

# Foreign Visits/Assignments from the Laboratory Standpoint

UEC Meeting

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BNL Foreign Visits Administrator

# In the Beginning ...

- DOE O. 1240 - 1240.2B
  - BNL was partially exempted and only required to provide monthly statistics on numbers of foreign national guests by citizenship
  - Later, was required to enter sensitive country nationals into a DOE database (VAMS & FARMS)

# Notice and Policy 142.1

- Directives dated July 14, 1999
  - Drastic change from previous requirements – eliminated partial exemptions
  - Established requirements to document and approve – all visits/assignments
  - Allowed some Lab discretion on implementation
  - Continued to exempt 7 sites

# How BNL Implemented N. & P. 142.1

- Established a review and approval process
- Re-defined some security areas
- Developed Lab Standard Practice Instruction as “Generic” Security Plan
- Submitted 4 deviation requests
- Postponed implementing “Host Reports”
- Entered all FVA requests into FACTS

# SO-24 (SO-30) and Site Administrators Interactions

- 1999 – 2000 Annual and Semi-Annual Workshops and several Tele-conference
- Volunteer policy development committee
- Designated regional “Facilitators”
- Traveling FACTS training sessions
- Encouraged and provided technical support to implement interfaces with legacy systems

# Drafted Pilot Program

- SO-30 initiated the idea of a “pilot site” utilizing a “graded approach” with BNL
- Concurrence and input from SO-30, Office of Science, Oversight Office, Area Office, Site Counterintelligence, and Site Scientific Staff (OPSEC Chair/Export Control)
- Officially submitted January 2001 – program offices reviewed and commented on the “pilot”

# 1<sup>st</sup> Draft Order 142.X

- Posted in RevCom July 2001
- Incorporated the “graded approach” within the sites
- Allowed “non-work-related activities” to be open to the public
- Required requests to be approved, managed, and documented in FACTS – but did not specify prior to granting access

# Counterintelligence Pilot Program for *Visits*

- Memorandum 01/10/2001 - Allowed *visits* (under 30 days) to begin site access prior to the completion of background checks
- Positive impact on 4 sites – BNL, PNNL, Argonne East, and Oak Ridge
- Incorporated fully in 1<sup>st</sup> version and mentioned with restrictions in 2nd DRAFT
- Still in effect through Memorandums

# Inspector General (IG) Survey

- Conducted week of June 3<sup>rd</sup>, 2002 with a follow up review in August 2002
- Official Audit Report in December 2002
- Concerned most with verifying “legal status” and recording INS information
  - Satisfied this for employees and visas that BNL sponsored
  - Insisted that INS information be documented

# Lab Director Compliance Memorandum

- Issued October 4, 2002
  - Required BNL to come into “full” compliance by Dec. 2, 2003
  - Mandated automated Visit/Assignment requests
  - Individual Specific Security Plans
  - Host Reports
  - Verification of INS documents
    - » Established 5 check-in points with staff trained in identifying various INS documents

# Badge Scanning System

- Implemented November 2002 to allow up to a 2yr assignment and badge
  - Badge expiration date
  - Appointment status
  - Passport fields
  - Visa fields
  - Provides checks and balances

# Kyle McSlarrow Memorandum

- Dated December 17, 2002
  - Required documentation of request and approvals in FACTS *prior* to allowing site access
  - Definition of sensitive country national modified – *born in*
  - Required the 7 sites to process assignments of sensitive country nationals and visits that require access to sensitive subjects
  - Verify and document in FACTS – INS docs.

# 2<sup>nd</sup> Draft Order 142.X

- Posted to RevCom on Sept. 7, 2003
  - Much more restrictive than previous draft
  - Utilized “Graded Approach” by Lab type (tier)
  - Basically, eliminates open to the public events
  - Annual and Semi-annual reviews of INS docs.
  - “...passport that is valid for a minimum of 6 months beyond the initial period of stay in the US.”
  - Host “...directly responsible for the day-to-day activities ...” and, “...must be identified to the visitor or assignee as his/her day-to-day POC and must meet ...”

# BNL Achievements

- Guest Information System (GIS) – all requests, reviews, and approvals automated
- Automated Security Plans – generated by GIS based on 3 fields and attached to request
- Check-in points with trained staff – only people who can authorize a BNL ID
- Badge Scanning system
- Partial Interface between GIS and FACTS

# Problem Areas

- New Draft Order 142.X
  - Open to Public definition
  - Host requirements
  - Documenting INS info in FACTS prior/access
  - Evaluate and certify the entire site in order to meet the “Graded Approach”
- Annual/Semi-annual requirement
- Host Reports – Close –outs and Program Secretarial Offices
- Documenting in FACTS prior to approvals