

DOE & SNL Reporting Requirements of Security Interest FAQs



This document is designed to provide responses to the most asked questions. It is a 'living' document that will be augmented and modified on a regular basis and provided as an attachment to Security Connection Article # 203, [DOE and SNL Reporting Requirements of Security Interest](#). Check the date to ensure you are referencing the most recent version. To start the reporting process, call security connection at 505-845-1321 or email security@sandia.gov.

GENERAL REPORTING

2/14/2023

- **Why do reporting requirements exist?**

Security Executive Agent Directive 3 (SEAD 3), applicable to all federal executive branch agencies like DOE, specifies reporting requirements for all covered individuals who have access to classified information or hold a sensitive position. Reportable items represent events and circumstances that are of potential importance in the security clearance adjudicative process. The adjudicative process is an examination of a sufficient period and a careful weighing of a number of variables of an individual's life to make an affirmative determination that they are an acceptable security risk.

- **What happens when something is reported to DOE?**

DOE evaluates the information for potential security concern(s). If a concern is identified, DOE will directly contact the individual for additional details or clarification that will be adjudicated to determine clearance eligibility.

- **What happens if I don't report something I should?**

You risk the possibility that DOE will ultimately become aware of the event or circumstance (e.g., via subsequent background [re]investigations or other methods and sources) and, beyond seeking details and clarification from you on the omitted item, potentially introduce to DOE a new and additional concern about your demonstrated willingness to comply with security requirements, itself an important security clearance eligibility factor.

- **What's the difference between information provided on a clearance questionnaire (e.g., SF86/e-QIP) and information from a reporting requirement?**

In general, information provided on a security questionnaire is historical and chronological, usually associated with a background (re)investigation. Information from a reporting requirement is more immediate in nature about a recent event or circumstance that is not otherwise already known to DOE occurring, for example, between regularly scheduled background (re)investigation periods. In many situations, you may have to report items on both the e-QIP and to the DOE.

- **Is reporting retro-active?**

For the new reporting requirements effective 10/31/2022 (e.g., Personal Foreign Travel Plans and several new Financial Matters circumstances), No.

However, for clearance applicants and clearance holders in particular, if a reporting item is recognized as something that has never otherwise been revealed in the course of their security clearance history (e.g.,

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previously reported, listed on past security forms, known via earlier background re(investigations), serious consideration should be given to report it in the interests of openness and transparency.

- **I have an SCI clearance and already reported something to the Field Intelligence Element (FIE). Do I have to report again?**

Yes, the FIE and DOE have separate reporting requirements and when a reportable incident occurs (including foreign travel), they both need to be notified. Report to the FIE using their internal system. To begin the reporting process to the DOE, contact security@sandia.gov or call 505-845-1321.

PERSONAL FOREIGN TRAVEL

- **Why is personal foreign travel reportable?**

While most personal foreign travel is without incident and not, by itself, a security concern, there is the potential for concern about some of the things that can happen during foreign travel. Persons who have access to classified or other protected information are frequently assessed and occasionally recruited while traveling abroad, and they are far more vulnerable when living in or traveling to a foreign country. Foreign governments and others trying to obtain classified or other protected information have many resources available and are more confident and aggressive when operating at home. The significance of foreign travel depends upon the country involved and the nature of the traveler's contacts there. The risk that travelers will be exploited by local intelligence or security services, or by other organizations or groups in the foreign country, is substantially greater in some countries than in others. In consideration of these factors, reporting personal foreign travel affords an early means to identify and address any circumstances, albeit rare, of potential security concern

- **Does DOE approve personal foreign travel plans?**

No, not for the purposes of this reporting requirement. DOE does not approve or deny any plans nor will they confirm receipt of your form. You may request a read receipt in outlook in the options tab for emails.

- **Must personal foreign travel plans associated with official (i.e., business-related) international travel be reported under this reporting requirement?**

Yes, all personal foreign travel plans are reportable even if associated with official travel.

- **If previously reported personal foreign travel plans change (e.g., expanded, postponed, or cancelled), is additional reporting required?**

- *For expanded travel (i.e., different/additional countries visited) known in advance, submit an additional [DOE F 272.2](#). In the 'Itinerary/Trip Location(s)' section of the form, indicate that you are supplementing earlier reported plans. For expanded travel during the trip itself, submit [DOE F 272.2](#) within two working days of your return, noting in the 'Itinerary/Trip Location(s)' section of the form that you are supplementing an earlier report. List the additional location(s) visited along with the applicable date(s). Note also that SNL/CI requires reporting deviations from sensitive country travel itineraries upon return.*
- *For postponed travel, submit an updated [DOE F 272.2](#) at the time travel plans are re-established. In the 'Itinerary/Trip Location(s)' section of the form, indicate that you are updating earlier reported travel plans.*
- *Cancelled travel does not require reporting.*



- **Are there any exceptions to reporting personal foreign travel plans before start of travel?**
Yes, if 1) reporting in advance is not possible due to an emergency (however prompt verbal notification to management is required), or 2) entails unplanned crossings to Canada or Mexico. Under both circumstances, information that otherwise would have been reported in advance of travel via [DOE F 272.2](#) is required immediately upon return.
- **Is any reporting required after returning from personal foreign travel?**
It depends. Aside from the two exceptions noted above (i.e., emergency travel or unplanned crossings to Canada or Mexico) that warrant reporting after travel, certain unique interactions, occurrences, or incidents described in the 'Unofficial Foreign Travel – Completed Trip' portion of [DOE F 272.2](#), are reportable if encountered.
- **The [DOE F 272.2](#) form doesn't seem to work or is giving me errors. What should I do?**
Try opening the form in a different browser. The form works best in Microsoft Edge. If you continue having errors, download the form and fill it in using Adobe Reader or print it out and complete it manually.
- **How do I report frequent border crossings?**
For multiple border crossings within a 7-day (i.e., week) period, you may report collectively at the end of that week. On [DOE F 272.2](#), enter "Border Crossings" in the 'Itinerary/Trip Location(s)' section and list each date of crossing along with the city and country visited.
- **Do I need to report if an immediate family member travels internationally?**
No. However, an immediate family assuming residence in a sensitive country is reportable.
- **Is the 'Completed Trip' portion (3rd page) of [DOE F 272.2](#) required to be completed following travel?**
This portion of the form is required only if the unique interactions, occurrences, or incidents described were encountered.



FINANCIAL MATTERS

- **The new requirement about “Unusual infusions of assets greater than \$10,000” is confusing. Can you provide some clarification?**
This requirement is an opportunity to identify and explain the legitimacy of legal circumstances that result in a sudden increase in wealth. Unexplained affluence, as shown by a lifestyle or standard of living, increase in net worth, or money transfers that cannot otherwise be explained by known lawful sources of income is a security concern.

Beyond the two specific examples in the actual text of the requirement (i.e., inheritance and winnings), other likely conditions are up to interpretation under a reasonable person standard. Key terms to reflect upon is ‘unusual,’ generally defined as “uncommon, rare,” and ‘assets’ commonly defined as “a valuable thing,” which can reasonably apply to such items as cash, homes, real estate, automobiles, boats, jewelry, etc.
- **What are common scenarios that are NOT unusual infusions of assets?**
Selling of assets like vehicles or property, receiving money from loans, working a part-time job on the side, cashing out an IRA or similar fund, receiving an IRS tax refund, all common occurrences.
- **I had multiple infusions of assets spread out over a long period of time and they add up to more than \$10,000. Is that reportable?**
No, the \$10,000 threshold is not cumulative. This requirement concerns a distinct event or circumstance such as receipt of an inheritance, winning the lottery, or a one-time gift
- **What are the most common “unusual infusions” that have been reported to the DOE?**
Inheritances, gifts, lottery winnings, gambling prizes, and lawsuit awards.
- **Do I need to report the “Unusual Infusions” when they occur or when I receive a payment?**
Upon receipt/possession.
- **Do I need to report if my spouse received a \$10,000 inheritance to her personal account?**
No, this is only reportable if a clearance holder has access to the funds.
- **Do I need to report sudden withdrawals or losses of assets?**
No. However financial “losses” such as garnishments or bankruptcy are reportable.

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