

Guidelines for SF 311 Data Collection

Background

In the past, ISOO asked agencies to report only the number of classified “finished products,” a term which originated in a paper-based environment and was often not easily applied in the electronic environment. However, because of the increasing use of the electronic environment to share and disseminate information, it has become clear that we need to discontinue the use of the “finished product” concept and instead count all classification decisions regardless of the media. We therefore request that each reporting agency adjust its counting or sampling methodology to include such things as e-mail, wikis, and blogs.

Counting Classification Decisions Regardless of Media

The SF 311 form asks that your estimate include the total number of classification decisions (regardless of media or whether produced in electronic form). The following is a list of types of materials to include in your count, some of which you might not have included in the past:

- Electronic presentations;
- E-mail;
- Official correspondence or memoranda;
- Photographs;
- Reports and/or intelligence products;
- Web pages; and
- Wiki articles and blog articles.

Counting Classification Decisions

The following is provided as guidance on how to count classification decisions:

General:

- Count all original and derivative classification actions.
- Do not count products classified by another agency.
- Do not count any reproductions or copies.

E-mail: If a classified e-mail is disseminated and no additional classified information is added in the replies or forwards, then only the first classified e-mail should be counted. The replies and forwards that do include additional classified information should be counted in addition to the original classified e-mail. Do not count unclassified e-mails that are created on a system that is certified to handle classified information.

If the e-mail is merely a transmittal vehicle for a classified attachment and contains no classified information itself, then do not count the e-mail. Only count the classified attachment if it was originated by your office.

Web pages: Each web page containing classified information that is created during the reporting period should be counted only once regardless of how many times it was modified or updated. The count should be conducted by the agency or command that hosts the web page.

Blogs: Every individual blog entry that constitutes a classification action should be counted. The count should be conducted by the agency or command hosting the blog.

Wiki articles: Each wiki article containing classified information that is created during the reporting period should be counted, and counted only once, regardless of how many times it is modified or updated by other users. The count should be conducted by the agency or command hosting the wiki.

Instant messages: Instant messages should not be counted.

The chart below provides examples of how to count decisions in both the paper environment and the electronic environment.

Examples of Counting Classification Decisions:

Paper environment	Electronic environment	How to count
A report contains classified information derived from a classified source and is photocopied and distributed to 30 recipients.	An e-mail contains classified information derived from a classified source and is disseminated to 20 recipients, and then forwarded on to 10 more recipients.	Count as one classification decision. Do not count as 30 or 31 classification decisions.
An unclassified internal memo is drafted in response to a classified Inspector General (IG) report. The IG report will be distributed as an attachment to the unclassified internal memo.	An unclassified transmittal e-mail is drafted in response to a classified IG report. The IG report will be distributed as an electronic attachment to the unclassified e-mail.	Do not count as a classification decision. A classification decision was already counted at the creation of the classified IG report. The e-mail must be protected as classified (classified transmittal) but does not warrant a classification count.

Steps for Sampling

Actual counts of classification decisions for a 52-week period are always preferred, but for many large agencies this may not be practical. In such cases a sampling method should be used. The following is a possible sampling technique that can be employed in order to estimate the total quantity of classification decisions under your agency.

1. Define the Total Population

The first step in this process is to define the total population of classifiers within your organization. This total population estimate should include all personnel (e.g., contractors, field personnel) making classification decisions under your agency's authority.

2. Define Sampling Population

After identifying your total population of classifiers, a sampling population must be defined. You can sample a percentage of the total population and then estimate the total number of original and derivative classification decisions agency-wide. The percentage used to identify the sampling population is at the discretion of the agency.

3. Collect Data of Sample Population

The most common practice for collecting data is to ask each classifier, derivative and original, to provide the number of classification decisions for a two-week period during the fiscal year. The manner in which the data is collected is entirely dependent on your agency. However, some agencies employ a survey via e-mail that is disseminated to the entire sampling population. The numbers entered on the SF 311 should reflect the final numbers for a 52-week period. **Regardless of sampling technique, please explain the methodology you employ in Part J of the SF 311.** (See example below.)

Example: The Department of Better Government has 500 employees with security clearances. The information security official responsible for reporting the agency's SF 311 data surveyed 20 percent of this total population. The information security official disseminated a classification decision survey via e-mail to 100 individuals to capture the classification decisions of each individual over a two-week period during the fiscal year. The derivative classification count of the sample population is then multiplied by 5 to arrive at the total population. Since the classification count survey was intended to only capture the decisions within a two-week period, the count should then be multiplied by 26 to show the total classification count of a 52-week fiscal year.

Additional Guidance for Completing SF 311

1. Part G: Automatic, Systematic, and Discretionary Declassification Reviews

The purpose of this block is to count the number of pages reviewed and declassified for each category of automatic, systematic, and discretionary declassification reviews. In previous years, numbers for automatic and systematic reviews were combined into one number. This year, we are requesting the numbers be broken out separately. Discretionary declassification decisions are those decisions by an OCA or official with declassification authority that are not performed under the automatic, systematic, or mandatory review programs.

2. Part H: Internal Agency Oversight

Clarification on Block 43

Please limit your response to any significant effort to self-inspect your agency's classified information security program as laid out in E.O. 13526, and 32 C.F.R. Part 2001. Do not count minor inspections like routine after-hours security checks. Please refer to 32 C.F.R. Part 2001.60 for the type of activities to be included in this count.

Clarification on Block 44

The purpose of this block is to count any internal or external classification challenges that may have been processed by your agency under section 1.8 of E.O. 13526 and 32 C.F.R. 2001.14. Do not count requests received under the Freedom of Information Act or the Mandatory Declassification Review provisions of E.O. 13526.

Clarification on Blocks 45 and 46

This is a new requirement to report the number of classification challenges where the classification status was either fully affirmed or overturned in whole or part.

3. Part I: Classification Guides

This is a new requirement to report the number of security classification guides created by your agency and currently in use. Additionally, please annotate in the comments section the number of guides that have not been reviewed and/or updated during the last five years.

4. Part J: Explanatory Comments

In order to improve our analysis of the information received, we are requesting that the sampling period used for your data collection be selected in this part along with the multiplier that was used, if any. Regardless of the sampling period used, the purpose of the multiplier is to cover the entire 52 weeks of the reporting period. For example, if you used a two-week sampling period, the multiplier would be 26; if you used a four-week sampling period, the multiplier would be 13; if you used an eight-week sampling period, the multiplier would be 6.5; and if your sampling period was 365 days, then no multiplier would be applied. If your data includes numbers from the sampling period only and a multiplier was not applied, please annotate that in this block. Please be consistent in your numbers. If you are reporting for multiple components, please use the same sampling period and multiplier throughout.