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## ISOO Notice 2017-02: Clarification of Classification by Compilation

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Executive Order (E.O.) 13526, Sec. 1.7(e) states “Compilations of items of information that are individually unclassified may be classified if the compiled information reveals an additional association or relationship that (1) meets the standards for classification under this order; and (2) is not otherwise revealed in the individual items of information.”

By definition, “compilation” means an aggregation of preexisting unclassified items of information (E.O. 13526, Sec. 6.1(j)).

The implementing directive, 32 CFR 2001.13(c) states “A determination that information is classified through the compilation of unclassified information is a derivative classification action based upon existing original classification guidance. If the compilation of unclassified information reveals a new aspect of information that meets the criteria for classification, it shall be referred to an original classification authority with jurisdiction over the information to make an original classification decision.” Any unclassified portions will be portion marked (U), while the overall markings will reflect the classification of the compiled information even if all the portions are marked (U). In any such situation, clear instructions must appear with the compiled information as to the circumstances under which the individual portions constitute a classified compilation, and when they do not.

However, compilation may also be applied to information that is classified at a lower level, that when combined, results in a higher classification. When this occurs, all portions will be marked at their original classification level and clear instructions must appear with the compiled information as to the circumstances under which the individual portions constitute a higher level of classification, and when they do not.

Please direct any questions regarding this ISOO Notice to: [isoo@nara.gov](mailto:isoo@nara.gov).

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