

ISOO Training Tip #7

June 2018

TOPIC:

Classification Challenges – Authorized Holder Responsibilities

Authorized holders of information who, in good faith, believe that its classification status is improper are encouraged and expected to challenge the classification status of information that they believe is improperly classified or unclassified in accordance with agency procedures.

What does this mean?

If any authorized holder of classified information has any questions about the markings applied to a document or the classification of a document, that individual should go back to the originator of the document for an explanation and/or clarification.

Classification challenges are an important part of the classification management system. It can be considered a checks and balance process to keep us all honest. It is not meant to be accusatory, but is a tool to maintain integrity in the system.

Informal Classification Challenge

While it is incumbent upon the creator of each document to properly classify and mark the document, it is also the responsibility of the authorized holder that receives the document to question anything that appears to be incorrect or doesn't make sense. If a classified document hasn't portion marked, it should be sent back to the originator to be fixed. If you aren't sure why a paragraph is marked Secret, go back to the originator and verify that the information is, in fact, Secret. This is all part of the informal classification challenge process.

Formal Classification Challenge

If the matter can't be resolved informally, then the authorized holder can submit a formal classification challenge in writing to the original classification authority with jurisdiction over the information. It does not need to be any more specific than to question why information is or is not classified, or why it is classified at a certain level.

Agencies are required to establish classification challenge procedures that will provide review by an impartial official and will include appeal procedures.

Individuals that submit classification challenges will not be subject to retribution.

Note: A high number of classification challenges does not indicate a poor classification management program. It actually shows the strength of an agency program.

Ref: [E.O. 13526, Sec. 1.8 / 32 CFR 2001.14](https://eopublications.gsa.gov/eosites/13526)



isootraining@nara.gov

www.archives.gov/isoo/training