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DD/S&T# 5323-78

OD&E-1334-78
15 November 1978

MEMORANDUM FOR: Director of Security

SUBJECT : Uniform Procedure for Administrative Handling and Accountability of Sensitive Compartmented Information, DCID 1/19

1. (AIUO) I wish to bring to your attention some serious problems I see with the Subject DCID. Initially you should be aware that despite the fact that DCID 1/19 became effective 6 June 1978, this Office was never on distribution for same; and we did not become aware of the DCID until, through our own efforts, we obtained a copy about two weeks ago. Furthermore, despite the fact that this Office deals extensively with SCI material, no one from this Office was consulted in the preparation of this Directive nor were we afforded the opportunity of commenting on the draft DCID prior to publication.

2. (AIUO) I have serious problems with the following Sections of DCID 1/19:

A. Section 2c. "Records. Except as provided in Section f below, SCI-accredited facilities shall keep a record of the initial receipt and internal distribution of all SCI received, by any means, for a minimum of six months. This record must describe in detail the SCI received and be annotated to reflect which office(s) within the facility was the recipient of the SCI. Recording of incoming SCI is required regardless of geographic proximity between the sender and recipient."

If this Section is interpreted literally, it negates the requirement for registry logs or document control cards for SCI material to be retained for more than six months beyond the initial receipt of same. It is realized that the six month period is a minimum requirement, but it should also be pointed out that this very Section is being cited by DIA as the reason that they could not locate or account for one copy of the [redacted] charged to them.

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B. Section 2e. "Accountability and Control Within an SCI-Accredited Facility. Subsequent to the initial recording process required by subparagraph c above, no further SCI security accountability controls (for example, internal receipting, certificates of destruction, inventories, document control numbers, access records, etc.) are necessary within an SCI-accredited area. However, SIOs may impose such additional administrative controls as deemed necessary to insure efficient administration of activities under their control."

Again it is understood that the provisions of this Section are minimum requirements, but to consider such minimal controls, such as no internal receipting, no certificates of destruction, no document control numbers, no access records, etc., within an SCI-accredited area could, I believe, lead to a total lack of accountability. The procedures in this Section might be appropriate to a small Intelligence Vault with two or three permanently assigned SCI control personnel, but it seems to me that they are not in any sense adequate for an operation such as OD&E which handles thousands of SCI documents each year.

C. Section 2g. "Audits. SCI Control/Security Officers shall periodically review holdings of SCI to ensure that proper accountability is being maintained and that SCI is destroyed when no longer needed. SIOs and/or SCI Executive Agent Program Managers may require the inventory of specified SCI."

This Section appears to me to be in conflict with both Sections 2c and 2e above. How can a periodic review of SCI holdings be made when no internal receipting, certificates of destruction, document control numbers, or inventories are required within an SCI-accredited facility.

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D. Section 2j(2). "Non-Electrical. SCI shall be transmitted from one SCI facility to another by two SCI couriers approved for this purpose, by diplomatic pouch, or by Armed Forces Courier Service (ARFCOS). Courier procedures shall ensure that SCI materials are adequately protected against the possibility of hijacking, unauthorized viewing, loss, or other form of compromise during the transmission. Transmittal of SCI via commercial aircraft not under U.S. Government or military charter is prohibited.* The Departmental SIO must specifically approve all exceptions.

"SCI couriers shall be active duty military or U.S. Government civilian employees meeting DCID 1/14 standards and be specifically designated by the responsible SIO. Couriering of SCI by contractor employees is prohibited except when specifically approved by an Intelligence Community SIO or an Executive Agent/Operational Program Manager."

"*Does not apply to ARFCOS and the diplomatic courier service."

OD&E couriers are required to utilize both commercial freighters, commercial airline passenger service as well as military air in order to perform their duties in a timely fashion. These couriers all meet DCID 1/14 standards, all have successfully passed polygraph examinations, and all are Contract employees of CIA. It is strongly recommended that DCID 1/19 be amended to permit our continued utilization of OD&E couriers to transport SCI material and to permit them to utilize commercial aircraft in the same manner in which ARFCOS and the diplomatic courier service may do so.

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3. (AIUO) Because of the problems cited in paragraph 2 above, I recommend that DCID 1/19 be reviewed. I would be happy to discuss this matter with you personally or to make available an OD&E employee who could serve on any reviewing body you may wish to establish.

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Acting Director
of
Development and Engineering

Distribution:
Original - Addressee
1 - SS/Sensitive Document Control File
1 - SS/BYEMAN Policy File
1 - SS/Chrono
1 - DDS&T (Dirks)

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ROUTING AND RECORD SHEET

SUBJECT: (Optional)

FROM:	EXTENSION	NO.
AD/OD&E		OD&E-1334-78
		DATE 15 November 1978

TO: (Officer designation, room number, and building)	DATE	OFFICER'S	COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)
1. D/OS GE31, HQS	8 NOV 1978		
2.			
3.			
4.			
5.			
6. C/PPG/P+M			- For your action in coordination, as appropriate, with SSC and CSG. K
7.			
8.			
9.			
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11.			D/Dir. of Security (Pers)
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