

ISOO Notice 2026-07: Executive Agent Guidance for Implementation of the Controlled Unclassified Information Program

September 2, 2026

Purpose

1. This Notice revises guidance on implementation of the Controlled Unclassified Information (CUI) Program, consistent with the requirements detailed in Executive Order (E.O.) 13556, “Controlled Unclassified Information,” and 32 Code of Federal Regulations (CFR) 2002.
2. The increasing sophistication of cyber threats and foreign intelligence collection efforts, as well as unauthorized disclosure risks, necessitate consistent and comprehensive protection of sensitive government information throughout all agencies, while also providing mechanisms to enable and ensure the efficient sharing of such information across government, with critical stakeholders outside of government, and with the public.

Background

3. E.O. 13556 was signed on November 4, 2010, establishing the CUI Program to standardize the way the executive branch handles unclassified information that requires safeguarding and/or dissemination controls in accordance with laws, regulations, or Government-wide policies.
4. Implementation of the CUI Program is essential for the consistent protection of sensitive information, as well as to facilitate appropriate information sharing for critical government functions – including the application of artificial intelligence (AI) and to ensure compliance with Administration priorities, including but not limited to Office of Management and Budget (OMB) Memorandum 25-05: Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance; OMB Memorandum 25-21: Accelerating Federal Use of AI through Innovation, Governance, and Public Trust; OMB Memorandum 25-22: Driving Efficient Acquisition of Artificial Intelligence in Government; and ISOO Notice 2026-01: Responsible Use of Classified National Security Information and Controlled Unclassified Information with Artificial Intelligence.
5. The CUI Notice rescinds:
 - a. CUI Notice 2022-01: Executive Agent Guidance Regarding White House National Security Council (NSC) Memorandum, “Initiating a Process to Review Information Management and Classification Policies,” June 2, 2022.
 - b. CUI Notice 2020-01: CUI Program Implementation Deadlines.

Guidance

6. All federal agencies are required, under E.O. 13556, to have implemented a CUI program for the management of all unclassified information that requires safeguarding or dissemination controls. On an annual basis, ISOO requires agencies to report on the status of their CUI program, and has, as needed, issued supplemental directives in the form of ISOO Notices to guide consistent implementation of agency CUI programs. This Notice, in addition to rescinding deprecated guidance, outlines the required elements for agency CUI programs, pursuant in E.O. 13556 and 32 CFR 2002.

CUI Policy and Procedures

7. Agencies must establish, document, and disseminate agency-specific CUI policies and implementing procedures that align with CUI Executive Agent (EA) requirements. Agencies may implement the CUI Program through a single policy or through multiple policies that address specific elements of the CUI Program. Agency sub-agencies or sub-components may implement the CUI Program through their agency policy or by utilizing their own individual policy. All individual sub-agency policies must be approved by their parent agency's CUI SAO. Critical elements for policies governing CUI include:

CUI Senior Agency Official (SAO) Designation

Agencies must designate, in writing, an SAO for CUI with the authority and resources necessary to oversee and implement the agency's CUI Program, as required by 32 CFR 2002.8(b) & (c).

CUI Program Manager (PM) Designation

The agency CUI SAO must designate, in writing, a PM for CUI with the authority and resources necessary to manage and implement the agency's CUI Program, on behalf of the CUI SAO, both within the agency and interagency contexts. The CUI PM must have direct access to the CUI SAO and serves as the principal advisor and representative to the CUI SAO in all matters pertaining to the agency's CUI Program and for any information requiring safeguarding and/or dissemination controls as required by a law, regulation or Government-wide policy (e.g., U.S. Code, CFR, or OMB Memorandum), excluding classified national security information, as defined by E.O. 13526. The CUI PM serves as the official representative to the CUI EA on the agency's day-to-day CUI Program operations.

Designation and Marking

Agencies must consistently and accurately designate and mark CUI in accordance with 32 CFR 2002 and CUI EA requirements across all information formats (e.g., documents, emails, electronic files, metadata, etc.).

Personnel Training

Agencies must provide training in accordance with 32 CFR 2002.30 and track mandatory CUI training requirements for all personnel who handle CUI, including initial training for new employees and regular refresher training for existing personnel.

Safeguarding

In accordance with 32 CFR 2002.14, agencies must implement appropriate safeguarding measures for CUI at rest and in transit, including physical security, cybersecurity/IT controls, and handling procedures proportional to the sensitivity of the information and in accordance with CUI EA requirements.

Contracts and Information-Sharing Agreements

Agencies entering into information-sharing agreements when sharing CUI with any non-executive branch entity, including contractors and foreign entities, must follow the requirements in 32 CFR 2002.16(a)(5)(i).

For all contracts requiring access to CUI, at a minimum, agencies must provide the prime contractor with specific guidance regarding the following:

- Identification of Specific Government-Furnished Information Designated as CUI;
- Process for identification of Contractor Developed Information as CUI;
- Process for CUI challenges;
- Training requirements and resources;
- Access requirements;
- Marking requirements;
- Safeguarding requirements;
- Decontrol and disposition requirements;
- Reporting requirements;
- Self-Inspection requirements;
- Process for reporting misuse of CUI; and
- Penalties for misuse of CUI.

Decontrol and Disposition

In accordance with 32 CFR 2002.18, agencies must establish procedures for the timely decontrol of CUI when it no longer requires protection and agencies must include the identification of a specific decontrolling date or event with all CUI.

Agencies must establish procedures for the proper disposition of CUI records in accordance with approved records schedules and [NARA Accessioning Guidance and Policy](#).

Challenges to CUI Status

Agencies must implement a process to accept, manage, and resolve challenges to CUI status (which may include improper or absent marking) in accordance with 32 CFR 2002.50.

Agencies must implement a process to proactively communicate challenge decisions to all authorized holders, both within the agency and interagency contexts, to facilitate consistent and timely updates to designation, marking, safeguarding, decontrol and disposition of CUI at issue.

Misuse of CUI

Agencies must implement a process and criteria for reporting and investigating misuse of CUI in accordance with 32 CFR 2002.54.

Sanctions for misuse of CUI will be in accordance with the specific laws, regulations, or Government-wide policies for the CUI at issue. To the extent that agency heads are otherwise authorized to take administrative action against personnel who misuse CUI, agency CUI policy governing misuse should reflect that authority.

Self-Inspection and Oversight

Agencies must conduct, at minimum, annual self-inspections of their CUI Program and maintain internal oversight mechanisms to ensure ongoing compliance with 32 CFR 2002.24 and 2002.8(b)(4), and CUI EA requirements.

Required Reporting

Agencies must submit accurate and timely annual reports to ISOO on their CUI Program status, challenges, misuse, and metrics as required by 32 CFR 2002 and CUI EA requirements.

Waivers of CUI Requirements

For guidance on the submission, use, and implementation of waivers of CUI requirements, refer to ISOO Notice 2026-08: CUI Requirements Waivers.

Authorities

E.O. 13556, Sec. 4(b), Controlled Unclassified Information

32 Code of Federal Regulations (CFR) 2002

This guidance pertains to Federal agencies and is binding on agency actions as authorized under law and similar authority. This guidance does not apply to, and is not meant to bind, the public, except as authorized by law or regulation or as incorporated into a contract.

Please direct any questions regarding this CUI Notice to: cui@nara.gov.

A handwritten signature in black ink, appearing to read "Michael D. Thomas". The signature is stylized, with the first name "Michael" written in a cursive-like script, followed by "D." and "Thomas" in a more formal, blocky style. A horizontal line extends from the end of the signature.

MICHAEL D. THOMAS

Director