



**MILLENNIUM**  
CHALLENGE CORPORATION  
UNITED STATES OF AMERICA

June 26, 2012

Mr. John P. Fitzpatrick  
Director  
National Archives and Records Administration  
Information Security Oversight Office  
700 Pennsylvania Avenue, NW  
Washington, DC 20408

Dear Mr. Fitzpatrick:

The purpose of this letter is to provide you with the results of the Fundamental Classification Guidance Review by Millennium Challenge Corporation (MCC) in implementing Executive Order 13526, "Classified National Security Information".

MCC was provided its authority to classify information from the Secretary of State who serves as Chairperson for the MCC Board of Directors. This delegation was approved August 15, 2005 to originally classify national security information to the secret level. The degree to which we classify information is minimal and generally consists of classifying four documents per year. All are related to the minutes of the quarterly MCC Board Meeting that is chaired by the Secretary of State.

MCC Security, the Office of General Counsel, and the subject matter experts from Department of State have worked together in revising our classified information security program and implementing Executive Order 13526.

We have completed a revision of the MCC Classified Information Security Manual (dated 3/20/2012) that provides program guidance on agency operations for classified information security. We have also created support classification guides, MCC Classification Guide (dated 7/12/2011) and MCC Declassification Guide (dated 8/4/2011). We issued MCC Classification and Declassification Memo to all staff including introducing the new guides to be used in classifying and declassifying information they create or control under Executive Order 13526. This information is posted on our MCC intranet site. We intend to post on our public website the contents of this memo.

MCC has completed a review of all documents it has classified since the delegation of authority was granted in August 2005. All classification decisions have been determined to reflect the intent of the guidance as to what is classified, the appropriate level, the duration, and associated markings.

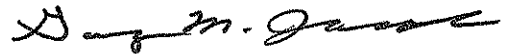
There were no classified documents that required downgrading in classification level or changes to the duration of classification. For future classification decisions by MCC, the new guidance is expected to have minimal impact because all decisions thus far have been related to the content of the quarterly MCC Board of Directors meetings.

Our Office of General Council is responsible for drafting and approving classified documents and they have been using the new marking templates and the guidelines established in the MCC Classification Guide.

In other areas, we have completed and updated our security education and training program content to include requirements and changes in Executive Order 13526. In December, all MCC employees completed the revised annual refresher training and all new employees receiving security clearances are briefed using the updated training program. MCC has an agreement with Department of State for all employees performing classification responsibilities to annually participate in their training for persons working with classified information.

If you have any questions, or need additional supporting information, please let me know.

Respectfully,



Gary M. Jacobs  
Director, Security  
Administration and Finance

cc: Chantale Y. Wong, Vice President  
for Department of Administration and Finance