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# *Information Security Oversight Office*

*National Archives and Records Administration*

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## **ISOO Notice 2009-16: Prohibited Use of Electronic Signatures on the Standard Form 312, “Classified Information Nondisclosure Agreement”**

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September 17, 2009

While the Government Paperwork Elimination Act (GPEA), Public Law 105-277 (1998) allows federal agencies to use electronic signatures, GPEA’s Implementation Guidance<sup>1</sup> from the Office of Management and Budget (OMB) acknowledged that electronic signatures may not be suitable for all purposes. The OMB guidance also encouraged agencies to undertake a risk analysis for each particular circumstance.

Based on guidance from the Department of Justice, we have determined that agencies should not use electronic signature technology to execute the Standard Form 312, “Classified Information Nondisclosure Agreement.” We will reevaluate this position at a later date to consider whether changes in electronic signature technology have advanced to support their use with the Standard Form 312.

**Please direct any questions regarding this ISOO notice to: [isoo@nara.gov](mailto:isoo@nara.gov).**

**Date of last review: August 26, 2010**

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<sup>1</sup> See <http://www.whitehouse.gov/omb/fedreg/gpea2.html>