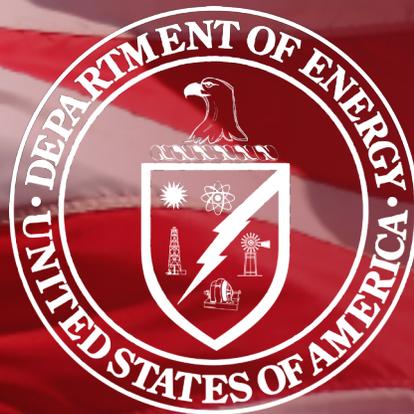


**INSPECTORS GUIDE**

# **Classification and Information Control**



Office of Security Evaluations  
Office of Independent Oversight  
Office of Health, Safety and Security

**October 2009**



**CLASSIFICATION  
AND INFORMATION CONTROL**

**INSPECTORS GUIDE**



**October 2009**

**U.S. Department of Energy  
Office of Independent Oversight  
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## User Comments

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## **Foreword**

As part of the mission of the Office of Health, Safety and Security, and to enhance the inspection process, the Office of Independent Oversight has prepared the Classification and Information Control Inspectors Guide as one in a series of inspectors guides. The guides incorporate safeguards and security criteria used by the U.S. Department of Energy (DOE) and information gleaned from Independent Oversight activities to assist inspectors in evaluating safeguards and security protection programs across the DOE complex. Federal and contractor employees may also wish to use the guides to assist in the planning and conduct of surveys and self-assessments. However, an inspectors guide does not represent DOE safeguards and security program implementation policy. Therefore, applicable DOE directives, as well as approved local procedures, must be used to evaluate DOE/National Nuclear Security Administration safeguards and security programs. Users of the guides must also remember that changes can occur in DOE safeguards and security directives that will outpace efforts to maintain the currency of the references listed in a guide, and care must be taken to be knowledgeable of current requirements. A loose-leaf notebook format is used so that sections can be easily removed and copied.

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**Acronyms**

CIC	Classification and Information Control
CMPC	Classified Matter Protection and Control
CO	Classification Officer
CR	Classification Representative
CSCS	Contract Security Classification Specification
DC	Derivative Classifier
DD	Derivative Declassifier
DEAR	Department of Energy Acquisition Regulation
DOE	U.S. Department of Energy
FRD	Formerly Restricted Data
ISSM	Integrated Safeguards and Security Management
LSR	large-scale Review
NNSA	National Nuclear Security Administration
NSI	National Security Information
OC	Original Classifier
OSTI	Office of Scientific and Technical Information
OOU	Official Use Only
PPM	Protection Program Management
PSS	Physical Security Systems
RD	Restricted Data
RO	Reviewing Official
SAP	Special Access Program
UCNI	Unclassified Controlled Nuclear Information
WFO	Work For Others

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## **Section 1: Introduction**

### **Purpose**

The Office of Independent Oversight Classification and Information Control (CIC) Inspectors Guide provides inspectors with information, guidelines, references, and a set of inspection tools that can be used to plan, conduct, and close out an inspection of CIC. The guide is designed to promote consistency, ensure thoroughness, and enhance the quality of the inspection process. The guide is intended to be useful to both novice and experienced inspectors. For the experienced inspector, the guide is organized to allow easy reference and can serve as a reminder when conducting interviews and data collection activities. For the novice inspector, the guide will serve as a valuable training tool. Under the direction of an experienced inspector, the novice inspector should be able to use the inspection tools and reference materials in the guide to collect data more efficiently and effectively. Inspectors may also wish to refer to the Office of Independent Oversight Appraisal Process Protocols and to the Independent Oversight Safeguards and Security Appraisal Process Guide for additional, non-topic-specific information pertaining to the inspection process.

### **General Considerations**

The tools contained in this guide are intended to be used at the discretion of the inspector. Typically, inspectors select the tools that are applicable and most useful on a facility-specific and inspection-specific basis. Although the guidelines presented here cover a variety of inspection activities, they do not and cannot address all program variations, systems, and procedures used at all U.S. Department of Energy (DOE) facilities. The tools may have to be modified or adapted to meet inspection-specific needs, and, in some instances, the inspectors may need to design new activities and/or tools to collect information that is not specifically covered in this guide. The information in this guide does not repeat all of the detailed information in DOE directives (including policies, orders, and manuals); rather, it is intended to provide practical guidance for planning Independent Oversight activities and collecting and analyzing inspection data. One significant consideration in developing Office of Independent Oversight inspectors guides is to provide a repository for the collective knowledge of inspectors that can be enhanced and updated as inspection methods improve and inspection experience accumulates. Every attempt has been made to develop specific guidelines that offer maximum utility to both novice and experienced inspectors. In addition to guidelines for collecting information, the inspection tools provide guidelines for prioritizing and selecting activities, as well as analyzing and interpreting results. The specific guidelines should be viewed as suggestions rather than dogma. All guidelines must be critically examined and interpreted on an inspection-specific basis, taking into account site-specific factors.

### **Organization**

This introductory section (Section 1) provides general considerations and descriptive information on the CIC topic, details on how the guide is organized, and explanations concerning the inspection tools and their use. Sections 2 through 7 provide detailed guidance for inspecting each major CIC subtopic:

- Section 2 – Program Administration
- Section 3 – Authorities
- Section 4 – Guidance
- Section 5 – Training

- Section 6 – Document Reviews
- Section 7 – Program Evaluation

The subtopic sections are further divided into several sub-elements to assist the reader in understanding subtopical organization.

Section 8 (Interfaces) provides guidelines to help inspectors coordinate their activities both within the CIC topic team and with other topic teams. Typically, this includes the teams reviewing physical security systems (PSS), information security, cyber security, protection program management (PPM), and protective force programs. The section emphasizes ways that data collection can be made more efficient by coordinating with other teams and identifies data that inspectors on other teams can collect that may be pertinent to CIC.

Section 9 (Analyzing Data and Interpreting Results) contains guidelines on how to organize and analyze information gathered during data collection activities. The guidelines also include statements regarding the significance of potential deficiencies, as well as suggestions for additional activities that may be appropriate if these deficiencies are identified. After completing each activity, inspectors can refer to this section to determine whether additional activities are needed to collect sufficient information necessary to evaluate the system. Appendix A (CIC Data Call) contains information that is requested from each inspection site to support the CIC topic team in the conduct of the CIC inspection. Appendix B (CIC Interviews) contains detailed information on the types of CIC interviews that are used to assist in determining the facts and confirming or refuting information gathered prior to the site visit.

## Using the Topic-Specific Tools

Sections 2 through 7 provide topic-specific information intended to help inspectors prepare for and conduct an inspection. The information is organized by subtopic and further by sub-element:

- **Program Administration:** Typically management is ultimately responsible for the overall CIC program through planning, training, and providing necessary resources. The overall effectiveness of the CIC program is most often determined by the degree of support received from management.
- **Authorities:** DOE classification and Unclassified Controlled Nuclear Information (UCNI) programs are implemented by certified officials who are trained and tested prior to receiving authority. All organizations that deal with CIC are required to have a classification program and associated personnel, even if personnel have CIC authorities at more than one DOE facility. Authorities are granted for specific subject areas, for a specific position, and for a specific period of time.
- **Guidance:** Appropriate guidance is critical for making correct classification and UCNI determinations. The guidance element ascertains that each derivative classifier (DC), derivative declassifier (DD), and UCNI reviewing official (RO) has access to appropriate guidance that is current and that they do not possess out-of-date guidance.
- **Training:** Training is critical to ensure that each person with a clearance understands their classification and UCNI responsibilities, and each classification, declassification, and UCNI official understands both the classification and UCNI programs and their responsibilities within the programs. The content of training must be consistent with DOE directive requirements. Training procedures must clearly state the intended audience and at what frequency training should be provided.

- **Document Reviews:** Document reviews include a random sampling from a cross-section of programs that generate classified, UCNI, and Official Use Only (OUO) documents at a site. When large inventories of documents exist, a statistical sampling plan is used to determine which documents to review. The statistical sampling plan requires a random sample of a specified number of documents to be reviewed. Inspectors need to be 95 percent confident that 99 percent of all documents are classified correctly.
- **Program Evaluation:** All CIC programs must be periodically evaluated to determine effectiveness and compliance with DOE directive requirements. Program evaluation consists of three elements: self-assessments, onsite reviews, and corrective action management.

Each sub-element is further divided into a standard format to assist the reader. Divisions may include the following headings:

- References
- General Information
- Common Deficiencies/Potential Concerns
- Planning Activities
- Data Collection Activities.

### **References**

The References section identifies the DOE directives and other applicable policy documents that serve as the basis for evaluating the inspected program and identifying areas of non-compliance. Due to periodic changes in policy, applicable directives should be reviewed during data collection activities to ensure that the most current directive is being used. In some cases, the References section may identify memoranda from DOE Headquarters that clarify or revise the policies and standards defined in DOE orders and other guidance. Inspectors must be aware of these clarifications and revisions because inspection objectives include verifying compliance with DOE directives. Since new memoranda are continually being issued, Office of Security Evaluations inspectors should determine whether additional memoranda have been issued and, if so, whether they apply specifically to the inspected topic and facility.

### **General Information**

The General Information section defines the scope of the subtopic, provides a framework for identifying and characterizing security interests, furnishes guidelines intended to help inspectors focus on the unique features and problems associated with protecting and inspecting each type of security interest, and discusses commonly used terms.

### **Common Deficiencies/ Potential Concerns**

The Common Deficiencies/Potential Concerns section lists deficiencies and concerns that the Office of Independent Oversight has encountered on previous inspections. That is not to say that the identified deficiencies are evident at every facility. However, these deficiencies have been noted often enough to warrant special attention during inspections. Associated with each potential deficiency or concern is a short discussion providing additional detail. Where appropriate, general guidelines are provided to help the inspector identify site-specific factors that may indicate that an identified deficiency is likely to be present. The information in this section is intended to help the inspector further focus the inspection.

By reviewing the section before collecting data, inspectors can be alert for such deficiencies and concerns at the inspected facility during interviews and other data collection activities.

### **Planning Activities**

The Planning Activities section identifies activities normally conducted by the CIC topic team during the planning phase of an inspection, including preplanning, review of documents and materials, and interviews with facility representatives. The information in this section is intended to promote systematic data collection and to ensure that critical program elements are not overlooked.

Though specific activities and documents are identified in Sections 2 through 7, the following are germane to all of the elements of the CIC topic and assist in defining the scope of inspection activities.

- Operations/Site Office oversight reports and corrective action plans developed to address identified findings
- Facility/program self-assessment reports and corrective action plans
- Approved and pending deviations from DOE requirements for any element of the CIC topic
- Organization charts or other descriptive materials for each/all of the elements of the CIC topic.

### **Data Collection Activities**

This section identifies activities that inspectors may choose to perform during data collection. The information is intended to be reasonably comprehensive, although it is recognized that every conceivable variation cannot be addressed. Typically, the activities are selected during the planning effort and are organized by functional element or by the type of system used to provide protection. The Data Collection Activities section includes activities that are most often conducted and that reflect as much Office of Security Evaluation data collection experience and expertise as possible. Activities include tours, interviews, observations, and performance tests, although inspectors do not normally perform every activity on every inspection. Activities are identified by an alphabetical letter for easy reference and assignment of data collection tasks.

### **Validation**

Validation is the procedure that inspectors use to verify the accuracy of information obtained during data collection activities and, consequently, is one of the most important activities conducted during the inspection. The validation process, discussed in detail in the Office of Security Evaluations Safeguards and Security Appraisal Process Guide, includes on-the-spot validations, daily validations, and summary validations. Inspectors should ensure that they are validating facts, conclusions, and impact, not providing conjecture. If representatives accompany the inspection team, facts (data points) noted during the inspection of the CIC program should be validated with facility representatives as they become apparent. If facility representatives do not accompany the inspection team, the data should be validated during the daily validation meetings with site personnel. Validation becomes even more difficult when CIC inspection team members must separate and work independently in order to cover all selected topic elements. For example, one team member may be assigned to look at the classification and UCNI programs, while others review a random sample of documents. This makes coordination and validation even more important, not only for team members but also for site representatives who may

have also been separated as they accompany Office of Independent Oversight personnel. CIC team members need to keep track of significant information to ensure that it is reiterated and that the facts are confirmed during the daily and summary validations.

### **Using the Tools in Each Inspection Phase**

The inspection tools are intended to be useful during all phases of an inspection. The following enumerates some of the tools usually considered during each inspection phase.

In the **planning stage**, inspectors:

- Use the General Information section to characterize the program and focus the inspection.
- Perform the activities identified under Planning Activities to collect the information necessary to further characterize the program and focus the inspection. Thorough planning for an inspection cannot be overemphasized.
- Review Common Deficiencies/Potential Concerns to determine whether any of the deficiencies are apparent and to identify site-specific features that may indicate that more emphasis should be placed on selected areas or activities.
- Assign specific tasks to individual inspectors (or small teams of inspectors) by selecting specific items from the Data Collection Activities section. The assignments should be made to optimize efficiency and ensure that all high-priority activities are accomplished. The guidelines under the Interfaces section should be considered when assigning tasks to ensure that efforts are not duplicated.
- Schedule data collection activities to optimize efficiency by ensuring that high-priority activities are conducted early in the process.
- Review the referenced DOE orders and memoranda to ensure that they are current.

In the **conduct phase**, inspectors:

- Use the detailed information in the Data Collection Activities section to guide interviews and data collection.
- Review Common Deficiencies/Potential Concerns after completing each data collection activity to determine whether any common deficiencies are apparent at the facility. If so, inspectors should then determine whether subsequent activities should be conducted to further distinguish the deficiency or determine the root cause.
- Review the Data and Results section after completing each data collection activity to determine whether additional data are needed to evaluate the program.

In the **closure phase**, inspectors:

- Refer to the appropriate references (DOE orders, policy supplements, etc.) to determine whether the facility is complying with all applicable requirements, including those issued by DOE Headquarters and/or the National Nuclear Security Administration (NNSA).
- Use the Data and Results section to help analyze the impacts of identified deficiencies.

In the **follow-up phase**, inspectors:

- Review comments received on the final draft report.
- Review and comment on the adequacy of the corrective action plan submitted by the site.
- Provide appropriate input to the final report.
- Prepare any policy issues or other reports for Headquarters staff elements.

## **Integrated Safeguards and Security Management**

The Department is committed to conducting work efficiently and securely. DOE Policy 470.1, *Integrated Safeguards and Security Management (ISSM) Policy*, is designed to formalize a framework that encompasses all levels of activities and documentation related to ISSM. The guiding principles of ISSM are:

- Individual responsibility and participation
- Line management responsibility
- Clear roles and responsibilities
- Competence commensurate with responsibilities
- Balanced priorities
- Identification of safeguards and security requirements
- Tailoring of protection strategies to work being performed.

The five core functions of ISSM are:

- Define the scope of work.
- Analyze the risk.
- Develop and implement security measures and controls.
- Perform work within measures and controls.
- Provide feedback and continuous improvement.

For the purposes of this CIC inspectors guide, the Office of Independent Oversight has highlighted the following four guiding principles and one core function.

### **Individual Responsibility and Participation**

Each individual is directly responsible for following security requirements and contributing to secure missions and workplaces.

**Line Management Responsibility for Safeguards and Security**

Line management is directly responsible for the protection of DOE/NNSA assets and, as such, is required to analyze risk, develop controls, and verify the adequacy of these controls.

**Competence Commensurate with Responsibilities**

Individuals must possess the experience, knowledge, skills, and abilities necessary to fulfill their responsibilities.

**Identification of Safeguards and Security Standards and Requirements**

Safeguards and security standards and requirements have been established that, if properly implemented, will provide appropriate assurance that DOE/NNSA assets, workers, and the public are protected.

**Provide Feedback and Continuous Improvement**

Feedback information on the adequacy of measures and controls is gathered during inspections, surveys, and self-assessments. Opportunities for improving safeguards and security programs are also identified and implemented. Best practices and lessons learned are shared. It is important to note that the categories above are used to organize information in the inspectors guide in order to help inspectors gather data about performance in a structured and consistent manner.

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## **Section 2: Program Administration**

### **References**

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Order 471.1A  
DOE Order 471.3  
DOE Manual 475.1-1B  
DOE Manual 471.1-1 chg. 1  
DOE Manual 471.3.1-1  
10 CFR 1045  
10 CFR 1017

### **General Information**

The mission of CIC program administration is to ensure the complete and appropriate implementation of CIC at all levels in the organization. Additionally, the CIC mission emphasizes organizational structure, careful planning, precise documentation, sufficiency of resources, and effective management. Specific elements essential to CIC program management include:

- Resources
- Program Administrator
- Performance Evaluation
- Procedures
- Deviations.

### **Resources**

Inspection of the program management component evaluates whether the classification, UCNI, and OOU programs have sufficient resources and whether resources are used effectively. Typical resources include personnel directly supporting the classification officer (CO) or program administrator, as well as properly trained and certified original classifiers (OCs), DCs, DDs, and ROs. Other resources include funding, support materials, and work space. A sufficient number and distribution of these resources must be maintained within each DOE and NNSA Headquarters and field element to prevent undue interference with the mission or delays of Headquarters or field element work. The performance expectation is that resources and support are sufficient to fulfill the requirements contained in DOE classification, UCNI, and OOU directives.

### **Program Administrator**

Classified and UCNI programs are managed and administered by a CO to ensure that classified and UCNI information is identified and protected. OOU programs must also be managed and administered appropriately to ensure that OOU information is identified and protected. The head of the field element, or his or her designee, nominates an employee to serve as CO by submitting a request to the appropriate appointing official: to the Director, Office of Classification, for DOE elements or to the Associate

Administrator for Defense Nuclear Security for NNSA elements. After verifying the nominated employee's qualifications, the appointing official notifies the employee and the head of the field element in writing that the employee is appointed as the CO. Federal COs must be an OC, DC, and DD, and must have a scientific or technical degree related to the field in which he/she is working. However, the degree requirement may be waived if the person has sufficient relevant work experience. Within one year of appointment, the CO must successfully complete training and pass examinations that cover the following elements: (a) bases for classifying Restricted Data (RD) and Formerly Restricted Data (FRD), (b) basis for classifying National Security Information (NSI), and (c) classification authorities and responsibilities of DOE officials. If the CO for a field element requires assistance from another CO (e.g., training DCs, conducting contractor onsite reviews), a written agreement for support is required that describes specifically what support will be provided.

Most programs are administered by a local CO within the field element. However, some programs may not have a local CO appointed and may rely on a CO from an outside organization. If a field element partners with a CO who is not located in the field element, a written agreement must be prepared that describes the specific duties to be performed by the supporting CO. The agreement must be signed by both parties. The existence of such an agreement does not remove the ultimate responsibility for performing the duties from the field element receiving the support. If a CO not located in the field element serves as the CO for the field element, the field element must designate a classification coordinator to monitor the activities of the CO. The head of the field element appoints the employee to serve as the classification coordinator in writing and provides a copy to the Director, Office of Classification, and for an NNSA element, to the Associate Administrator for Defense Nuclear Security. To serve as a classification coordinator, the employee must be knowledgeable about the classification requirements identified in DOE Order 475.2 and DOE Manual 475.1-1B and be aware of classified activities within his or her field element. Within one year of appointment, the classification coordinator must attend a briefing that covers the requirements contained in DOE Order 475.2 and DOE Manual 475.1-1B and the specific responsibilities of a CO.

The classification representative (CR) is the program administrator for Headquarters elements that have DCs assigned. This person must be knowledgeable about the work being performed in classified areas in the Headquarters element and be a DC. The head of the Headquarters element nominates an employee for the position by submitting a request to the appropriate appointing official: the Director, Office of Classification, for DOE Headquarters elements or the Associate Administrator for Defense Nuclear Security for NNSA Headquarters elements. After verifying the nominated employee's qualifications, the appointing official notifies the employee and the head of the Headquarters element in writing that the employee is appointed as the Headquarters CR. Within one year of appointment, the CR must receive training and successfully pass examinations that cover the following elements: (a) bases for classifying RD and FRD, (b) basis for classifying NSI, and (c) classification authorities and responsibilities of DOE officials.

### **Performance Evaluation**

The performance expectation for the program administrator inspection element is that the CIC program is effectively administered by an individual who was appropriately appointed and meets all DOE directive requirements.

The performance evaluation element addresses the requirement that the performance contract, or other system used to rate personnel performance, must include the management of classified information as a critical element or item to be evaluated in the rating of OCs and all other personnel whose duties significantly involve the creation of classified information (e.g., CO, classification coordinator,

Headquarters CR, DC, and DD). Such performance systems include, but are not limited to, the annual personnel performance rating system or personnel evaluations based upon the ISSM system or an organization's internal self-assessment system.

### **Procedures**

Inspection of locally issued procedures validates consistency with DOE directives. Examples of locally issued procedures include, but are not limited to, procedures for:

- Reviewing documents in classified subject areas prior to public release
- Self-assessments
- Completing Contract Security Classification Specification (CSCS) forms, (DOE Form 470.1)
- Submissions to OpenNet.

The performance expectation is that written procedures issued by the field element are consistent with DOE classification, UCNI, and OUC directive requirements.

### **Deviations**

There are three categories of deviations from requirements in DOE Order 475.2 and DOE Manual 475.1-1B.

1. **Variance.** A variance is an alternative means of meeting the intent of a requirement in a manner that is different from that specified in the Order or Manual.
2. **Waiver.** A waiver is an alternative means of addressing a requirement that does not meet the intent of the requirement, but which includes measures in another area that compensate for this inability to meet the intent of the requirement.
3. **Exception.** An exception allows for a requirement not to be met.

A CO or Headquarters CR may propose alternative approaches to address order and manual requirements. This proposal must (1) identify the order or manual requirement for which a deviation is being requested; (2) identify the category of the deviation; (3) explain why the deviation is needed; and (4) if requesting a variance or waiver, describe the alternate measures for addressing the requirement. The proposal must be submitted in writing to the Director, Office of Classification (if within NNSA, through the Associate Administrator for Defense Nuclear Security), for approval. A decision on the proposal must be made within 30 calendar days of receipt of the proposal. Annually, the CO or Headquarters CR must review and document the continuing need for each deviation. If the deviation is determined to no longer be needed, the CO or Headquarters CR must so inform the Director, Office of Classification (through the Associate Administrator for Defense Nuclear Security if within NNSA).

### **CIC Topic Team Inspection Strategy**

The CIC topic team should dedicate adequate resources to inspect each organization's CIC program administration. Interviews with the CO, and with DCs, DDs, and ROs, are one of the most important methods of gathering information about CIC. Consequently, inspectors can gather much of the information discussed in the data collection activities sections by interviewing key managers. Experience has shown that an effective way to organize the inspection interviews is to start with personnel who have immediate supervisory authority for the various aspects of the CIC program. An organized interview

schedule, in which the inspectors cover a variety of subjects with each manager, is essential for maximizing the effectiveness of the data collection process and minimizing the impact on facility managers.

### **Common Deficiencies/Potential Concerns**

A key element in the program administration subtopic is the CO or program administrator. Inspectors should examine the appointment letter, qualifications, and certifications of the CO or program administrator to ensure consistency with DOE directive requirements. If a CO has not been designated for a particular site, and the site has an agreement with another CO to act in that capacity for the local programs, inspectors should review that agreement to determine whether adequate support is provided. The performance expectation is that the classification, UCNI, and OOU programs are effectively administered by an individual who is appropriately appointed and meets DOE directive requirements.

Common deficiencies found in the area of program administration are:

- The CO/representative does not have enough resources at his/her disposal (e.g., immediate staff, shared internal resources, contractor/subcontractor support, outside support) to meet requirements.
- The CO/representative has not completed the required training and/or does not have the required authorities.
- Local procedures do not cover all DOE order/manual requirements (i.e., classification review of documents by the classification office prior to widespread distribution or public release).
- Local procedures have not been updated to reflect the most recent DOE order and manual requirements or most recent organizational changes.

### **Planning Activities**

During the planning phase, inspectors should interview points of contact and review available documentation to characterize the program. Inspectors should:

- Determine the CIC program organizational structure, including separate points of contact for the program that may exist among the various organizational elements with CIC interests.
- Review organizational charts and determine the names of all persons with CIC supervisory and management authority.
- Determine how CIC policy and procedures are promulgated and distributed.
- Determine the number of DCs, DDs, and ROs involved in the CIC program and the number to be interviewed during the inspection.

Once inspectors understand the structure of the CIC program, they should determine which organizations and program elements will be reviewed in more depth and which individuals will be interviewed. At large facilities, it is not practical to inspect all organizations to the same depth or to interview all individuals who perform CIC duties. In such cases, inspectors should select a representative sample for evaluation. Typically, inspectors should cover other CIC subtopics as well as the program administration subtopic for reasons of efficiency. Consequently, a variety of factors should be considered when

selecting organizations to review. Inspectors should interview first-line managers with responsibility for the CIC program to ensure that the impact of any deficiencies identified during the reviews are covered. Frequently, the information gathered during the first few days of the inspection will influence the selection of managers to be interviewed. As program strengths and weaknesses are noted, the inspectors should modify their planned activities appropriately.

### **Data Collection Activities**

**A.** Inspectors should interview management, the CO, DCs, and non-DCs to ascertain whether resources are sufficient and to determine the level of awareness of CIC review requirements and procedures. Typically, interviews include the first- and second-tier supervisors of the CO. This component requires extensive contact with the CO.

**B.** Inspectors should review the background information package to begin to determine whether classification and UCNI programs have sufficient resources. If responses to DC questionnaires and interviews indicate that there are an insufficient number of DCs or that the classification office is not responsive, inspectors should follow up with the CO to determine the credence and awareness of the problem. In addition, inspectors should discuss any incomplete follow-up actions from the previous oversight review to determine whether the potential lack of resources contributed to the action not being completed.

**C.** Inspectors should review the CO's letter of appointment. The appointment should have been made by the appropriate authority and otherwise comply with DOE directive requirements. If the CO's appointment does not meet directive requirements, the CO should be notified prior to the onsite visit. If the site has an agreement with a CO who is off site, team members should review the agreement for services to ensure that all administrative responsibilities of the CO are covered. If all duties are not covered, the local person responsible for them must be clearly identified. It is the local site's responsibility to ensure that any required agreements are made and function effectively. If there are any questions regarding an agreement for CO services, these should be clarified at the site.

**D.** Inspectors should review the performance contract or other system used to rate personnel performance of OCs and all other personnel whose duties significantly involve the creation of classified information (e.g., CO, classification coordinator, Headquarters CR, DC, and DD) to verify that the management of classified information is a critical element or item to be evaluated in the rating. Such performance systems include, but are not limited to, the annual personnel performance rating system, personnel evaluations based upon the ISSM system, or an organization's internal self-assessment program.

**E.** Locally written procedures are not a requirement, but, if they exist, they must be consistent with DOE directive requirements. Inspectors should review all locally issued procedures submitted in response to the data call to determine whether they are consistent with DOE directive requirements. Examples of locally issued procedures include, but are not limited to, procedures for the review of documents in classified subject areas prior to public release, procedures for self-assessments, procedures for completing CSCS forms, and procedures for submissions to OpenNet. Any inconsistencies are to be noted and discussed with the CO. However, if the CO is not responsible for drafting the procedure in question, inspectors should arrange to discuss the procedure with appropriate personnel during the onsite visit. During the interview with the CO, inspectors should discuss any issues regarding local procedures and the process for updating procedures in response to changes in DOE directive requirements.

**F.** Inspectors should check the Headquarters Office of Classification files and the file room for any approved deviations. Such deviations should be checked against the response to the data call to determine whether the deviation was noted and whether the deviation is still necessary. If there are questions regarding a deviation, inspectors should discuss such questions with the CO. Inspectors should also discuss with the CO the continuing necessity of any approved deviations.

## Section 3: Authorities

### References

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Order 471.1A  
DOE Manual 475.1-1B  
DOE Manual 471.1-1 chg. 1  
10 CFR 1045  
10 CFR 1017

### General Information

DOE classification and UCNI programs are implemented by certified officials who are trained and tested prior to receiving authority. All organizations that deal with CIC are required to have a classification program and associated personnel, even if personnel have CIC authorities at more than one DOE facility. Authorities are granted for specific subject areas, for a specific position, and for a specific period of time.

During planning for an inspection, documentation from the site should be reviewed to determine authority distribution, authority descriptions, and certifications of the personnel involved with CIC. The CIC topic team should also take a broad, systematic approach to evaluating the staffing afforded to classification, declassification, and review of documents within the facility.

#### Authority Distribution

The inspector's role in the authority distribution element is to determine whether the distribution of officials and the number, type, and scope of the authority are sufficient for the classification and UCNI programs to fulfill DOE directive requirements. The performance expectation is that questionnaires and interviews with the CO, DCs, non-DCs, and UCNI ROs indicate that an adequate number of officials are located either on site or are available to the facility.

#### Authority Description

The assessment of the authority description element is determined by reviewing the letters of authority on file at the site. Authority descriptions must contain all information required by DOE directives. The performance expectation is that authority descriptions accurately identify the responsible individual and specific criteria identified below, and each authority is approved by the appropriate official.

- Each OC and DC description of authority includes the individual's name, organization, effective date, specific subject areas covered by the authority, jurisdiction of authority, expiration date, and any special instructions or limitations on the authority.
- Each DD description of authority includes the individual's name, organization, effective date, specific subject areas covered by the authority, jurisdiction of authority, expiration date, and any special instructions or limitations on the authority.

- Each UCNI RO description of authority includes the individual's name, title, organization, effective date, specific subject areas covered by the authority, jurisdiction of authority, expiration date, and any special instructions or limitations on the authority.

### **Certification**

Each OC, DC, DD must successfully complete required training and an examination prior to being granted authority, successfully complete an examination for recertification, and be recertified within the required timeframe. Each UCNI RO must successfully complete required training.

The performance expectation is that:

- Records and interviews indicate that each OC, DC, and DD successfully completed training and an examination prior to being granted authority.
- Records and interviews indicate each OC, DC, and DD successfully completed an examination for recertification and was recertified within the required timeframe.
- Records and interviews indicate that each UCNI RO completed training and, as applicable, an examination prior to being granted authority.

### **Staffing**

The inspector's job is not to determine and validate specific staffing levels and individual performance; rather, the inspector should monitor staffing problems within the organization and determine whether the problems are affecting the facility's ability to achieve CIC objectives.

Significant staffing factors to consider are discussed below.

### **Budget Limitations**

Budget limitations may affect the staffing of an organization by restricting the level of qualifications that can be requested, the number of full-time equivalents authorized, the degree to which CIC staff provide services to more than one site, limitations on new hires, or the overall personnel budget.

### **Impact of Organizational Structure**

Staffing requirements, especially at the supervisory and managerial levels, are influenced directly by the organizational structure. The number and level of supervisory positions generally increase in fragmented organizations. The staffing at each site and for each organizational level should be evaluated against how successful and efficient it is in implementing an effective CIC program.

### **Workload**

Ideally, workload is the predominant factor for determining optimum staffing levels. However, many tasks are not easily quantified into work units that can be equated to requirements for a specific number of staff. Also, workloads for CIC staff members typically fluctuate between extremes and are frequently driven by unpredictable events. Accordingly, inspectors may be able to form an opinion on the workload assigned to a position or individual, but are rarely able to acquire validated, hard data to support a strong

position that staffing is an issue because of excessive or moderate workload. Regardless, inspectors can readily identify when necessary program tasks are omitted or are not being accomplished adequately.

### **Position Description**

Every government and contractor position should be supported by a written position description, ideally supported by a job-task analysis. Job-task analyses are typically performed to develop or validate a job description and to assist in position management. An unexplained discrepancy of any significance between the job description and the actual tasks being conducted by an individual performing CIC-related duties should be examined. Inspectors should look for evidence of logical and consistent CIC-related duties and responsibilities that are indicative of an effective, efficient, and productive mission-oriented organization.

### **Staff Qualifications and Training**

A CIC program's effectiveness is measured by the capabilities of the personnel accountable for its implementation. A formal training plan for Federal and contractor employees that identifies short- and long-term training requirements and individual skills development for the CIC staff members is essential to ensure that a qualified staff is in place. Ideally, the plan addresses the entire spectrum of training, from on-the-job training to attendance at formal courses for certification and recertification training. Attendance at mandatory training and the attainment and maintenance of the required level of individual proficiency is typically documented. Without adequate plans and training records, the qualifications of the CIC staff cannot be assured.

### **Common Deficiencies/Potential Concerns**

Common deficiencies found in the area of authorities are:

- The amount of classification, declassification, and UCNI authorities is insufficient to meet site requirements (as determined by interviews with DCs, non-DCs, responses from pre-inspection questionnaires, and discussions with the CO/CR).
- Classification, declassification, and UCNI authority descriptions do not identify the specific areas/organizations covered by the authorities.
- Classification and declassification authorities have not been recertified within three years, as required.

### **Planning Activities**

Inspectors review organization charts that contain the number of officials in each organization and the number of classified documents generated annually by each office. If there appears to be an insufficient number of officials within the office that generates classified documents, inspectors should interview personnel within that organization to determine whether the number of staff is adequate.

Inspectors also review responses to classifier questionnaires that may have been included in the pre-inspection data call. If possible, arrangements should be made to interview DCs who respond that an inadequate number of DCs are provided or who indicate other specific deficiencies.

Inspectors should gather and review DC, DD, and UCNI RO authority descriptions and select candidates for interviews.

The response to the background information request includes a list of classification, declassification, and UCNI officials. The inspector responsible for authorities may request the Office of Classification query the Authorities and Training Tracking System for a list of officials at the site. This list is compared to the list provided, and differences are resolved prior to the site visit, if possible. The Authorities and Training Tracking System and site lists provided are checked to ensure that records indicate that:

- Each OC, DC, and DD has successfully completed training and an examination prior to being granted authority.
- Each OC, DC, and DD has successfully completed an examination for recertification and was recertified within the required timeframe.
- Each UCNI RO completed training and, as applicable, an examination prior to being granted authority.

### **Data Collection Activities**

If the pre-inspection data call indicates an insufficient number of classifiers, this should be explored further during DC interviews. Interviewers should determine whether there may have been recent moves, retirements, or reorganizations involving officials that would have impacted classifier availability. The information from DC interviews is discussed with the CO to determine whether the CO is aware of the problem.

In addition, the interviewer should determine whether there is a sufficient number of DCs in the necessary subject areas. For example, inspectors determine whether DCs must go to another organization for classification determinations in a particular subject area.

Inspectors should also review a sample of authority letters at the site classification office and review the authority letters of the officials interviewed. Authority letters are reviewed for compliance with DOE directive requirements, including whether authority letters are signed; contain all the appropriate information, including special instructions or limitation on the authority; and contain the subject areas covered by the authority for each DC, DD, and UCNI RO.

## Section 4: Guidance

### References

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Order 471.1A  
DOE Manual 475.1-1B  
DOE Manual 471.1-1 chg. 1  
10 CFR 1045  
10 CFR 1017

### General Information

Appropriate guidance is critical for classification and UCNI determinations. Locally issued guidance must be reviewed at least every five years for consistency with DOE directive requirements and Headquarters guidance. Further, each certified official must have access to appropriate guidance to make accurate decisions. During inspection planning, the site's guidance should be reviewed to assess the adequacy of facility's guidance in the area of classification and document control. DOE guidance is found in a variety of places, including the classification office, in shared guidance locations, and in the possession of DCs. During DC interviews, inspectors should review guidance documents to determine whether they are current and are appropriate for the DC's subject areas of authority. In addition, CSCS forms are reviewed to determine whether the listed DOE guidance is appropriate, the classification/declassification DEAR clause has been checked, the local CO has certified that the appropriate areas have been completed correctly, and whether the issued guidance for work-for-others (WFO) contracts contradicts any DOE guidance.

- The appropriate guidance element ascertains that each DC, DD, and UCNI RO has access to appropriate guidance that is current. The performance expectations are:
  1. Questionnaires, interviews, and onsite reviews of guidance locations indicate that DCs, DDs, and UCNI ROs have or have access to appropriate guidance.
  2. Guidance held and used by DCs, DDs, and UCNI ROs in shared locations or in a classification office reference library is up to date (page changes are incorporated into guidance).
- The locally issued guidance approval element is evaluated to determine whether locally issued guidance has been approved according to DOE directive requirements and a record of all locally issued guidance is maintained. The performance expectation is that:
  1. Locally issued guidance has been submitted to and approved by the appropriate authority.
  2. A record of all locally issued guidance is maintained.
- The locally issued guidance validation element is evaluated to determine that locally issued guidance does not contradict DOE directive requirements or DOE-approved guidance. The performance

expectation is that a review of locally issued guidance does not find any contradictions with DOE classification policy.

- The locally issued guidance review element is evaluated to determine if locally issued classification guidance is reviewed at least once every five years to ensure it is up to date and that the review is documented. The performance expectation is that:
  1. All locally issued classification guidance has received a cover-to-cover review in the past five years.
  2. The record copy of classification guidance is annotated with the date of the review and the results.
- The DOE contract guidance element is evaluated to determine whether DOE Form 470.1, *Contract Security Classification Specification*, is filled out for contracts performing work that requires access to classified information; all information required by DOE directives is identified; and an authorized person certifies that the information is correct. The performance expectation is that:
  1. Applicable classification guidance for the contract is listed in block 13 or it contains a statement that a list of guidance is maintained by the CO.
  2. If classification guidance is not needed for the contract, a reasonable explanation is included in block 13.
  3. The box for Department of Energy Acquisition Regulation (DEAR) 952.204-70, “Classification/Declassification,” in block 14 is checked.
  4. The CO or a delegate certifies by signing block 18, that block 13 is completed correctly and the box for DEAR 952.204-70, “Classification/Declassification,” in block 14 is checked.
  5. Delegations of authority to certify DOE contract guidance are documented.
- The WFO guidance element is evaluated to determine whether classification guidance, provided by the funding organization for all classified non-DOE-funded work (i.e., WFO), does not contradict DOE guidance. The performance expectation is that:
  1. Classification guidance is provided by the funding organization for all classified non-DOE-funded work.
  2. The CO or a delegate reviews the work request and proposed classification guidance and certifies in writing that the guidance does not contradict DOE classification guidance prior to work commencement and during the period of performance, if the guidance is revised.
  3. If DOE classification guidance concerning NSI is used, the funding agency must agree in writing.
  4. The CO or delegate has access to a copy of the WFO guidance and any subsequent revisions until the work is completed.
  5. Delegations of authority to certify WFO guidance are documented.

## **Common Deficiencies/Potential Concerns**

Common deficiencies in the area of guidance are:

- Classification, declassification, and UCNI officials do not have access to the guides required for the subject areas in which they have authority.
- Local guides are not up to date or follow obsolete DOE guidance.
- Locally issued guides are not approved by the appropriate authority.
- Locally issued guides are not consistent with DOE Headquarters guidance or policy.
- Locally issued guides have not been reviewed for consistency with Headquarters guidance and policy in the past five years.
- Guidance review has not been documented on the record copy of the guide.
- CSCS forms for contracts with the potential to access classified information do not have guidance identified for the work to be performed or a statement that guidance is not required in block 13 of the form and the classification/declassification DEAR clause in block 14 has not been checked.
  1. Block 18 has not been signed by an authorized individual.
  2. Authority to sign block 18 has not been delegated in writing.
- CSCS forms for WFO contracts with the potential to generate classified information do not have guidance identified for the work to be performed or a statement that guidance is not required in block 13 of the form and the classification/declassification DEAR clause in block 14 has not been checked.
  1. Block 18 has not been signed by an authorized individual certifying that the guidance is adequate and does not contradict DOE guidance.
  2. Authority to sign block 18 has not been delegated in writing.

## **Planning Activities**

Classifiers, declassifiers, and UCNI ROs must have access to appropriate guidance. DOE Headquarters guidance used at the facility must be up to date with the most recent changes. To evaluate this requirement, inspectors should verify the list of guidance distributed by DOE against the list of guides provided in the latest version of the Headquarters Index of Classification Guidance. The check will indicate whether classification guidance reviewed is up to date and/or identify specific areas to be investigated further.

## **Data Collection Activities**

Inspectors will conduct the following data collection activities.

- A.** Determine whether the site maintains a list of guides distributed to DCs, DDs, and UCNI ROs.
- B.** Review guides in the site's classification office to ensure that the guides are up to date and contain all changes issued by DOE.
- C.** Obtain a sample of guides shared by DCs in other locations to ensure that the guides are up to date.
- D.** Review guides during DC interviews to ensure that the guides are up to date; verify that the DC is on the CO's guidance distribution list.
- E.** Obtain a list of local guides that were developed by the site.
- F.** Review all local guides to ensure that they do not contradict DOE Headquarters classification guidance.
- G.** Review all local guides to determine that a cover-to-cover review has been conducted within the past five years to ensure that the guidance is up to date. Appropriate action should be completed to either annotate the guidance to indicate the review was conducted and that the guidance is current or update the guidance and submit for approval within 180 days.

## **Section 5: Training**

### **References**

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Order 471.1A  
DOE Manual 475.1-1B  
DOE Manual 471.1-1 chg. 1  
10 CFR 1045  
10 CFR 1017

### **General Information**

Training is critical to ensure that each person with a clearance understands their classification and UCNI responsibilities and each classification, declassification, and UCNI official understands both the classification and UCNI programs and their responsibilities within the programs. The content of training must be consistent with DOE directive requirements. Training procedures must clearly state the intended audience and the frequency when training should be provided. To evaluate the training component, sites submit their training materials for review as part of the pre-inspection data call. Training also may be observed and should be followed by interviews with the trainers and DCs who attended the training.

The CIC training objective is the effective and efficient development and maintenance of a training program to maintain the capability to perform the tasks required for CIC. Most effective training programs for CIC are:

- Mission oriented
- Based on a valid and complete set of job tasks
- Directed by appropriate training objectives
- Aimed at achieving the level of competency required to perform each job task
- Designed so that training activities make optimum use of available resources
- Implemented so that competency is attained by all qualified trainees
- Accomplished on a timely basis.

The training program should be based upon a complete set of job tasks. Identified tasks should be essential and directly contribute to the fulfillment of the CIC mission. To be functional, the tasks must be clearly identified and documented and must include measurable performance criteria.

Training objectives are best defined when written to be consistent with the job tasks. Gaps between desired competencies and existing competencies should be identified during inspection activities. Further, when information about trainees (e.g., experience, education, performance feedback) is systematically applied to training development and implementation, the training program can best meet individual needs and job requirements.

To achieve organizational compliance with the CIC training requirements, the CIC training organization needs sufficient resources and authority. Usually, this organization operates from written outlines that

specifically implement the overall training plan. It is important that the plans include provisions designed to meet all CIC compliance requirements. Successful training programs are based on management providing a sufficient number of qualified training staff and having the appropriate CIC staff involved in the development of the training plan. Effective oversight of the training program is essential to maintain its compliance with DOE directives and relevance to the overall site mission.

The specialized nature of the CIC training subtopic and the potential range of activities included in the process of gathering data require an efficient and effective inspection plan. There are four elements of the training subtopic that should be evaluated: training material content, classification overview training, continued classification education, and subject-matter-related classification awareness briefings.

The individual training records element is evaluated to determine if all certified officials have received required training within appropriate timeframes. The performance expectation is that training records accurately reflect completed training for all certified officials.

The training material content element is evaluated to determine if training materials, when last presented, were consistent with DOE directive requirements. The performance expectation is that training materials (including initial classification overview training and annual classification refresher training for all personnel authorized access to classified information; OC, DC, DD, and UCNI RO initial training; and OC, DC, and DD recertification training/testing) for the most recent classes or current computer-based training are consistent with DOE directive requirements.

The classification overview and continuing classification training elements are evaluated to determine if each person authorized access to classified information receives initial overview training at the time their clearance is issued and annual classification refresher training thereafter. The performance expectation is that records indicate all employees authorized access to classified information receive initial and annual classification training.

The subject-matter-related classification awareness briefings element is evaluated to determine if each person authorized access to classified information who is working in a classified subject area receives subject-matter-related classification awareness briefings. The performance expectation is that records and interviews with personnel indicate all employees authorized access to classified information working in a classified subject area receive subject-matter-related classification awareness briefings that explain what information is potentially classified in their relevant areas.

In addition, the following elements may be evaluated based on the complexity and structure of the site's training program: the program delivery structure, training instructor qualifications, and overall training program effectiveness.

### **Common Deficiencies/Potential Concerns**

Common deficiencies in the area of training are:

- Initial and annual classification awareness training do not cover all areas required by the DOE manual.

- Training material has not been updated to reflect the most recent DOE orders and manuals or organizational changes.
- All cleared personnel have not attended classification awareness training.

### **Lack of a Comprehensive Training Plan**

While many classification offices have a document called a training plan (or annual training plan, etc.), this document is frequently not comprehensive. That is, it does not fully address the training needs and objectives of CIC or outline the strategy, methods, and resources to be used to meet those needs and objectives. Often, the individual elements of a training program are not combined to ensure that they each contribute to a coherent program. The absence of a comprehensive plan that is anchored in requirements and performance standards increases the potential for ineffective use of scarce training resources and failing to meet important training needs.

### **Training Not Properly Executed**

A common problem encountered in CIC training is that initial and annual classification awareness training do not cover all areas required by the DOE manual. In some cases, a site's training material may not have been updated to reflect the most recent DOE orders and manuals or organizational changes. Also, cleared personnel have often not attended classification awareness training. Outdated training materials often accompany the presence of outdated electronic or hard copies of DOE orders and manuals. Because of the small size of some CIC operations at certain sites, inspectors should review the list of attendees at training activities during the period since the last Independent Oversight inspection. The amount of CIC activity at the site, particularly low activity, does not exempt personnel from obtaining thorough, annual training and/or updates.

### **Lack of Qualified Training Instructors**

Many CIC offices rely on individuals that provide in-service training, even though they may not be qualified trainers. Such instructors might not be formally trained to deliver training, but their expertise and experience might be satisfactory for keeping the staff current on the most recent directives from DOE. Lack of adequate performance in training-specific skills or significant differences in skill levels between various classifier personnel might be indicators of inconsistent quality of instruction.

### **Lack of Appropriate Performance Testing**

Classroom instruction with hands-on CIC procedures or performance tests is often used to measure competency in tasks that are evaluated by performance testing. The best and only reliable way to determine whether an individual has a particular skill is to have the individual perform that skill. Programs must include both knowledge and skill (performance) objectives.

## **Planning Activities**

Inspectors review the data call to determine who at each organization should be interviewed. The training schedule of each organization is also reviewed to determine the possibility of attending a training session. The training materials provided in the data call are reviewed to determine the accuracy and adequacy of the information and compliance with DOE directive requirements as pertains to the site's mission.

During inspection planning activities, inspectors interview points of contact and review available documents. The following items should be collected during the planning activities:

- Statement of training objectives
- Annual training plan
- Curricula for basic and refresher training
- On-the-job training procedures
- Written tests currently in use (with answers)
- A sample of representative lesson plans
- The training records system used for the CIC function
- Achievement or performance standards and their rationale, especially for critical tasks.

Inspectors should also:

- Interview site personnel to identify characteristics of the program and corroborate documentation.
- Identify training activities scheduled during the inspection and arrange to observe some or all of these activities.
- Coordinate all training inspection activities with other CIC subtopic areas.

### **Performance Tests**

Inspectors should plan to review and evaluate three aspects of the site's CIC training. Note the performance expectations included in the following brief descriptions of training areas.

1. Training material content. Training materials are consistent with DOE directive requirements. Inspectors should determine whether training materials (including initial and annual classification refresher training for all cleared personnel; OC, DC, DD, and UCNI RO initial training; and OCDC, and DD recertification training, as applicable) for the most recent classes or current computer-based training are consistent with DOE directive requirements.
2. Classification overview training. Each person with a clearance receives initial and annual classification training. Inspectors should confirm that records indicate that all employees with a clearance receive annual classification refresher training.
3. Subject-matter-awareness training. Each person with authorized access to classified information who is working in a classified subject area receives subject-matter-related briefings that explain what information is potentially classified in their relevant area.

### **Data Collection Activities**

Training materials (including initial and annual classification refresher training for all CIC personnel; OC, DC, and UCNI RO initial training; and OC, and DC recertification training, as applicable), examinations for certifications, and answer keys are requested to be submitted in response to the data call. If all requested training materials are not submitted, inspectors should arrange to review materials on site.

Training materials are reviewed to determine their accuracy and consistency with policy. Training materials should contain all content required by DOE directives. Inaccuracies that increase the likelihood of misclassification should be discussed with the site point of contact. If there are other suggested

corrections to training materials, inspectors should note those corrections on the materials and return the materials to the site point of contact during the onsite visit.

The person responsible for training at the site should be interviewed. Any training materials that were not submitted as part of the data call should be reviewed on site for accuracy and consistency with DOE directive requirements. If possible, a training session should be observed. Technical personnel may also review training in classified subject areas to ensure accuracy.

**A.** Inspectors should review the training materials, schedules, qualifications of instructors, and availability of training according to annual refresher needs and updated DOE directives.

**B.** Inspectors should determine whether systems exist that identify annual refresher training and in-service training requirements. Inspectors should interview training personnel, review documentation pertinent to the methodology used to determine training needs, and review the most recent example of work completed in this area.

**C.** Inspectors should review the training plan and discuss it with the CO to determine whether it provides a clear roadmap for accomplishing the organization's CIC training. This information may be contained in one or more documents, such as a training plan, a training order, an annual training plan, or a standard operating procedure for training. Whatever the form, essential ingredients of a good plan include:

- Identification of site-specific training needs and goals (at least for the period being addressed)
- Description of training resources and an explanation of how they will be used to meet the training needs and goals
- All basic training requirements for all CIC tasks
- All required and necessary annual training, both general and specialized.

**D.** Inspectors should review training schedules and other associated documents used to implement the training plan to determine whether training is actually scheduled and conducted to meet the identified needs and goals.

**E.** Inspectors should examine the lesson plans currently in use to determine their adequacy in supporting training goals.

**F.** Inspectors should review class rosters to ensure that the necessary training was actually conducted and that the required personnel attended.

**G.** Certification records should be reviewed to ensure that personnel on the job have met all pertinent certification requirements.

**H.** Inspectors should evaluate the proficiency of instructors. Several techniques are useful in this evaluation, including:

- Instructors can be interviewed to ascertain the scope and depth of their knowledge relating to training development and instructional techniques.
- Inspectors can review instructor products, such as lesson plans, instructional aids, and exams or performance tests for completeness, appropriateness, site specificity, etc.
- Inspectors can observe an instructor teaching a class or directing a training event.

**I.** Inspectors should determine how well the training program prepares the CIC personnel for their duties. This question can only be answered by the assimilation of information collected by various means throughout the inspection.

## Section 6: Document Reviews

### References

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Order 471.1A  
DOE Order 471.3  
DOE Manual 475.1-1B  
DOE Manual 471.1-1 chg. 1  
DOE Manual 471.3.1-1  
10 CFR 1045  
10 CFR 1017  
International Standards Organization 2859, Acceptance Sampling

### General Information

DOE requirements for classification and document control extend beyond initial document preparation. All classified, UCNI, and OOU matter must meet DOE standards for proper marking. One function the CIC inspectors is to ensure that qualified staff deal appropriately with all phases of the classification process.

A large volume and wide variety of classified, UCNI, and OOU documents can be generated at a site. Included in the definition of CIC-related documents are all records of information that require protection against unauthorized disclosure, regardless of physical form or characteristics. Classified, UCNI, and OOU documents are found in many forms, ranging from handwritten notes to final manuscripts. Many forms of classified, UCNI, and OOU matter have unique markings or handling requirements, and all types must be strictly controlled in accordance with current directives. The most common forms of classified, UCNI, and OOU matter held by DOE are:

- Letters and reports
- Files, folders, and groups of documents
- Memoranda and letters of transmittal
- Blueprints and viewgraphs
- Photographic slides, negatives, and prints
- Charts, maps, and drawings
- Material (e.g., parts, metals, machinery, chemical compounds)
- Motion picture film
- Videotapes
- Microfilm reels, negatives, and prints
- Aperture cards
- Punch cards
- Data processing software
- Printouts
- Recordings (e.g., magnetic media including video, audio, computer tapes)
- Disks (e.g., floppy and removable hard disks)

- Microfiche
- Containers
- Drafts and worksheets
- Documents pending review
- Messages/cables
- Typewriter and printer ribbons
- Printer cartridges.

Responsibility for the proper preparation of classified, UCNI, and OOU documents varies among organizations. Some organizations specifically assign document preparation responsibilities (at least for the most common types of documents), while others leave such responsibilities to subordinate organizations or even the originators. The presence or absence of at least one full-time CO also varies among sites.

The Office of Independent Oversight document review activity includes a random sampling from a cross-section of programs that generate classified, UCNI, and OOU documents at the site. When large inventories of documents exist, a statistical sampling plan is used to determine which documents to review. The statistical sampling plan requires a random sample of a specified number of documents to be reviewed. Inspectors need to be 95 percent confident that 99 percent of all documents have the correct determination.

There are three elements of the document reviews subtopic that should be evaluated: document reviews, OpenNet submittals, and large-scale reviews (LSRs).

The document reviews element is evaluated to determine if documents and materials are correctly classified, declassified, or controlled as UCNI or OOU based on proper guidance by an appropriate authority and according to DOE directive requirements. The performance expectations are:

1. A survey of randomly selected documents that were reviewed within the past five years, or since the last oversight review, indicates that there are no systemic errors in the document review process.
2. For each classified document:
  - a. The determination is correct.
  - b. The correct guidance is cited.
  - c. The individual who made the determination had the appropriate authority.
  - d. The classifier marking is correctly completed.
  - e. NSI documents contain the appropriate declassification instructions.
  - f. NSI documents contain the special control marking on declassification.
3. For each UCNI document:
  - a. The determination is correct.
  - b. The correct guidance is cited.
  - c. The individual who made the determination had the appropriate authority.
  - d. The UCNI RO marking is correctly completed.
4. For each OOU document:
  - a. The determination is correct.
  - b. The correct exemption and category are cited.
  - c. The correct guidance is cited, if applicable.

- d. The OOU markings are correctly applied.
5. For each declassified document:
    - a. The determination is correct.
    - b. The correct guidance is cited.
    - c. The individuals who made the determination had the appropriate authority.
    - d. The declassifier marking is correctly completed.
    - e. The classification markings have been appropriately removed.

The OpenNet element is evaluated to determine if all required information for each document that has been declassified and determined to be publicly releasable is submitted to the Office of Scientific and Technical Information (OSTI) for inclusion on OpenNet. The performance expectations are:

1. There is a process for submitting information for each document that has been declassified and determined to be publicly releasable to OSTI for inclusion on OpenNet.
2. The required information on documents declassified and determined to be publicly releasable since the last oversight review has been submitted to OpenNet.

The LSR element is evaluated to determine if the CO notified the appropriate authority of any declassification review that exceeds 25,000 pages, and, if an LSR plan was submitted and approved, it is being followed. The performance expectations are:

1. All existing LSRs are covered by approved plans, when required.
2. LSR plans are being followed.

### **Common Deficiencies/Potential Concerns**

The most common deficiencies found in the document reviews subtopic are:

- Classified, UCNI, and OOU document markings do not contain the information required by DOE orders/manuals.
- Inappropriate or obsolete guidance is cited on the document marking.
- The date of the guidance used is not cited.
- The classifier stamp is not applied to the document.
- Incorrect declassification instructions are applied to NSI documents.
- UCNI documents do not contain the guide used to make the determination.
- OOU documents do not contain the exemption number and/or category.
- Inaccurate determinations are made.

- The site does not have a procedure in place for submitting information on documents that have been declassified and are publicly releasable to OSTI for input to OpenNet (*not a common deficiency since most sites are not conducting declassification reviews*).
- The site has not notified Headquarters of reviews exceeding 25,000 pages (*not a common deficiency since most sites are not conducting declassification reviews*).

### **Lack of Most Recent Guidance**

The most common deficiency encountered in this subtopic is failure to properly mark materials. One reason for occurrences of this deficiency involves compliance with the most recent classification or declassification instructions. For example, if the latest guidance for counterintelligence is a change to CG-CI-1, *DOE Classification Guide for Counterintelligence Information*, then all items classified since the issuance of this change must reflect the new guidance. Further, each CIC office should have on hand, and easily available, an electronic and/or hard copy sample of the most recent version of each appropriate guide applicable to the site's mission.

### **Lack of Access to Appropriate Documents**

To accomplish document reviews, the inspection team must have access to all collections of recently generated documents. Documents should have been determined to be unclassified, classified, UCNI, or OUO. Inspectors must also have access to collections of documents that have been reviewed since the last oversight for possible declassification. Inspectors will assess accurate downgrading, upgrading, retaining classification, or declassifying determinations. The document reviewers should review at least the number of documents called for by the random sampling methodology.

In conducting these document reviews, the reviewers must remember:

- Reviews of unclassified, classified, UCNI, or OUO documents are intended to cover only those documents that were originated since the last oversight review.
- Reviews shall include only those documents generated by the site being inspected. For example, when doing a review of the Savannah River Operations Office, reviewers only review unclassified, classified, UCNI, or OUO documents generated by the Savannah River Operations Office. Inspectors will probably encounter many documents generated by Savannah River Nuclear Solutions, LLC, and Wackenhut Services, Inc., in the Savannah River Operations Office files. These documents can be reviewed but shall be counted toward the Savannah River Nuclear Solutions, LLC, and the Wackenhut Services, Inc., not the Savannah River Operations Office. Any documents generated by sites other than Savannah River Nuclear Solutions, LLC; Wackenhut Services, Inc.; and Savannah River Operations Office should not be reviewed.

### **Inaccurate Determinations**

The purpose of conducting reviews of documents generated at the various sites is to determine whether accurate determinations are being made by the local classifiers, declassifiers, and UCNI ROs on documents that are reviewed for classification, declassification, UCNI, and OUO. These determinations may consist of the following:

- Confirming that a document is unclassified

- Determining that a document contains classified information and has the appropriate classifier markings
- Determining that a document can be downgraded to a lower level or category
- Determining that a document should be upgraded to a higher level or category
- Determining that a document marked as classified still contains classified information
- Determining that a document marked as classified no longer contains classified information and can be declassified
- Determining that an unclassified document contains UCNI
- Determining that an unclassified document contains OUO information.

### **Planning Activities**

The following information is requested in the data call (see Appendix A, Data Call) that is sent out prior to the inspection:

- A list of offices within the field element that generate classified documents, an estimate of the number of classified documents generated annually by each office, and the location of these documents
- Any written procedure for submitting bibliographic data on documents that have been declassified and determined to be publicly releasable to OSTI for entry on OpenNet
- A copy of any LSR notification correspondence submitted by the CO and a copy of the LSR plan, if applicable.

The inspection team leader should determine which document collections are to be sampled, with equal emphasis among classified, declassified, UCNI, OUO, and unclassified documents generated at the site. Additionally, the team leader should determine which intranet locations and public reading facilities are to be surveyed for declassified and unclassified documents.

The inspection team should arrange for the document review to take place in field locations, allowing sufficient time for reviewers to review documents and address issues that might arise. Inspectors should consult each site's lists of classified programs to help determine the amount of time document reviewers should devote to specific locations.

During the planning meeting, inspectors interview points of contact and review available documentation (e.g., DOE orders, CIC procedures) to characterize marking activities at the facility. Elements to cover include:

- Types and quantities of classified materials on hand
- Which organizations or individuals are responsible for marking materials and ensuring that materials are properly marked

- Method(s) used to mark materials on hand.

The next step is to determine which materials to inspect. Depending upon the quantity of materials present, it may be necessary to use sampling techniques.

## Performance Tests

Inspectors should plan to conduct a comprehensive review of randomly selected documents that were generated locally since the last appraisal. Doing so determines if there are systemic errors in the site's document review process. Inspectors should select a random sample of documents, applicable to the inspected site, in making a judgment of the percentage of documents correctly classified.

Acceptance sampling by attributes based on International Standards Organization 2859 is the methodology used to conduct the document reviews. The table below lists the various sample sizes that inspectors should review based on the number of applicable documents available (population). The standard is for the inspector to be 95 percent confident that 99 percent of the document population is classified correctly. The rejection point listed in the table is the number of incorrectly classified documents at which the confidence level drops below 95 percent. At this point, the document review stops and a finding issued.

**DOCUMENT REVIEW SAMPLE SIZE AND REJECTION CRITERIA**

<b>NUMBER OF DOCUMENTS</b>	<b>SAMPLE SIZE</b>	<b>REJECTION POINT</b>
1-15	ALL	1
16-150	13	1
151-500	50	2
501-1200	80	3
1201-3200	125	4
3201-10000	200	6
10001-35000	315	8

In addition to determining if the documents are classified correctly, the inspectors will need to review each document to confirm that the:

- Correct guidance is cited
- Individual who made the determination had the appropriate authority
- Document contains the correct DC markings.

These requirements are less serious than incorrect classification, which could lead to compromises of classified information, so the 95 percent confidence that documents are 99 percent correct does not apply. If issues arise with the correct implementation of these requirements, the inspector must make a determination if the magnitude of the problem is sufficient to warrant a finding with follow-on corrective action plan, or if an opportunity for improvement would suffice.

## Marking Format

The following figures (6-1, 6-2, 6-3, and 6-4) provide guidance on marking formats for declassified, classified, UCNI, and OOU documents, respectively.

The number and types of document reviews, as well as any identified deficiencies should be clearly noted for later reference. If the deficiency is the failure to identify the document as containing classified information, UCNI, or OOU, the inspectors should note the specific document identifiers and related deficiency. When the information noted by the inspector is explicit, the notation should be marked with the same classification level or control level as the information contained in the document.

### Declassified Document Markings

There is no specific marking format for documents that have been declassified. However, certain information is required on these documents. DOE Manual 475.1-1B, *Identifying Classified Information*, Chapter V, Part B - Declassification, Section 4, states that:

For each document or material that is declassified, the Derivative Declassifier crosses out or authorizes the crossing out of the classification markings and provides the following information:

- The names or personal identifiers and positions or titles of individuals declassifying the document for the “Declassified By” line.
- For the “Derived From” line:
  - For DOE-approved guidance, the short title, issuance date of the guide, and “DOE OC” (e.g., CG-SS-4, 9/2000, DOE OC).
  - For other-Agency guidance, the short title, issuance date of the guide, Agency, and, where available, the office issuing the classification guidance (e.g., CG No. 1, 7/5/2005, Dept of Good Works, Office of Administration).
  - If more than one guide was used to declassify the document, enter the words “Multiple Sources” on this line and include a list identifying each guide with the record copy of the document.
- The date of declassification for the “Declassified On” line.

Any document that has been declassified should have the above information on the first page of the document and not covering any existing words or images. The classification markings should be crossed out but still readable. In most cases, the document should display the names of the two authorized individuals who reviewed the document for declassification. The exceptions to this are documents that were previously declassified as part of the comprehensive classification review program and situations where the local classification office has been granted an exception to the two-person review requirement by Headquarters.

**Figure 6-1. Declassified Document Markings**

**Classified Document Markings**

There is no specific marking format for documents that have been classified. However, certain information is required on these documents. DOE Manual 475.1-1B, *Identifying Classified Information*, Chapter V, Part A - Classification, Section 6, requires that the DC ensure that all the following markings are included on RD and FRD documents:

- Name or personal identifier and position title of the derivative classifier for the “Classified By” line.
- For the “Derived From” line:
  - For DOE-approved guidance, the short title, issuance date of the guide, and “DOE OC” (e.g., CG-SS-4, 9/2000, DOE OC).
  - For other-Agency guidance, the short title, issuance date of the guide, Agency, and, where available, the office issuing the classification guidance (e.g., CG No.1, 7/5/2005, Dept of Good Works, Office of Administration).
  - If more than one guide was used to classify the document, enter the words “Multiple Sources” on this line and include a list identifying each guide with the record copy of the document.

**Example:** Classified By: Jane Doe, Director, HS-555  
 Derived From: CG-W-5 dated 10/16/95, DOE-OC

The same section in DOE Manual 475.1-1B requires all of the following markings on national security information documents:

- Name or personal identifier and position title of the derivative classifier for the “Classified By” line.
- For the “Derived From” line:
  - For DOE-approved guidance, the short title, issuance date of the guide, and “DOE OC” (e.g., CG-SS-4, 9/2000, DOE OC).
  - For other-Agency guidance, the short title, issuance date of the guide, Agency, and, where available, the office issuing the classification guidance (e.g., CG No.1, 7/5/2005, Dept of Good Works, Office of Administration).
  - If more than one guide was used to classify the document, enter the words “Multiple Sources” on this line and include a list identifying each guide with the record copy of the document.
- Duration of classification derived from the guidance or source document for the “Declassify On” line.
  - For information that is not exempt from declassification after 25 years, indicate the specific date (mm/dd/yy) or event for declassification.
  - For information that is exempt from declassification after 25 years, include the notation “25X” followed by the number of the appropriate exemption category or categories from the classification guidance and the date or event when the information will be declassified.

**Example:** Classified By: Jane Doe, Director, HS-555  
 Derived From: CG-SS-4 dated 9/12/00, DOE OC  
 Declassify On: 3/22/2026

Additionally, the following statement must appear on the document in the vicinity of the above markings: “Derivative Declassifier review required prior to declassification.”

Any document that has been classified should have the above information on the first page of the document.

**Figure 6-2. Classified Document Markings**

**UCNI Document Markings**

DOE Manual 471.1-1, change 1, *Identification and Protection of Unclassified Controlled Nuclear Information Manual*, Chapter 1, Part C, paragraph 2, requires that documents that have been determined to contain UCNI be marked as follows:

- Front marking: When a reviewing official determines that unclassified matter contains UCNI, the reviewing official marks or authorizes the front of the matter to be marked as follows:

**UNCLASSIFIED CONTROLLED NUCLEAR INFORMATION****NOT FOR PUBLIC DISSEMINATION**

Unauthorized dissemination subject to civil and criminal sanctions under section 148 of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2168).

Reviewing Official: \_\_\_\_\_  
(Name/Organization)

Date: \_\_\_\_\_

Guidance Used: \_\_\_\_\_  
(List all UCNI guidance used)

- Page marking: The marking “UNCLASSIFIED CONTROLLED NUCLEAR INFORMATION” or “UCNI” must be placed on the top and bottom of the front of the matter and (1) on the top and bottom of each interior page of the matter or (2) if more convenient, on the top and bottom of only those interior pages that contain UCNI.

**Figure 6-3. UCNI Document Markings**

### OUO Document Markings

DOE Manual 471.3-1, *Manual for Identifying and Protecting Official Use Only Information*, Chapter I, paragraph 3, requires that documents that contain OUO information be marked as follows:

- Front marking: The front marking includes the
  - Applicable Freedom of Information Act exemption number
  - Related category name (i.e., Exemption 2 - Circumvention of Statute; Exemption 3 - Statutory Exemption; Exemption 4 - Commercial/Proprietary; Exemption 5 - Privileged Information; Exemption 6 - Personal Privacy; Exemption 7 - Law Enforcement; Exemption 8 - Financial Institutions; Exemption 9 - Wells)
  - Name and organization of the employee making the determination; that employee must ensure that the marking immediately below is placed on the front of each document containing OUO information.
  - Identifies the guidance used if the determination was based on guidance.

#### OFFICIAL USE ONLY

May be exempt from public release under the Freedom of Information Act  
(5 U.S.C. 552), exemption number and category:

\_\_\_\_\_

Department of Energy review required before public release

Name/Org: \_\_\_\_\_

Date: \_\_\_\_\_

Guidance (if applicable) \_\_\_\_\_

- Page marking: The employee making the determination must ensure that the words “Official Use Only” (or “OUO” if space is limited) are placed on the bottom of each page or, if more convenient, on just those pages containing the OUO information.

**Figure 6-4. OUO Document Markings**

### Data Collection Activities

**A.** Inspectors should interview selected individuals responsible for document marking (and/or ensuring that information is properly marked) to determine whether site-specific procedures are understood and implemented. Inspectors should also determine the appropriateness of actual marking practices.

**B.** Prior to the onsite visit, the document review team examines declassified and unclassified documents posted on the facility’s Internet and intranet sites to confirm that the documents do not contain classified, UCNI, or OUO information. The team reviews a cross-section of documents in subject areas that have the potential to contain classified information, UCNI, or OUO.

**C.** The document review team reviews the site’s LSR plan for compliance with DOE directive requirements. Document reviewers should sample documents reviewed according to the plan to determine whether the plan is being followed.

**D.** During the onsite review, the document review team examines a cross-section of classified, UCNI, OOU, declassified, and confirmed unclassified documents. Additionally, the team examines upgraded and downgraded documents. Inspectors should conduct an examination to confirm that documents are correctly determined to be classified, UCNI, or OOU based on appropriate guidance, by an authorized individual, and with correct markings.

**E.** The document review team examines unclassified documents that have not been reviewed by a DC to confirm that the documents do not contain classified, UCNI, or OOU information and do not require DC or UCNI RO review. The document review team also examines declassified and unclassified facility documents posted in local public reading rooms to confirm that the documents do not contain currently classified, UCNI, or OOU information.

**F.** The process for OpenNet submissions is discussed with the CO and examined to determine its effectiveness. If there have been OpenNet submissions to OSTI since the last oversight review, the OpenNet is queried to ensure that the data has been published. If it has not been published, the OSTI is contacted to determine the reason. If the site is responsible for the delay, the CO is contacted and the issue is further investigated.

**G.** Team members review LSR plans that were not approved by the OC to determine whether the plans comply with DOE directive requirements. Document reviewers shall take a copy of any current LSR plans to the site to ensure that the plan is followed. Persons conducting the LSR are interviewed, and documents are reviewed to ensure that the plan effectively protects classified information and UCNI.

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## **Section 7: Program Evaluation**

### **References**

The following are standard references for the CIC topic:

DOE Order 475.2  
DOE Manual 475.1-1B

### **General Information**

All CIC programs must be periodically evaluated to determine effectiveness and compliance with DOE directive requirements. Program evaluation consists of three elements: self-assessments, onsite reviews, and corrective action management.

#### **Self-Assessments**

CIC programs must periodically (minimum two years) evaluate their own effectiveness. Without sufficient feedback, programs may be unaware that the processes and procedures in place are either not effective or not fully implemented. Programs that have subordinate organizations must conduct oversight reviews of such organizations and ensure that a self-assessment is performed by the subordinate organization. All self-assessments must meet DOE directive requirements and include a valid evaluation of program performance.

Each field element CO and Headquarters CR must document the self-assessment of his or her implementation of the requirements contained in DOE Order 475.2 and DOE Manual 475.1-1B in a written report. The self-assessment must include Federal and contractor organizations under his or her cognizance that do not have a CO or Headquarters CR, but do have DCs or DDs. The performance expectations are:

1. Self-assessments are conducted at least every two years.
2. Self-assessments are comprehensive and cover all DOE directive requirements.
3. Self-assessments include subordinate Federal and contractor organizations that do not have a CO but do have DCs or DDs.
4. A written report is prepared.
5. For identified issues, appropriate corrective actions are identified and tracked until completion.

#### **Oversight Reviews**

Each field element CO must conduct an onsite review of each Federal or contractor organization under his or her cognizance that has a CO to evaluate his or her implementation of the requirements contained in DOE Order 475.2 and DOE Manual 475.1-1B. This review must be documented in a written report, and a corrective action plan must be issued by the assessed organization for any deficiencies noted. The onsite

review should be conducted at least every two years; however, the interval between onsite reviews may be decreased (e.g., annually) if significant problems are found or increased, but not less than once every five years, if only minor problems are found. The interval between onsite reviews is determined by the field element CO responsible for conducting the review. The performance expectations are:

1. Onsite reviews of each subordinate organization with a CO are conducted at a frequency that conforms to DOE directive requirements.
2. Onsite reviews are documented in a written report.
3. Corrective action plans are developed for any deficiencies noted.

Each self-assessment and onsite review must cover the following areas:

1. **Management Responsibilities.** Management provides the necessary resources and support to meet the requirements specified in DOE Order 475.2 and DOE Manual 475.1-1B.
2. **Authorities.** A sufficient number and appropriate distribution of OCs, DCs, and DDs exist so as to not unduly interfere with or delay the work of the Headquarters or field element; a record of classification officials appointed is maintained (e.g., in a paper document, electronic database); the description for each authority includes the individual's name, organization, the effective date, the specific subject areas covered by the authority, the jurisdiction of the authority, the expiration date, and any special instructions or limitations on the authority; and initial and recertification training and testing have been conducted and successfully completed.
3. **Guidance.** Classification guidance is up to date, and DCs and DDs have access to appropriate guidance. Block 13 and block 14 of DOE Form 470.1 are certified as being completed correctly by the signature of the appropriate official in block 18. Classification guidance for non-DOE-funded work does not contradict DOE guidance.
4. **Training.** Training programs ensure that personnel are aware of their classification responsibilities, training conducted is documented, and training materials are accurate and up to date when presented.
5. **Document Reviews.** Based on a statistically significant, random sample of documents created since the last self-assessment or onsite review, document classification determinations are correct, the basis for each determination is correct, and classifier and declassifier markings are completed correctly. The methodology for determining a statistically significant, random sample of documents is specified by the CO conducting the self-assessment or onsite review.
6. **Program Evaluation.** The classification program is evaluated to assess performance and determine if improvements are necessary.

### **Corrective Action Management**

The final element of the program evaluation subtopic is corrective action management. This element is evaluated to determine if appropriate corrective actions are taken in a timely manner to address findings from previous self-assessments, onsite reviews, and Office of Independent Oversight reviews. The performance expectation is that adequate corrective actions were implemented in a timely manner.

## **Common Deficiencies/Potential Concerns**

Common deficiencies found in the area of program evaluation are:

- Self-assessments are not conducted in the required timeframe.
- Self-assessments are not comprehensive.
- Onsite reviews of contractor/subcontractor organizations are not conducted.
- Onsite reviews of contractor/subcontractor organizations do not cover all of the areas specified in DOE Manual 475.1-1B.
- The site has not closed all of the findings from previous Office of Independent Oversight reviews, consistent with corrective action plans.

## **Planning Activities**

In the data call, inspectors should request copies of the most current self-assessment, onsite reviews of subordinate organizations, and corrective action plans for all self-assessments and onsite reviews, including the most recent independent oversight reviews. Inspectors should arrange for interviews with the COs of each organization to discuss these programs.

## **Data Collection Activities**

**A.** Inspectors responsible for the program evaluation review subtopical area should collect any self-assessments conducted since the last Office of Independent Oversight review, onsite reviews of subordinate organizations, and corrective action plans for these reviews.

**B.** Procedures submitted during the data call are reviewed under the program administration subtopic for compliance with DOE directive requirements. The procedures for self-assessments are also evaluated under the program evaluation element to ensure that self-assessments provide a valid evaluation of program performance.

**C.** Inspectors should examine the completed self-assessments to determine whether the self-assessments are thorough, covering all six required elements, and are objective examinations of classification and UCNI programs. Each requirement from the procedures utilized does not need to be addressed in the inspecting official's final written report, but deficiencies or areas of concern should be noted, and inspectors should plan to discuss them with the CO.

**D.** Inspectors should also determine whether corrective action plans generated from the previous oversight review were submitted and completed.

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## **Section 8: Interfaces**

### **Integration**

Integration is the process in which inspection team members work together to achieve a better understanding of the overall protection programs used at DOE facilities. In this context, integration includes coordinating, cooperating, interfacing, and assimilating information. The fundamental goal of integration is to ensure that DOE facilities are provided the necessary degree of protection and that vulnerabilities are clearly identified and analyzed. Integration also results in a more effective and organized inspection effort, a refinement of inspection techniques, and a more comprehensive inspection report. Lastly, the integration effort significantly contributes to the Office of Independent Oversight's ability to provide an accurate, in-depth evaluation of protection programs throughout the DOE complex.

No inspection topic team can operate in a vacuum. The primary objective of a comprehensive inspection is to provide a meaningful, management-level evaluation of the overall status of safeguards and security at the inspected facility. To ensure the accomplishment of this objective, the CIC team and all other topic teams must work closely together throughout every phase of the inspection process, carefully integrating their efforts with those of the other topic teams. Integration is realized by exchanging information and discussing how information collected by one topic team influences protection program elements observed by other topic teams. Additionally, integration provides a means of prioritizing the efforts of the various topic teams, of assigning particular issues for investigation to particular teams, and of mobilizing special inspection team elements to examine issues that transcend topic boundaries.

No more than five or six days are available for data collection during a typical comprehensive inspection. During this time, the various topic teams will collect a massive quantity of data pertaining to their particular subject matter areas. A careful delineation of each team's inspection activities is required to avoid wasteful duplication of effort. However, even with a clear definition of activities, the boundaries between topic teams are not always neatly differentiated, and each topic team is bound to discover data of interest and significance to other teams. Such data must be shared in a timely manner and determinations made as to which topic team will pursue the issues posed to a point of resolution.

Much of the required integration occurs informally. During both the planning and data collection phases, topic leads and individual topic team members share information with the members of other topic teams. More formal integration occurs during inspection planning meetings and at daily coordination sessions involving the inspection team lead and the topic team leads. During the data collection phase of the inspection, a formal team meeting is scheduled on a daily basis (typically at 4 or 5 p.m.), which provides a forum for the exchange of information between the topic teams.

It is essential that the integration process be instilled with the realization that the fundamental DOE protection philosophy is based on the concept of protection in depth, that layers of protection are applied in a manner that ensures that the failure of a single layer does not expose the protected asset. To be effective, layered protection requires the careful integration of protection layers and of the protection elements within each layer. In this sense, integration is the basic process through which DOE ensures that the security interests at a particular facility are afforded the necessary degree of protection in depth. The formal part of this process includes: identifying and characterizing the priority security interests at a facility, testing and evaluating the protection system elements that are critical to the protection of these

interests, and analyzing the impact of deficiencies in these critical system elements to determine the overall status of safeguards and security at the inspected facility.

## **Integration by the CIC Topic Team**

The CIC program is an important part of the overall protection system at a facility. This section provides guidelines to help inspectors coordinate their activities with other CIC elements and with other topics. The CIC program is cross-cutting in nature, interacting with a number of other inspection areas. This interdependence requires close coordination with other topic teams, particularly classified matter protection and control (CMPC), protective force, PSS, personnel security, cyber security, and PPM.

### **Classified Matter Protection and Control**

Significant integration occurs between the CIC team and the CMPC team. The CIC team conducts detailed reviews of classified documents at each site to verify that the documents are classified correctly. As part of the review process, the CIC team reviews document markings, which is a CMPC topic area. Any document marking concerns that are identified during the document review process are communicated to the CMPC team for their action, as appropriate. For example, if a number of NSI documents are found to be incorrectly portion marked, the information is passed to the CMPC team for further investigation. Similarly, if all classified documents are not consistently marked (top, bottom, front, and back), that information is also relayed to the CMPC team.

The CMPC team also reviews documents to determine if they have been appropriately marked. When the CMPC team identifies a potential issue regarding the classification of the documents that they review, this information is given to the CIC team to investigate further. Close coordination between the CIC and CMPC teams ensures that potential issues with classified documents are appropriately evaluated for significance.

### **Protective Force and Physical Security Systems**

Some integration occurs between the CIC team and the protective force and PSS topic teams. Aspects of the physical protection program that the CIC team would typically be exposed to during the document reviews include:

- Physical protection during transfers
- Storage repository, vault, and vault-type room requirements
- Access controls in storage areas
- Physical control of documents in use.

When reviewing the above items during the inspection, physical protection concerns identified by the CIC team should be communicated to the PSS or protective force teams as soon as practical so that their significance can be evaluated.

### **Personnel Security**

At some facilities, security training relating to CIC is an element of the overall security education program administered by the personnel security staff. In such cases, close coordination with the personnel security topic team is essential. The CIC inspection team should coordinate with the personnel security team to determine whether the security education program incorporates materials to educate staff on their responsibility to identify and protect classified matter and to report infractions.

### **Protection Program Management**

Frequently, the PPM topic is inspected in addition to inspecting the management topic in CIC. If inspectors reviewing CIC management encounter any conditions that could be attributed to lack of management attention or inadequate oversight, such conditions should be reported to the PPM topic team for coordination. For example, the failure to provide policies and procedures for generating, preparing, reviewing, and using classified matter, or the failure of self-assessments or surveys to detect and address existing problems in this area, should be communicated to the PPM topic team for further investigation.

### **Cyber Security**

Cyber security inspections are conducted by the Office of Cyber Security Evaluations. A cyber security team might or might not be operating on site at the time of a CIC topic inspection. If the CIC inspection team identifies a problem that requires cyber security expertise, but no cyber security team is on site, the CIC topic lead should coordinate with inspection management to obtain cyber security's assistance.

The Office of Cyber Security Evaluations usually reviews pertinent aspects of the generation and handling of computer-related documents, including storage media and printouts. Because the CIC team also reviews document generation and handling, it frequently touches upon classified computing equipment (generally personal computers), facilities, and practices. Any cyber security items of concern that might require follow-up should be communicated.

Another area for concern is the increasing importance of the protection provided to sensitive information found on unclassified computer networks. While not directly related to the protection of classified matter, problems in the implementation and coordination of the unclassified cyber security program can impact site CIC programs. Poor unclassified computer user security awareness can also be indicative of an overall lack of security awareness or deficiencies in the security education program itself. The failure to develop necessary unclassified cyber security procedures and plans can lead to the revelation that CIC procedures and plans are also lacking. As the unclassified cyber security program matures and changes to meet new security threats, additional interfaces may be identified between the CIC and unclassified cyber security programs.

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## **Section 9: Analyzing Data and Interpreting Results**

### **Introduction**

This section provides guidelines to help inspectors analyze data and interpret the results of data collection. The guidelines include information on the analysis process, including factors to consider while conducting an analysis. Information is also included on the significance of potential deficiencies, as well as suggestions for additional activities when deficiencies are identified. After completing each activity, inspectors can refer to this section for assistance in analyzing data and interpreting results and for determining whether additional activities are needed to gather the information necessary to accurately evaluate the system.

When analyzing the data collected on a particular aspect of the CIC program, it is important to consider both the individual segments of the CIC system and the system as a whole. In other words, the failure of a single segment of a CIC system does not necessarily mean the entire system failed. However, a number of relatively insignificant systemic deficiencies can point to a failure in the entire CIC system. For this reason, integration among topic teams is crucial. Integration provides a glimpse at the “big picture” within the framework of the site mission when determining whether the overall security system is effective.

### **Data Review**

Data review consists of sorting out and logically grouping all validated data collected for each subtopic during each phase of the inspection (remembering that data is collected during the planning process as well as the conduct phase). Although the topic team is generally aware of most of the data, not all team members will be familiar with all data collected. Therefore, it is important for the topic team to review data at the end of each day in order to develop a comprehensive picture of how effectively the CIC program meets requirements. This topic team review is best accomplished while preparing for the daily inspection team meeting. In this way, individual elements of the CIC team can come together to discuss each validated data point, begin the process of analysis, and identify impact as it may exist at that point in time (recognizing that additional data may eliminate, mitigate, or increase the impact of a particular concern).

Generally, arranging the data according to positive or negative features is most effective and aids in clearly identifying strengths, weaknesses, and positive or negative trends. Proper organization and thorough review of all inspection data are essential to analysis and report preparation.

### **Analysis of Results**

The process of analyzing results begins with the first document to be reviewed, briefing received, or person interviewed during planning. A full analysis is not completed until the final inspection report is disseminated. By recognizing this concept early in the inspection process, the topic team can enhance the completeness and usefulness of its analysis.

The information collected for each of the subtopics is reviewed to determine whether the overall CIC program complies with the requirements in DOE orders. In addition to mere compliance, the analysis

process involves the critical consideration by topic team members of all inspection results, particularly identified strengths and weaknesses or deficiencies, framed within the parameters of the site mission. Analysis should lead to a logical, supportable conclusion regarding how well the CIC program is meeting the required standards and satisfying the intent of DOE requirements. A workable approach is to first analyze each subtopic individually. The results can then be integrated to determine the effects of the subtopics on each other and, finally, the overall status of the topic. As mentioned before, it is important to weigh the significance of a weakness or deficiency in light of the entire system.

If no deficiencies are identified, or if those that are identified do not impact the rating, the analysis is relatively simple. In this event, the analysis is a summary of the salient inspection results supporting the conclusion that protection needs are being met. If compensatory systems or measures were considered in arriving at the conclusion, these should be discussed in sufficient detail to clearly establish why they counterbalance the identified deficiencies. Some of these compensating measures may be from other security programs (that is, security systems or the protective force); therefore, the discussions should involve the other topic teams.

If there are negative findings, weaknesses, deficiencies, or standards that are not fully met, the analysis must consider the significance and impact of these factors. The deficiencies must be analyzed both individually and collectively and then balanced against any strengths or mitigating factors to determine the overall impact on the site security system's ability to meet DOE requirements and site mission objectives. Deficiencies identified in other topic areas should be reviewed to determine whether they have an impact on the analysis. Other considerations include:

- Whether the deficiency is isolated or systemic
- Whether the operations office or the contractor management previously knew of the deficiency and, if so, what action was taken
- The importance or significance of the standard affected by the deficiency
- Mitigating factors, such as the effectiveness of other protection elements that could compensate for the deficiency
- The deficiency's actual or potential effect on allowing the loss, compromise, or unauthorized disclosure of classified information.

## **Findings**

Inspection findings are the primary means of identifying elements of the CIC program that have a significant negative impact on the effectiveness of the overall program. Topic teams are normally expected to exercise judgment in determining findings, omitting minor and non-systemic items, and limiting formal findings to items of significance. When several findings address specific aspects of a requirement, the inspection team should determine whether a single rollup finding should be reported that addresses that requirement. Findings should identify the specific nature of the deficiency and should indicate whether the deficiency is specific to a location at the site or to a specific system.

## Ratings

The conclusions reached through the analysis of the CIC program inspection usually result in the assignment of a single rating for the topic. However, subtopic ratings may be required when more than one organization's CIC program is inspected. It may also become necessary to assign ratings to individual subtopics to pinpoint the exact nature of the concerns related to a particular CIC program. The topic team is responsible for assigning ratings; however, approval of final ratings rests with the Office of Health, Safety and Security management.

Guidelines for assigning ratings are:

- **Effective Performance** – Assigned when the system (topic or subtopic) provides reasonable assurance that the identified protection needs are met, other compensatory factors exist that provide equivalent protection, or the impact of any identified deficiency is minimal and does not significantly degrade the protection provided.
- **Needs Improvement** – Assigned when the system only partially meets identified protection needs; provides questionable assurance that the identified protection needs are met; or identified deficiencies are only partially compensated for by other systems or compensatory factors, and the resulting deficiencies degrade the effectiveness of the system.
- **Significant Weakness** – Assigned when the system does not provide adequate assurance that the identified protection needs are met, there are no compensating factors to reduce the impact of identified deficiencies on system effectiveness, and the deficiencies seriously degrade the effectiveness of the system.

## Interpreting Results

### Program Administration

During an inspection, CIC program administration is not to be reviewed based on any particular view of how a program should function. Rather, inspectors should take a results-oriented approach and examine the program in light of the effectiveness of the CIC program and in terms of compliance with DOE requirements. Thus, the primary purpose behind reviewing the management program is not to evaluate management itself as adequate or inadequate, but to use the management review to identify root causes of deficiencies observed in the organization's implementation of DOE policy during the inspection of other CIC program areas. Additionally, deficiencies identified in the management review may cue inspectors to examine corresponding areas more closely. For example, if the results of inspection activities for any requisite classification guidance indicate that findings identified during the previous Independent Oversight inspection have not been adequately addressed, inspectors may wish to closely examine the management tracking system and corrective action plans to determine why.

**Program Administrator.** Deficiencies in any of the management areas of program administration can seriously affect the ability of the CIC program to adequately protect DOE classified security interests because these areas establish the framework within which the organization implements DOE policies and local procedures. If significant problems in this area are discovered, inspectors should attempt to determine whether the deficiencies have resulted in possible vulnerabilities in the protection of classified information. The proper training and education of the program administrator is especially important. The program administrator for a site's CIC program is normally the CO or Headquarters CR. If the

administrator has not been trained and certified in accordance with DOE policy, the overall CIC program may not be adequately protecting DOE sensitive information.

**Locally Issued Procedures.** Deficiencies in locally issued procedures could affect the protection of classified and sensitive unclassified information. The procedures for the review of documents in classified subject areas prior to public release, procedures for self-assessments, procedures for completing CSCS forms, and procedures for submissions to OpenNet are relied upon to ensure proper protection and to prevent inadvertent release of sensitive information. If procedures are not in place or are deficient in the review of documents prior to public release, classified information may be compromised. Inspectors should review documents that have been publicly released to determine whether any compromises have occurred. If classified or sensitive unclassified information has been released, immediate management attention is needed to correct the problem.

### **Authorities**

**Authority Distribution.** The authority distribution element of the inspection determines whether the number, type, and scope of authority, and the distribution of officials are sufficient for the classification and UCNI programs to fulfill DOE directive requirements. The lack of DCs for a particular program area may lead to the compromise of classified information because documents may not be reviewed or may not be thoroughly reviewed by qualified personnel. Inspectors should review information provided in questionnaires and interviews to determine if a problem exists, the extent of the problem, and/or whether mitigating procedures are in place.

**Authority Description.** The letters of authority for OCs, DCs, DDs, and UCNI ROs are their “licenses” to review documents and classify, declassify, or control them as UCNI. The lack of the correct information contained in the letter or the lack of the letter itself does not necessarily indicate that classified information or UCNI has been compromised. However, further investigation is required to determine whether the personnel in question are properly trained and knowledgeable enough in their program areas to make classification, declassification, and/or UCNI decisions. Security infractions may be issued for classifying or declassifying without proper authority.

**Certification.** The certification element involves the inspection of training and examination records. DOE directives require that DCs and DDs are trained and have passed an examination prior to being certified. UCNI ROs are also required to undergo training and pass an examination prior to certification. Inspectors who discover that individuals have been certified without the requisite training should determine the reason. Documents should be reviewed to determine whether the untrained individuals are over- or under-classifying documents, which indicates a serious problem that should be corrected immediately.

### **Guidance**

**Appropriate Guidance.** The appropriate guidance element is evaluated to determine whether each DC, DD, and UCNI RO has access to appropriate up-to-date guidance. DCs, DDs, and UCNI ROs are required to use guides to make classification, declassification, and UCNI determinations. The failure to have the appropriate up-to-date guide on hand could lead to over-classification, under-classification, or improper control of UCNI. When this situation is encountered, inspectors should review documents to determine whether classified information or UCNI has been mishandled or potentially compromised. This is more significant than simply not having the correct guidance.

**Locally Issued Guidance Approval.** The locally issued guidance approval element is evaluated to determine whether locally issued guidance has been approved according to DOE directive requirements. This is primarily a compliance issue. If inspectors determine that the guides have not been approved, the inspectors should determine the extent of the problem. If the guides are being used to make classification decisions, documents need to be located and classified using approved guidance. The use of unapproved guides may lead to the over- or under-classification of documents.

**Locally Issued Guidance Validation.** Inspectors compare all local guides with DOE Headquarters guidance to ensure that there are no contradictions. Sites have 120 days from the date of Headquarters guidance issuance to bring all local guides into compliance. The use of local guides that are out of sync with Headquarters guidance could lead to documents being over- or under-classified.

**Locally Issued Guidance Review.** All local guides are required to be reviewed and updated as necessary every five years. If the reviewer confirms the local guidance is up to date, the record copy of the guide must be annotated with the results of the review. Guides that have been scheduled for cancellation are exempt from this requirement. Inspectors review applicable records and guides to determine whether they are in compliance. Without periodic review, guides can become outdated and lead to over- or under-classification.

**DOE Contract Guidance.** Inspectors review CSCS forms available on the Department's Safeguards and Security Information Management System to verify that contracts that require access to classified information identify the appropriate classification guidance if there is a potential for the generation of classified matter. Inspectors also ensure that the CO, or approved delegate, has certified the information related to the CIC program is correct. If the potential exists for the generation of classified matter, the classification level and category of the classified information should be identified and the appropriate classification guidance should be identified in block 13. The purpose of the form is to document that the classification issues pertaining to the contract have been reviewed by a knowledgeable person and that proper guidance has been provided. If the forms have not been completed satisfactorily, inspectors must interview the CO and the contract personnel to determine whether classified material is handled properly. A finding is issued if there are indications of systemic errors or if a significant percentage of the CSCS forms reviewed: 1) do not identify whether guidance is required in block 13; 2) do not identify correct guidance in block 13; 3) do not have the Classification/Declassification, DEAR 952.204-70 clause marked in block 14; or 4) if the CO or delegate has not certified the form in block 18.

**Work-for-Others Guidance.** The guidance provided in classified WFO projects must be certified as adequate. To verify guidance, inspectors sort the CSCS forms that indicate classified work is performed for other agencies (i.e., WFO) and review block 13 to ensure that classification guidance has been identified for use by the contractor. Inspectors also review block 18 to ensure that the CO, or approved delegate, has certified that the classification guidance identified in block 13 is appropriate for the work to be performed, and to determine whether authorized personnel signed the CSCS form. The purpose of the form is to document that the CO has reviewed the WFO contract and has addressed any classification issues. If the form is not completed properly, inspectors interview the CO, or approved delegate, and contract personnel to determine whether classified material is being handled properly. A finding is issued if there are indications of systemic errors or if an authorized person has not certified that the guidance does not contradict DOE-approved guidance.

## **Training**

**Training Material Content.** Inspectors review training materials to evaluate accuracy and consistency with policy. Training materials should contain all content required by DOE directives. Errors that increase the likelihood of misclassification are discussed with the site point of contact. If inspectors suggest other corrections to training materials, the CO is provided with the suggestions in the form of notes when materials are returned. A finding is issued if inspected training materials are not consistent with manual requirements. A finding is also issued if inspected training materials contain errors that could increase the likelihood of misidentification of classified information or UCNI.

**Classification Overview and Subject Matter Awareness Training.** Deficiencies in attendance records for annual classification refresher and subject matter awareness training could indicate that individuals with a clearance have not received the required annual training or that their training was reported incorrectly. If a person did not attend training, as scheduled, the follow-up process is examined. A finding is issued if a significant percentage of employees did not receive the annual training.

## **Document Reviews**

**Document Reviews.** During document reviews, the document review team examines a cross-section of classified, UCNI, OOU, declassified, and confirmed unclassified documents. Additionally, the team examines upgraded and downgraded documents. The examination determines whether the documents are correctly classified or controlled as UCNI or OOU based on appropriate guidance by an authorized individual and are correctly marked. The number of documents reviewed is a statistically significant sample, and if inspectors cannot determine with 95 percent confidence that 99 percent of the documents are error free, a finding is issued.

**OpenNet.** The effectiveness of the process for OpenNet submissions is evaluated. If submissions to OpenNet have occurred since the last oversight review, OpenNet is queried to ensure that the submission has been published. If the submission has not been published, OpenNet is contacted to determine the reason. If the site is responsible for the delay, the CO is contacted and the issue is further investigated. A finding is issued if no process is in place for submitting bibliographic data for each document that has been declassified and determined to be publicly releasable to the OSTI for inclusion on OpenNet. A finding is also issued if more than ten percent of all documents declassified and determined to be publicly releasable since the last oversight review have not been submitted to OpenNet.

**Large-Scale Reviews.** An LSR plan is required to be submitted to the OC for any declassification review project consisting of 25,000 pages or more. Inspectors determine whether such projects are ongoing and whether appropriate plans have been submitted. A finding is issued if an LSR project is being conducted and a plan has not been submitted to DOE Headquarters.

## **Program Evaluation**

**Self-Assessments.** Completed self-assessments are examined to ensure thoroughness, covering all six required elements, and an objective examination of classification and UCNI programs. Each requirement from the procedures utilized does not need to be addressed in the written report, but deficiencies or areas of concern are noted, and inspectors should discuss them with the CO. A finding is issued if self-assessment reports do not comply with DOE directive requirements. A finding is also issued if self-assessments are not a thorough and objective examination of classification and UCNI programs.

**Oversight Reviews.** Any CO onsite contractor review report must clearly identify deficiencies and require that contractor follow-up actions be implemented in a timely manner. A finding is issued if CO onsite reviews are not conducted every two to five years (there should be justification for extending the onsite reviews past two years). A finding is also issued if onsite review reports do not comply with DOE directive requirements or if onsite reviews are not submitted to appropriate authorities.

**Corrective Action Management.** Team members responsible for program evaluation assess the previous oversight review to determine whether there are deficiencies in the submission and completion of corrective action plans and the respective corrective action resolution. A finding is issued if any findings from previous self-assessments, CO oversight reviews, and the last independent oversight reviews were not corrected in a timely manner.

**Document Review Quality Control.** Documentation of the local document quality control review is assessed to ensure that the sample of documents selected for review includes unclassified, classified, declassified, and UCNI documents. The sample should also include a review of documents at locations other than the classification office. A finding is issued if the annual document quality control review is not conducted according to DOE directive requirements.

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## Appendix A: Data Call

### DATA CALL Classification and Information Control (CIC)

The information listed below is requested to support the Office of Independent Oversight CIC topic team in the conduct of the CIC inspection. This data call is divided into subtopics and the associated program elements (with descriptions and performance expectations) as follows:

- Program Administration: resources, classification and UCNI program administrator, OOU program administrator, performance evaluation, locally issued procedures, deviations
- Authorities: authority distribution, authority descriptions, certification
- Guidance: appropriate guidance, locally issued guidance approval, locally issued guidance validation, locally issued guidance review, DOE contract guidance, work for others guidance
- Training: training material content, classification overview training, subject-matter-related classification awareness briefings
- Document Reviews: document reviews, OpenNet, large-scale reviews
- Program Evaluation: self-assessments, onsite reviews, corrective actions.

Questions should be addressed to Reece Edmonds, Office of Security Evaluations, (301) 903-5118, or [Reece.Edmonds@hq.doe.gov](mailto:Reece.Edmonds@hq.doe.gov).

The following documents and/or information is requested to be **provided by XXXXXXXXXX**. The preferred method is by email to [reece.edmonds@hq.doe.gov](mailto:reece.edmonds@hq.doe.gov). If this is not possible, then send hardcopy via express mail to the Office of Security Evaluations, DOE Headquarters—Germantown Building, ATTN: Reece Edmonds.

Please:

- Respond to all of the questions under “Background Information Requested.”
- Use “Not applicable” if the question does not apply to your organization.
- Provide a copy of the material identified under “Supporting Documentation Required” as attachments.
- Number each attachment and indicate the attachment number under the appropriate question.
- If the “Supporting Documentation Required” does not apply to your organization, indicate “Not applicable” after the attachment identification.

**PROGRAM ADMINISTRATION****Resources****Description**

Sufficient resources and support are available to fulfill the classification and unclassified controlled information program requirements contained in Department of Energy (DOE) directives.

**Performance Expectation**

Resources and support are sufficient to fulfill the requirements contained in DOE classification, Unclassified Controlled Nuclear Information (UCNI), and Official Use Only (OUO) directives.

**Background Information Requested**

1. What resources are available to the Classification Officer (CO) (e.g., four technical analysts, one part-time administrative assistant shared with the division director)?
2. Does the CO receive assistance from another CO (e.g., for training or guidance distribution)?
3. If so, is there a written agreement that describes specifically what support is provided?
4. Is the CO responsible for implementation of the OUO directives in the organization? If not, please provide the name and organization of the individual responsible for OUO directive implementation.
5. Does the CO or staff have any duties not related to classification, UCNI, or OUO? If so, what are they?
6. What percentage of time is spent by the CO (and each staff member) on work related to classification, UCNI, and OUO?
7. Are there adequate resources to ensure the timely completion of all work related to classification, UCNI, and OUO?
8. Has any work related to classification, UCNI, or OUO been delayed or left undone due to pressure of other work or lack of available resources?
9. If so, describe the work that cannot be completed, and explain why it could not be completed (e.g., insufficient resources, other priorities, etc.).
10. Has the CO requested additional resources?

**Supporting Documentation Required**

1. If the CO receives assistance from another CO, provide a copy of the written agreement that describes specifically what support is provided.
2. Provide an organization chart showing the position of the CO and staff in the organization (show chain of command up to the head of the element).

3. Provide an organization chart highlighting the organizations that generate classified material.
4. Provide a list of all classified programs and activities conducted at the organization.

**Program Administrator**

**Description**

Classification and UCNI programs are administered by a CO who meets DOE directive requirements.

**Performance Expectation**

The classification and UCNI programs are administered by an individual who was appropriately appointed and meets DOE directive requirements.

**Background Information Requested**

1. Is there a CO located within the organization?
2. If not, where is the CO located?
3. Is there an agreement for support with the organization where the CO is located?
4. If the CO is not located within the organization, has a Classification Coordinator been appointed?
5. Has the Classification Coordinator attended the required briefing?
6. Does the CO have a scientific or technical degree related to the field in which he/she is working?
7. If so, specify the degree(s).
8. If not, provide a description of the relevant work experience.
9. Is the CO an original classifier (OC) (Federal COs only), derivative classifier (DC), and derivative declassifier (DD)?
10. Has the CO completed the required training?

**Supporting Documentation Required**

1. Provide a copy of the CO's appointment letter and delegations of authority correspondence.
2. If the CO is not located within the organization, provide a copy of the signed agreement for CO services.

**PROGRAM ADMINISTRATION (Continued)****Program Administrator****Description**

OUO programs are administered by an individual consistent with DOE directive requirements.

**Performance Expectation**

An unclassified document originated within a program element must be evaluated to determine whether it contains OUO information.

**Background Information Requested**

1. Is there an individual located within the organization responsible for the OUO program?
2. If not, how is the OUO program implemented?
3. Is there an agreement for OUO program support between the organization and an outside organization?
4. If not the CO, does the individual who implements the OUO program have other duties?
5. Has the person responsible for the OUO program completed OUO-specific training that would enhance implementation?

**Supporting Documentation Required**

1. Provide an organization chart showing where the OUO program administrator is located.
2. If the implementation of the OUO program is the responsibility of an entity that is not located within the organization, provide a copy of the agreement for OUO program support.
3. Provide the percentage of time spent on OUO program implementation compared with the time spent on other assigned duties.

**PROGRAM ADMINISTRATION (Continued)****Performance Evaluation****Description**

The performance contract or other system used to rate personnel performance includes the management of classified information as a critical element or item to be evaluated.

**Performance Expectation**

The performance contract or other system used to rate personnel performance for OCs and all other personnel whose duties significantly involve the creation of classified information (e.g., CO, Classification Coordinator, DC, and DD) includes the management of classified information as a critical element or item to be evaluated.

**Background Information Requested**

1. Are OCs, the CO, and the Classification Coordinator (if appropriate) evaluated on management of classified information?
2. How many DCs' and DDs' duties significantly involve the creation of classified information?
3. How do you determine which DCs and DDs must be rated on management of classified information?
4. Explain how the evaluation is conducted (e.g., annual personnel performance rating system, personnel evaluations based upon the integrated safeguards and security management system, or an organization's internal self-assessment system).

**Supporting Documentation Required**

Provide a list of DCs and DDs who are rated on management of classified information.

**PROGRAM ADMINISTRATION (Continued)****Locally Issued Procedures****Description**

Locally issued procedures are consistent with DOE directive requirements.

**Performance Expectation**

Written procedures issued by the organization are consistent with DOE classification, UCNI, and OOU directive requirements (e.g., procedures for review of documents in classified subject areas intended for public release, instructions for use of DOE Form 470.1, *Contract Security Classification Specification*, etc.).

**Background Information Requested**

Provide a list (in the following format) of **all** the local procedures that implement the requirements of DOE Order 475.2, *Identifying Classified Information*; DOE Manual 475.1-1B, *Manual for Identifying Classified Information*; DOE Order 471.1A, *Identification and Protection of Unclassified Controlled Nuclear Information*; DOE Manual 471.1-1, *Identification and Protection of Unclassified Controlled Nuclear Information Manual*; DOE Order 471.3, *Identifying and Protecting Official Use Only Information*; and DOE Manual 471.3-1, *Manual for Identifying and Protecting Official Use Only Information*, or their corresponding Contractor Requirements Documents.

<u>Procedure Number</u>	<u>Issue Date</u>	<u>Title</u>	<u>Directives Requirements Addressed in Procedure</u>
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**Supporting Documentation Required**

Provide a copy of each of the procedures listed above and other local documents (memoranda, bulletins, etc.) that implement DOE classification, UCNI, and OOU directives.

**Note:** Background information should include every procedure that implements DOE classification, UCNI, and OOU directives. Local procedures may not be required, but those that exist must be consistent with DOE directives.

**PROGRAM ADMINISTRATION (Continued)**

**Deviations**

**Description**

Each approved deviation (variance, waiver, or exception) is reviewed according to DOE directive requirements to determine whether it is still necessary.

**Performance Expectations**

Approved deviations (variances, waivers, or exceptions) are still needed.

**Background Information Requested**

Have any deviations from DOE classification, UCNI, or OOU directive requirements been approved by the Office of Classification, and do they continue to be necessary?

**Supporting Documentation Required**

1. If deviations have been granted and were in effect during any portion of the period being inspected, provide a copy of all correspondence concerning the request and approval of the deviations.
2. Provide a matrix showing each deviation, the deviation subject area, and any alternative activities in lieu of the requirement.

**AUTHORITIES**

**Authority Distribution**

<b><u>Description</u></b>
The number, type and scope of authority, and distribution of officials are sufficient for the classification and UCNI programs to fulfill DOE directive requirements.

<b><u>Performance Expectation</u></b>
Questionnaires and interviews with the CO, DCs, non-DCs, and UCNI Reviewing Officials (ROs) indicate that the number of officials is adequate.

**Background Information Requested**

1. Indicate how many of the following types of officials are employed by the organization (Federal and contractor):

Top Secret Derivative Classifiers:	_____
Secret Original Classifiers:	_____
Secret Derivative Classifiers:	_____
Other Classifiers (specify):	_____
Derivative Declassifiers:	_____
UCNI ROs:	_____
Other:	_____

2. Describe how the number, type and scope of authority, and distribution of officials are determined and how DCs and UCNI ROs are appointed.

**Supporting Documentation Required**

1. Provide a list of all OCs, DCs, and DDs, including name, organization, type of authority, effective date of authority, subject areas covered by the authority, the jurisdiction of authority, the expiration date of authority, and any special instructions or limitations. (NOTE: If the organization in the list is a code, provide a list of the codes with the full title of the organization.)
2. Are any of these DCs on detail from another organization?
3. Provide a list of all UCNI ROs, including name, title, organization, effective date of authority, the expiration date of the authority, if any, and any special instructions or limitations that apply to their authority.
4. Provide an organization chart with the number of OCs, DCs, DDs, and UCNI ROs in each organization identified.

**AUTHORITIES (Continued)****Authority Descriptions****Description**

Each authority description meets DOE directive requirements.

**Performance Expectations**

Authority descriptions accurately identify the person and other criteria identified below, and each authority is approved by the appropriate official:

1. Each OC and DC description of authority includes the individual's name, organization, effective date, the specific subject areas covered by the authority, the jurisdiction of authority, the expiration date, and any special instructions or limitations on the authority.
2. Each DD description of authority includes the individual's name, organization, effective date, the specific subject areas covered by the authority, the jurisdiction of authority, the expiration date, and any special instructions or limitations on the authority.
3. Each UCNI RO description of authority includes the individual's name, title, organization, effective date of authority, and any special instructions or limitations on the authority.

**Background Information Requested**

1. Do all OCs, DCs, DDs, and UCNI ROs receive a written designation of authority that includes the above information?
2. Is classification guidance available for all the subject areas in which authority has been granted?
3. Have you designated any DCs to serve as representatives for their organization to assist the CO?

**Supporting Documentation Required**

1. Provide a sample copy of OC, DC, DD, and UCNI RO appointment correspondence and any accompanying material (i.e., certificate, description of authority, etc.).
2. Provide a list of all subject areas in which authorities have been granted and the classification guidance that covers each subject area.
3. If you have designated any DCs to serve as representatives for their organizations, provide a list with their names and organizations.

**AUTHORITIES (Continued)****Certification****Description**

Each OC, DC, and DD (1) successfully completes required training and an examination prior to being granted such authority, (2) successfully completes an examination for recertification, and (3) is recertified within the required timeframe. Each UCNI RO (1) successfully completes required training prior to being granted such authority.

**Performance Expectations**

1. Records and interviews indicate that each OC, DC, and DD successfully completed training and an examination prior to being granted authority.
2. Records and interviews indicate that each OC, DC, and DD successfully completed an examination for recertification and was recertified within the required timeframe.
3. Records and interviews indicate that each UCNI RO successfully completed training prior to being granted authority.

**Background Information Requested**

1. Did all OCs, DCs, and DDs successfully complete training and an examination prior to being granted authority?
2. What type of training (lecture, one-on-one, computer-based, etc.) was provided to the DCs?
3. Do all UCNI ROs receive training prior to being appointed?
4. How do you recertify DCs (e.g., additional fundamental training, specialized training, testing)?
5. Are recertification letters/memoranda issued?

**Supporting Documentation Required**

Provide a sample notice of recertification requirement and a sample recertification letter/memorandum.

**GUIDANCE****Appropriate Guidance****Description**

Each DC, DD, and UCNI RO has access to appropriate guidance that is current.

**Performance Expectations**

1. Questionnaires, interviews, and onsite reviews of guidance locations indicate that DCs, DDs, and UCNI ROs have or have access to appropriate guidance.
2. Guidance held by DCs, DDs, and UCNI ROs; used by these individuals in shared locations; or in a classification office reference library is up to date (page changes are incorporated into guidance).

**Background Information Requested**

1. Does the CO maintain a library of guides used at the organization?
2. How does the CO determine who needs what guidance?
3. Does the CO maintain a list of guidance that each DC, DD, and UCNI RO uses?
4. Does the CO maintain a list of locations that house shared guidance and which DCs use the shared guidance?
5. How are new guidance and changes to existing guidance disseminated to the appropriate officials?
6. How does the CO ensure that DCs, DDs, and UCNI ROs update their copies of guidance?

**Supporting Documentation Required**

1. Provide a list of all guidance used by the organization.
2. If maintained, provide a list of the guidance each DC, DD, and UCNI RO uses.
3. If there are collections of guides that are shared by several DCs, list the locations of the guide collections and identify the central custodian. If possible, list the DCs or the number of DCs that use the collection.

**GUIDANCE (Continued)****Locally Issued Guidance Approval****Description**

Locally issued guidance has been approved according to DOE directive requirements, and a record of all locally issued guidance is maintained.

**Performance Expectation**

1. Locally issued guidance has been submitted to and approved by the appropriate authority.
2. A record of all locally issued guidance is maintained.

**Background Information Requested**

1. Is there any locally issued classification, UCNI, and OOU guidance?
2. Does the CO maintain or have access to a record of guidance that he or she issues?
3. Do all locally issued guides contain the name of the approving official and the approval date?
4. Have you issued any extracts from guidance for use by DCs?
5. Are there any locally issued special access program (SAP) guides?
6. If so, who approved them?
7. Has the authority to approve locally issued SAP guides been delegated by the Office of Classification to someone in the SAP?

**Supporting Documentation Required**

1. Provide a list of locally issued guidance and all notices and bulletins that supplement this guidance.
2. Provide a list of any extracts from guidance that have been issued for use by DCs.

**GUIDANCE (Continued)**

**Locally Issued Guidance Validation**

**Description**

Locally issued guidance does not contradict DOE directive requirements or DOE-approved guidance.

**Performance Expectation**

A review of locally issued guidance does not find any contradictions with classification policy.

**Background Information Requested**

Is all locally issued guidance up to date? If not, explain.

**Supporting Documentation Required**

Provide a copy of any local guidance that is not in the latest copy of the Classification Guidance System. If such guidance is “close-hold,” indicate that fact and arrange for a copy to be reviewed on site by an authorized person on the CIC Inspection team.

**GUIDANCE (Continued)****Locally Issued Guidance Review****Description**

Locally issued classification guidance is reviewed at least once every five years to ensure that it is up to date and that the review is documented.

**Performance Expectations**

1. All locally issued classification guidance has received a cover-to-cover review in the last five years.
2. The record copy of classification guidance is annotated with the date of the review and the results.

**Background Information Requested**

1. When was each locally issued classification guide reviewed cover to cover to ensure that it is up to date and does not contradict other DOE guidance or policy?
2. If a review revealed that the classification guidance did not contradict other DOE guidance or policy, was the record copy of the guidance annotated to reflect the results and date of the review?

**Supporting Documentation Required**

None.

**GUIDANCE (Continued)****DOE Contract Guidance****Description**

DOE Form 470.1, *Contract Security Classification Specification (CSCS)*, is filled out for contracts performing work that requires access to classified information; all information required by DOE directives is identified; and an authorized person certifies that the information is correct.

**Performance Expectations**

1. Applicable classification guidance for the contract is listed in CSCS block 13, or it contains a statement that a list of guidance is maintained by the CO.
2. If classification guidance is not needed for the contract, a reasonable explanation is included in CSCS block 13.
3. The box for DEAR 952.204-70 in CSCS block 14 is checked.
4. The CO or a delegate certifies that CSCS block 13 is completed correctly and the box for DEAR 952.204-70 in CSCS block 14 is checked.
5. Delegations of authority to certify DOE contract guidance are documented.

**Background Information Requested**

1. What are the procedures to ensure that all CSCS forms for contracts performing work that requires access to classified information are reviewed by the classification office?
2. If there are no written procedures to ensure that the CO receives the appropriate CSCS forms, describe the process.
3. Who processes CSCS forms, and where are completed CSCS forms maintained?
4. Has the authority been delegated to certify that the guidance is correct and that the Department of Energy Acquisition Regulation (DEAR) clause is checked?

**Supporting Documentation Required**

1. Provide a list of DOE contracts in the organization that perform work that requires access to classified information.
2. If there are written procedures for preparing CSCS forms, provide a copy.
3. If the authority to certify that the guidance is correct and that the DEAR clause is checked has been delegated, provide a copy of the delegation correspondence.

**GUIDANCE (Continued)****Work for Others (WFO) Guidance****Description**

Classification guidance that does not contradict DOE guidance is provided by the funding organization for all classified non-DOE-funded work (i.e., WFO).

**Performance Expectations**

1. Classification guidance is provided by the funding organization for all classified non-DOE-funded work.
2. The CO or a delegate reviews the work request and proposed classification guidance and certifies in writing that the guidance does not contradict DOE classification guidance, both before the work commences and when the guidance is revised during the period of performance.
3. If DOE classification guidance concerning National Security Information is used, the funding agency must agree in writing.
4. The CO or delegate has access to a copy of the guidance and any revisions until the work is completed.
5. Delegations of authority to certify WFO guidance are documented.

**Background Information Requested**

1. How does the CO ensure that guidance is provided for non-DOE-funded programs before the work commences and when guidance is revised during the period of performance?
2. Are there procedures to ensure that classification guidance supplied by non-DOE organizations is reviewed to identify inconsistencies with DOE-approved guidance and that it is certified by the CO or delegate?
3. If there are no written procedures, describe the process used to ensure that classification guidance supplied by non-DOE organizations is reviewed to identify inconsistencies with DOE-approved guidance and that it is certified by the CO or delegate.
4. Where are WFO classification guidance certifications maintained?
5. Has the authority to certify non-DOE-funded work guidance been delegated?
6. If so, to whom and in what areas?
7. Does the CO have access to a copy of all non-DOE-funded program guidance?
8. Does the CO keep a list of all non-DOE-funded program guidance that has been approved for use at this facility?
9. Do all WFO projects in a classified subject area have classification guidance covering the work to be performed or a written statement that the work does not involve classified activities?

**Supporting Documentation Required**

1. Provide a list of classified non-DOE-funded contracts in the field.
2. Provide the procedures used to ensure that classification guidance supplied by non-DOE organizations is reviewed to identify inconsistencies with DOE-approved guidance and that it is certified by the CO or delegate.
3. Provide a list of all non-DOE-funded program guidance that has been approved for use by this organization.
4. If the authority to certify non-DOE-funded work guidance has been delegated, provide a copy of the delegation correspondence.

**TRAINING****Training Material Content****Description**

When last presented, training materials were consistent with DOE directive requirements.

**Performance Expectation**

Training material (including initial classification overview training and annual classification refresher training for all personnel authorized access to classified information; OC, DC, DD, and UCNI RO initial training; and OC, DC, and DD recertification training/testing) for the most recent classes or current computer-based training is consistent with DOE directive requirements.

**Background Information Requested**

1. Are training materials reviewed periodically, before each session, or whenever changes in policies are distributed?
2. On what date was each of the following last presented?
  - a. Initial classification overview training for personnel authorized access to classified information
  - b. Annual classification refresher training
  - c. DC initial training
  - d. DD specialized local training
  - e. UCNI RO initial training
  - f. DC recertification training
3. Will any of the above training sessions be conducted during the Oversight review?
4. Does the organization provide any training on OUO?

**Supporting Documentation Required**

1. If any of the above training sessions will be held during the Oversight review visit, list the course and dates. If possible, include the agenda.
2. Provide a copy of the initial classification overview training. Indicate the date it was last used, if other than the date above.
3. Provide a copy of the latest annual classification refresher training. Indicate the date it was last used, if other than the date above.
4. Provide a copy of any material from the most recent training used to train OCs and DCs, including any handouts and tests with answer keys. Indicate the date it was last used, if other than the date above.
5. Provide a copy of the most recent training material used to recertify DCs, including any handouts and tests with answer keys. Indicate the date it was last used, if other than the date above.

6. Provide a copy of any material used to provide specialized local training to DDs. Indicate the date it was last used, if other than the date above.
7. Provide a copy of the training material used to train UCNI ROs, including any handouts and tests with answer keys. Indicate the date it was last used, if other than the date above.
8. If refresher training is given to UCNI ROs, provide a copy of the most recent refresher training material, including any handouts and tests with answer keys. Indicate the date it was last used, if other than the date above.
9. If OOU training is given, provide a copy of the most recent training material, including any handouts.

**TRAINING (Continued)**

**Classification Overview Training**

**Description**

Each person authorized access to classified information receives annual classification refresher training.

**Performance Expectation**

Records indicate that all employees authorized access to classified information receive annual classification refresher training.

**Background Information Requested**

1. Have all cleared employees received annual classification refresher training within the past year?
2. Who maintains the records of attendance at the annual classification refresher training?
3. What measures are taken if someone does not complete the required refresher training?

**Supporting Documentation Required**

None.

**TRAINING (Continued)**

**Subject-Matter-Related Classification Awareness Briefings**

**Description**

Each person authorized access to classified information who is working in a classified subject area receives subject-matter-related classification awareness briefings.

**Performance Expectation**

Records and interviews with personnel indicate that all employees authorized access to classified information working in a classified subject area receive subject-matter-related classification awareness briefings that explain what information is potentially classified in their relevant areas.

**Background Information Requested**

1. Have the appropriate personnel received subject-matter-related classification awareness briefings?
2. Who conducts the briefings (supervisors, DCs, CO, etc.)?
3. Are records of attendance maintained? If so, by whom?

**Supporting Documentation Required**

None.

**DOCUMENT REVIEWS****Document Reviews****Description**

Documents and materials are correctly classified or controlled as UCNI based on appropriate guidance by an appropriate authority and according to DOE directive requirements. Documents and materials are correctly controlled as OOU according to DOE directive requirements.

**Performance Expectations**

1. A survey of randomly selected documents that were reviewed locally within the past five years or since the last oversight review indicates there are no systemic errors in the document review process.
2. For each classified document:
  - a. The determination is correct.
  - b. The correct guidance is cited.
  - c. The individual who made the determination had appropriate authority.
  - d. The classifier marking is correctly completed.
  - e. National Security Information documents contain the special control marking on declassification.
3. For each declassified document:
  - a. The determination is correct.
  - b. The correct guidance is cited.
  - c. The individual who made the determination had appropriate authority.
  - d. The classifier marking is correctly completed.
4. For each UNCI document:
  - a. The determination is correct.
  - b. The correct guidance is cited.
  - c. The individual who made the determination had appropriate authority.
  - d. The UCNI RO marking is correctly completed.
5. For each OOU document:
  - a. The determination is correct.
  - b. The correct exemption is cited.
  - c. The correct guidance is cited, if applicable.
  - d. The OOU markings are correctly applied.

**Background Information Requested**

1. Does the organization have a public reading room? If so, where is it located?
2. Are there major repositories at the organization for classified information? Where are they located? The CIC document review team will need access to these repositories.
3. Are there repositories at the organization that maintain record copies of unclassified documents? Where are they located? The CIC document review team will need access to these repositories.
4. Do these unclassified repositories contain OOU documents? If not, is there some way of locating documents that have been determined to be OOU so the CIC document review team can review them?

5. Does your organization conduct periodic reviews of classified, UCNI, OOU and unclassified matter?
6. Provide the Information Security Oversight Office statistics for the last two years showing the number of documents classified and declassified.

**Supporting Documentation Required**

Provide a list of offices within the organization that generate classified documents, an estimate of the number of classified documents generated annually by each office, and the location of these documents.

**DOCUMENT REVIEWS (Continued)****OpenNet****Description**

All required information for each document that has been declassified and determined to be publicly releasable is submitted to the Office of Scientific and Technical Information (OSTI) for inclusion on OpenNet.

**Performance Expectations**

1. There is a process for submitting information for each document that has been declassified and determined to be publicly releasable to OSTI for inclusion on OpenNet.
2. The required information on documents declassified and determined to be publicly releasable since the last Oversight review has been submitted to OpenNet.

**Background Information Requested**

1. How many documents have been submitted to OSTI since the last Oversight review?
2. Who/what office has responsibility for submitting data to OSTI?
3. Have bibliographic references and locations where the documents are available to the public been submitted to OSTI for all eligible documents?

**Supporting Documentation Required**

If there are written procedures for submitting bibliographic data on documents that have been declassified and determined to be publicly releasable to OSTI for entry on OpenNet, provide a copy (if not provided under **Locally Issued Procedures**).

**DOCUMENT REVIEWS (Continued)**

**Large-Scale Reviews**

**Description**

The CO has notified the appropriate authority of any declassification review that exceeds 25,000 pages. If a plan was submitted, it is being followed.

**Performance Expectations**

1. All existing LSRs are covered by approved plans, when required.
2. LSR plans are being followed.

**Background Information Requested**

1. Are there any ongoing LSRs, or have any LSRs been conducted since the last Oversight review?
2. Was an LSR plan submitted, and if so, is it being followed?

**Supporting Documentation Required**

If the organization has an approved LSR, provide a copy of any notification correspondence and a copy of the plan.

**PROGRAM EVALUATION****Self-Assessments****Description**

A written self-assessment is conducted in accordance with DOE directive requirements.

**Performance Expectations**

1. Self-assessments are conducted every two years.
2. Self-assessments cover the areas required by DOE directives.
3. Self-assessments include subordinate Federal and contractor organizations that do not have a CO but do have DCs or DDs.
4. A written report is prepared.

**Background Information Requested**

1. Does the CO perform a self-assessment every two years?
2. When was the last self-assessment conducted?
3. Are self-assessments conducted as part of security surveys or as a separate classification self-assessment?
4. Do the self-assessments cover the following areas: Management Responsibility, Authorities, Guidance, Training, Document Reviews, and Program Evaluation?
5. When is the next self-assessment scheduled?

**Supporting Documentation Required**

1. Provide a copy of any procedures concerning the self-assessment program (if not provided under **Locally Issued Procedures**).
2. Provide copies of all classification self-assessments conducted since the last Oversight review.
3. Provide a schedule for future self-assessments by the organization and subordinate elements.

**PROGRAM EVALUATION (Continued)****Onsite Reviews****Description**

An onsite review of each subordinate organization with a CO is conducted in accordance with DOE directive requirements.

**Performance Expectations**

1. Onsite reviews of each subordinate organization with a CO are conducted at a frequency that conforms to DOE directive requirements.
2. Onsite reviews are documented in a written report.
3. Corrective action plans are developed for any deficiencies noted.

**Background Information Requested**

1. Are there any subordinate organizations for which you must conduct an onsite review?
2. What areas are evaluated by the onsite review?
3. What was the date of the last onsite review you conducted of each subordinate organization, and when are future onsite reviews scheduled?
4. How is the frequency for conducting onsite reviews determined?
5. What are the procedures for conducting onsite reviews?
6. Are the results of all onsite reviews documented in written form (e.g., a review report)?
7. Are corrective action plans developed for any deficiencies noted?
8. Are there documented procedures for monitoring the status of all required follow-up actions?
9. Do all onsite reviews include reviews of a random sample of classified documents, unclassified documents, documents reviewed for declassification, and documents marked as containing UCNI?

**Supporting Documentation Required**

1. Provide a list of all contractors doing classified or UCNI work.
2. Provide any documented procedures for conducting onsite reviews (if not provided under **Locally Issued Procedures**).
3. Provide a copy of the most recent onsite review of each subordinate organization.

**PROGRAM EVALUATION (Continued)****Corrective Actions****Description**

Appropriate corrective actions are taken in a timely manner to address findings from previous Oversight reviews.

**Performance Expectation**

Adequate corrective actions were implemented in a timely manner.

**Background Information Requested**

1. Have all corrective actions been completed for deficiencies identified during the previous Oversight review of your organization?
2. Are contractors required to submit corrective action plans for deficiencies discovered during your onsite reviews of them?
3. Have all corrective actions been completed for deficiencies identified in your onsite review of contractors?
4. Do you have a procedure for tracking corrective action plans and completing corrective actions?

**Supporting Documentation Required**

1. Provide the corrective action plan for all deficiencies from the previous Oversight review of your organization and the status of the corrective actions.
2. Provide the corrective action plan for all deficiencies from your onsite reviews of contractors and the status of the corrective actions.
3. Provide any procedures for tracking corrective action plans and completing corrective actions (if not provided under **Locally Issued Procedures**).

## Appendix B: Interviews

### Introduction

Interviews are one of the most important sources of information in the Oversight review process. Rather than duplicate or replace the background information requested, interviews are used to assist in determining the facts and confirming or refuting information gathered prior to the site visit. Interviews require time, but this is usually time well spent. A good interview exchange provides valuable information for the interviewer.

All interviews are documented on interview worksheets. There are interview worksheets for derivative classifiers (DCs) and non-DCs. The interview worksheets are organized to: 1) assist the interviewer in gathering information on specific components and requirements, and 2) provide a basis from which to easily compare and analyze information from multiple interviews. Use of worksheets with pre-determined questions to guide observations and conclusions can significantly ease the job of preparing the final report for an oversight review.

At the end of each day, interviewers should review the interview worksheets and summarize the results. If the summary reveals a potential issue in a component or with a specific requirement, including any classification or UCNI issues, the interviewer should inform the Team Lead so the appropriate individuals can be notified.

### Interviewees

The classification officer (CO), management, classification office staff, original classifiers, DCs, derivative declassifiers (DDs), UCNI ROs, person(s) responsible for contract security classification specification (CSCS) forms, person(s) in other organizations responsible for classification-related training, and other non-DCs are interviewed during the onsite visit. Interviews may provide data related to multiple requirements, including requirements in the program administration, authorities, guidance, program assessment, and training components.

#### Classification Officer Interviews

The CO interviews are used to evaluate whether resources are sufficient and used efficiently. Locally issued procedures, such as the procedure for public release of documents in classified subject areas, are discussed. The guidance distribution method, currency of guidance on hand, and local guides are also discussed. The following specific issues are addressed during an interview:

- Adequacy of the number of officials by locations and subject areas
- Process for certification and recertification
- Quality control of DC determinations
- Self-assessments
- Oversight reviews of subordinate organizations
- Deviations from the U.S. Department of Energy (DOE) Order 475.2 and DOE Manual 475.1-1B
- Large-scale reviews
- Locally issued guidance review

- DOE classified contracts
- Work-for-others guidance certification method
- Training program
- Non-classification responsibilities.

### DC Interviews

Interviews with DCs assist in gathering information for several components. DCs are chosen from a variety of organizations and should not include staff from the classification office. To prepare for DC interviews, the team members should have the most recent copy of the *Index of DOE Headquarters Classification Guidance*. Team members should also have reviewed the DC list to be familiar with the available information about the DCs they interview. Reviewing this information allows the interviewer to address any specific issues raised by the DCs in the questionnaire and explore any other issues that may arise during the interview.

During the interview, team members inspect the letter of authority and guidance in the DC's possession. Letters of authority must be current and must indicate an expiration date and authorized subject area(s). Interviews with classification and UCNI officials are specifically used to verify that:

- Each original classifier, DC, and DD has successfully completed training and an examination prior to being granted authority.
- Each original classifier, DC, and DD has successfully completed an examination for recertification and has been recertified within the required timeframe.
- Each UCNI RO has completed training prior to being granted authority.

Each DC should also have appropriate guidance on hand. Guidance in each DC's possession should be compared to the subject areas of authority. If guidance appears to be outside the areas of authority, determine whether the DC uses the guidance for reference or to make determinations. Any concerns are noted and addressed with the CO.

Guidance in the DC's possession should also be up to date and should incorporate the most recent changes from DOE Headquarters. If the DC uses guides in a shared location not scheduled for inspection, guidance at that location should be inspected, and a note made of the approximate number of DCs who use the guidance at that location.

Team members should also question DCs about the effectiveness of their initial classification training, annual classification overview training, and derivative classification authority certification and recertification training. The process for notifying DCs about authority expiration and annual classification overview training should also be discussed.

### Non-DC Interviews

Interviews with non-DCs are a useful tool in determining the effectiveness of a classification program. During interviews with non-DCs, the following are assessed:

- Is the person familiar with procedures for classification review, including documents, e-mail, material intended for widespread distribution, and material for oral presentations?

- How often does the non-DC create documents that they are certain are unclassified?
- How often does the non-DC create documents that require classification or UCNI review?
- Did the non-DC receive annual classification overview training regarding document classification?
- How effective was the training? Was it sufficient?
- Does the non-DC have any suggestions for improvements to training?

## **Interview Techniques**

Interview techniques and interpersonal communication skills are important. As with the overall Oversight review, careful planning is important for a successful interview. Almost any interview will be more successful if time is taken to establish objectives, general methods, and techniques.

### **Planning the Interview**

The experienced interviewer plans as carefully as possible by reviewing the background information provided in the data call. The list of officials can be used to determine the individual's authorities, subject areas, and the guides in his/her possession. Prior to the interview, the interviewer should note on the interview worksheet any areas requiring emphasis.

### **Conducting the Interview**

The interviewer should adapt the interview to the persons involved. However, it is important to use the interviewing techniques to their maximum effectiveness. These techniques include:

- Questioning
- Listening
- Observing
- Evaluating.

Begin each interview with an introduction and explanation of purpose. At that time, the interviewer should ask the interviewee about his/her position, responsibilities, and employment with the organization. This serves as an "icebreaker" and helps the interviewer gauge the individual's personality and perceptions. Using the worksheet as a guide, the interviewer should ask straightforward, relevant questions that will yield specific answers. The interviewer should not ask vague or misleading questions, take excessive notes (which is distracting), or show approval or disapproval. Ideally, the interviewee should participate freely and thoroughly.

Following the interview, the interviewer should draft a copy of the general impression of the interview, including any possible findings or comments. This should include the general subject area knowledge or lack thereof, any interviewee comments or suggestions (e.g., "I wish we had more training"), and general impressions. The interviewer must consider that the interview procedure may, in some cases, provide most of the information for the final report.

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