

CMMC Foreign Assets/Ownership/Relationships Questions

Organization

1. Please provide an overview of your organization.
2. Please provide an overview of your operations.
3. Please provide a summary of the goods, services, or labor your organization provides to the US commercial marketplace.
4. Please provide a summary of the goods, services, or labor your organization provides to the US government.
5. Please provide a summary of the goods, services, or labor your organization provides to foreign customers.
6. Please provide a summary of the goods, services, or labor your organization provides to foreign governments.
7. Has your organization done business with the US Government before? If so, please provide when, which governmental entity, and a summary of goods or services provided.

Leadership

1. Please provide an organizational chart.
2. Please provide an updated capitalization table of your organization's ownership structure.
3. Do any foreign nationals (or dual-citizenship holders) sit on your board of directors (or similar governing body)?
4. Do any foreign nationals hold roles as officers, executive personnel, general partners, regents, trustees, or senior management officials? If so, please provide name, country of residence, country of citizenship, role/capacity within your organization.
5. Please provide personally identifiable information all executives, senior leaders, and board members (name, date of birth, social security number; for foreign nationals, please provide relevant visa or immigration information). This information should be provided in a separate, password-protected appendix document.
6. Do any of your board members, officers, executive personnel, general partners, regents, trustees, or senior management officials serve as an employee, consultant, or advisor, in any capacity, to a foreign company? If so, please provide details.

Employees

1. Does your organization currently employ any foreign nationals? If so, please provide a list of names, roles, country(ies) of residence, and country(ies) of citizenship

2. Does your organization have employees in overseas facilities or working remotely from an overseas location? If so, please provide names, roles, country(ies) of residence, country(ies) of citizenship.
3. In the last seven years, have any of your employees worked for a foreign government? If so, please provide details.
4. In the last seven years, have any of your employees worked overseas for a foreign company? If so, please provide details.
5. Does your company hire interns, temporary employees, or employees not considered full-time employees? If so, please provide details.

Relationships

1. Please provide an overview of your organization's foreign relationships.
2. Has your organization ever provided goods, services, or labor to a foreign government? Please provide details of this relationship.
3. Has your organization ever provided goods, services, or labor to a foreign government as a sub-contractor, indirect supplier, reseller, or wholesaler? Please provide details of this relationship.
4. Does your organization belong to any professional societies, affiliations, clubs, or organizations? If so, please provide details.
5. Does your organization collaborate with any academic institutions, research centers, or affiliates? If so, please provide details.
6. Please provide a list of all international conferences, events, and gatherings your organization attended over the past three years.
7. Does your organization currently have any national security agreements with the US Government? With a foreign government?
8. Does your organization currently have any contracts or provide any goods, services, or labor to any foreign companies? If so, please provide details.
9. Please provide an overview of your organization's growth strategy over the next five years to include targeted industries, regions, and new markets.

Financials

1. Please provide a copy of a government-issued business license from the state of incorporation.
2. Do any foreign persons or entities directly or indirectly own or have beneficial ownership of five percent or more of your organization's equity or shares?
3. Please provide a list of investments received by your organization from private investors.
4. Please provide a list of investments received by your organization from foreign investors.

5. Does your organization, whether as a borrower, surety, guarantor, or otherwise, have any indebtedness, liabilities, or obligations to a foreign person, entity, or financial institution? If so, please provide details.
6. In the last five years, did more than 5% of your net income come from any single country or company? If so, please provide details.
7. In the last five years, did more than 25% of your net income come from multiple foreign individuals or companies? If so, please provide details.
8. Do any entities own 10% or more of your organization? If so, please provide details.
9. Which bank(s) service your organization? In what capacity?
10. Who is your organization's auditor?
11. Which lawyer/law firm represents your organization?

Suppliers

1. Please list the foreign countries which directly supply your organization with goods, services, or labor.
2. Please list the types of goods, services, or labor directly supplied to your organization from foreign companies or companies located in foreign countries.
3. Does your organization conduct supply chain risk analysis?
4. Does your organization conduct due diligence or background checks on suppliers?
5. Does your organization review OFAC sanctioned countries while considering suppliers?
6. Does your organization, either in the US or overseas, contract directly with companies headquartered in Russia, China, Iran, or OFAC sanctioned countries?
7. Does your organization have contingency plans for alternate suppliers or stockpile critical supplies?

Physical Security

1. Please provide an overview of your organization's physical security practices and protocols.
2. Does your organization contract with external organizations to provide physical security services? If so, please provide the name of the service provider.
3. For non-US operations, which company provides physical security services?

Cyber Security

1. Please provide an overview of your organization's cyber security practices and protocols.
2. Does your organization contract with external organizations to provide physical cyber security services? If so, please provide the name of the service provider.

3. For non-US operations, which company provides cyber security services?
4. Does your organization store any sensitive data overseas – either physically or digitally?

Risk Scoring Framework:

To the yes/no styled questions, score 1 point for each answer in the affirmative.

Score	0 – 2	3 – 6	7 – 10	10+
Risk Level	Minimal	Low	Medium	High