

## **Reportable Contacts FAQ** **( Frequently Asked Questions )**

### **What happened to the requirement to report "Close and Continuing Contacts"?**

Frankly, our attempts to implement and explain the policy within DOE have resulted in confusion, and raised additional questions. We have decided to drop the "Close and Continuing" terminology and have instead opted for a straightforward presentation and explanation of the types of information we want reported. These "new" requirements include parts of the old Close and Continuing Contact reporting requirements, such as the need to report certain kinds of relationships, and discard others, such as the need to report contacts with family members.

### **Do contacts with foreign nationals from non-sensitive countries need to be reported?**

No, not based solely on their status as foreign nationals. Certain Professional, Personal, and Financial Relationships with Sensitive Country Foreign Nationals must be reported while the same is not true for Non-Sensitive Country Foreign Nationals. Travel and hosting arrangements that would place you in contact with Sensitive Country Foreign Nationals require prebriefing and debriefing by a CIO, as indicated in the applicable DOE Orders. If a non-sensitive country foreign national makes inappropriate attempts to gather sensitive or classified information, that should be reported. Contacts with foreign nationals who have status as Permanent Resident Aliens (PRAs) are not reportable unless there is some indication of foreign intelligence service involvement. If one is uncertain of the PRA status of the foreign national, report the contact. If the counterintelligence officer finds that the person is a PRA, the reported information will be deleted from OCI's record systems.

### **When do contacts with business associates or financial advisor need to be reported?**

In general, substantive financial relationships with citizens of sensitive countries must be reported. For instance, if you have joined with a sensitive country citizen to establish a private consulting firm supporting energy production efforts in Turkmenistan, that must be reported to OCI. Significant one-time transactions as well as long-term relationships must be reported. Financial transactions involving routine, incidental expenses such as for house cleaning or auto repair need not be reported.

### **If I decide to date a foreign national, does this fall within the reporting requirements?**

There is no prohibition on dating foreign nationals. If the relationship is with a sensitive country foreign national who is not a permanent resident alien and it evolves to meet the substantive personal relationship criteria, it must be reported. That is, if it becomes an enduring relationship in which there is substantial sharing of personal information and/or an emotional bond is formed, then it should be reported. Generally, only an initial report

is required, unless other circumstances arise, such as unusual requests for sensitive information or other such indications of foreign intelligence interest.

**A sensitive country foreign national friend and I occasionally go to professional baseball games together. I have told him about my marriage being on the rocks because he is the only person I can really talk to. He has been tremendous moral support for me during these hard times. Do I have to report this?**

As described, this relationship would be reportable under the "Personal Relationships" criteria. Personal information is being shared and a sense of personal gratitude has formed based on the emotional support provided by the sensitive country foreign national. Of course, as noted in earlier questions, a foreign national's status as a permanent resident alien (PRA) impacts on the need to report such information. CI information is not collected on PRA's or U.S. citizens, absent some information suggesting involvement with a foreign intelligence service.

**My wife and I attend community youth soccer games in which our children compete with children of a sensitive country foreign national. On occasion, we sit next to the sensitive foreign national adult family members of these children and we may see each other at other community-sponsored social activities. During these times we become involved in conversations about sports and current events. Must I report this contact?**

No. These kinds of superficial personal interactions do not meet the criteria for substantive personal relationships that would be reportable.

**My neighbor is a citizen of a sensitive foreign country and is here in the U.S. attending UNLV. He is an expert in financial matters and the stock market and I regularly go to him for advice concerning investment funds. Is this reportable under the Financial Relationship guidelines?**

No. Unless there is a financial relationship between you and the sensitive country foreign national, this does not meet the Financial Relationship reporting requirement. It also does not appear to meet the Personal Relationship reporting criteria, though it could evolve in that direction. This situation could also evolve into a reportable relationship if over time you develop a sense of gratitude/obligation for the financial insights and the foreign national attempts to exploit the relationship by asking you for sensitive/classified information for which he is not authorized to have access.

**I have a good friend from graduate school I've known for 20 years who is a citizen of China. She lives in the U.S. Do I have to report the contact each time I talk to her?**

No. Make an initial contact report to the Counterintelligence Officer if you know that she is not a permanent resident alien. Further reporting is not usually required. However, if

something changes in your relationship with her (e.g. there are probes for information or offers of monetary compensation for advice, for instance) report it.

**I am a naturalized U.S. citizen and still have family members living in my country of origin, which is designated a sensitive country by DOE. Do I need to report my contacts with these family members?**

No. Absent any indication of involvement by the intelligence service of the sensitive country, you do not need to report your contacts with family members. Naturally, if circumstances arise which lead you to believe you (or your family members) may be pressured or solicited by a foreign intelligence service, you should report that information to the Office of Counterintelligence.