NCCS Implementation Guidance for DD Form 254

1. Federal Acquisition Circular (FAC) 2020-07, effective 3 August 2020, mandates use of the National Industrial Security Program Contracts Classification System (NCCS) module of the Procurement Integrated Enterprise Environment (PIEE) for the electronic submission of the Contract Security Classification Specification (DD Form 254). The PIEE landing site is located at https://piee.eb.mil/piee-landing/

2. This document provides implementation guidance for DD Form 254 submission within NCCS and is not intended to replace the FAR or any other regulatory requirement and guidance for DD Form 254 processing. TAB 1, drafted by SAF/AAZ, provides an overview of the NCCS system and process.

3. Web based training for NCCS, and all other areas of PIEE, is found by navigating to the PIEE landing page, scrolling to the bottom of the PIEE homepage, and clicking "View training and help" (<u>https://pieetraining.eb.mil/wbt/</u>). Listed below are training resources:

3.a. PIEE Role List: Found below the application blocks and located under "References". The PIEE role list provides for an understanding and application of all of the roles within PIEE per PIEE module. Contracting Officers will register for, at a minimum, the Contracting Role. Contracting Officers may also have the Certifying Official role in the event the execution of block 17 on the DD Form 254 is not delegated.

3.b. NCCS General Training: Is found by clicking on the NCCS application found under "Security" in the suite of PIEE applications displayed on this page. This training is high level training provided by the Department of Defense.

4. The electronic DD Form 254 process in NCCS is a *multiple role* effort that reflects the previous, hard copy way of submission and signature. To properly implement the FAR requirement, the following roles are required to process each DD Form 254: Originator, Reviewer, Certifying Official, and Contracting Officer.

4.a. Originator: Individual who drafts the DD Form 254, typically the requirements owner or other individual as determined by the organization. E.g. Program Manager, Contracting Officer Representative

4.b. Reviewer: Information Protection (IP), Sensitive Compartmentalized Information (SCI), or Special Access Program (SAP) personnel. The Reviewer role is typically reserved for security professionals or others in accordance with local processing procedures.

4.c. Certifying Official: Individual who normally executes block 17 on the DD Form 254. This can be either the Contracting Officer OR an authorized representative (DoDM5220.22v2_AFMAN16-1406v2, paragraph 3.4.a.3). The Certifying Official is the approving official for the form and shall ensure that it is prepared and distributed in accordance with the Industrial Security Regulation. (Note delegation to an authorized representative must be documented in official contract file)

4.d. Contracting: Role responsible for *final release* of the document and is either a Contracting Officer or *authorized individual*. The release function automatically emails the form to all email addresses identified in the creation of the document. The DD Form 254 <u>WILL NOT</u> be released

before contract award. The Certifying Official and Contracting roles can be fulfilled by the same individual if such responsibilities are not delegated.

5. HQ AFMC IP developed user-friendly procedures on how to register for each role located at TAB 2.

6. Each requested role, once approved by the supervisor, must be activated by the assigned Government Account Manager (GAM). HQ AFMC IP developed user-friendly procedures on how a GAM would activate a role in NCCS, TAB 3.

6.a. Contracting Officer role(s) will be activated by their existing, assigned GAMs with "Procurement" as an area of interest in PIEE.

6.b. Security professional role(s) will be activated by their existing, assigned security GAMs with "Security" as an area of interest in PIEE.

6.c. Requirement's owner role(s) (e.g. Program Manager, COR) establishment of GAMs and activation of accounts in NCCS will be the responsibility of the program management/requiring activity.

7. Creating and submitting a DD Form 254 in NCCS requires *active* Originator, Reviewer, Certifying Official, and Contracting roles. Contracting Officers will register for, at a minimum, the Contracting Role. Contracting Officers may also have the Certifying Official role in the event the execution of block 17 on the DD Form 254 is not delegated.

8. Certifying Official Role responsibilities. Once an individual is assigned the Certifying Official role receives a DD Form 254 in their NCCS dashboard for certification, it is their responsibility to ensure the document is accurate prior to certifying the document. If the Certifying Official has questions on the content, they are to contact either the requirements owner and/or servicing IP office. The Certifying Official must:

8.a. Verify that the CAGE code of the cleared defense contractor is either the same or a part of what is included in the contract award documentation.

8.b. Verify that clause FAR 52.204-02, Security Requirements is on contract.

8.c. Have the proper delegation paperwork in the official contract file in the event the Certifying Official is not the assigned Contracting Officer.

8.d. Verify that the contract number(s) reflected in Block 2a (or 2c) are accurate. This includes any annotation of task or delivery order numbers and modifications.

8.e. Verify that if the contract is a follow-on contract, block 4 reflects "yes" and that the correct contract number is referenced.

8.f. Verify that if block 5 is checked "yes", Final DD Form 254, the retention period (dates) is included.

8.g. Verify a <u>Servicing IP Office representative</u> signs in block 13. This is a minimum policy requirement. This signature is typically one from the host installation IP Office and can include additional security professionals as determined by local operating procedures. If this individual is unknown, contact your servicing IP Office for verification.

8.h. Verify that the respective SCI representative signs in block 13 or supporting documentation, as applicable.

8.i. Verify that the respective SAP representative signs in block 13 or supporting documentation, as applicable.

8.j. Ensure the distribution includes all applicable email addresses, at a minimum: Contractor Facility Security Officer; host-installation IP office; performance location IP office (if applicable); and Defense Counterintelligence and Security Agency field office. The system allows for additional email addresses to be added.

9. Contracting Role responsibilities. An authorized individual with the "Contracting" role will receive the DD Form 254 in their NCCS dashboard upon certification from the "Certifying Official". <u>DO NOT</u> release the document without reviewing the below:

9.a. PRIOR TO contract award:

9.a.1. If block 17 was not signed by the Contracting Officer: Verify block 17 was executed by an authorized, delegated individual. If there is no delegation paperwork in the official contract file, reject the DD Form 254.

9.a.2. Print a .pdf copy of the DD Form 254 and upload into the contract writing system.

9.a.3. <u>DO NOT</u> release the document in NCCS.

9.b. <u>AFTER</u> contract award:

9.b.1. Log back into NCCS and release the DD Form 254.

9.b.2. Upon release, the document will be sent to all annotated email addresses in the distribution block and the process is complete in NCCS.

10. Additional information:

10.a. Contractors will complete subcontract DD Form 254's in NCCS. A subcontract DD Form 254 can ONLY be created by a prime contractor if the prime contract DD254 has been formally released in NCCS.

10.b. Contractors will receive the completed DD254 if their email address is included in the release phase.

10.c. Masked DODAAC's will not be able to be accomplished in PIEE.

10.d. Advisory and Assistance Support (A&AS) Contractors should only be given Reviewer – View Only access. This will limited their access to only the DD Form 254 that you provide to them for review or input. Recommend verifying if there is a non-disclosure agreement on file. A&AS contractors will not review home company or affiliate company DD Form 254s.

10.e. Prime contractor and subcontractor NCCS accounts will not be managed by USAF personnel. Contractors desiring NCCS accounts may request them through the Defense Counterintelligence & Security Agency.

10.f. Local business rules still apply and may need to be reviewed/updated to reflect the use of NCCS. If local procedures do not currently exist, it may be necessary to create procedures in order to define any location-specific requirements that may exists.

10.g. See <u>https://www.esd.whs.mil/portals/54/documents/dd/forms/dd/dd0254-Inst.pdf</u> for instruction on completing the DD Form 254.

- 11. References:
 - 1. NCCS Overview and Process Flow
 - 2. AFMC NCCS Account Creation for Initiator Reviewer Contracting Officer
 - 3. AFMC NCCS GAM Procedures for NCCS Reviewer Account Activation

12. Points of Contact:

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