



April 7, 2017

Memorandum for: Heads of Executive Departments and Agencies

From: Mark A. Bradley *Mark A. Bradley*
Director

Subject: Controlled Unclassified Information (CUI) Program Implementation Status Report

Purpose

This memorandum requests that you report on your efforts to implement the Controlled Unclassified Information (CUI) Program within your agency.

Background

The CUI Program was established to reform the inconsistent and conflicting patchwork of agency-specific policies, procedures, safeguarding measures and labels, used to handle sensitive unclassified information throughout the executive branch. The National Archives and Records Administration (NARA) is the CUI Executive Agent (EA). The Archivist of the United States delegated EA responsibilities to the Director of the Information Security Oversight Office (ISOO). The implementing regulation for the CUI Program is 32 CFR part 2002, "Controlled Unclassified Information," with an effective date of November 14, 2016.

In consultation with the Office of Management and Budget and affected agencies, on September 14, 2016, ISOO issued target dates for phased implementation of the CUI Program in CUI Notice 2016-01, "Implementation Guidance for the Controlled Unclassified Information Program." The 32 CFR part 2002 provides that the CUI EA may request implementation reports from agency heads.

Report Requested

CUI Notice 2016-01 outlines the phased implementation deadlines for agencies and describes the significant elements of a CUI Program. The CUI EA is assessing the status of the CUI Program's implementation for the first six months throughout the executive branch and requesting an interim report from agencies.

We are requesting that reports be submitted using the attached form no later than **May 31, 2017**. Agencies are not required to submit detailed implementation plans.

Submit interim implementation reports to:

National Archives and Records Administration
Information Security Oversight Office
Attention: CUI Oversight Team
700 Pennsylvania Avenue, NW, Room 500
Washington, DC 20408

Electronic submissions are acceptable and may be sent to mark.riddle@nara.gov.

Any questions may be submitted to Patrick Viscuso, Ph.D., Associate Director at (202) 357-5313, patrick.viscuso@nara.gov; or Mark Riddle, Lead for CUI Program Oversight, at (202) 357-6864, mark.riddle@nara.gov.

Enclosures: 1. Controlled Unclassified Information (CUI) Program
Implementation Status Form
2. Controlled Unclassified Information (CUI) Program
Implementation Status Form Instructions

Controlled Unclassified Information (CUI) Program Implementation Status Form

PART A: Identifying Information	
1. Report Date.	1.
2. Department or Agency.	2.
3. Senior Agency Official contact information.	3. Name: Title: Address: Phone: Email:
4. Program Manager contact information.	4. Name: Title: Address: Phone: Email:
5. If applicable, enter the department or agency that has agreed to provide some or all security support or cognizance over your agency's CUI Program.	5.
6. If applicable, enter the departments or agencies that your agency has agreed to provide some or all security support or cognizance over their CUI Program(s).	6.
7. If applicable, enter the departments or agencies that your agency has entered into a partnership with to share resources or services related to each agencies respective CUI Program.	7.
PART B: Policy	
1. Select the status that best describes your agency's progress in developing and issuing a policy that implements the CUI Program.	
<input type="checkbox"/> Not Started <input type="checkbox"/> Planning <input type="checkbox"/> Draft <input type="checkbox"/> Internal Review <input type="checkbox"/> Complete	
Date:	Date:
2. If not complete, enter the projected date your agency's policy will be issued.	2.
PART C: Training	
1. Select the status that best describes your agency's progress in developing and deploying CUI training.	
<input type="checkbox"/> Not Started <input type="checkbox"/> Planning <input type="checkbox"/> Draft <input type="checkbox"/> Internal Review <input type="checkbox"/> Complete	
Date:	Date:
2. If not complete, enter the projected date your agency's CUI training will be deployed.	2.
3. Has your agency engaged in any general awareness activities that address the CUI Program and its implementation within your agency?	3. <input type="checkbox"/> Yes <input type="checkbox"/> No
PART D: Physical Safeguarding	
1. Select the status that best describes your agency's progress in implementing the physical safeguarding requirements, as described in 32 CFR part 2002 and agency policy.	
<input type="checkbox"/> Not Started <input type="checkbox"/> Planning <input type="checkbox"/> Assessing <input type="checkbox"/> Modifying <input type="checkbox"/> Complete	
Date:	Date:
2. If not complete, enter the projected date your agency's physical safeguarding measures will align to those described in 32 CFR part 2002 and agency policy.	2.

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PART E: Information Systems	
1. Select the status that best describes your agency's progress in assessing and transitioning all information systems that process, store, or transmit CUI to the standards described in 32 CFR part 2002.	
<input type="checkbox"/> Not Started	<input type="checkbox"/> Identifying
<input type="checkbox"/> Assessing	<input type="checkbox"/> Modifying
<input type="checkbox"/> Complete	
Date:	
2. If not complete, enter the projected date your agency's information systems will align to the standards described in 32 CFR part 2002.	2.
3. Does your agency have a plan to set up a process to inventory, assess and modify all systems that process, store, or transmit CUI to meet the requirements of 32 CFR part 2002?	3. <input type="checkbox"/> Yes <input type="checkbox"/> No
4. If not complete, what is the planned operational start date for the process to inventory, assess and modify all systems that process, store, or transmit CUI to meet the requirements of 32 CFR part 2002?	4.
PART F: Self-Inspection Program	
1. Select the status that best describes your agency's progress in developing and initiating internal oversight efforts for the agency's CUI Program.	
<input type="checkbox"/> Not Started	<input type="checkbox"/> Planning
<input type="checkbox"/> Draft	<input type="checkbox"/> Scheduled
<input type="checkbox"/> Complete	
Date:	
2. If not complete, enter the projected date your agency will initiate internal oversight efforts.	2.
PART G: Additional Information	
1. Use this space to elaborate on any section of this form. If more space is needed, provide as an attachment to this form.	

Controlled Unclassified Information (CUI) Program Implementation Status Form

Instructions

PART A: Identifying Information
1. Report Date. Enter the date (day, month, and year) of the report.
2. Department or Agency. Enter your department or agency. Note: Components, elements, regional locations, divisions, and/or internal lines of business within agencies are not expected to report directly to the Information Security Oversight Office. Components, elements, regional locations, divisions, and/or internal lines of business must report to their parent agency. Only parent agencies are required to directly to ISOO using this form.
3. Senior Agency Official contact information. Enter the contact information of the officially designated Senior Agency Official for the agency's CUI Program.
4. Program Manager contact information. Enter the contact information for the officially designated Program Manager for the agency's CUI Program.
5. If applicable, enter the department or agency that has agreed to provide some or all security support or cognizance over your agency's CUI Program. Due to their size, budgetary limitations, staffing, or available resources, some agencies may elect to allow or authorize another agency to provide security support or cognizance over all or part of their CUI Program. If applicable, list the department or agency that has agreed to provide some or all security support or cognizance over your agency's CUI Program (e.g., destruction services, incident reporting mechanisms, training modules, internal inspections).
6. If applicable, enter the departments or agencies that your agency has agreed to provide some or all security support or cognizance over their CUI Program(s). Due to their size, budgetary limitations, staffing, or available resources, some agencies may request from other agencies some form of assistance in order to adequately implement their CUI Program. If applicable, list any departments or agencies that your agency has agreed to provide security support to or cognizance over (e.g., destruction services, incident reporting mechanisms, training modules, internal inspections).
7. If applicable, enter the departments or agencies that your agency has entered into a partnership with to share resources or services related to each agencies respective CUI Program. Due to their size, budgetary limitations, staffing, or available resources, agencies may elect to form partnerships to share resources or services related to the CUI Program (e.g., destruction services, incident reporting mechanisms, training modules, internal inspections). If applicable, list any list any departments or agencies that your agency has entered into an agreement with to share resources or services related to each of your CUI Programs.
PART B: Policy
1. Select the status that best describes your agency's progress in developing and issuing a policy that implements the CUI Program. Not Started: Not started means that your agency has not begun to develop a policy or policies that will implement the CUI Program. If selected, enter the date (month and year) that your agency plans to initiate the development of policy. Planning: Planning means that your agency has officially begun the process to modify or develop a policy or policies that will implement the CUI Program. This includes identifying all existing policies that prescribe protective measures for unclassified information and identifying all information types (CUI Categories or Subcategories) that the agency currently uses. Draft: Draft means that your agency has a rough draft of a policy. Internal Review: Internal review means that a draft policy is being circulated to internal elements or organizations for concurrence or comment. Complete: Complete means that your agency has successfully developed and issued a policy (or policies) that implement the CUI Program. If selected, enter the date (day, month, and year) the policy was complete.
2. If not complete, enter the projected date your agency's policy will be issued. Enter the date (month and year) your agency expects to issue a policy that implements the CUI program.
PART C: Training
1. Select the status that best describes your agency's progress in developing and deploying CUI training. Not Started: Not started means that your agency has not begun to develop training for the CUI Program. If selected, enter the date (month and year) that your agency plans to initiate the development of CUI training. Planning: Planning means that your agency has officially begun the process to develop CUI training. Draft: Draft means that your agency has a draft training for the CUI Program. Internal Review: Internal review means that a draft CUI training is being circulated to internal elements or organizations for concurrence or comment. Complete: Complete means that your agency has successfully developed and deployed CUI training. If selected, enter the date (day, month, and year) the training was complete.
2. If not complete, enter the projected date your agency's CUI training will be deployed. Enter the date (month and year) your agency expects to deploy CUI training to the workforce.
3. Has your agency engaged in any general awareness activities that address the CUI Program and its implementation within your agency? Select the response that represents whether or not your agency has engaged in awareness activities that address the CUI Program and its implementation within your agency. General awareness activities include, but are not limited to, training modules, broadcast messages, agency newsletters, information sheets, and agency websites that address the CUI Program and its implementation within your agency.

Controlled Unclassified Information (CUI) Program Implementation Status Form

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PART D: Physical Safeguarding

1. **Select the status that best describes your agency's progress in implementing the physical safeguarding requirements, as described in 32 CFR part 2002 and agency policy.**

Not Started: Not started means that your agency has not begun implementing the physical safeguarding requirements for CUI. If selected, enter the date (month and year) that your agency plans to begin implementing the physical safeguarding requirements for CUI.

Planning: Planning means that your agency has started planning for implementing the physical safeguarding requirements for CUI. This activity could include identifying existing policies and safeguarding measures currently in use for your agency and developing a plan for assessing current implemented safeguards.

Assessing: Assessing means that your agency is currently assessing the current physical safeguards used to protect CUI.

Modifying: Modifying means that your agency is currently taking steps to modify all areas that do not meet the physical safeguarding requirements for CUI.

Complete: Complete means your agency implemented the physical safeguarding requirements for CUI. If selected, enter the date (day, month, and year) this activity was completed.

2. **If not complete, enter the projected date your agency's physical safeguarding measures will align to those described in 32 CFR part 2002 and agency policy.** Enter the date (month and year) your agency expects to have implemented the physical safeguarding requirements for CUI.

PART E: Information Systems

1. **Select the status that best describes your agency's progress in assessing and transitioning all information systems that process, store, or transmit CUI to the standards described in 32 CFR part 2002.**

Not Started: Not started means that your agency has not begun assessing and transitioning all information systems to the standards described in 32 CFR part 2002.

Identifying: Identifying means that your agency has started the process of identifying all information systems that process, store, or transmit CUI.

Assessing: Assessing means that your agency has started assessing the current configuration of all information systems that process, store, or transmit CUI against the standards of described in 32 CFR part 2002 (the moderate confidentiality impact value).

Modifying: Modifying means that your agency is currently taking steps to modify all information systems that were found to be configured at a lower standard (less than the moderate confidentiality impact value).

Complete: Complete means that your agency has successfully modified all systems that process, store, or transmit CUI to the standard identified in the 32 CFR part 2002. If selected, enter the date (day, month, and year) this activity was completed.

2. **If not complete, enter the projected date your agency's information systems will align to the standards described in 32 CFR part 2002.** Enter the date (month and year) your agency expects information systems that process, store, or transmit CUI will meet the requirements of 32 CFR part 2002.

3. **Does your agency have a plan to set up a process to inventory, assess and modify all systems that process, store, or transmit CUI to meet the requirements of 32 CFR part 2002?** Select the response that represents whether or not your agency has a plan to set up a process to inventory, assess, and modify all systems that process, store, or transmit CUI.

4. **If not complete, what is the planned operational start date for the process to inventory, assess and modify all systems that process, store, or transmit CUI to meet the requirements of 32 CFR part 2002?** Enter the date (month and year) your agency expects to begin assessing and transitioning all information systems to the standards described in 32 CFR part 2002.

PART F: Self-Inspection Program

1. **Select the status that best describes your agency's progress in developing and initiating internal oversight efforts for the agency's CUI Program.**

Not Started: Not started means that your agency has not begun to develop a method for evaluating or assessing implementation efforts for the agency's CUI Program. If selected, enter the date (month and year) that your agency plans to start developing a method for evaluating implementation efforts for the agency's CUI Program.

Planning: Planning means that your agency has officially begun the process to develop a method for evaluating or assessing implementation efforts for the agency's CUI Program.

Draft: Draft means that your agency has a rough draft of a method for evaluating or assessing implementation efforts for the agency's CUI Program.

Scheduled: Scheduled means that your agency has developed a schedule or plan for assessing implementation efforts within the agency.

Complete: Complete means that your agency has successfully developed a method for evaluating and assessing implementation efforts for the agency's CUI Program and has conducted at least one oversight action or activity. If selected, enter the date (month and year) this action was completed.

2. **If not complete, enter the projected date your agency will initiate internal oversight efforts.** Enter the date (month and year) your agency expects to initiate internal oversight efforts.