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FEDERAL BUREAU OF INVESTIGATION
POLICY DIRECTIVE

0535D

1. Policy Directive Title.	Unofficial Contacts and Reporting Requirements
2. Publication Date.	2013-01-14
3. Effective Date.	2013-01-14
4. Review Date.	2019-01-14
5. Date of Last Renewal.	03/02/2016

6. Authorities:

- 6.1. Executive Order (EO) 10450, "Security Requirements for Government Employment."
- 6.2. EO 12968, "Access to Classified Information."
- 6.3. Intelligence Community Directive 704, "Personnel Security Standards and Procedures Governing Eligibility for Access to Sensitive Compartmented Information and Other Controlled Access Program Information."
- 6.4. Intelligence Community Policy Guidance (ICPG) 704.2, "Personnel Security Adjudicative Guidelines for Determining Eligibility for Access to Sensitive Compartmented Information and Other Controlled Access Program Information."
- 6.5. National Industrial Security Program Operating Manual (NISPOM), re-issued on 02/28/2006, as required by Executive Order 12829 and under the authority of DoD Directive 5220.22-M, "National Industrial Security Program (NISP)." NISPOM, Chapter 1, Section 3, Reporting Requirements, Paragraph 1-302(b) Suspicious Contacts.
- 6.6. Attorney General's Guidelines Regarding the Use of FBI Confidential Human Sources, dated 12/13/2006 (effective on 07/13/2007).

7. Purpose:

This policy sets forth guidance and procedures for all FBI personnel to report unofficial contacts with foreign nationals or individuals who are or suspected of engaging in criminal or terrorist activities.

8. Policy Statement:

- 8.1. All FBI personnel must report unofficial contacts with foreign nationals. They must also report unofficial contacts with individuals who are or suspected to be engaging in criminal or terrorist activity.
- 8.2. FBI personnel must report these contacts through the Enterprise Process Automation System (EPAS) using the FD-981 (Report of Foreign Contact) or FD-1078 (Personnel Self Reporting Requirements) form.
- 8.3. (U) Unofficial contacts may develop in person or through interaction between parties via written or electronic communication (e.g., the Internet, letter, or telephone).
- 8.4. (U) Any FBI personnel's willful failure to comply with the provisions of this directive may result in a reevaluation of his/her eligibility for a security clearance or FBI accesses.

9. Scope:

This policy applies to all FBI personnel. (See Section 15.4 for definition of FBI personnel)

10. Proponent:

Clearance Passage and Sub-Programs Unit (CPSU), Internal Security Section (ISS), Security Division (SecD)

11. Roles and Responsibilities:

11.1. All FBI personnel must:

11.1.1. Report suspicious, unusual, or unexpected contacts involving foreign nationals.

11.1.2. Report suspicious, unusual, or unexpected contacts involving individuals engaged in or associated with criminal or terrorist activities.

11.1.3. Report these unofficial contacts within 72 hours using the EPAS FD-981 form for foreign nationals or the FD-1078 form for individuals, including foreign nationals.

11.1.3.1. Such contacts are further described as follows:

11.1.3.1.1. [Redacted]

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11.1.3.1.2. [Redacted]

11.1.3.1.3. [Redacted]

11.1.3.1.4. [Redacted]

11.1.4. Report other unofficial contacts with foreign nationals within five business days via the EPAS FD-981 form.

11.1.4.1. Report any [Redacted] including the specific details of the [Redacted] as follows:

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11.1.4.1.1. [Redacted]

[Redacted] field of the EPAS FD-981 form

11.1.4.1.2. [Redacted]

[Redacted] field of the EPAS FD-981 form, as warranted

11.1.4.1.3. If the initial FD-981 form has been completed or finalized by CPSU [Redacted]

[Redacted] submit a second FD-981 form with the updated information. Reference the initial EPAS FD-981 ticket number [Redacted] section of the second EPAS FD-981 form

11.1.4.1.4. [Redacted]

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11.1.4.1.5. Be aware that [Redacted]

11.1.5. Report within five business days, via the EPAS FD-1078 form, any unofficial contacts who are, or who are suspected of engaging in criminal or terrorist activities. For purposes of this policy, criminal and terrorist activities include felonious, violent acts and ongoing misdemeanor violations.

11.1.6. Note: Unofficial contacts do not typically include routine commercial transactions for goods or services or unavoidable casual or ad hoc encounters, such as in restaurants or retail shops, during community or sporting events, or though sporadic purchases or contacts via the Internet. Casual contacts or associations arising from living in a community or while attending a house of religious worship do not normally need to be reported to the FBI.

11.1.7. After reporting unofficial contacts:

11.1.7.1. Provide and report updates, via the EPAS FD-981 or FD-1078 form, when there are

substantive or relevant changes in the nature or purpose of the previously reported relationships or associations.

11.1.7.2. Obtain guidance from the Chief Security Officer (CSO), as needed, particularly regarding changes in the nature or purpose of the previously reported contacts that have evolved or are evolving into different kinds of contacts as defined in Section 15.

11.2 CSOs must:

11.2.1. Receive and review all EPAS FD-981 and FD-1078 forms submitted by FBI personnel.

11.2.2. Conduct appropriate Personnel Security Interviews (PSIs), as needed, regarding unofficial contacts.

11.2.3. For FBI field office personnel, conduct record checks regarding unofficial contacts as follows:

11.2.3.1. [Redacted]

11.2.3.2. [Redacted]

11.2.3.3. [Redacted]

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11.2.4. For field office and FBIHQ personnel, process and submit all EPAS FD-981 and FD-1078 forms with supporting documentation to CPSU for review, processing, and appropriate action.

11.2.5. Conduct annual security awareness briefings (SABs) for FBI personnel, including notification of the reporting requirements of this policy.

11.3. CPSU must:

11.3.1. Receive, process, and review all EPAS FD-981 and FD-1078 forms regarding unofficial contacts and any suspicious, unusual, or unexpected contacts involving individuals identified in this policy.

11.3.2. For FBIHQ personnel, conduct record checks regarding unofficial contacts with individuals identified in this policy as follows:

11.3.2.1. [Redacted]

11.3.2.2. [Redacted]

11.3.2.3. [Redacted]

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11.3.3. For FBIHQ and field office personnel, conduct additional record checks as needed regarding these individuals through the following:

11.3.3.1. [Redacted]

11.3.3.2. [Redacted]

11.3.3.3. [Redacted]

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11.3.4. Make risk assessments regarding security issues identified during the investigative and review processes.

11.3.5. Risk assessments associated with [Redacted]

[Redacted]

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11.3.6. Submit all high-risk cases involving unofficial contacts; willful non-compliance with this policy; any suspicious, unusual, or unexpected contacts; and/or substantive foreign influence issues [Redacted]

[Redacted]

11.4 [Redacted]

11.4.1 [Redacted]

[Redacted]

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11.4.2. In high-risk cases, determine whether the facts and circumstances raise acceptable or unacceptable risks to the national security interests of the United States.

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[Redacted]

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12. Exemptions:

None

13. Supersession:

Security Policy Manual (SPM), Section 2.24, Foreign Contacts

14. References, Links, and Forms:

14.1. References

14.1.1. International Operations Division Policy Directive and Policy Guide (IOPG) 0531DPG14.1.2. Official Foreign Contacts, Policy Directive 0466D14.1.3. Ethics and Integrity Program Policy Guide 0754DPG (FBI Ethics Guide)14.1.4. Confidential Human Source Policy Guide 0836PG, Sections 4-18

14.2. Links

14.2.1. SecD Web site

14.3. Forms

14.3.1. FD-981: Report of Foreign Contact form14.3.2. FD-1078: Personnel Self-Reporting Requirements form**15. Key Words, Definitions, and Acronyms:**

15.1. Key Words

15.1.1. Designated countries

15.1.2. Foreign nationals

15.1.3. Official foreign contacts

15.1.4. Unofficial contacts

15.2. Definitions

15.2.1.

15.2.2. Association: coming together of individuals or social and/or professional interaction between persons.

15.2.3. Close or Personal: involving or having an ongoing relationship, friendship or voluntary association because of shared personal interests or obligations.

15.2.4. FBI Personnel: employees, interns, contractors, consultants, joint task force (JTF) and joint terrorism task force (JTTF) members, and other government agency (OGA) personnel who are assigned or detailed to FBI workspaces; who are authorized for unescorted FBI facility access privileges; and/or who maintain access to FBI protected information, information technology (IT) and information security (IS) systems, essentially the same as their FBI employee counterparts.

15.2.5. Foreign National: an individual who is not a U.S. citizen.

15.2.6. Intimate: close, personal, loving, or sexual relationship.

15.2.7. Official Contacts: ongoing and professional relationships or associations that are required and linked directly with official FBI business, duties and/or responsibilities.

15.2.8. Ongoing or Continuing: a relationship or association having been developed, or in progress for some time, or taking place at the present time, and likely to be recurring in the future.

15.2.9. Professional: a relationship or association having been developed or initiated and maintained because of official FBI business, duties, or responsibilities.

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15.2.10. Relationship: an emotional or close friendship, which may or may not involve sexual activity; an ongoing and professional or social association; or the way in which two or more persons or family members are related by birth, adoption, or marriage.

15.2.11. Unofficial Contacts: ongoing, close, personal, intimate, or familial relationships or voluntary associations and friendships.

15.2.12. Voluntary: arising, acting, or resulting from a person's own choice or decision rather than because of an official assignment or external pressure or force.

15.3. Acronyms

15.3.1. [Redacted]

15.3.2. CD: Counterintelligence Division

15.3.3. [Redacted]

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15.3.4. CPSU: Clearance Passage and Sub-Programs Unit

15.3.5. CSO: chief security officer

15.3.6. CTD: Counterterrorism Division

15.3.7. [Redacted]

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15.3.8. ECF: electronic case file

15.3.9. EO: executive order

15.3.10. FNI: Foreign National Information

15.3.11. ICPG: Intelligence Community Policy Guidance

15.3.12. IS: information security

15.3.13. ISS: Internal Security Section

15.3.14. IT: information technology

15.3.15. JTF: joint task force

15.3.16. JTTF: joint terrorism task force

15.3.17. NCIC/III: National Crime Information Center/Interstate Identification Index

15.3.18. NISP: National Industrial Security Program

15.3.19. NISPOM: National Industrial Security Program Operating Manual

15.3.20. OGA: other government agency

15.3.21. [Redacted]

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15.3.22. PSI: Personnel Security Interview

15.3.23. SAB: security awareness briefing

15.3.24. SecD: Security Division

15.3.25. SPM: Security Policy Manual

15.3.26. UNI: universal index

16. Appendices and Attachments:

None

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