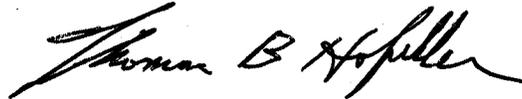


For: FSA Employees and Contractors

Requirements for Shredding Personally Identifiable Information (PII)

Approved by: Associate Administrator for Operations and Management



1 Overview

A Background

A procedural weakness was identified with respect to properly disposing of paper documents containing PII.

B Purpose

This notice implements new FSA requirements that shall be followed when permanently disposing paper documents containing PII.

C Contact

If there are questions about this notice, contact John W. Underwood, Chief, Information Management Section, Kansas City Administrative Services Branch, MSD at either of the following:

- e-mail at john.underwood@kcc.usda.gov
- telephone at 816-926-6992.

2 PII

A Definition of PII

PII is any information:

- about an individual maintained by an agency, including, but **not** limited to, education, financial transactions, medical, criminal, or employment history
- that can be used to distinguish or trace an individual's identity, such as their name, Social Security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information that is linked or linkable to an individual.

Disposal Date	Distribution
June 1, 2008	All FSA employees and contractors; State Offices relay to County Offices

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2 PII (Continued)

B Determining PII

All employees and contractors are responsible for determining whether paper documents needing permanent disposal contain PII.

For PII determinations, employees and contractors are encouraged to seek advice, guidance, and assistance from their respective FOIA/Privacy Act Service Center that can be found at http://www.fsa.usda.gov/Internet/FSA_File/foiaservicecenters.pdf.

C Data Types

The following table serves as a quick reference guide for identifying the most common PII data types.

Note: The core list **must not** be viewed as encompassing all PII data types. If the information being disposed of contains **any** of the data types listed, the **entire** document shall be considered to be PII.

Item	Data Type
1	Social Security Number
2	Financial Information Examples: Bank account numbers/information, financial transaction histories, credit reports/credit worthiness information, credit/debit card numbers, and personal ID numbers
3	Tax Information
4	Date of Birth
5	Loan/Loan Application Information
6	Personal Contact Information Examples: Home address, telephone number, and e-mail address
7	Medical Information (Including disability information and sick leave usage.)
8	Driver's License Number
9	Producer Acreage Information
10	Producer Head of Livestock Information
11	Employee/Producer Racial Identity Information
12	Employee/Producer Investigator Information
13	Employee Disciplinary Information
14	Insurance Information
15	Legal/Lawsuit Information
16	Agency Internal Work Product Examples: Internal personnel rules and practices; privileged interagency or intra-agency memorandums or letters; and State, County, Field, or National Office correspondence

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2 PII (Continued)

C Data Types (Continued)

Item	Data Type
17	Procurement/Contract Information and/or Information on Other Contractors/Potential Contractors
18	Information on Individuals or Organizations About Whom the USDA Keeps Information
19	USDA Proprietary Documentation/Materials Examples: Flow charts, codes, software, computer instructions, techniques, models, information, and diagrams
20	Private Agency Internal Trade Secrets, Business Records, and/or Marketing Information

3 Nonrecord Disposal Only

A Nonrecords Containing PII

This notice applies **only** to the disposal of nonrecord paper documents containing PII that have not been and/or will never be entered into an official system of records.

A nonrecord is a paper document created or received that will not serve to document the agencies' functions, policies, decisions, procedures, operations, or other activities of the Government. A nonrecord is also any paper document copy/print out of an official record, such as a working copy.

This notice does **not** supersede and/or replace guidance concerning the disposal of official records. Official records are records where management/disposition is covered by the Federal Records Act, 44 U.S.C. 3101-3102.

4 Proper Paper Document Disposal

A Definition of Shredding

The shredding of paper documents containing PII shall be considered complete **only** when:

- PII is rendered unreadable/undecipherable
- output produced (shredded PII) is beyond reconstruction through any means.

B Shredding Paper Documents Containing PII

The **only** approved method of permanent disposal for paper documents containing PII is by shredding. The approved methods for shredding paper documents containing PII are:

- using an on-site shredder
- contracting with an approved vendor (bonded and insured professional document destruction company) to perform PII paper document shredding.

4 Proper Paper Document Disposal (Continued)

C On-Site Shredder Output

On-site shredder output (shredded PII) shall:

- be bagged and placed beside (not in) a recycle bin
- **not** be placed in a trash can.

Note: Sending the shredder output (shredded PII) to a recycle vendor provides an additional measure of security because the shredder output will be completely and permanently destroyed as it moves through the paper recycling process.

5 Improper Paper Document Disposal

A Unshredded Paper Documents Containing PII

Under **no** circumstances shall **unshredded** paper documents containing PII be placed into a:

- trash can
- recycle bin.