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# DOE Reporting Requirements Overview

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New Mexico Site



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Sandia National Laboratories is a multimission laboratory managed and operated by National Technology and Engineering Solutions of Sandia LLC, a wholly owned subsidiary of Honeywell International Inc. for the U.S. Department of Energy's National Nuclear Security Administration under contract DE-NA0003525.





# Reporting Responsibilities and Requirements

- **DRIVERS**

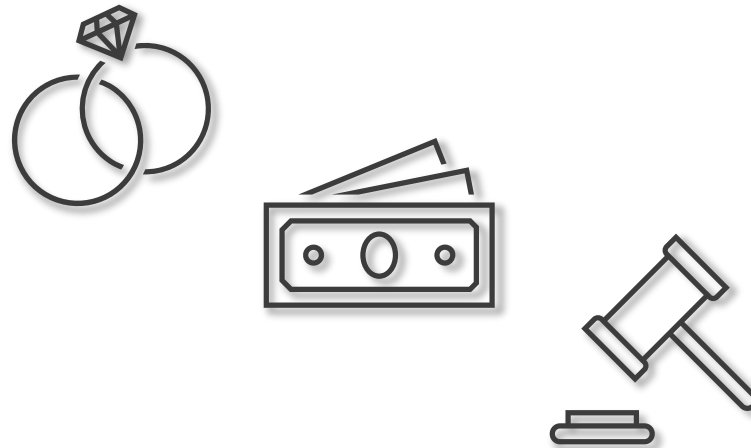
- DOE Order 472.2, *Personnel Security*

- **APPLICABILITY**

- All individuals applying for (applicants) or in possession (holders) of a DOE security clearance

- **CATEGORIES**

- Life circumstances
- Law enforcement
- Financial Matters
- Drug/Alcohol Use
- Foreign Interaction
- Citizenship





# General Reporting Roles & Methods

## REPORTING ROLES

- Prime Contractor serves as the subcontractor reporting resource
- DOE/NNSA is the exclusive evaluating authority
- Reporting must occur immediately or as soon as possible, but no later than 2 working days after the event

## HOW TO REPORT?

- Follow guidance from your Prime Contractor:
  - Kansas City National Security Campus
  - Sandia National Laboratories
  - Lawrence Livermore National Laboratory
  - Los Alamos National Laboratory



# Sandia Reporting Roles, Methods, and Impact

## REPORTING ROLES

- Sandia National Laboratories (SNL) serves as the reporting resource
- DOE/NNSA is the exclusive evaluating authority

## HOW TO REPORT?

- Reporting Guide as an initial reference
- Security Connection: (505) 845-1321 | [security@sandia.gov](mailto:security@sandia.gov)
- Personnel Security: (505) 844-8902 | [persecreporting@sandia.gov](mailto:persecreporting@sandia.gov)

## IMPACT

- Dependent on the nature of the item reported
- DOE/NNSA
  - May or may not choose to inquire further (e.g., LOI)
  - Their determination based on 'whole person concept'
- Don't jump to conclusions and bear in mind that reporting itself is a positive factor!

**DOE and SNL  
REPORTING REQUIREMENTS  
OF SECURITY INTEREST**

Revised: April 28, 2021

**Instructions**

- The events and circumstances described below are reportable by the individuals specified in the spanning subheadings.
- All reporting must occur immediately or as soon as possible, but no later than two (2) working days after the event or circumstance.
- To begin the reporting process, contact Security Connection at 321 from a Sandia landline, 505-845-1321 from any phone, or [security@sandia.gov](mailto:security@sandia.gov).

**Members of the Workforce (MOWs)**

All MOWs are required to report the events/circumstances specified below, when applicable. However, the red highlighted items are applicable only to clearance holders and clearance applicants.

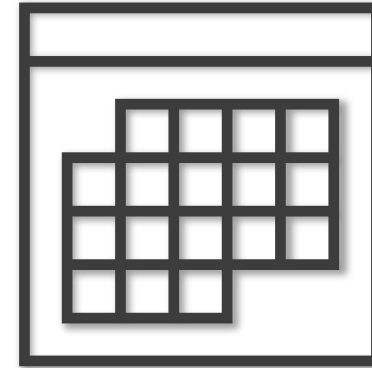
GENERAL REQUIREMENTS	CITIZENSHIP
1. Become aware of information that raises concerns of personnel security interest* about others who are applying for or in possession of a DOE security clearance. <i>*"Concerns of personnel security interest" include but are not limited to the reportable circumstances cited in this guide. Note: Individuals who report circumstances about others may be asked to provide additional, corroborative information.</i>	8. Change in citizenship (i.e., U.S. or foreign) or acquisition of another country citizenship(s).
2. Approached or contacted by any individual seeking unauthorized access to classified matter or special nuclear material (SNM).	<b>DRUG USE</b> 9. Use of an illegal drug, or use of a legal drug in a manner that deviates from approved medical direction. 10. Treatment for drug abuse. 11. Positive (i.e., unfavorable) drug test regardless of source (e.g., court-ordered, military, employment).
<b>LIFE CIRCUMSTANCES</b> 3. Marry or cohabitate. <i>Note: A cohabitant is a person who lives in a spouse-like relationship or with a similar bond of affection or obligation, but is not a legal spouse, child, or other relative (in-laws, mother, father, brother, sister, etc.).</i>	<b>ALCOHOL USE</b> 12. Treatment for alcohol abuse.
<b>LAW ENFORCEMENT</b> 5. Arrested or subject to criminal charges (including dismissed charges), citations, tickets, summonses, or detentions by federal, state, or other law-enforcement for violations of law within or outside the U.S. <i>Exception: Traffic violations for which a fine of up to \$300 was imposed* need not be reported, unless the violation was alcohol- or drug-related.</i> <i>*Imposed* means agreeing to pay the fine, or a court ruling to pay, exclusive of court fees or other administrative costs.</i>	<b>MENTAL HEALTH</b> 13. Hospitalization for mental-health reasons.
<b>FINANCIAL MATTERS</b> 6. Personal or business-related filing for bankruptcy. 7. Garnishment of wages (e.g., for debts, divorce, child support).	<b>FOREIGN TRAVEL</b> 14. Travel to a sensitive country for personal reasons. <i>Note: Reporting prior to travel is preferred. A list of sensitive countries is available at the <a href="#">Counterintelligence (CI) website</a>. Keeping a record of all personal foreign travel is recommended as a reference for future clearance (re)investigations.</i> 15. Travel to any country where discussions with sensitive-country foreign nationals regarding sensitive subjects are anticipated or have already occurred. <i>Note: This includes chance meetings where sensitive-country foreign nationals are in attendance.</i> 16. Travel to any country where sensitive subjects will be discussed.



# Forthcoming Changes to Reporting Requirements

## Revision of DOE O 472.2 to comply with Security Executive Agent Directive (SEAD) 3

- Expected year 2022
- Notable changes include:
  - Unofficial Personal Foreign Travel
  - Additional Foreign Activity items
  - Financial Anomalies



# Items to Remember/Keep in Mind

- ✓ Review/understand your reporting requirements
- ✓ Be honest & truthful
- ✓ Be timely & available
- ✓ Know your references





# Questions





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# Contract Security Management

Facility Clearances, CSCSs, DOE KMP Clearances

Jennifer Mahkee and Alexsea Stringfellow

Sandia National Laboratories

New Mexico Site



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# Facility Clearances

## Facility Clearance Components

- Subcontract requiring personnel clearances (contains Clause 610- FO, *Security Requirements*)
- Contract Security Classification Specification (CSCS)
- Favorable Foreign Ownership, Control or Influence (FOCI) determination
- Facility Security Officer (FSO) designation and training
- Key Management Personnel (KMP) security clearances (executives, FSO etc.)
- Security Requirements Plan
- Ongoing Assessments
  - Periodic Security Review



# Facility Clearances

## What is it?

DOE/National Nuclear Security Administration's approval of a subcontractor entity's eligibility to access, receive, generate, reproduce, store, transmit, or destroy:

- Classified matter
- Special Nuclear Material (SNM)
- Other hazardous material presenting a potential radiological, chemical, or biological sabotage threat
- DOE property of significant monetary value, exclusive of facilities and land values



# FSO Responsibilities - Facility Clearance

## Report Significant Changes

- All circumstances that would change any answer on the SF 328, *Certificate Pertaining to Foreign Interests* from "No" to "Yes,"
- When contracting with a Foreign Entity
- If there is any change in the foreign ownership, control or influence of your company

## Report Anticipated Actions

- Action to terminate business or operations of subcontractor or parent
- Legal actions to initiate bankruptcy
- Entering into negotiations with non-U.S. Citizens

## Other Changes

- Changes in company name or address
- Any changes in Key Management Personnel



# Contract Security Classification Specification (CSCS)

## What is a CSCS?

- A contractually binding form between Sandia National Laboratories and the subcontractor entity outlining security and classification guidance for the classified information disclosed during the performance of the subcontract.
- Used to register each subcontract and begin the facility clearance process if the subcontract is for a company that does not yet hold a clearance interest with Sandia National Laboratories
- Used to individually register each security interest/subcontract with DOE/NNSA
- Outlines:
  - Subcontract information (company, subcontract number, period of performance)
  - The highest classification level and category of classified subcontractor personnel will have access to.
  - Places where classified work is authorized to occur.
- Subcontractor personnel clearances can be requested after a CSCS is approved



# Contract Security Classification Specification (CSCS)

## When is a CSCS required?

- When a Sandia subcontract requires personnel clearances in the performance of work.
- When a company that holds a Sandia subcontract needs to further subcontract work to other companies that will require personnel clearances in the performance of their work.
- When a parent or partner company of a subcontract company requires clearances.
- When any information on an approved CSCS changes, a revised CSCS is required.



# FSO Responsibilities - CSCS

## You will receive an updated CSCS when you:

- Have a new cleared subcontract approved
- Have an existing subcontract renewed or revised (updating classification level and category of classified information)

## Verify CSCS information is correct:

- Subcontract number and end date
- Company name and address
- Description of work
- Place(s) of Performance
- Contract Classification Level/Category
- Personnel Clearance Level
- Safeguarding/Storage Level

SNL Representation for  
DOE F 470.1



Sandia National Laboratories

## Contract Security Classification Specification (CSCS)

-- Draft --

This specification, a contractual document, authorizes the performance of work involving classified matter or unescorted access to limited areas.

CSCS No.:	CSCS Status:	Initial	Approval Date:	CNP Date:
Subcontract Detail		Prime Contract Detail		
Subcontract/PO No.:	2123456	Prime Contract No.:	DE-NA0003525	
Est. End Date:	7/10/2022	Est. End Date:		
Facility Code:	4788	Facility Code:	14600	
Subcontractor Location: MAKO, Inc. 1234 Jaws Ave Huntington Beach, CA 92021		Prime Contractor Location: National Technology & Engineering Solutions of Sandia, LLC (NTESS) 23500 W. 105th Street MD300 Olathe, KS 66061		
Description of Work: Fabrication of Dorsal Fin				
Access Details in Performance of this Contract:: There will be classified access/work performed/generated/stored at the Contractor site, the SNL site and other cleared facilities as needed. Possessing.				
Place(s) of Performance:				
Location	Contract Classification Level/Category Personnel Clearance Level	Safeguarding Level	Authorized Access to Caveats	
Facility Code: 4788 MAKO, Inc. 1234 Jaws Ave Huntington Beach, CA 92021	SRD ----- Q	SRD		
Facility Code: 0501 Sandia National Laboratories/NM P.O. Box 5800 1515 Eubank Blvd., SE Albuquerque, NM 87185	SRD ----- Q	SRD		
Classification Guidance: CG SNL/NM-SHARK-e  All derivative classification determinations for classified matter that may be generated in performance of this contract may only be made by an authorized SNL derivative classifier (DC). The primary DC for this contract is: Perry, Jason (505-284-1234); however, if the subject matter is within a DC's authority/jurisdiction, any authorized SNL DC can make classification determinations in performance of this contract.  * DEAR 952.204-2, Security * DEAR 952.204-70, Classification/Declassification * SNL Contract Clause -610FO, Security Requirements * SNL Contractor Security Requirements Plan or Site Security Plan, as applicable				



# FSO Responsibilities – CSCS (cont)

- Notify Contract Security Management of needed corrections
- Retain copies of CSCS forms for your records



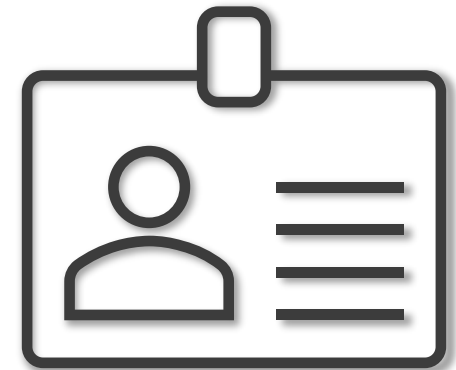
# Key Management Personnel Clearances

## New requirement from Department of Energy

- All Key Management Personnel (KMP) must receive a DOE personnel clearance regardless if their facility clearance is under DOE Cognizance in order to maintain or obtain a DOE facility clearance.

## KMP are identified by DOE and DCSA

- KMP must obtain and maintain DOE personnel clearances at the same level of the highest subcontract that the company holds at a DOE facility.





# Resources Available

**Security Toolcart** <https://www.sandia.gov/security/home/facility-clearance/>

## You will find:

- FSO Foreign Ownership Control and Influence (FOCI) Responsibilities & Facility Clearance Reporting Requirements
- S&S PLN-120, Non-Possessing Subcontractor Security Requirements Plan (NPSSRP)
- PHY-210DE, Facility Security Officer Overview
- Flow Down of Requirements
- Other Security-Related information

## Contract Security Management Team

You can reach us at [farateam@sandia.gov](mailto:farateam@sandia.gov)



# Questions

