



Information Security Oversight Office

National Archives and Records Administration

700 Pennsylvania Avenue, NW Washington, DC 20408



ISOO Notice 2009-13: Prohibited Use of X1-X8 Markings

May 8, 2009

Prior to the March 28, 2003 amendment of Executive Order 12958, as amended, “Classified National Security Information,” (the Order), and the accompanying September 22, 2003, change to its Government-wide implementing directive, 32 C.F.R. Part 2001, information was subject to declassification after 10 years, unless the information fell into one of eight exemption categories. In those instances, the information was exempt from automatic declassification at 10 years, but not from automatic declassification at 25 years. Rather than indicating the date or event for declassification, an original classification authority (OCA) was required to indicate the appropriate marking (X1-X8) on the source document or classification guide. These markings have been prohibited since September 22, 2003.

Despite this prohibition, documents created prior to September 22, 2003, and marked X1-X8 may continue to be utilized as a source of derivative classification. When performing derivative classification using a source document created prior to September 22, 2003, in which the markings X1-X8 appear in the “Declassify On” line, derivative classifiers shall follow the instructions provided in 32 C.F.R Part 2001.22(d)(2).

However, since September 22, 2003, some OCAs have failed to properly determine the duration of classification and have instead continued to use the now prohibited designations X1-X8. Such failures (to include the failure to update classification guides) have resulted in a multitude of derivatively classified documents inappropriately marked with the X1-X8 markings. As a consequence, ambiguity as to the duration of classification is created, placing classified information at needless risk and otherwise undermining the classification system.

In order to resolve any ambiguity and to aid agencies that receive improperly marked classified information from other agencies, the Director of ISOO issued a letter to agencies on this subject on February 16, 2007. The purpose of this Notice is to remind agencies of the need to address this issue and to provide additional clarification.

In cases where a document created on or after September 22, 2003, has any of the X1-X8 markings on the “Declassify On” line and is used as a basis for a derivative classification decision, derivative classifiers shall calculate the date 25 years from the date of the source document when determining a derivative document’s date or event to be placed on the “Declassify On” line.

If the source document’s date cannot be readily determined, derivative classifiers should seek clarification from the originator. In those cases where consultation is not practicable, derivative classifiers shall use a declassification date of September 22, 2028, when determining a derivative

document's date or event to be placed on the "Declassify On" line. This date reflects 25 years from the last authorized use of the X1-X8 markings.

When performing derivative classification using a classification guide that has not been updated to reflect the 2003 change in Presidential direction, derivative classifiers should seek clarification from the pertinent OCA. In those cases where consultation is not practicable, derivative classifiers shall use a declassification date of September 22, 2028, as noted above, when determining a derivative document's date or event to be placed on the "Declassify On" line.

Agencies are reminded of the need to ensure that classification guides, agency implementing regulations, security education and training efforts, and self-inspection guidelines have been updated to reflect the discontinuation of the markings X1-X8. Any classification guide that still includes such declassification instructions must be updated immediately.

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