Corporate Portfolio Program,”
March 8, 2023

The Corporate Portfolio Program (CPP), established in December 2020 in partnership with the Defense Industrial Base (DIB), facilitates development and delivery of Special Access Program (SAP)-protected capabilities to the warfighter to address national security challenges. Participation was initially limited to qualifying DIB companies directly responsible for developing and delivering warfighting capabilities.

To further enable and accelerate integration opportunities, the CPP participation criteria is hereby expanded to include eligible Federally Funded Research and Development Centers (FFRDCs), University Affiliated Research Centers (UARCs), and DIB corporations on contract to provide Systems Engineering and Technical Assistance (SETA) and Studies, Analyses, and Evaluations (SA&E) support for SAP-protected warfighter capability development efforts.

The attached CPP Implementation Guide supersedes the previous edition dated January 6, 2021, and specifies qualifying criteria and application processes for both previous and expanded participation categories. Contracts that provide management and professional support services to the government continue to be of value but will remain excluded from the CPP.

My point of contact for the CPP is Maj Gen David Abba, Director, Special Access Program Central Office (SAPCO) at (703) 697-1282.

William A. LaPlante

Attachment:
As stated

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Corporate Portfolio Program Implementation Guide March 2024



A handwritten signature in blue ink, appearing to read "D. Abba", is positioned above a horizontal line.

DAVID W. ABBA
Major General, USAF
Director, DoD Special Access Program
Central Office

DoD SAPCO
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- References:
- (a) Undersecretary of Defense for Acquisitions and Sustainment Corporate Portfolio Program Establishment Memorandum, December 15, 2020
 - (b) Department of Defense Special Access Program Central Office Portfolios Guidance, August 2, 2018
 - (c) Department of Defense Manual 5205.07, "Special Access Program (SAP) Security Manual: Personnel Security (Vol 2)," October 30, 2020
 - (d) Department of Defense Instruction 5205.11, "Management, Administration, and Oversight of DoD Special Access Programs," February 4, 2020

Purpose

This implementation guide specifies the procedures for the Corporate Portfolio Program (CPP) based on the framework established in Reference (a) by the Under Secretary of Defense for Acquisition and Sustainment (USD(A&S)). All participants of the CPP shall comply with this guidance. The Director, DoD Special Access Program Central Office (SAPCO) will administer the CPP as the Cognizant Authority (CA) for portfolios as specified in Reference (b).

Participation in the CPP is entirely voluntary. Nothing in this implementation guidance is meant to constitute a change to the terms and conditions of any prior, current, or future contract with your corporation or to obligate government funds. The Director, DoD SAPCO will modify this guidance as needed to ensure the CPP continues to meet the intent of the DoD in support of national security priorities.

General Guidance

In addition to the specific CPP guidance contained herein, all corporate portfolios will adhere to the general portfolio guidance outlined in Reference (b). Accordingly, all corporate portfolios will be documented in a Terms of Reference (ToR).

The CPP is an access management tool for qualifying corporations that includes Special Access Programs (SAPs) for which the corporation in question has an active DoD contract. CPP does not include access to SAPs that are not directly tied to an existing contractual relationship between the corporation in question and the DoD. For SAPs that provide protections to multiple lines of effort across multiple corporations, CPP partners shall only access information directly outlined in the statement of work specified in the corporation's DoD contract.

The Secure Integration Cloud (SIC) is the primary means of communication involving both Classified and Controlled Unclassified Information (CUI) for all CPP-related actions and correspondence. DoD SAPCO, in coordination with the DoD Chief Information Office (CIO), will sponsor the CPP baseline security billets for both Joint Access Database Environment (JADE) and SIC accounts. On a case-by-case basis, DoD SAPCO shall accept hand-delivered documentation marked and handled at the appropriate classification level by appropriately cleared corporate employees. Unclassified communication, to include that containing up to CUI-level information, may be conducted via Unclassified Information Technology (IT) systems, if required, in accordance with applicable regulations and procedures.

CPP participants shall provide updates to the DoD SAPCO on both their utilization of the CPP and specific security training within 18 months of establishment and annually thereafter. These updates will be utilized to provide oversight of CPP execution and to assess the cost, benefit, and risk of the CPP to the DoD. The primary forum for updating the DoD SAP Oversight Authorities (OA) and Cognizant Authorities (CA) will be the SAP Senior Working Group (SSWG). CPP Participants will coordinate with the DoD SAPCO and provide appropriate briefing materials (e.g., slides, etc.) with sufficient lead time for inclusion in all SSWG engagements.

CPP Participation

Corporations must have an active DoD contract that is validated by the period of performance listed on the statement of work and/or the associated DD Form 254. Additionally, corporations must align with one of the two (2) categories below to be eligible to participate in the CPP. This requirement will enable the participation of as many corporations within the modernized defense industrial ecosystem as possible while ensuring the DoD SAPCO has sufficient resources to govern and manage the CPP.

Category 1: Cleared Defense Contractor (CDC) corporations that comprise the Defense Industrial Base (DIB) who develop warfighting capabilities (i.e., hardware, software, and/or associated services) for the DoD. To qualify, CDC corporations must have current contractual requirements to access a minimum of 15 non-waived SAPs, not including programs that are inherited. Corporations must be identified as the prime or a direct sub-contractor to the prime to qualify.

CDC corporations that are eligible for Category 1 and desire to participate in the CPP will provide DoD SAPCO a draft ToR for review. This ToR will include a current SAP listing, the associated contract security classification specification(s) (DD Form 254), and a baseline billet plan with justification of each position.

Category 2: Federally Funded Research and Development Centers (FFRDCs), University Affiliated Research Centers (UARCs), and DIB corporations on contract to provide Systems Engineering and Technical Assistance (SETA) and Studies, Analyses, and Evaluations (SA&E) support to the DoD for SAP-protected warfighting capability development efforts. Qualifying FFRDCs, UARCs, and DIB corporations must have contracts designating SAP access that are directly tied to the performance of engineering and analytical activities for the development of warfighting capabilities (e.g., multi-domain kill chains). To qualify, FFRDCs, UARCs, and DIB corporations must have current contractual requirements to access a minimum of 15 non-waived SAPs, not including inheritances. Qualifying corporations in this category will be nominated by the respective DoD Component and approved by the SSWG.

FFRDCs, UARCs, and DIB corporations that are eligible for Category 2 and desire to participate in the CPP will provide DoD SAPCO a draft ToR for review. This ToR will include a current SAP listing, the associated contract security classification specification(s) (DD Form 254), and a baseline billet plan with justification for each billet. When an FFRDC, UARC, or DIB corporation has multiple contracts represented on a single DD Form 254, the ToR must also

include the relevant statement of work, performance work statement, task order, and/or other relevant documentation.

Non-Qualifying Contracts: Contracts that provide Management and Professional Support Services or other general support services to the government will not be included under the CPP.

Corporations wishing to participate in the CPP should contact the DoD SAPCO CPP Management Team to initiate a request (see page 8 for details). Organizations that do not meet the established thresholds will adhere to the SAP nomination process for SAP access requests per Reference (c).

SAP Inclusion

Once a CPP ToR is approved, corporations are authorized to request the inclusion of additional non-waived DoD SAPs for which they have corresponding DoD contracts to execute. The corporation must utilize and submit the CPP Program Addition Request Form (Attachment 1) and corresponding DD Form 254 to request the inclusion of an additional DoD SAP into their corporate portfolio.

Each additional program nomination must be de-conflicted by the corporation's SAP Coordinator (SAPCOORD) prior to submission to the DoD SAPCO. Specifically, SAPCOORDs will ensure that all requested programs meet the criteria for CPP inclusion and verify that the program is not already in the corporate portfolio or in close-out. If the SAPCOORD is not cleared to access the program nominated for inclusion, an alternate cleared corporate employee may submit the required documentation to the DoD SAPCO CPP Management Team, in accordance with the provision above. However, at a minimum, the SAPCOORD will be notified of the pending request and remain the primary point of contact to DoD SAPCO.

Corporations shall notify the DoD SAPCO no later than ten (10) business days prior to a contract's period of performance expiration (of the associated contract(s) used to justify SAP inclusion in the CPP). The Corporation's SAPCOORD will submit notification to the DoD SAPCO via the CPP Deletion Request Form (Attachment 2) and the program will be removed accordingly.

If required, requests for access to waived programs will be processed separately using the SAP nomination process in accordance Reference (c).

Billet Plan

Each participating corporation will have billets allocated to provide the DoD SAP accesses required to enable CPP initiatives. The following outlines the specific billet structure for each CPP category.

The baseline CPP billet plan for **Category 1** participants contains 13 billets allocated as follows:

Key Corporate Officers: Five (5) billet access quotas for corporate leadership to provide access to the DoD SAP-protected efforts their corporations are contractually supporting, in part to

enable their fiduciary responsibilities (e.g., Chief Executive Officer/President, Chief Financial Officer, legal counsel, etc.).

Baseline Technology Leaders: Four (4) billet access quotas for corporate technology leaders to provide access to the DoD SAP-protected efforts their corporations are contractually supporting to expedite technology integration and improve cost efficiency by leveraging existing, relevant technologies across the DoD development programs the corporation is on contract to support and/or is submitting proposals for. A Baseline Technology Leader billet may be exchanged for an additional Baseline Security Professional billet.

SAPCOORD: One (1) billet access quota for the Corporate SAP Coordinator to fulfill the role as described in the Corporate SAP Coordinator section below.

Baseline Security Professionals: Three (3) billet access quotas for security professionals to provide security administrative support required to execute the CPP, in addition to providing DoD SAP security support for all DoD SAP-protected activities within the corporation, to include SAP Information Technology (SAP IT) systems and networks. A Baseline Security Professional billet may not be exchanged for a Baseline Technology Leader billet.

Category 1 participants are also allocated additional extended billet access quotas for technology leaders and security professionals based on the corporation's number of DoD SAP-accessed employees, as recorded in JADE. The census of SAP-accessed employees will be conducted annually by the DoD SAPCO using the "contractor organization" field within JADE. The extended CPP billet plan allocation will be reviewed and amended during each annual review of the portfolio. If the SAP efforts and number of SAP-accessed employees diminishes, the amendment may result in a removal of extended billet access quotas. It is the corporation's continued responsibility to ensure the assignment of their employees is accurate and current in JADE.

Extended Integration (Technology): Each Category 1 participant will be allocated additional extended billet access quotas above the baseline for technology leaders based on the calculation of 0.8% of its total number of DoD SAP-accessed employees. An Extended Integration billet may be exchanged for an additional Extended Security Professional billet.

Extended Security Professionals: Each corporation will be allocated additional billet access quotas above the baseline for security professionals based on the calculation of 0.05% of its total number of DoD SAP-accessed employees. An extended Security Professional billet may not be exchanged for an Extended Integration billet.

Oversight Agencies: DoD agencies that perform oversight of contracts, namely the Defense Contract Management Agency (DCMA) and the Defense Contract Audit Agency (DCAA), may also be allocated four (4) billet access quotas each in a corporation's portfolio to conduct oversight activities of defense industry contracts. These billet access quotas do not count against a corporation's extended billet authorization and corporations are not responsible for accounting for DCMA or DCAA personnel.

The baseline CPP billet plan for **Category 2** participants contains a maximum of 25 billet access quotas per corporation as follows:

Key Corporate Officers: Five (5) billet access quotas for corporate leadership to provide access to the DoD SAP-protected efforts their corporations are contractually supporting to enable their fiduciary responsibilities (e.g., Chief Executive Officer/President, Chief Financial Officer, legal counsel, etc.).

Baseline Technology Leaders: Up to 16 billet access quotas for corporate technology leaders to provide access to the DoD SAP-protected efforts their corporations are contractually supporting to expedite technology integration and improve cost efficiency by leveraging existing, relevant technologies across the DoD development programs the corporation is on contract to support and/or is submitting proposals for. Category 2 Technology Leader Billets are intended to support technology integration for broad multi-domain, multi-discipline “system of systems” development efforts that may leverage contributions from multiple warfighter capability development contractors. A Baseline Technology Leader billet may be exchanged for an additional Baseline Security Professional billet.

Corporate SAPCOORD: One (1) billet access quota for the Corporate DoD SAPCOORD to fulfill the role as described in the Corporate DoD SAP Coordinator section.

Baseline Security Professionals: Three (3) billet access quotas for security professionals to provide security administrative support required to execute the CPP, in addition to providing DoD SAP security support for all DoD SAP-protected activities within the particular corporation to include SAP Information Technology (SAP IT) systems and networks. A Baseline Security Professional billet may not be exchanged for a Baseline Technology Leader billet.

Corporate Special Access Program Coordinator (SAPCOORD)

To support the CPP and streamline communications with the DoD, each participating corporation will designate an appropriately qualified corporate employee to act as the single interface between the DoD SAPCO, Component SAPCOs, and the corporation for all CPP and SAP oversight and policy matters. This corporate-level interface will not supersede existing security relationships between U.S. government and contract program offices.

The corporate SAPCOORD will serve as the administrative lead for the corporate portfolio, responsible for managing all activities to include SAP inclusion requests, billet plan management, personnel security administration and training, and other necessary activities.

- The SAPCOORD shall be the single point of contact for all coordination between the corporation and the DoD SAPCO for matters related to the CPP.
- The SAPCOORD shall de-conflict all program submissions prior to submitting documentation to the DoD SAPCO. It is the SAPCOORD’s responsibility to ensure SAPs already included in the Corporate Portfolio or in close-out are not submitted.

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- The SAPCOORD shall forward new DD Form 254s to the DoD SAPCO, updated DD Form 254s for programs already in the portfolio or, if applicable, other appropriate justification (e.g., Statement of Work or Task Order for FFRDCs and UARCs) as required.
- The SAPCOORD shall notify the DoD SAPCO no later than ten (10) business days prior to the period of performance expiration (of the contract(s) used to justify SAP inclusion in the CPP).
- The SAPCOORD shall conduct a review of the portfolio at least once per year and provide the DoD SAPCO with a memorandum certifying that only programs with a current, valid DD Form 254 or other approved justification (e.g., Statement of Work or Task Order for FFRDCs and UARCs) are included in the corporation's portfolio.
- The SAPCOORD shall manage all the activities of the corporate security professionals accessed to the corporate portfolio.
- The SAPCOORD's name will be documented in the corporation's portfolio ToR. The SAPCOORD will provide immediate notice to the DoD SAPCO when the corporation changes the designated employee who is the Corporate SAPCOORD.

Corporate Portfolio Security Administration

To support the SAPCOORD, each corporation is designated three (3) Baseline Security Professional billet access quotas to facilitate oversight and governance of their CPP and provide, as needed, support to the DoD SAP-accessed employees and DoD SAP-accredited facilities throughout the corporation.

Corporations are required to perform their own administrative actions for the CPP. This includes all SAP Nomination Process (SAPNP) actions including collecting and uploading the requisite Pre-Screening Questionnaire (PSQ) and nominating the individual via an electronic Program Access Request (PAR) in JADE. After nomination, the DoD SAPCO will complete the SAPNP and make an access approval decision.

Upon access approval, the corporation will obtain a SAP Indoctrination Agreement (SAPIA) from the individual approved for access and provide an indoctrination briefing to the individual for the corporate portfolio. The corporation will then upload the SAPIA to JADE and notify the DoD SAPCO that the individual approved for access is now ready to be recorded as briefed in JADE. The DoD will retain the SAP eligibility determination and individual access approval authority.

On a case-by-case basis, the DoD SAPCO will facilitate corporate portfolio access for the CPP baseline billet structure. Facilitation does not include monitoring Personnel Security (PERSEC) requirements. This will be done at the corporation regardless of JADE availability. The CPP participant must make every effort to utilize one of their JADE-accessed employees to fulfill PERSEC requirements. A list of JADE-accessed employees can be requested from the DoD SAPCO.

The Department of the Air Force Office of Special Investigations (AFOSI) - Office of Special Projects (PJ) is responsible for providing support to and oversight of the CPP, under the overall management of the DoD SAPCO. Specifically, AFOSI-PJ, in coordination with the SAP Facility (SAPF) Accreditation Official, is responsible for facility certification and validation of individual security training and standard operating procedures, as specified for handling of SAP information.

Annual Reviews

All corporate portfolios and security-specific corporate training plans will be reviewed and revalidated annually by the DoD SAPCO CPP Program Manager. Upon completion of an annual portfolio review, a new ToR will be signed allowing the continued use of the portfolio.

For each Category 1 corporate portfolio, the extended billet plan allocation will be recalculated during the annual review. The corporate SAPCOORD will revalidate, through a memorandum for record to the DoD SAPCO, that all programs currently in the corporate portfolio are still required to execute a contract as the prime or direct sub-contract to the prime as documented on a DD Form 254. Any program that the corporation cannot revalidate will be removed from the corporate portfolio.

Facilities

SAPs within the CPP can be stored, processed, and discussed in a SAPF and on an accredited SAP IT system consistent with the requirements of the individual program security classification guide. The DoD SAPCO will sponsor and accredit one SAPF for storage and one conference room for discussion for each CPP corporation. Discussion and non-persistent processing of SAP information is authorized in any contractor SAPF in accordance with existing DoD SAP policy.

Point of Contact

For additional information, contact the DoD SAPCO CPP Management Team via unclassified email: osd.pentagon.ousd-a-s.list.dsp-cpp@mail.mil or SIC: "DoD SAPCO Corporate Portfolio Program (CPP) Management Team."

Corporate Portfolio Program Addition Request

Date

To: Director, DoD Special Access Program Central Office (SAPCO)

Thru: DoD SAPCO Corporate Portfolio Program Management Team

From: Insert Corporation Name

Insert Corporation Name requests the addition of the SAP listed below to our portfolio. With this request, insert Corporation name affirms the following:

- Insert Corporation Name is the Prime or a Sub-contract to the Prime of a current DoD Contract (see attached DD Form 254).
- This program addition request has been de-conflicted with the current insert Corporation name portfolio (i.e., the Program is not already in the portfolio and not in close-out).
- Upon contract termination, insert Corporation name will notify the DoD SAPCO Corporate Portfolio Program Management Team no later than ten (10) business days prior to a contract's period of performance expiration, at which point the SAP will be removed from the portfolio and all program data at insert Corporation name will be destroyed and/or sent to the program owner.

PROGRAM NAME	PID	COGNIZANT AUTHORITY	CONTRACT NUMBER	Government Program Security Officer: Name, Org, POC	DOD Program Manager: Name, Org, POC

Type Name
 SAP Coordinator, Insert Corporation Name
 Phone number
 Email

Note: If the program is already in the portfolio, submit a memorandum stating the previous DD Form 254 with the new DD Form 254 attached.

Corporate Portfolio Program Deletion Notification

Date

To: Director, DoD Special Access Program Central Office (SAPCO)

Thru: DoD SAPCO Corporate Portfolio Program Management Team

From: Insert Corporation Name

Insert Corporation Name submits this notification to remove the below SAP from our corporate portfolio. With this notification, insert Corporation name affirms the following:

- Insert Corporation Name is no longer a Prime or Sub-contractor to the Prime on a contract that requires access to the SAPs listed below.
- The program information within insert corporation name's facilities in support of the CPP has been destroyed and/or sent to the program owner for archive.

PROGRAM NAME	PID	COGNIZANT AUTHORITY	Government Program Security Officer: Name, Org, POC	DOD Program Manager: Name, Org, POC

Type Name

SAP Coordinator, *Insert Corporation Name*

Phone number

Email