



Exceptional service in the national interest

DOE Gen-16 Rev 2 “No Comment” Policy

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Safeguards & Security Awareness Program



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Before We Begin

- Teams Etiquette
 - Mute mics unless you have a question, comment, or concern.
 - Participation is key. Be focused. Don't multi-task.
 - Share your perspective during the activity.
 - DCs, provide unclassified program guidance when applicable.
- Discussion Guidance
 - Discussion must be unclassified.
 - No specifics of incidents or GEN-16 situations.
 - Off-line discussions are available.
- Discussion Resource
 - [Understanding Classification factsheet](#)

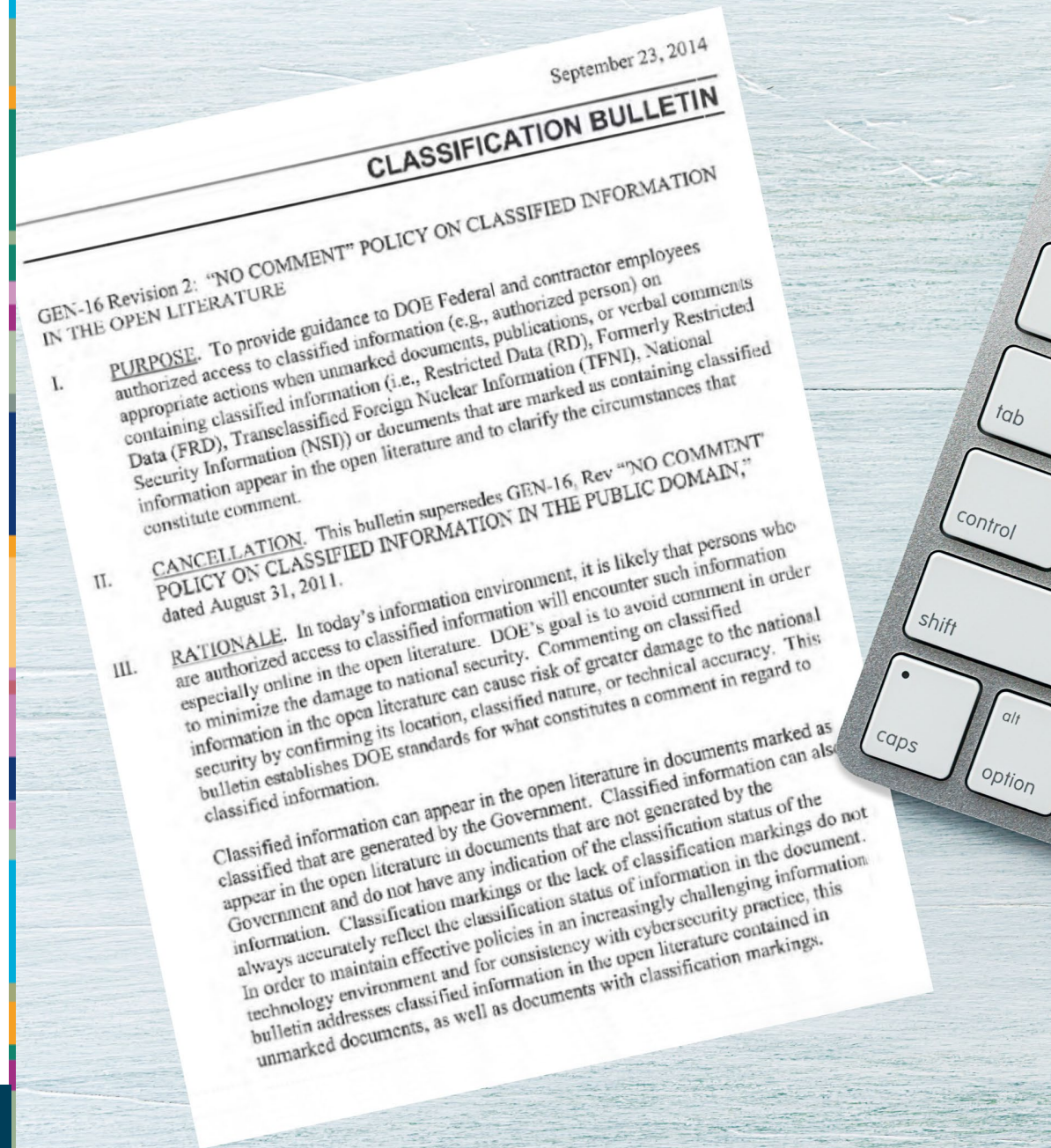


Why?

- The U.S. DOE Classification Bulletin Gen-16 Rev 2, “No Comment” Policy on Classified Information in the Open Literature (6/2/14) provides guidance to cleared DOE employees, contractors and subcontractors on what to do if they encounter classified information in the open literature.
- If a cleared Member of the Workforce (MOW) comments on classified information, it creates a greater risk to national security by drawing attention to the information, confirming it is classified or confirming the technical accuracy of the information.
- Cleared MOW must know how to handle inadvertent or unintentional contact with classified information in the open literature.
- Cleared MOW with additional caveats must follow their program’s more restrictive requirements.



If you don't know, ask.



The DOE Gen-16 Rev 2 “No Comment” Policy is:

- intended to make you aware that documents in the open literature that deal with a classified subject area could contain classified information.
- intended to alert you how comments on sources in the open literature can risk the compromise of classified information.
- NOT intended to prevent you from discussing every aspect of your work or from using all sources in the open literature.

Commenting can add credibility or validity to information in public venue and reveal classified.



Terms

- **Classified information:** Information classified by statute or Executive Order, such as Restricted Data (RD), Formerly Restricted Data (FRD), Transclassified Foreign Nuclear Information (TFNI), and National Security Information (NSI).
- **Open literature:** Information outside of the Federal Government. Information that is copyrighted as well not copyrighted. Does not include information sent to other Agencies (interagency communication).
- **Comment:** Any activity that could potentially allow an unauthorized person to locate classified information or confirm the classified nature or its technical accuracy.
“Pointers” information that identify, expand upon, or confirm that an item is classified.
- **Authorized Person:** Individual with a clearance.



Your Impact on National Security

- Don't underestimate the value of your contribution.
 - You are a DOE-cleared individual, and work at one of the nation's premier National Laboratories.
 - Others may not feel certain of what they see or hear about Sandia, its work, or other national security topics until you comment on it.
 - Our Adversaries are constant in their efforts to steal from us or undermine our efforts. What you say or do can impact our nation's nuclear weapons programs and warfighters.
- Know how to handle circumstances when classified information (marked or unmarked) in the open literature is inadvertently viewed, stored, or printed.
 - You may have to give briefings or attend discussions with uncleared individuals. Be ready for questions about classified information.
 - You may be conducting research using sources from the open literature containing classified information. Be aware of when and how you may cite those resources.



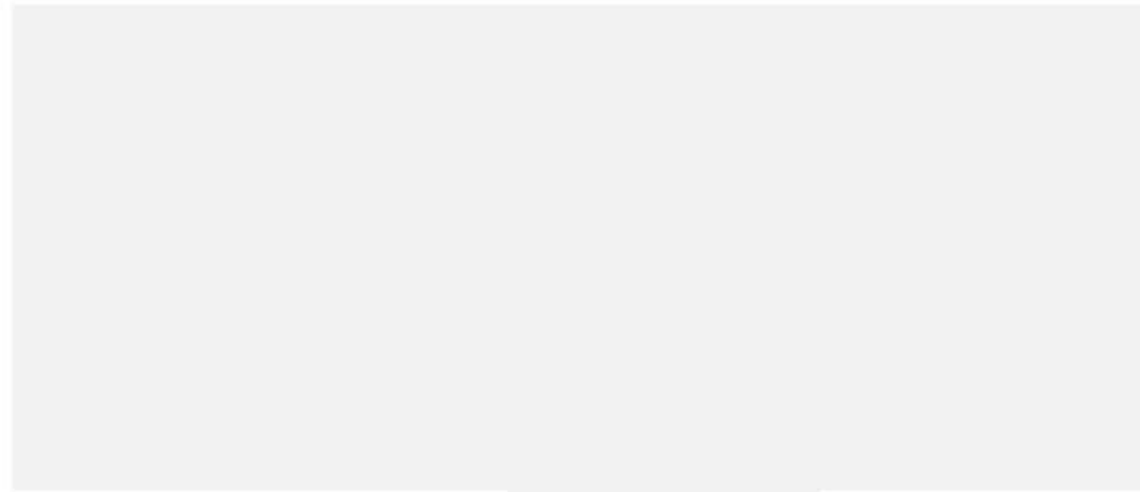
We all want the same thing:
To keep classified information from
getting into the wrong hands.

ACTIVITY

TRUE or **FALSE**



The following scenarios occur in areas not approved for classified.



You are giving an **unclassified** presentation at a **public** forum and you get asked this question: “About how much Uranium is in a nuclear weapon?”

Your response is: “I’m not sure what I can or cannot say about this; so I **will not comment.**”
Your response **is** an appropriate use of the No Comment Policy.

Questions, Comments, Concerns?



True

You find information on the **Internet** that you believe is classified, but **not marked**.

You can **read and print** this information if you **do not** imply the information is **classified** or **technically accurate**?

Questions, Comments, Concerns?

True




You find information on the **internet** that is **marked** classified.

You can **forward** the link to another person to have them check it out.

Questions, Comments, Concerns?

False





You **collect** open literature publications or web pages in **general** subject areas of interest, and you **know** that **some** of them have **classified** information in them.

You **do not** include **summaries** of any of the publications. You have violated the No Comment Policy.

Questions, Comments, Concerns?

False

You **link** to a **public** webpage that contains unmarked classified information in **one** of the paragraphs.

You **email** this **link** to someone in Sandia with a note "**FYI.**" You have not violated the No Comment Policy.

Questions, Comments, Concerns?

True

The background of the slide features a dark, blurred image of hands typing on a laptop keyboard. A large, semi-transparent blue envelope icon is overlaid on the right side of the image, pointing towards the text on the left. The overall aesthetic is professional and tech-oriented.

You own a **book** that is in the **open literature** about nuclear weapons that contains **some classified** information.

You **loan** the book to a coworker to read.
You have violated the No Comment Policy.

Questions, Comments, Concerns?

False

You own a **book** that is in the **open literature** concerning the development of nuclear weapons that **contains classified** information.

You have **added** personal **notes** in the margins concerning the **technical accuracy** of the technical details. You have violated the No Comment Policy.

Questions, Comments, Concerns?

True

We Can Do Better

You must be **Knowledgeable and Confident** that information (from open literature or not) is unclassified before disseminating it in unclassified venues (per SS002). Otherwise it must be reviewed by a DC.

Knowledgeable and Confident means:

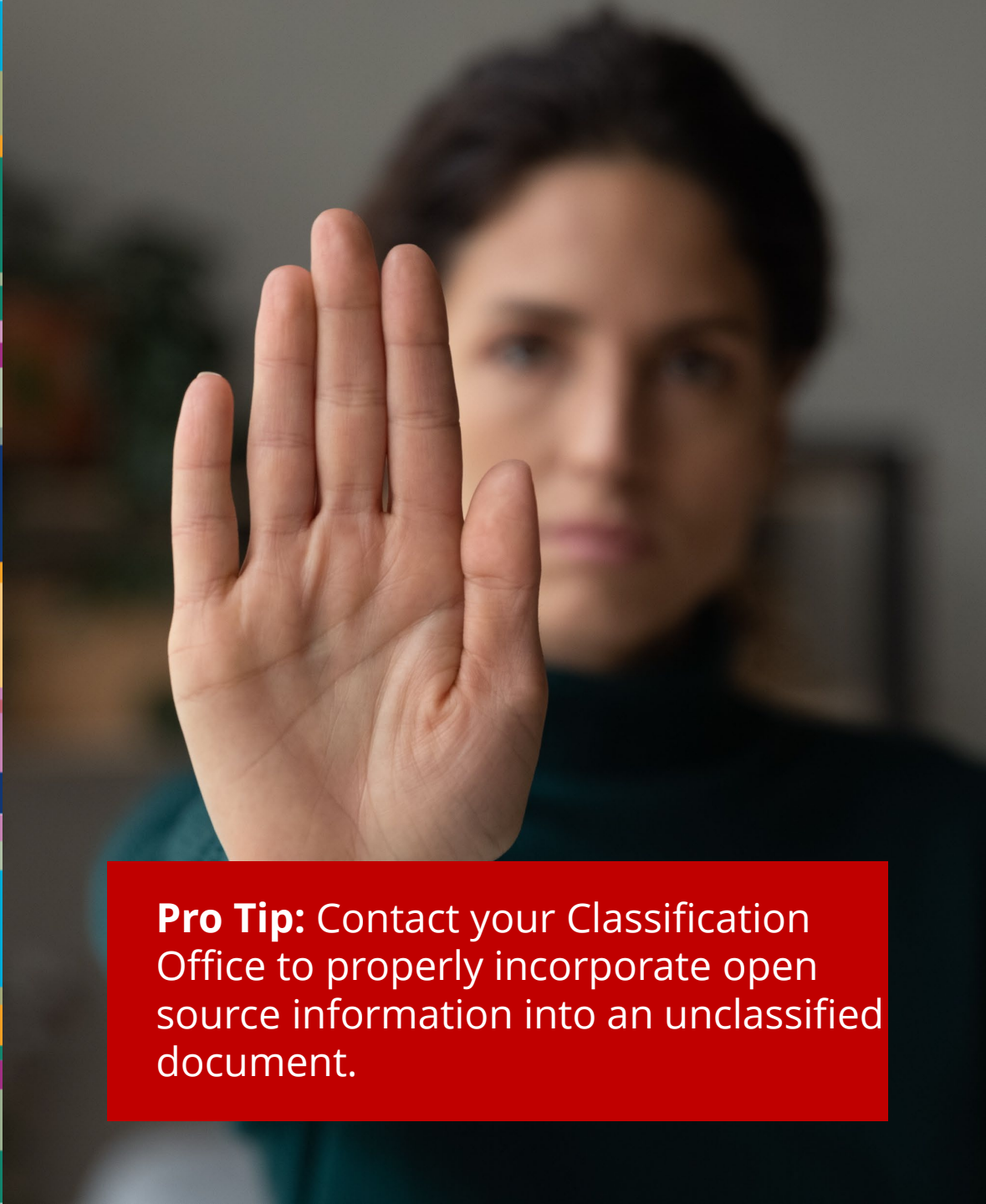
- You have previously discussed similar information with a DC and learned that it is not classified.
- The same information has been discussed in a subject matter related classification briefing or similar discussion by a DC in department or group meetings that you have attended.
- Your knowledge of classified aspects of the subject area is based on detailed experience in the area and having used this information in the creation of other documents that were determined by a DC to be unclassified.



Pro tip: When there is no specific program guidance, treat the information at its highest potential.

When in Doubt, Don't Discuss It!

- You may not always know when open literature sources contain classified information.
- Be aware of pictures and annotations in sources where classified information may be present.
- Consider your audience and be consistent in what you will say about potentially classified information or any classified aspects of your work. Reason things out before speaking, writing, or sending information.
- Context is very important (e.g., political developments or historical information versus technical information). What is being referenced?
- You are making a declaration of knowledge and confidence every time you “comment” (in a potentially classified subject area) without getting a DC determination.

A background image on the right side of the slide shows a woman with dark hair, looking directly at the camera. Her right hand is raised in a flat, palm-forward gesture, signifying a 'stop' or 'no' action. The image is slightly blurred, focusing attention on the hand gesture.

Pro Tip: Contact your Classification Office to properly incorporate open source information into an unclassified document.

Do the Right Thing

Make security a priority: As with safety, good security is necessary for our work and well-being.

Take ownership: You are a keeper of knowledge. A misstep could impact national security.

Be deliberate: At, and outside of work, ask, “How can I do better at protecting sensitive information?”

Stay away from the line: Don’t just figure out where the edge of the cliff is and build your house there – give yourself a big backyard. Avoid technical details on the SRN (e.g., locations/orientations, compilations, design details and associations).

Become a Derivative Classifier: You will become an expert in the sensitivity of your project information to help yourself and others protect our Nation’s information assets.



Pro Tip: Avoid “**Pointers**” to information that **identify, expand upon** or **confirm** that an item is classified.

Resources



[U.S. DOE Understanding DOE's "No Comment" Policy brochure](#)

- Classification Office
ClassificationDept@sandia.gov
505-844-5574
- [Classification website](#)



THINK. ASSESS. PROTECT

Security Questions? **Call 321**

Security Connection
505-845-1321
security@sandia.gov