

For: FSA Employees and Contractors

**Requirements for Shredding Nonrecord PII**

Approved by: Deputy Administrator, Management



**1 Overview**

**A Background**

The National Institute of Standards and Technology (NIST) Special Publication 800-88, Guidelines for Media Sanitization recommends, for paper documents containing PII, the shred size of the refuse/output should be small enough that there is reasonable assurance, in proportion to the level of data confidentiality, that the information cannot be reconstructed.

**B Purpose**

This notice:

- implements FSA requirements for shredding **nonrecord** paper documents containing PII
- establishes maximum shred size for a onsite shedder refuse/output
- establishes onsite shedder refuse/output disposal policy.

**C Contact**

If there are questions about this notice, contact John W. Underwood, Privacy Act Officer/ PII Officer at either of the following:

- e-mail to [john.underwood@kcc.usda.gov](mailto:john.underwood@kcc.usda.gov)
- telephone at 816-926-6992.

Disposal Date	Distribution
June 1, 2010	All FSA employees and contractors; State Offices relay to County Offices

## 2 Shredding Only Nonrecords

### A Nonrecords Containing PII

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

**Important:** A **nonrecord** paper document is a document that will **not** serve to document the agencies':

- decisions
- functions
- operations
- policies
- procedures
- other government activities.

A nonrecord is also a copy/printout of an official record that has been preserved **only** for the convenience of reference or an exact copy of official record material on which **no** additional operational or administrative handwritten notation action has been recorded.

### B Not for Official Records

This notice **does not** supersede and/or replace guidance about:

- official record disposal

**Note:** Official records are records where management/disposition is covered by the Federal Records Act, 44 U.S.C. 3101-3102.

- requirements to retain documentary material that is subject to a litigation hold or a records retention freeze.

## 3 Disposing of Nonrecord Paper Documents Containing PII

### A Complete Shredding

Shredding paper documents containing PII shall be considered complete **only** when there is reasonable assurance, in proportion to the level of data confidentiality, that the information **cannot** be reconstructed.

### B Maximum Shred Size for Refuse/Output of Shredders in FSA Offices

When shredding paper documents containing PII, the maximum shred size (refuse/output) of a PII compliant shredder shall be **no** larger than 3/32" x 19/32" micro-cut particles.

**Note:** Because of maximum shred size requirements, FSA offices shall **not** use strip style shredders for shredding paper documents containing PII.

### 3 Disposing of Nonrecord Paper Documents Containing PII (Continued)

#### C Shredding Paper Documents Containing PII

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

- using a shredder that produces shredded refuse/output **not** to exceed the maximum shred size (subparagraph B)
- contracting with an approved shredding vendor (bonded and insured professional document shredding service) to perform PII paper document shredding.

**Note:** The approved shredding vendor may perform shredding at the FSA office (mobile destruction capability) or transport the paper documents to the vendor's central destruction facility.

**Important:** The maximum shred size requirement **does not apply** when FSA offices use an approved, professional document shredding service. When using an approved document shredding service, paper documents containing PII shall be placed in a locked onsite shred bin while awaiting destruction.

Onsite shred bins shall **not** be released to the document shredding service for destruction until the shred bin is at least 75 percent full, ensuring that paper documents containing PII are sufficiently commingled, thereby reducing the potential of paper documents being reconstructed after vendor shredding occurs.

#### D FSA Office Shredder Output Disposal

Once shredded, output no longer poses a PII concern and shall be disposed of according to established local policy.

**Note:** FSA office shredder collection bins shall **not** be emptied until the bins are at least 75 percent full, ensuring that shredded documents containing PII are sufficiently commingled.

#### E Unshredded Paper Documents Containing PII

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

- trash can
- recycle bin.

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### 3 Disposing of Nonrecord Paper Documents Containing PII (Continued)

#### F Purchasing Shredders

FSA offices may purchase **any** shredder for shredding paper documents containing PII as long as the shredder meets the maximum shred size requirement in subparagraph B.

The following types of shredders currently meet the maximum shred size (refuse/output) requirement:

- Fellowes MicroShred MS-450Cs - GSA Advantage Product Number FEL3245001
- Fellowes MicroShred MS-460Cs - GSA Advantage Product Number FEL3246001
- GBC Shredmaster 3870M - GSA Advantage Product Number GBC1757320
- GBC Shredmaster 5570M - GSA Advantage Product Number GBC1757380
- GBC Shredmaster GDM10 - GSA Advantage Product Number GBC1770070
- GBC Shredmaster GLM11 - GSA Advantage Product Number GBC1770050.

#### G Reporting Loss/Suspected Compromise of PII

Employees or contractors with any reason to suspect that PII has been lost or compromised **shall report** concerns within 1 workday of becoming aware of the issue. Contact the 24-hour support Security Incidents Hotline at either of the following:

- 888-926-2373
- 877-PII-2YOU.