

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE  
CHIEF MANAGEMENT OFFICER  
WASHINGTON, DC 20511

MEMORANDUM FOR: Mr. John P. Fitzpatrick  
Director, Information Security Oversight Office  
700 Pennsylvania Avenue, NW, Room 500  
Washington, DC, 20408

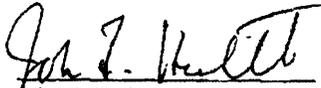
SUBJECT: ODNI Fundamental Classification Guidance Review

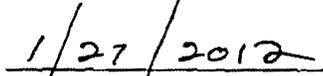
REFERENCE: (a) ODNI Memorandum, Same Subject, dated July 21, 2011  
(b) ISOO Memorandum, Same Subject, dated January 27, 2011

As a follow-up to reference (a) and in response to your request for an update on agency efforts conducting Fundamental Classification Guidance Reviews (reference (b)), a status update is provided in Attachment 1 for the Office of the Director of National Intelligence (ODNI) for the period ending December 31, 2011. The ODNI's efforts are ongoing and continuous to ensure the information is up to date and accurate.

Please contact me at [REDACTED] or via E-mail at [REDACTED] with any questions.

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John F. Hackett  
Chief, IC CIO/Information and Data Management Group

  
Date

Attachment 1: Status Report of ODNI Fundamental Classification Guidance Review

**ATTACHMENT 1 – Status Report of ODNI Fundamental Classification Guidance Review Efforts as of 31 December 2011**

| <b>FCGR PROGRESS UPDATE</b>                                    | <b>Period Ending<br/>30 Jun 2011</b> | <b>Period Ending<br/>31 Dec 2011</b> |
|----------------------------------------------------------------|--------------------------------------|--------------------------------------|
| Total number of SCGs for which an FCGR has been initiated:     | 8                                    | 20                                   |
| Total number of SCGs for which an FCGR has not been initiated: | 14                                   | 11                                   |
| Total number of SCGs for which an FCGR has been completed:     | 6                                    | 17                                   |
| Total number of SCGs eliminated as a result of the FCGR:       | 1                                    | 2                                    |
| Total number of active ODNI-sponsored SCGs:                    | 22                                   | 29                                   |

**Table 1: ODNI Classification Guide FCGR Summary**

**Overview:** The ODNI continued its efforts to ensure the classification management program maintains compliance with EO 13526 and 32 CFR Part 2001 requirements. Significant progress was made during the past six months as evidenced by the statistical numbers in Table 1; the completion of ODNI's first self-inspection on classification management issues; development of a classification and markings web-based-training module beta testing by members of the Intelligence Community; completion of the annual Classification Management Program Data Report for FY11; new DNI policy guidance on classification marking challenge procedures; and the scheduling of an ODNI Classification Guide update kickoff meeting. Additional details for these and other areas involved in the ODNI FCGR process are highlighted below.

**ODNI Classification Guide Update:** The ODNI Guide underwent an extensive revision in preparation for a wider review by several ODNI operational and administrative elements. A kickoff meeting to review and provide comments on the proposed revised guide is being scheduled. Goal is to have the ODNI CG updated and signed by June 1, 2012.

**ODNI Self-Inspection Program:** The Office of the Director of National Intelligence (ODNI) conducted its first annual self-inspection as required by Executive Order 13526, *Classified National Security Information*, pursuant to guidance issued by the Information Security Oversight Office (ISOO). Implementation of the program was managed by the Intelligence Community /Information and Data Management Group (IC CIO/IDMG), which polled and assessed a representative sample of activities and program areas through questionnaires, interviews, and classified document reviews. In conducting this self-assessment, the ODNI polled employees and reviewed both original and derivatively classified documents from nine elements integral to the ODNI's mission. The self-assessment covered the following Program areas:

- Original Classification
- Derivative Classification
- Declassification
- Safeguarding
- Security Violations
- Security Education and Training
- Management and Oversight

Overall, the ODNI made significant progress in its classification management program since the ISOO-led document review in August 2009 where classification marking errors were noted to have dropped from 53% (in August 2009) to about 16% as noted during this recent survey. The ODNI believes the mandated training program for derivative classifiers will also help to further reduce the remaining classification marking inconsistencies.

Actions taken or planned to correct and deter recurrence of identified deficiencies or misclassifications:

- Classification training for all ODNI employees at least once every two years;
- Development of additional computer-based and web-based training modules (CBT/WBT);
- Continuous updating of classification pamphlets and website information;
- Creation of a quarterly classification management newsletter to notify ODNI employees of upcoming changes to the program;
- Annual training for ODNI OCAs;
- Training tailored to meet specific needs of individual ODNI elements;
- Flexible training venues to minimize impact on operations; and
- Revised ODNI classification guidance to ensure current circumstances and classification levels are codified.

Best practices identified during the self-inspection review were:

- Centralized classification management program;
- One lead office (CIO/IDMG) to assist with all classification issues;
- Availability of the classification management team through a collective email address and hot line phone number; and
- Responsiveness to classification reviews and actions.

**DNI Guidance for Classification Marking Challenges:** The Director of National Intelligence (DNI) issued Intelligence Community Directive 700 (ICD 700) on January 18, 2012, directing IC elements establish formal and informal marking challenge procedures to complement existing IC procedures for classification (level) challenges. This new policy is designed to harmonize challenges made to classification levels of information, which help identify over-classification issues, with the marking conventions applied to ensure adherence to IC marking standards.

**Web-based-Training Module:** The ODNI completed the *Classification Management and the IC Markings System* web-based training module which is currently undergoing beta testing. The course provides the requisite training to meet requirements established in EO 13526 and Intelligence Community Directive (ICD) 710. The ODNI is also researching the feasibility of placing the module on unclassified networks for maximum utility.

**Annual Classification Management Program Data Report for FY11:** The ODNI creates and classifies documents using the Central Intelligence Agency's (CIA) information technology infrastructure. For FY 2011, our Information Management Group (IDMG) worked with the CIA to randomly identify internal ODNI users who could be surveyed in order to obtain an accurate sampling of derivative classification decisions (SF 311, Part D). Statistical sampling was used to obtain an estimate of the total classification decisions made by ODNI staff and contractor personnel.

The FY 2011 estimate of derivative classification decisions decreased 17.3% to 1,457,634 from last year's total, while the number of decisions per person decreased by 5.1 %. The decrease in total decisions was largely driven by a 12.9% decrease in population size.

**Controlled Unclassified Information (CUI) Compliance Plan:** While not specifically tied to the FCGR process, the ODNI developed and submitted its *interim* CUI Compliance Plan to the Executive Agent (NARA), which is related to protecting USG sensitive but unclassified information. The Plan provides broad guidance to ODNI employees covering the CUI program, categories and subcategories requiring protection, and how CUI will be integrated into other ODNI policies and procedures for safeguarding information.

**Other highlights impacting the ODNI FCGR review this period were:**

- Completing OCA training for two newly appointed senior officials.
- Successfully installing the Automated Classification Management Tool onto the DNI Secret-level network to standardize classification markings being applied.
- Updating all classification training brochures, briefings and the Information Management website.