CUI MEMO 2019-08-12: This guidance document does not have the force and effect of law and is not meant to bind the public, except as authorized by law or regulation or as incorporated into a contract. Accordingly, with regard to the public, this document only provides clarity regarding existing requirements under the law or agency policies. This guidance document is binding on agency actions as authorized under applicable statute, executive order, regulation, or similar authority.

## INFORMATION SECURITY OVERSIGHT OFFICE

NATIONAL ARCHIVES and RECORDS ADMINISTRATION 700 PENNSYLVANIA AVENUE. NW. ROOM 100 WASTINGTON, DC 20408-0001 www.archives.gov/isoo



August 12, 2019

Memorandum for: Heads of Executive Departments and Agencies

From: Mark A. Bradley Mah A. Bralley

Director

**Subject:** Annual Report on Agency Implementation of the Controlled Unclassified

Information (CUI) Program for FY19

## Purpose:

This memorandum requests that you report on your current and projected efforts to implement the Controlled Unclassified Information (CUI) Program within your agency. The CUI Executive Agent (EA) will use your agency's submission to plan implementation and oversight activities as well as to inform our Annual Report to the President on Agency Implementation of the CUI Program.

## Background:

The CUI Program reforms inconsistent and conflicting agency-specific policies, procedures, safeguarding measures, and labels used to handle sensitive unclassified information throughout the executive branch. This is the third required Annual Report to the CUI EA on the status of CUI implementation at your agency. Most agencies have shown significant progress in their respective implementation of the CUI Program. Our office is looking forward to receiving this year's reports to determine whether agencies have successfully met or are still on track to meet their projected completion dates for the implementation elements described in *CUI Notice 2016-01: Implementation Guidance for the Controlled Unclassified Information Program.* Most agencies have missed their projected 2-year timeline for the full implementation of the Program. Beginning in FY20, the CUI EA will begin formally evaluating agency implementation efforts. This assessment will evaluate and compare previously reported projected timelines in the FY18 Report to the projected timelines of other comparable agencies.

In the FY 18 Report, most agencies reported to our office that their policies and procedures implementing the CUI program would be completed in FY 19. As agency CUI policy is one of the most important building blocks of a CUI Program, our office will focus on reviewing the status of these efforts and will look to the narratives of the reports for explanations of any delays.

In the Enclosure I, Controlled Unclassified Information (CUI) Program Annual Report Form:

- If "No" is selected for question 1 of Part B (Budget), agencies must provide an explanation in the space provided in question 2
- If neither "Internal review" nor "Complete" is selected for question 1 of Parts C (Policy) and D (Training), agencies must provide an explanation in the spaces provided in question 6 or 4 of their respective Parts.
- If neither "Modifying" nor "Complete" is selected for question 1 of Parts E (Physical Safeguarding) and F (Information Systems), agencies must provide an explanation in the spaces provided in question 3 of their respective Parts.

## Report:

Agencies must submit reports using the attached enclosure no later than **November 1, 2019.** Reports must be endorsed by the agency Senior Agency Official prior to being sent to the CUI EA.

Submit reports to:

National Archives and Records Administration

Information Security Oversight Office Attention: CUI Oversight Team

700 Pennsylvania Avenue, NW, Room 500

Washington, DC 20408

Electronic submissions are acceptable and may be sent to <a>CUI@nara.gov</a>.

Any extension requests to the reporting deadline should be submitted no later than **October 17, 2019** to Mark Riddle, Principal for CUI Program Oversight, at (202) 357-6864 Mark.Riddle@nara.gov.

Any questions regarding CUI policy, the CUI Registry, CUI categories, or limited dissemination controls may be submitted to <a href="CUI@nara.gov">CUI@nara.gov</a>.

Enclosures: 1. Controlled Unclassified Information (CUI) Program Annual Report Form

2. Controlled Unclassified Information (CUI) Program Annual Report Form Instructions