



## **CUI Notice 2018-05: Implementation Guidance when Commingling Controlled Unclassified Information (CUI) and Classified National Security Information (CNSI)**

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October 24, 2018

### **Purpose**

1. The purpose of this notice is to provide agencies with marking guidance, for commingling CUI and CNSI, as they implement the national CUI Program and as automated marking tools are developed or modified to meet the marking standards described in the 32 CFR Part 2002 and the guidance found on the CUI Registry.

### **Authorities**

1. Executive Order 13556, “Controlled Unclassified Information,” (the Order) November 10, 2010;
2. 32 CFR Part 2002, “Controlled Unclassified Information,” (the Directive) September 14, 2016; and
3. Marking Controlled Unclassified Information, Version 1.1, (the Marking Handbook) December 6, 2016

### **Guidance**

1. As agencies implement the Program, transition to the marking standards described in the Marking Handbook, and/or prior to the modification of any automated marking tools, the following may be used to satisfy the marking and identification requirements for CUI. In a manner that is readily apparent to users and recipients, these alternative methods must: (1) list any CUI Specified categories contained in the document; (2) list any Limited Dissemination Controls (markings) that must also be applied to the CUI; and (3) list any special handling or dissemination requirements called for by the underlying law, regulation, or Government wide policy related to the CUI Specified.
  - a. Agency CUI implementation policies may prescribe alternative methods for informing users or recipients that CUI is present within classified documents. Such as:
    - i. Authorized holders may utilize a warning/informational box or section on the cover or first page of a document to convey to users and recipients that CUI is present in the document.
    - ii. Authorized holders may apply a statement on the front cover of the document stating, “This document contains CUI [List all CUI Specified categories and limited dissemination control markings], and must be reviewed and appropriately marked upon declassification. In accordance with [cite applicable authority] this information must [List all special handling or dissemination requirements].”

Note: If any alternative methods are used, CUI markings do not have to appear in banners or in portion markings but must appear in the alternative method. Upon declassification, include the CUI control marking, CUI Specified category markings, and limited dissemination control markings in an overall banner marking.

2. Once the CUI Program is fully implemented within agencies, for documents that contain both CNSI and CUI, authorized holders must:
  - a. Portion mark all CUI to ensure that authorized holders can distinguish CUI portions from portions containing classified or uncontrolled unclassified information; and
  - b. Include the CUI control marking, CUI Specified category marking(s), and limited dissemination control marking(s) in an overall banner marking.

Note: The Marking Handbook describes the specific requirements for commingling CUI and CNSI.

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

  
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