

**INFORMATION SECURITY OVERSIGHT OFFICE (ISOO)
NOTICE No. 1**

1.1 PURPOSE

This notice provides direction for the use of the marking A25X@ under Executive Order 12958, as amended, AClassified National Security Information,@ and its implementing directive, ISOO Directive No. 1.

A uniform security classification system requires that standard markings be applied to classified information in order to leave *no doubt* about the classified status of the information, the level of protection required, *and the duration of classification*. The 25X markings are the only authorized markings for the identification of information approved by the President or the Interagency Security Classification Appeals Panel (ISCAP) for classification beyond 25 years. The 25X markings shall not be used for any other classified information.

1.2 AUTHORITY

Applicable provisions of E.O. 12958, as amended: Sections 1.5, 1.6, and 3.3.

Applicable provisions of ISOO Directive No. 1: Sections 2001.15, 2001.21(e), 2001.30 (j) & (l), and 2001.32.

1.3 BACKGROUND

One of the most basic tenets of E.O. 12958, as amended, is that with a single exception, agencies with original classification authority may only classify information for up to 25 years and that the classification of information beyond 25 years requires the authorization of the President. This concept has been effective since October 1995. The single exception is the identity of a confidential human source or a human intelligence source. Presidential authorization comes from the approval of a request made in accordance with sections 3.3(c) or (d) of the amended Order.

Section 3.3(c) of the amended Order provides agency heads the ability to seek approval from the President to maintain the classification of file series of records beyond 25 years. Such file series must be replete with specific information requiring classification beyond 25 years. These requests are most commonly referred to as file series exemptions.

Section 3.3(d) of the amended Order provides agency heads with the ability to seek the continued classification of specific information beyond 25 years through the submission of a request to ISCAP. Such requests normally take the form of a declassification guide. ISCAP advises and assists the President in the discharge of his constitutional and discretionary authority to protect the national security of the United States. ISCAP exercises Presidential authority when it approves the classification of information beyond 25 years.

1.4 DIRECTION

a. For Original Classification Decisions: No 25X marking, other than A25X1-human,@ is permitted on the ADeclassify on@ line when an original classification decision is made. There are no exceptions to this policy.

(1) When determining the duration of classification in the first instance, i.e. original classification, the original classification authority has four choices: (i) a date or event less than 10 years from the date of the decision; or (ii) a date 10 years from the date of the decision; or (iii) a date greater than 10 years and less than 25 years from the date of the decision; or (iv) a date 25 years from the date of the decision.

(2) The only exception to the four choices identified above is the marking A25X1-human.@ This marking may be used when the disclosure of the information could be expected to reveal the identity of a confidential human source or human intelligence source. A25X1-human@ is the *only* 25X marking that does not require a date or event for declassification to be cited with the 25X marking.

(3) Information that could be expected to reveal information about the application of an intelligence source or method, though a part of 25X1, is separate and distinct from the marking, A25X1-human.@ Agencies may not use the marking A25X1-human@ for non-human intelligence sources or for intelligence methods.

b. For Derivative Classification Actions: To use a 25X marking on the ADeclassify on@ line for derivative classification actions, ISCAP must have previously approved the classification beyond 25 years. There are no exceptions to this policy. For derivative classification actions the declassification instructions on the ADeclassify on@ line must include one of the following:

- (1) Date or event up to 25 years, as noted on the source document; or
- (2) Source marked OADR, date of source (cannot be a date after October 1995); or
- (3) Source marked X1-X8, date of source (cannot be a date after September 2003); or
- (4) 25X1 through 25X9, and a specific date or event for declassification; or
- (5) 25X1-human.

For each of the above five options, if the date is cited in a number form, use the YYYYMMDD format, e.g. 20501207 equals December 7, 2050.

c. Approved File Series Exemptions: Individual documents contained within file series approved by the President for exemption from automatic declassification under section 3.3(c) of E.O. 12958, as amended, may only be individually marked with 25X markings if they otherwise meet *all* of the standards for classification beyond 25 years, over and above the file series exemption. As such, whenever individual documents within an approved file series exemption are reviewed and specific information is identified as requiring continued classification beyond 25 years, agencies

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must ensure that the specific information is covered by their declassification guide and that ISCAP has approved both the continued classification and a date or event for declassification.

d. Classification Guides: Agency classification guides must be updated every five years. With the 2003 amendment to E.O. 12958, agencies must update their security classification guides to reflect the revised declassification instructions or Aduration,@ and the Areason@ line. Other needed revisions to these guides include, but are not limited to:

- (1) Incorporating the use of A25X1-human,@ where it is appropriate.
- (2) Incorporating other 25X markings, only when:
 - (i) the specific information has been properly exempted and received *final* approval from the ISCAP, usually in the form of a declassification guide; and
 - (ii) the specific information remains in current use (e.g., certain Continuity of Government information or certain intelligence methods); and
 - (iii) a specific date or event for declassification is stated. If the date is cited in a number form, use the YYYYMMDD format, e.g. 20501207 equals December 7, 2050. If the ISCAP approved a review date beyond 25 years in lieu of a specific date or event for declassification, the pertinent 25X markings may not be carried forward to a classification guide *unless* the ISCAP approved declassification guide specifies that the review date becomes the declassification date if the review does not occur. The review date approved by ISCAP shall be used with the appropriate 25X marking, e.g. 25X1, 20501207.

e. Individual Documents with Improperly Annotated 25X Markings: Individual documents with improperly annotated 25X markings must be reviewed for the correct application of the 25X markings whenever the documents are: (1) processed under sections 1.8, 3.3, 3.4, or 3.5 of E.O. 12958, as amended, or (2) reviewed pursuant to the Freedom of Information Act, as amended, or the Privacy Act of 1974; or (3) used as a source for derivative classification actions. If a 25X marking has been incorrectly or incompletely (lack of a declassification date or event) applied, the reviewer/classifier must correct the marking. Additionally, the reviewer/classifier must take reasonable action to notify the holders of the document of the correction(s).

1.5 QUESTIONS

Questions regarding this guidance should be addressed to ISOO via e-mail at isoo@nara.gov or by telephone at (202) 219-5250. Additional information about ISOO and the security classification and declassification programs can be found at <http://www.archives.gov/isoo/index.html>.