Instructions for Completing the Key Management Personnel (KMP) List

Provide KMP information for your company based on its current business structure. For business structures other than those listed below, consult the DSS Industrial Security Representative assigned to your facility for additional guidance.

For Corporations:

- Chairman of the Board. If there are provisions in the bylaws for rotating chairmanship among the directors, all directors who could fill the [rotating] chairman position should be listed.
- The Senior Management Official (e.g., chief executive officer (CEO), president).
- Facility Security Officer (FSO).
- Insider Threat Program Senior Official (ITPSO).
- Remaining corporate officers and members of the board of directors. These individuals will not be automatically processed for eligibility for access classified information in connection with the FCL. Any requirement for eligibility for such personnel will be governed by the access that the related classified contract(s) require them to have. If eligibility for access is not required, the other officers and board members will be formally excluded from access. If a FOCI mitigation agreement is involved, clearance eligibility may be required under the terms of the mitigation agreement for certain individuals other than the Chairman, Senior Management Official, and FSO. Eligibility for other corporate officers, employees and board members who will require access to classified information may be processed concurrently with the FCL, but the FCL determination is not contingent upon the status of their eligibility.

For Limited Liability Companies (LLC):

- The senior management official.
- Facility Security Officer (FSO).
- Insider Threat Program Senior Official (ITPSO).
- LLC members/managers. Member managed LLCs are treated similarly to partners in a general partnership. LLC members must either be determined to be eligible for access or excluded. Analysis by the DSS Industrial Security Representative of any particular member’s duties and degree of ownership, control, or influence will be required to make the determination.

For Partnerships:

- All general partners, unless there is a legally designated managing partner and/or legally constituted executive committee that has been formally given full executive authority to exercise management control and supervision for the partnership. General partners who are not members of the executive committee or who are otherwise excluded by agreement among the partners from managing the partnership may be excluded.
- All executive committee members. All executive committee members, whether general partners or not, will be processed for eligibility for access if such a legally constituted executive committee has been established by the partnership and has been given full authority to act on behalf of the partnership. The IS Rep should obtain copies of the partnership agreement or resolution that authorizes the executive committee to determine the degree of authority delegated to the committee.
- The senior management official in charge of the facility if the partnership has established management officials other than the general partners.
- Facility Security Officer (FSO).
- Insider Threat Program Senior Official (ITPSO).
- Partners other than general partners. Partners other than general partners may be processed for determination of clearance eligibility if they occupy positions that enable them to adversely affect the partnership’s policies or practices in the performance of classified contracts.

Sole Proprietorship:

- The owner of the sole proprietorship.
- The Senior Management Official (if different than the owner).
- Facility Security Officer (FSO) (may be the owner).
- Insider Threat Program Senior Official (ITPSO).

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