Webinar Questions and Answers

Security Classification Guides

Webinar guests submitted several questions before and during the June 26, 2014 Security Classification Guides (SCG) session. The following responses are provided by the Center for Development of Security Excellence (CDSE).

Question: Are there guidelines regarding the issuance of Security Classification Guides? Should they be issued with the DD 254 or only if needed in the performance of duties on the contract?

Answer: The Government Contracting Activity (GCA) provides the contractor with the SCG needed during the performance of the contract. This guidance is provided to the contractor via the DD Form 254, Contract Security Classification Specification. The complete DD Form 254, including attachments and supplements, is the basic document for conveying to contractors the applicable classification and declassification guidance for the classified contract or subcontract. The specific classification guidance required for contract performance should be captured in block 13 of the DD Form 254. The GCA can also include the entire SCG as an attachment to the DD Form 254, depending on the contractor's level of involvement and the complexity of the contract or program.

Question: My company has a new software product that may be used in a classified DoD project. The software is unclassified but we will be asked to custom build some classified plugins (the methods and calculations are sensitive). Do I need to develop a classification guide for these components?

Answer: Because only government officials are designated as an Original Classification Authority (OCA), your company will not develop an SCG. You would derive the appropriate classification for each plugin from the SCG(s) applicable to your classified project.

Question: How does a security professional obtain a security classification guide?

Answer: The Defense Technical Information Center (DTIC) has an online index of most of the SCGs issued within the DoD. The index can be accessed at http://www.dtic.mil/dtic/stresources/standards/securityclassindex_desc.html (Note: you must first register for a user account to access the index and the SCGs).

Question: Who should participate in the development of SCGs?

Answer: The persons who should participate in the development of an SCG are those individuals who have subject matter expertise of the specific system, plan, program, project, or mission in its entirety, or in one or more of the 11 categories outlined in Appendix 3 of DoDM

5200.45, Instructions for Developing Security Classification Guides, i.e. performance and capability, specifications, vulnerabilities, procurement, production, logistics, operations, testing and other related data. The OCA, however, remains ultimately responsible and is accountable for all original classification decisions and associated aspects in the development and finalization of the SCG.

Question: Is Restricted Data (RD)/Formerly Restricted Data (FRD) derivative classification training required when RD/FRD is included in the SCG?

Answer: Yes, DoDM 5200.01, Vol. 1-4, Information Security Program, contains guidance regarding RD and FRD information contained in National Security Information (NSI) classified in accordance with E.O. 13526. The Department of Energy (DOE) can also be contacted for additional training information. Please also keep in mind coordination is required with the DOE Office of Classification through the Deputy Assistant Secretary of Defense for Nuclear Matters whenever SCGs containing RD or FRD information are developed or revised.

Question: Should security classification guides be updated every five years?

Answer: Yes, per DoDM 5200.01, Vol. 1, Enclosure 6, each SCG shall be reviewed by the issuing OCA at least once every five years. SCGs, however, must be reviewed and updated sooner when necessitated by significant changes that affect the content of the SCGs.

Question: If a new SCG is released, but your DD Form 254 cites the old SCG, which do you follow? What if there is work that is not on your current DD254?

Answer: The new SCG should be followed. You should also alert your GCA of the new SCG so the DD Form 254 can be revised. According to DoD 5220.22-M, National Industrial Security Program Operating Manual (NISPOM), and DoD 5220.22-R, Industrial Security Regulation (ISR), the GCA or User Agency (UA) is required to periodically review existing classification guidance and issue a revised Contract Security Classification Specification, i.e. DD Form 254, when a change occurs to existing guidance. The DD Form 254 and/or contract statement of work must also accurately convey the work to be performed by the contractor and be revised accordingly.

Question: Our DoD customer has never approved declassification of any of our storage. How do we initiate declassification?

Answer: You should first discuss with your DoD customer your concerns, and determine the reason or reasons why declassification approval has not been granted. For example, if you have material with a declassification date in the past yet remains classified by your customer, you may want to ask if the declassification date was extended and obtain the new declassification date. You may also want to seek out and speak directly with the owner of the information and detail your concerns. If there is no forthcoming solution, or if you believe further action is needed after speaking with your DoD customer and/or information owner, you may initiate a formal challenge, following the guidance in paragraph 4-104 o the NISPOM. Alternately, you can simply return the classified material in question to your DoD customer for disposition or destroy the material if your company no longer requires the material for contract performance. In any case, you should also coordinate your actions with your assigned DSS Industrial Security Representative (IS Rep).