

***Controlled Unclassified Information
(CUI) Life Cycle Short #2: Safeguarding
Part 1 - Marking CUI
Student Guide***

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Center for Development of Security Excellence

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Introduction

To protect our national security a variety of laws, regulations, and government-wide policies require the careful handling of specific types of unclassified information – collectively referred to as controlled unclassified information (CUI).

DOD personnel at all levels may be responsible for creating, identifying, and designating CUI; safeguarding CUI; safely sharing CUI; decontrolling CUI; and destroying CUI.

The Safeguarding step of this CUI Life Cycle includes marking, handling, and storing CUI.

This Short will focus on the first key element of Safeguarding – the application of appropriate markings so information is immediately recognized as CUI and protected as such.

When you have completed this Short, you should be able to apply the policy requirements outlined in Department of Defense Instruction, or DODI 5200.48, Controlled Unclassified Information (CUI), by properly marking CUI materials.

This Short will also guide you in creating the CUI Step 2 Workplace Reference, a quick “how-to” guide specific to your agency or workplace. The template for this guide is in your Course Resources.

Course Objective

- Apply the policy requirements outlined in DODI 5200.48, Controlled Unclassified Information, by properly marking CUI materials.

Course Details

- Estimated completion time: 25 minutes
- POC: dcsa.cdsetraining@mail.mil

CUI Step 1: Review

Remember, for information to be considered CUI, it must be unclassified and require safeguarding according to an applicable law, regulation, or government-wide policy.

DOD personnel should reference the DOD CUI Program Registry, which generally mirrors the Information Security Oversight Office (ISOO) National Registry, to determine if information must be protected as CUI.

These registries also specify when additional controls must be included in CUI markings. These include Limited Dissemination Controls (LDCs) and Warning Statements.

To learn more about the process of creating, identifying, and designating CUI, see CUI Short #1: Create/Identify and Designate CUI.

Recognizing CUI

Once you determine that your information requires protecting and safeguarding in accordance with the CUI program, you must apply the minimum required CUI markings. Markings ensure holders immediately recognize CUI and safeguard it appropriately when handling it for any reason.

Marking CUI is required in both classified and unclassified environments. Before sharing CUI in any format, whether electronically via email or via hard copy, it is the responsibility of the holder to ensure the information is properly marked in accordance with DODI 5200.48, CUI.

CUI Scenario: Introduction

Imagine you are a human resource (HR) professional compiling information into a report on agency personnel. Some of the information you will include in this report is marked CUI. You need to know which documents – both electronic and hard copy – will need safeguarding, and you need to know how to mark the various types of documents included in your project.

Legacy Markings

You will encounter markings for controlled unclassified information other than “CUI.”

Before the issuance of DODI 5200.48 in March 2020, DOD protected controlled unclassified information using a different marking system. With the issuance of DODI 5200.48, however, these markings are now considered legacy markings.

Legacy markings include For Official Use Only (FOUO); Sensitive But Unclassified (SBU); and Law Enforcement Sensitive (LES), to name just a few.

The DOD CUI Program does not require that you remark or redact documents with legacy markings, provided the information remains under DOD control or is accessed online within the DOD. If legacy information is shared outside DOD or a new document is created using information derived from legacy material – if it still qualifies as CUI after a review – it must be remarked as CUI in accordance with the DOD CUI Registry.

For more specific questions on redacting or remarking legacy material at your agency, seek guidance from your CUI Component Program Manager (CPM).

Now, take a moment to update your Workplace Reference document with any legacy marking considerations.

Scenario: Legacy Markings

Consider the report you are compiling on agency personnel.

Some of the data you are using to compile your report is marked as FOUO-PRIVACY SENSITIVE because it contains Personally Identifiable Information or PII.

Does that mean your report should also be marked CUI-PII in the banner and footer?

Should your personnel report be marked as CUI-PII in the banner and footer?

Select the best response. Check your answer in the Answer Key at the end of this Student Guide.

- Yes
- No

Minimum Marking Requirements

When creating a new CUI document there are two minimum marking requirements.

First, you must include the acronym “CUI” in the banner and footer of each page of your document.

Second, the Designation Indicator (DI) block must appear on the first page or cover sheet of all documents containing CUI.

Banner/Footer Markings

The acronym “CUI” must appear on the banner and footer of each page.

When adding this marking, note that you must NOT add “UNCLASSIFIED” before CUI, as used to be the case with legacy markings. You must not spell out the acronym CUI, or add the CUI category to the banner and footer of each page. The CUI category will be included in the DI block.

Note: These are DOD minimum marking requirements for the banner/footer of CUI. Consult your CUI CPM for additional guidance.

DI Block

As already noted, the CUI DI block must appear on the first page or cover sheet of all documents containing CUI. Generally, it is placed in the lower right-hand corner of the document, though if the lower right-hand corner is not available – for example, on a map or chart – the block may be placed in the upper right-hand corner, or somewhere else visible.

The DI block must contain: the name of the DOD Component; the office creating the document; categories contained in the document; any applicable distribution statements or limited dissemination controls (LDCs); and the name and phone number of the point of contact (POC). As a best practice, provide an office phone number or email to ensure the POC is relevant as personnel changes.

Keep in mind that you should not implement LDCs unless they are authorized by a specific law, regulation, or government-wide policy. LDCs should not be used to unnecessarily restrict access to information. You can find the approved list of DOD LDCs in your course Resources.

DI Block Line	Description of DI Block Line
Controlled by:	The first Controlled by line indicates the name of the DOD Component. This line is not required if the DOD Component is identified in the letterhead.
Controlled by:	The second Controlled by line identifies the office creating the document.
CUI Category(ies):	This line identifies the category or categories of CUI contained in the document – sometimes there is more than one.

LDC:	<p>This line identifies any applicable limited dissemination controls (LDCs). LDCs are dissemination or access controls approved to limit dissemination by the creator of CUI in accordance with DODI 5200.48.</p> <p>LDCs are not required under current policy; only use LDCs approved for use by the executive agent.</p> <p>Applicable Distribution Statements are also included in this line and are authorized for use with:</p> <p>CUI export-controlled technical information Controlled technical information (CTI) Other scientific, technical, and engineering information</p>
POC:	<p>This line includes the name and phone number or email of the appropriate point of contact.</p> <p><i>Best practice: Do not list an individual's name, just the office central email or office central phone number. This way, if the original POC leaves, questions will still get through.</i></p>

Take a moment to update your Workplace Reference Document.

Scenario: CUI Category

Now, consider the personnel report you are compiling on federal agency personnel. It includes Privacy information like employee social security numbers and other personnel record information. In addition to the required banner and footer markings on each page, you need to complete the DI block.

You complete lines one, two, and five of the DI block, identifying your component, your office, and your office's contact information.

Next, you need to identify the CUI category or categories contained in the document. Remember, your report contains personnel records with specific privacy information. What should you enter into the CUI Category section of the DI block?

Visit the DOD CUI Registry to investigate. A link is available in your Course Resources.

What should you enter in the CUI Category(ies) section of the DI block?

Select all that apply. Check your answer in the Answer Key at the end of this Student Guide.

- FOUO
- PII
- PRVCY
- PERS

Scenario: Minimum Markings

Next, what are you required to enter in the LDC section of the DI block for this document containing personnel records with specific privacy information?

Visit the DOD CUI Registry to investigate.

What are you required to enter in the LDC section of the DI block?

Select the best response. Check your answer in the Answer Key at the end of this Student Guide.

- NOFORN
- FEDCON
- RELIDO
- No LDC is required

Portion Markings

Beyond the required banner and footer markings and the DI block, you also need to be aware of portion marking requirements for CUI. In accordance with DODI 5200.48 CUI, portion markings are optional at this time. For exceptions consult your DOD CUI CPM.

If you decide to mark individual portions of your document as CUI or unclassified you must mark ALL portions of the document, including but not limited to: subjects; titles; headings; pictures, graphs, charts, and maps; reference lists; paragraphs, sub-paragraphs, and bullets and sub-bullets. The CUI DI block does not require a portion marking.

When used, portion markings should appear as the abbreviation CUI in parentheses, and the letter U in parentheses.

Do not write U//CUI or CUI// and the category, as these are not valid portion markings.

Note if all sub-paragraphs or sub-bullets carry the same portion marking as the main paragraph or bullet point, portion marking is not required for the sub-paragraph or sub-bullet. If any of the subparagraphs or sub-bullets carry different portion markings than the main paragraph, however, then portion markings are required for all.

Select NOFORN to review additional important details about using NOFORN to control CUI.

NOFORN

Check with your Foreign Disclosure Officer (FDO) before using NOFORN to control CUI.

NOFORN is an intelligence control marking and may only be applied to CUI where laws, regulations, or government-wide policy specifically prohibit sharing with foreign nationals or when a government agency has determined the information is not releasable.

The DOD allows the following types of non-intelligence information (classified and CUI) to be marked as NOFORN:

- Naval Nuclear Propulsion Information (NNPI)
- Unclassified Controlled Nuclear Information (UCNI)
- National Disclosure Policy (NDP-1)
- Cover and cover support information

Scenario: Portion Markings

Now, consider the report you are compiling on agency personnel. You decide to apply portion markings and reach this bulleted section. Which of the marking options shown here should you apply to the document?

Option A:

- (CUI) John Smith:
 - SSN: 123-45-6789
 - (234) 567-8901
 - 23 Maple Dr
Washington, D.C.

Option B:

- (CUI) John Smith:
 - (CUI) SSN: 123-45-6789
 - (CUI) (234) 567-8901
 - (CUI) 23 Maple Dr
Washington, D.C.

Option C:

- (U//CUI) John Smith:
 - (CUI) SSN: 123-45-6789
 - (CUI) (234) 567-8901
 - (CUI) 23 Maple Dr
Washington, D.C.

Which option contains correct portion markings?

Select the best response. Check your answer in the Answer Key at the end of this Student Guide.

- Option A
- Option B
- Option C

Marking CUI in Other Formats

Of course, documents aren't the only CUI medium. Slide presentations, emails, graphics, charts, and drawings, and other electronic media may also contain CUI.

Slide Presentations

Just like a document, a slide deck containing CUI must include the marking CUI at the top and bottom of each screen. The DI block appears in the lower right-hand corner of the first screen.

Portion markings are optional for presentations, just as they are for other CUI documents but applied using the same guidelines when implemented.

Emails

Mark emails containing CUI just as you would mark a document, although the banner and footer and the DI block may be left-justified rather than centered if necessary.

When CUI files are attached to an email, the overall control of the message is dictated by the level of the attachment, but the DI block does not need to appear in the email itself.

Graphics, Charts, and Drawings

Graphics, charts, and drawings must be marked with the text CUI. When they are presented on their own – that is outside of a document – they also require the DI block.

If necessary, you may use color to make the CUI markings conspicuous on a black and white document.

Electronic Media

Electronic media such as USBs, hard drives, and CDs must be marked to alert holders that CUI is stored on the device. Space limitations can make it difficult to include CUI Categories or LDC markings on this type of media.

Labels are available for electronic media, including the SF 902, which is appropriate for hard drives, and the SF 903, which fits USBs.

Scenario: Marking Other Formats

Consider the report you have been writing. You are now turning it into a slide deck to brief team members regarding your findings. What markings do you need to include on the slide deck?

What markings are *required* for your slide presentation?

Select all that apply. Check your answer in the Answer Key at the end of this Student Guide.

- CUI at the top of the slide
- CUI at the bottom of the slide
- DI block
- Portion markings

Marking CUI in Classified Documents

Until now we have been discussing CUI in an unclassified environment. When a classified document contains CUI, there are additional considerations.

First, of course, the document must follow all classified marking requirements, in accordance with DODM 5200.01 Vol. 2: DOD Information Security Program: Marking of Information.

Portion markings are required for classified documents, and CUI markings must appear in those portions known to contain CUI. These portions should be marked with the acronym CUI in parentheses. When possible, you should try to keep CUI paragraphs and portions separate from classified portions so each may be marked appropriately as CUI or classified. If this is not possible and you have a section that contains CUI and classified information that cannot be separated, then you should mark the highest classification in the portion – for example, S for Secret.

For example:

(CUI) This section contains CUI.

(S) This section contains classified information.

(S) This section contains CUI and classified information that cannot be separated.

(U) This section contains unclassified information and no CUI.

The acronym CUI does NOT go in the banner line of classified documents. Instead, the highest classification – for example, SECRET – appears in the banner.

The CUI DI block is placed at the bottom right of the first page of the document. Note that the Classification Authority Block (CAB) appears on the opposite, or left side of the first page of the document.

Classification Authority Block (CAB) example:

Classified By: John Smith, Program Analyst
Derived From: Multiple Sources
Declassify On: 20360515

Finally, a CUI Warning Statement should be added to the bottom of the first page, alerting readers to the presence of CUI in the classified document.

CUI Warning Statement example:

This content is classified at the [insert highest classification level of the source data] level and may contain elements of controlled unclassified information (CUI), unclassified, or information classified at a lower level than the overall classification displayed. This content shall not be used as a source of derivative classification; refer instead to [cite specific reference, where possible, or state “the applicable classification guide(s)”]. It must be reviewed for both classified national security information (CNSI) and CUI in accordance with DODI 5230.09 prior to public release. [Add a point of contact when needed.]

Review the Comingled Markings section of your Workplace Reference document.

Conclusion

Congratulations on completing the second CUI Life Cycle Short: Safeguarding Part 1 – Marking CUI. In this Short you learned how to mark documents containing CUI, including minimum marking requirements, portion markings, CUI markings in other formats, and marking CUI in classified documents.

You should now be able to apply the policy requirements outlined in DODI 5200.48 Controlled Unclassified Information, by properly marking CUI materials.

You should also now have a completed Workplace Reference document customized for your workplace.

Course Objective

- Apply the policy requirements outlined in DODI 5200.48, Controlled Unclassified Information, by properly marking CUI materials.

Appendix A: Answer Key

Scenario: Legacy Markings

Consider the report you are compiling on agency personnel.

Some of the data you are using to compile your report is marked as FOUO-PRIVACY SENSITIVE because it contains Personally Identifiable Information or PII.

Does that mean your report should also be marked CUI-PII in the banner and footer?

Should your personnel report be marked as CUI-PII in the banner and footer?

- Yes
- No

Feedback: *In accordance with DODI 5200.48 CUI, although some of your source material contains PII, your newly created document should have CUI in the banner and footer of each page of the document.*

Scenario: CUI Category

Now, consider the personnel report you are compiling on federal agency personnel. It includes Privacy information like employee social security numbers and other personnel record information. In addition to the required banner and footer markings on each page, you need to complete the DI block.

You complete lines one, two, and five of the DI block, identifying your component, your office, and your office's contact information.

Next, you need to identify the CUI category or categories contained in the document. Remember, your report contains personnel records with specific privacy information. What should you enter into the CUI Category section of the DI block?

Visit the DOD CUI Registry to investigate. A link is available in your Course Resources.

What should you enter in the CUI Category(ies) section of the DI block?

- FOUO
- PII
- PRVCY
- PERS

Feedback: *Your report contains both personnel record information for federal employees and includes private information and PII, such as social security numbers. In this case, the information requires two categories of CUI, Personnel Records, abbreviated to PERS, and General Privacy, abbreviated to PRVCY.*

Scenario: Minimum Markings

Next, what are you required to enter in the LDC section of the DI block for this document containing personnel records with specific privacy information?

Visit the DOD CUI Registry to investigate.

What are you required to enter in the LDC section of the DI block?

- NOFORN
- FEDCON
- RELIDO
- No LDC is required

Feedback: No dissemination controls or distribution statements are required for personnel records per DOD minimum requirements. In some instances, privacy information may require a Privacy Act Warning Statement. Contact your CUI CPM for additional guidance as applicable.

Scenario: Portion Markings

Now, consider the report you are compiling on agency personnel. You decide to apply portion markings and reach this bulleted section. Which of the marking options shown here should you apply to the document?

Option A:

- (CUI) John Smith:
 - SSN: 123-45-6789
 - (234) 567-8901
 - 23 Maple Dr
Washington, D.C.

Option B:

- (CUI) John Smith:
 - (CUI) SSN: 123-45-6789
 - (CUI) (234) 567-8901
 - (CUI) 23 Maple Dr
Washington, D.C.

Option C:

- (U//CUI) John Smith:
 - (CUI) SSN: 123-45-6789
 - (CUI) (234) 567-8901
 - (CUI) 23 Maple Dr
Washington, D.C.

Which option contains correct portion markings?

- Option A
- Option B
- Option C

Feedback: The marking (CUI) can be applied to the entire list. Remember, if all sub-bullets carry the same portion marking as the main bullet, then you do not need to mark each individually. You should not use the marking (U//CUI).

Scenario: Marking Other Formats

Consider the report you have been writing. You are now turning it into a slide deck to brief team members regarding your findings. What markings do you need to include on the slide deck?

What markings are *required* for your slide presentation?

- CUI at the top of the slide
- CUI at the bottom of the slide
- DI block
- Portion markings

Feedback: The marking CUI must be added to the top and bottom of each slide and the DI block must be added to the first screen. Portion markings are optional.