

DOE CI Reporting Requirements

Adhering to the President's direction (in PDD/NSC-12) DOE has established an extensive Counterintelligence reporting system. The portions of the DOE system directed by the President do not apply to Fermilab as no classified work is performed at Fermilab. However, DOE has added the specific requirements that have been determined to apply to Fermilab employees. Namely certain Professional, Personal, and Financial Relationship information, these requirements are detailed below:

Professional Relationships:

Employees are required to report professional contacts and relationships with sensitive country foreign nationals, whether they occur at the workplace or abroad. (See http://www.ch.doe.gov/insidech/org_offices/oci/SensitiveCountries/index.htm for a list of countries currently identified by DOE as sensitive countries.) This is especially important when the sensitive country foreign national is employed by the government of the sensitive country. This is often captured in trip reports or other formal, routine documentation of professional activity. It may also be gathered directly by a DOE Counterintelligence Officer (CIO). The DOE CIO is informed of the foreign travel of all employees through the foreign travel request process. Those employees traveling to sensitive countries may receive pre-briefings and post travel debriefings by a DOE CIO at the CIO's discretion. These pre- and post- travel briefings may encompass other foreign travel if it is deemed, by the CIO, that international conditions warrant them.

Another requirement is that the DOE CIO must be informed of any foreign travel for which foreign monetary support is provided, whether to a sensitive or non-sensitive country. This is also done when the foreign travel approval forms are processed.

Any such relationships not captured through the travel or trip report mechanism are to be reported to the Laboratory Associate Director for Administration (LADA) who will inform the DOE CIO.

Personal Relationships:

Substantive personal relationships with sensitive country foreign nationals (who are not permanent resident aliens), other than family members, also are to be reported to the LADA who will inform the DOE CIO. A substantive relationship is one that is enduring and involves substantial sharing of personal information and/or the formation of emotional bonds. An enduring relationship is one that has existed, or is expected to exist, for a substantial period of time (months or years). Substantial sharing of personal information involves discussion of "private" information about oneself (that one would not routinely share with strangers, for instance). Emotional bonds refer to feelings of affection or emotional attachment in a relationship. Because the concepts of "personal information" and "emotional bonds" are necessarily subjective, reliance must be placed

on the judgment of each individual as to the existence of, and reporting threshold, for these criteria. Examples of such relationships are provided in the attached table.

Financial Relationships:

In addition to professional and personal relationships, certain financial relationships are also reportable. Substantive business transactions with citizens of sensitive countries (who are not permanent resident aliens) are to be reported to the LADA, whether they involve one-time interactions or on-going financial relationships. The requirement pertains to non-incidental financial transactions. Small payments for such things as house cleaning or other such personal services are not included in the requirement. Partnerships or other business interests or investments are the focus of this reporting requirement, because they provide the potential for exploitation or pressure. Financial support provided to family members is not included.