

FY 2022
Fundamental Classification Guidance Review (FCGR)

Section A: Identifying Information			
Agency:	Department of the Treasury	Date:	
Name and Title/Position of Senior Agency Official:	Shannon Corless, Assistant Secretary for Intelligence and Analysis		
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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 (SCG) 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 (SAP))? When was (were) the consolidation(s) implemented? Please explain in your attached narrative.	1
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.	Yes

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.	11
C-2. Number of classification guides cancelled as a result of this FCGR review.	0
C-3. Number of classification guides consolidated or superseded as a result of the current FY 2022 FCGR. Please explain in your attached narrative.	0
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.	No
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.	0
C-5. Total number of classification guides at the end of the current FY 2022 FCGR.	11

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.	0
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) .	0

Section E: Shared or Multi-agency Guides	
E-1. Does your agency use any shared or multi-agency classification guides?	No
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.	N/A
E-1b. If not, is your agency considering the development of any shared or multi-agency classification guides? Please explain in your attached narrative.	No

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.	No
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.	See Section I
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.	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.	0%
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
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.	See Section I
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.	No

Section G: FGCR Review Process	
G-1. Was a working group formed to conduct the review?	Yes
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.	Yes
G-3. If no, please describe the process used to conduct the review in your attached narrative.	N/A
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?	No
G-4c. Should any information be declassified?	No
G-4d. Is the current duration of classification appropriate?	Yes
G-4e. Are current exemptions from automatic declassification valid?	Yes

Section G: FGCR Review Process (Continued)	
G-4e(1). If so, what is your process for confirming the exemption(s)? Please describe in your attached narrative.	See Section I
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.	See Section I
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?	Yes
G-5a. If so, please describe the process in your attached narrative. If not, please describe why not.	See Section I
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-3. 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.	Yes
H-4. 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-2. The Departmental Offices has a consolidated classification guide containing over 250-line items requiring some form of protection (i.e., sensitive or classified) and includes equities from eight of the Department's 10 original classification authorities having made one or more classification decisions.
- B-2a. 2017.
- B-3. Not at this time. During calendar year 2023, discussions will begin with the remaining two OCAs – U.S. Mint and Bureau of Engraving and Printing (BEP) – on if the incorporation of their equities should take place. There is only one FTE responsible for the agency's Information Security; Security, Education, Training, and Awareness; Operations Security (OPSEC); and Declassification programs; the focus has been on (1) OPSEC program policy development and implementation and (2) ISOO reporting requirements.
- F-1b. The Office of Security Programs (OSP) will begin coordination with the Office of the Chief Information Officer (OCIO) to look into the possibility of this capability. OSP may be inhibited by funding or technical restraints.
- F-1c. Maintaining the SCG in electronic format provides for greater access by classifiers having a vested need to know, regardless of their duty station or system used, and in a manner to better protect it from unauthorized disclosure.
- F-2. The Classification Management Tool (CMT). CMT is currently only installed on classified networks for use in e-mail marking.
- F-2a. None. The CMT only requires two mandatory marking elements to be selected/completed before executing the sending of an e-mail: the banner line and the classification authority block. All markings must either be chosen or manually entered by the author (i.e., classifier's name, Source document information, declassification instructions, portion markings, special or warning notices). The OCIO is looking into the development of a Treasury-wide metadata management tool.
- G-4e(1). Within the Department of the Treasury (Department), only two bureaus currently have Interagency Security Classification Appeals Panel (ISCAP)-approved exemptions – the U.S. Mint and the BEP. As required by 32 CFR 2001.32(c), *Internal review and update*, the declassification guide is reviewed once every five years to ensure approved elements still meet the standard for classification – during the review period, a Departmental tasker is created requiring the two bureaus to review their respective exempted equities to ensure they continue to meet eligibility for continued classification. Finally, as required by section 2001.32(b)(2), where changes not requiring ISCAP approval have been made or where no action is required, a cover letter and the declassification guide are submitted to the Director of ISOO. When the update includes a new request requiring ISCAP approval, the requesting bureau will submit their package in accordance with the requirements established in Treasury Directive Publication 15-71, *Treasury Security Manual*. A copy of all requests and ISCAP results are maintained at the agency headquarters.
- The current declassification guide was updated on December 3, 2018 and received written ISCAP verification of approval on January 31, 2019. The declassification guide is up for review during calendar year 2023.
- G-4f(5). During 2017, the Department underwent an Information Security Oversight Office (ISOO) on-site review of its Information Security program. During this review, a number of classification guides

were scrutinized for compliance with both E.O. 13526, *Classified National Security Information*, as amended, and its implementing directive, 32 CFR Part 2001, *Classified National Security Information*, as amended. As a result of this review, ISOO found several element descriptions in the Treasury consolidated security classification guide that failed to meet 32 CFR 2001.15(b)(6) requirements. These issues were resolved during 2020 and the update signed and submitted to ISOO in 2021. With its submission to ISOO, as part of an ISOO Executive agencies' SCGs review, the guide underwent a second examination that resulted in an additional two element descriptions being considered "too broad." Upon receipt of the ISOO review results, coordination with the cognizant OCAs began to correct the issue and better define the elements requiring protection. Once all corrective actions are complete, the Department will submit the update for review and to close out the finding.

- G-5a. In the past, classification and declassification decisions were maintained in separate guides; to ensure all classified equities are appropriately protected, and as authorized under 32 CFR 2001.15(b)(9), new updates to classification guidance will include both elements meeting eligibility for classification and those with ISCAP-approved exemptions. For elements listed with ISCAP-approved exemptions, the authorized exemption shall be listed in the "Declassify On Date" column and the approval reference and how to retrieve it will be included in the "Remarks" column of the element line. Once consolidated, both the classification and declassification five-year reviews will take place concurrently. This action will reduce the administrative burden of subject matter experts (SME) and original classification authorities while ensuring only those equities needing continued protection receive it.
- G-6. During updating of the Treasury Consolidated Security Classification Guide, a review of internal equities was conducted against other Department OCA decisions as well as external equities applicable to this agency to ensure consistency in classification decisions applied. BEP and U.S. Mint equities are agency unique but similar enough that they were evaluated against each other to ensure consistency.
- H-1. Annual training that includes the SCG and its use has been created and sent to agency activities for use. Additionally, section 2 of the updated Treasury Consolidated Security Classification Guide provides the derivative classifier with key points on its use, required markings, examples, and references. Additionally, supplemental guides 1 and 2 are being updated to include this information. Finally, bureau updated guidance will also include this information.
- H-2. Training in the use of the classification marking tool is provided by the specific office in which the employee works. The employee does receive a user manual on the marking tool for quick reference. "Hip pocket" training in the use of the marking tool does take place during self-inspections, when required (e.g., when employees are found to rely on CMT automated features that incorrectly cite classification authority block information).
- H-3. Key SMEs within each office representing an OCA did receive one or more sessions on the requirements, limitations, recommended remarks, etc., for their OCA's equities. Additionally, coordination supporting training received in element description development, classification by compilation, and specific single element multi-classification remark entries did take place (i.e., describing the requirements to meet classification for each of two or more classification levels, to include "Unclassified," for the same element).