

DM-2026-001

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PDF Tools Working Group  
Technical Lead

**DATE:** January 19, 2026

**TO:** Document Processing Stakeholders

**SUBJECT:** CUI Coversheet Implementation Approach

**OFFICE OF PRIMARY RESPONSIBILITY:** PdfTools

### 1. Purpose

This memorandum documents the decision to implement the CUI (Controlled Unclassified Information) coversheet capability using a LaTeX template that recreates Standard Form 901 (SF901), rather than programmatically modifying the official GSA PDF.

### 2. Background

The PdfTools capability requires the ability to prepend CUI cover pages to PDF documents as part of the document preparation workflow. The official CUI coversheet is Standard Form 901, prescribed by GSA/ISOO under 32 CFR Part 2002 and Executive Order 13556.

SF901 includes a designated area for document-specific information: CUI categories, limited dissemination controls, special instructions, and points of contact. Two implementation approaches were considered:

- **Approach A:** Programmatically edit the official GSA PDF (SF901-18a.pdf) to insert custom text into the designated area
- **Approach B:** Recreate SF901 as a LaTeX template with parameterized fields for customization

### 3. Analysis

#### Approach A: PDF Manipulation

- Requires PDF manipulation tools (pdftk, qpdf, or similar)
- Precise text positioning in existing PDF is technically challenging
- Runtime dependency on external tools
- Preserves exact GSA formatting
- Requires downloading SF901 from GSA for each use, or maintaining a local copy

- GSA URL changes with each form revision (e.g., SF901-18a.pdf)

#### Approach B: LaTeX Recreation

- Full control over customizable text area via `\newcommand` variables
- Consistent with existing LaTeX document workflows (DecisionDocument, etc.)
- No runtime dependency on PDF manipulation tools for cover page generation
- LaTeX template generation with AI coding agents is trivial
- SF901 has been stable since November 2018, indicating low maintenance burden

**Tracking Requirement (applies to both approaches):** Both approaches require tracking the official GSA source for form updates. Approach A requires network access or manual downloads for each use; Approach B requires only periodic verification that the template remains current.

- GSA Form Page: <https://www.gsa.gov/reference/forms/controlled-unclassified-information>
- Current PDF: <https://www.gsa.gov/system/files/SF901-18a.pdf>
- Current Revision: SF901 (11-18) — November 2018
- Authority: 32 CFR Part 2002, Executive Order 13556

#### 4. Decision

**Approved:** Approach B — Recreate SF901 as a LaTeX template.

##### Rationale:

- Aligns with existing LaTeX-based document infrastructure
- Provides maximum flexibility for customization
- Eliminates runtime tool dependencies for cover page generation
- No additional tracking burden vs. Approach A (both require monitoring GSA for updates)
- LaTeX template generation is trivial with AI coding agents
- Form stability (7+ years unchanged) minimizes maintenance burden
- Official PDF retained as reference for periodic verification

##### Implementation:

- Create `sf901_cover.tex` with parameterized fields
- Retain `SF901-Example.pdf` for reference comparison
- Document tracking requirement in AGENTS.md