

UNCLASSIFIED
Central Intelligence Agency



Washington, D.C. 20505

4 October 2022

Mark A. Bradley, Director
Information Security Oversight Office
National Archives and Records Administration
Washington, D.C. 20408-0001

This letter is in response to the requirement in your memorandum dated 9 December 2021, and contains the Central Intelligence Agency's (CIA) final report on the results of the FY 2022 Fundamental Classification Guidance Review (FCGR), as mandated in Executive Order 13526 "Classified National Security Information."

Following the previous review in 2017, the CIA Classification Management Program (CMP) has undertaken a continuous review of our classification guidance in conjunction with appropriate subject matter experts, classification and declassification experts, and other users. This analysis is intended to identify relevant areas of improvement and gaps in policy that may be present, concerning both our guidance and the tools used to classify our Agency's equities.

Our goal since the completion of the 2017 review has been to consolidate, simplify, and de-conflict guidance wherever possible. To that end, our guides have become smaller and more user-friendly, but we note that there is always room for improvement. We have identified several guides since the 2017 review that require revisions or decommissioning. Many of these have been completed, and in some cases, declassification exemptions were removed, items were downgraded from SECRET//NOFORN to UNCLASSIFIED, and some guides were decommissioned or significantly updated.

In 2021, the CIA completed its effort to remove the CONFIDENTIAL level from the National Security Classification Guide and the Classification Management Tool. This effort, along with ongoing policy improvements, serves to improve the user experience and increase the accuracy of all derivative classification decisions at CIA.

A handwritten signature in black ink, appearing to read "Hurley R. Blankenship" followed by a stylized flourish.

Hurley R. Blankenship
Chief Data Officer

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FY 2022
Fundamental Classification Guidance Review (FCGR)

Section A: Identifying Information			
Agency:	Central Intelligence Agency	Date:	September 30, 2022
Name and Title/Position of Senior Agency Official:	Hurley V. Blankenship, Director/Agency Data Office; Chief Data Officer		
Name, Title/Position, Phone Number, and E-Mail Address of FCGR Point of Contact:	Mary S. Houlihan, Chief/Classification Management Program (703) 613-1390 MARYSH2@ucia.gov		

Section B: Consolidated Classification Guides (CCG)	
B-1. Does your agency have a CCG that consolidates classification guidance that applies for all components within the agency? If so, how many separate Security Classification Guides (SCGs) did your agency consolidate into the CCG? Please explain in your attached narrative.	No
B-2. Whether or not your agency has a CCG that applies for all components within the agency, does your agency have guides that consolidate classification guidance for specific activities, programs, or topics (including Special Access Programs [SAPs]) within the agency? Please explain in your attached narrative.	Yes
B-2a. If so, how many classification guides does your agency have that apply to the specific activities, programs, or topics (including Special Access Programs [SAPs])? When was (were) the consolidation(s) implemented? Please explain in your attached narrative.	18
B-3. In the absence of a current CCG that applies for all components within the agency, does your agency have a plan to develop one? In your attached narrative, please explain your agency's plan. If your agency has no plan for a CCG that applies for all components within the agency, please explain why not.	No

Section C: Security Classification Guides (SCG)	
C-1. Total number of classification guides at the beginning of the current FY 2022 FCGR. DO NOT COUNT DECLASSIFICATION GUIDES.	34
C-2. Number of classification guides cancelled as a result of this FCGR review.	10
C-3. Number of classification guides consolidated or superceded as a result of the current FY 2022 FCGR. Please explain in your attached narrative.	7
C-4. As a result of the current FY 2022 FCGR, was there a determination that new classification guides are required? Please explain in your attached narrative.	Yes
C-4a. If there was a determination that new classification guides are required as a result of the FY 2022 FCGR, how many are required? Please explain in your attached narrative.	2
C-5. Total number of classification guides at the end of the current FY 2022 FCGR.	19

Section D: Security Classification Elements	
D-1. Total number of modifications made to increase the duration of classifications.	0
D-2. Total number of modifications made to decrease the duration of classifications.	44
D-3. Total number of exemptions from automatic declassification added to guides, pursuant to E.O. 13526, Sec. 3.3, (b)(1-9).	0

D-4. Total number of exemptions from automatic declassification removed from guides, pursuant to E.O. 13526, Sec. 3.3, (b)(1-9).	43
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Section E: Shared or Multi-agency Guides	
E-1. Does your agency use any shared or multi-agency classification guides?	Yes
E-1a. If so, how has your agency conducted the review of such shared or multi-agency classification guides for purposes of the FY 2022 FCGR? Please describe in your attached narrative.	
E-1b. If not, is your agency considering the development of any shared or multi-agency classification guides? Please explain in your attached narrative.	n/a

Section F: Classification Guides in Electronic Format	
F-1. Does your agency maintain classification guides in electronic format?	Yes
F-1a. If so, are your agency's classification guides provided to users in a machine-readable electronic format? Please explain in your attached narrative.	Yes
F-1b. If all of your agency's classification guides are not maintained in a machine-readable electronic format, do you plan to put them in a machine-readable electronic format as part of the FCGR process? Please explain in your attached narrative.	n/a
F-1c. What is the total number of classification guides currently maintained by your agency in an electronic format at the end of the current FY 2022 FCGR, expressed as a raw number and as a percentage of the total number of classification guides? Please explain in your attached narrative.	19; 100%
F-1d. What is the total number of classification guides currently maintained by your agency in a machine-readable electronic format at the end of the current FY 2022 FCGR, expressed as a raw number and as a percentage of the total number of electronic classification guides? Please explain in your attached narrative.	19; 100%
F-2. Does your agency use an electronic marking tool to mark classified information in accordance with the appropriate classification guide? Please identify the electronic marking tool(s) used by your agency.	Yes; CMT
F-2a. If so, what metadata standard does your electronic marking tool use to mark classified information in accordance with the appropriate classification guide? Please explain in your attached narrative.	CMT XML
F-2b. If your agency uses an electronic marking tool, does the electronic marking tool apply electronic markings in a machine-readable electronic format? Please explain in your attached narrative.	Yes

Section G: FGCR Review Process	
G-1. Was a working group formed to conduct the review?	No
G-2. If yes, did the working group include subject matter experts, classification and declassification experts, technical experts, and users of the guides? Please describe the process in your attached narrative.	n/a
G-3. If no, please describe the process used to conduct the review in your attached narrative.	
G-4. During the review process, did your agency consider the following:	
G-4a. Should the information retain its current level of classification?	Yes
G-4b. Should any information be downgraded?	Yes
G-4c. Should any information be declassified?	Yes
G-4d. Is the current duration of classification appropriate?	Yes

G-4e. Are current exemptions from automatic declassification valid?	Yes
G-4e(1). If so, what is your process for confirming the exemption(s)? Please describe in your attached narrative.	
G-4f. Does each guide contain the following information: (as required by 32 CFR 2001.15):	
G-4f(1). Identification of the subject matter.	Yes
G-4f(2). Approval and signature by the appropriate OCA by name or personal identifier, and position.	Yes
G-4f(3). Agency point of contact (and contact information) for questions regarding the guide.	Yes
G-4f(4). Date of issuance or last review.	Yes
G-4f(5). Precise statement of each element of information that requires protection.	Yes
G-4f(6). The level of classification for each element of information.	Yes
G-4f(7). If applicable, handling caveats.	Yes
G-4f(8). The concise reason for classification as described in E.O. 13256, Sec. 1.4.	Yes
G-4f(9). A specific date or event for declassification.	Yes
G-5. Have past and recent classification and declassification decisions been incorporated?	No
G-5a. If so, please describe the process in your attached narrative. If not, please describe why not.	
G-6. Has your FY 2022 FCGR process included cross-referencing information with other classification guides (internal and external) and coordinated the cross-referencing of classification guides with the appropriate OCAs to ensure consistency? Please explain in your attached narrative.	Yes
Section H: Training	
H-1. For the period under review, did agency personnel receive any training in the use of your SCGs, CCG, and all classification guides for specific activities, programs, or topics (including SAPs)? If so, describe the training in your attached narrative.	Yes
H-2. For the period under review, did agency personnel receive any training in the use of electronic classification marking tools? If so, describe the training in your attached narrative.	Yes
H-2. For the period under review, did agency personnel receive any training in the development of your SCGs, CCG, and all classification guides for specific activities, programs, or topics (including SAPs)? If so, please describe the training in your attached narrative.	No
H-3. For the period under review, were OCAs involved in the process of developing your CCG, SCGs, and all classification guides for specific activities, programs, or topics (including SAPs)? Please explain in your attached narrative.	Yes

Section I: Comments

B-1: While CIA does not have a Consolidated Classification Guide or CCG, the CIA National Security Classification Guide, or NSCG, functions as the umbrella guide to cover all CIA equity. The other guides provide topic-specific guidance.

B-2: Aside from the CIA NSCG, all CIA classification guides cover specific topics or programs. The CIA does not have a CCG.

B-3: The CIA does not currently have a plan to develop a CCG. Our current guides are able to provide nuanced guidance that relates to a particular program and are signed by the relevant OCA. The CIA NSCG serves as an umbrella guide that covers all collateral CIA equity, with other guides providing topic-specific guidance.

C-3: CIA continuously reviews and updates its classification guidance. For example, between 2019 and 2021, 17 classification guides were identified for decommission, consolidation, or removal. An additional 2 guides were created as a result of this process. Over the 5 years of the review, CIA's total number of classification guides decreased from 34 guides to 19.

C-4: During the 2022 FCGR process, it was determined through coordination with other offices that additional classification guidance is required, as there are topics that are not addressed in CIA's existing classification guidance. CIA is planning to edit the existing NSCG derivatives rather than proliferate additional classification guides and will create Classification Quick Reference Guides, or CQRGs, which map back to the SCGs and provide additional nuanced guidance on relevant topics.

E-1a: CIA has reviewed its shared guides. The guides in this area are classified and cannot be listed here; however, they remain relevant, and CIA will coordinate with relevant stakeholders and other agencies, as appropriate, to update and revise this guidance.

F-1: CIA provides all classification guides in two places: on our Classification Guidance webpage, where they are available as PDFs, and in the Security Classification Guide Retrieval Tool (SCGR), which allows users to keyword search the full text of every current guide and CQRG that CIA has. CIA plans to continue to make all guides available in machine readable format.

F-2: The CIA's Classification Management tool (CMT) metadata standard is CMT XML. The CMT XML can be converted to the IC XML metadata standard using the CMT-WS translation operation. With each CMT transaction CMT XML metadata is created and can be read by another machine or web service.

G-3: Due to CIA's continual evaluation of its classification guides, a working group was not determined to be necessary. The Classification Management Program works with appropriate subject matter experts and program owners whenever new classification guidance is asked for or issued, and they are continually engaged when updates are requested.

G-4e(1): Exemptions are verified by ensuring that they are in keeping with those outlined in Executive Order 13526. CIA has recommended that all items be reviewed for declassification after 25 years, with the exception of sensitive HUMINT information. The guides are being updated to reflect this, but some guides still include valid exemptions, such as 25X1 in the Agency Cover Program Guide. 43 exemptions were removed from CIA's classification guides during the 2022 FCGR period.

G-5a: In October 2021, the CIA National Security Classification Guide was updated to remove the CONFIDENTIAL level of classification for CIA equity. This change was reflected in the CMT, but some guides have not been fully updated. Many of these guides are in process of being decommissioned, converted to Classification Quick Reference Guides, or need to be entirely replaced. This process is ongoing.

G-6: CIA works continually to ensure that classification guidance is consistent, appropriate, and reasonable. Often, guide updates arise as questions are raised about the meaning or intent behind certain line items or their current relevance. Currently, there are questions and guidance gaps, which we are engaging appropriate OCAs and subject matter experts to remedy. Some of these pertain to complex issues that will take time to resolve. Sometimes, this takes the form of engaging with other IC Agencies and ODNI to ensure that guidance is consistent with efforts that span outside of CIA.

H-1: All Agency personnel receive training each year in classification through CIA's required annual Derivative Classifier Training. This course provides the proper procedures and guidance for classifying information in order to protect national security, avoid unauthorized disclosure, and comply with Executive Order 13526, Intelligence Community Directive 710, and CIA initial and annual mandatory training requirements.

H-2: CIA's annual Derivative Classifier Training includes instruction on the use of the CMT to mark documents properly.

H-3: OCAs are involved in the process of developing all SCGs; they review these documents prior to providing their signatures. Only then are the SCGs uploaded as a reference for employee use.