

## Objectives

**[a]**

Media containing CUI is marked with applicable CUI markings.

**[b]**

Media containing CUI is marked with distribution limitations.

# MP.L2-3.8.4

## Media Protection

### Media Markings

*"Mark media with necessary CUI markings and distribution limitations."*

#### Key Discussion Points

**Both Elements Required:**

Two marks are needed: (1) the CUI marking identifying the content type, and (2) the distribution limitation restricting who can receive it.

**NARA Guidance:**

NARA CUI Notice 2019-01 provides specific guidance on labeling media of different sizes — labels must follow the prescribed format.

**Digital AND Paper:**

USB drives, CDs, hard drives, printed documents — all must be externally marked, not just the files inside.

**Links to 3.8.8:**

3.8.8 requires identifiable media ownership — organizations may include owner information on the same label.

## Assessment Methods

### EXAMINE

System media protection policy; procedures addressing media marking; physical and environmental protection policy; system security plan; list of system media marking security attributes; designated controlled areas.

### INTERVIEW

Personnel with system media protection and marking responsibilities; personnel with information security responsibilities.

### TEST

Organizational processes for marking information media; mechanisms supporting or implementing media marking.

# Plain English

## What this control is really saying:

If a USB drive with CUI on it has no label, anyone who picks it up doesn't know to protect it. This control requires that CUI media be externally marked so people know the content is CUI and know who can receive it. A sticky note saying 'CUI' is not sufficient — the marking must follow NARA's prescribed format.

## How it is used:

- All USB drives containing CUI are labeled with the CUI designation and the program's distribution limitation statement following NARA CUI Notice 2019-01.
- Printed CUI documents have a CUI header and footer on every page and a cover sheet with distribution limitations when provided to external parties.
- CUI labels include the owner name and contact information so the media can be returned if lost.
- New media is labeled before CUI is transferred onto it — unlabeled media is not permitted to contain CUI.

# MP.L2-3.8.4

MEDIA PROTECTION — Media Markings

## Real World Example

### The Scenario

Acme Defense's engineers use USB drives to share CUI design files. The drives are plain black USB sticks with no labels. One was left in a hotel lobby after a conference. The finder has no way to know the drive contains CUI or who to return it to.

### What the assessor finds

The lost drive contains design specifications for a DoD program. There are no CUI markings, no distribution limitation, and no ownership information on the drive. There is no procedure for marking CUI media and no way to identify which drive was lost or what it contained.

## SPRS Score Impact

3.8.4 carries a point value of 1. Unmarked CUI media cannot be recognized as requiring protection — a lost unlabeled drive with no distribution marking is both a CUI spill and a reporting obligation under DFARS.

## What Good Looks Like

All CUI media externally marked per NARA CUI Notice 2019-01, distribution limitation included on every label, owner information on label, digital and paper media both covered, unlabeled media prohibited from containing CUI, marking procedure documented.

# Common Gaps

## What assessors actually find in the field:

- ✗ **CUI media not marked**  
USB drives and printed documents containing CUI have no external markings — recipients cannot identify the content as CUI.
- ✗ **No distribution limitation**  
Media is marked 'CUI' but does not include a distribution limitation — [b] is not met.
- ✗ **Informal labels used**  
Staff write 'CUI' on sticky notes or masking tape — these do not follow NARA's prescribed format and can be easily removed.
- ✗ **Digital files not marked**  
USB drives are unlabeled — the files inside may have CUI markings but the media itself is not externally identified.
- ✗ **No marking procedure**  
No written procedure defines how or when CUI media must be marked — marking is inconsistent across staff.