



Information Security Oversight Office

National Archives and Records Administration

700 Pennsylvania Avenue, NW Washington, DC 20408



ISOO Notice 2009-09: Derivative Classification – Identification of Multiple Sources

January 9, 2009

In accordance with section 2.1(b)(2) of E.O. 12958, as amended, “Classified National Security Information,” (the Order) and 32 C.F.R. Part 2001.22(b), persons who apply derivative classification markings are required to carry forward a listing of the sources on or attached to the official file or record copy of the material they derivatively classify. During the course of our on-site reviews, we have observed that this requirement is in large measure not being fulfilled.

All derivative classification actions must ultimately be traceable back to an original classification decision. If, as in the case of documents derived from multiple sources that do not include a list of their sources, there is no information about the source(s) of classification, then the basis for derivative classification cannot be readily determined, and the appropriateness of the classification of the document may be called into question.

Also, the identification of the source(s) of classification is necessary to facilitate the referral of information that originated with other agencies or the disclosure of which would affect the interests or activities of other agencies in accordance with section 3.3(h) and section 3.6(b) of the Order. Failure to properly identify all of the sources from which derivative classification actions are based places classified national security information at needless risk.

Agencies should place special emphasis on the listing of multiple sources during refresher and specialized training. They should also review the application of this requirement as part of their self-inspection activity, particularly during the periodic review and assessment of the agency’s classified product.

Additionally, as the derivative classifier is unlikely to be readily aware of whether the product they are creating will serve as the “official file or record copy,” and can’t otherwise know the status of the product once distributed further, the list of sources should be included on or attached to all derivatively classified materials. This is consistent with an existing requirement to do so, “whenever practicable” in accordance with 32 C.F.R. Part 2001.22(b)(1)(ii).

Please direct any questions regarding this ISOO Notice to: isoo@nara.gov .