

Privacy Reminders

8. PII and Records Management.

A successful DLA privacy program must include an ongoing, purposeful records review and disposal component. While hard copy files cannot be ignored, the volume of electronic data files is a much larger issue and must be directly addressed by local commands/units.

Personally Identifiable Information (PII) and Federal Records management are inextricably linked. PII is stored on virtually every DLA-owned or leased computer and includes both classified and unclassified files. Careful management of this sensitive information will prevent potential data breaches in the future. A key reference in managing records review and disposal is the [DLA Records Schedule](https://headquarters.dla.mil/J-6/records/tools.asp) (available at <https://headquarters.dla.mil/J-6/records/tools.asp>). This PII Reminder highlights the need to develop clear guidance for the collection and retention of PII as an integral part of the records management program. Some valuable tips when managing your PII records disposal program are:

- PII and records management are a responsibility of each DLA employee.
- For non-federal records (reference materials, to-do lists, etc.), apply this rule: "If you don't store it, you can't lose or compromise it." However, if it is a federal record, you must maintain it.
- Proper electronic and paper file disposal practices enhance network security, minimize physical storage costs, and frees up valuable network storage space.
- Use the [DLA Records Management Procedural Guide](#) to identify when documents, including e-mail, are considered official records. Retain these records until destruction or transfer is authorized IAW the DLA Records Schedule.
- Disposal methods for PII are considered adequate if the personal data is rendered unrecognizable or beyond reconstruction.
- The user/owner of files is responsible for screening both electronic and hard copy files for unnecessary PII collection on a routine and ongoing basis.
- All personal e-mail, personal correspondence and personal electronic files that do not qualify as federal records shall be clearly designated as such and shall at all times be maintained separately from the office's records. Delete or destroy when the personal documents are no longer needed or the member is leaving DLA permanently.
- Local procedures should include an annual records review to include disposition of paper and electronic files.
- Local DLA Records Officers in consultation with the local privacy officer should ensure that employees adhere to the DLA Records Schedule when disposing of federal records. When questions arise, they should work with their local counsel to resolve.
- PII and records disposal programs should include procedures for all personnel who leave DLA permanently.
- When there is any question regarding whether or not to retain a specific document, e-mail or file, users should consult their local DLA Records Officer.
- New employees should be reminded of their responsibility to maintain

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data/records, how to properly store, file and dispose of records, as well as their PII handling responsibilities.

Records retention questions should be referred to your [Local Records Officer](#).

Questions concerning the collection and maintenance of PII should be referred to your [local Privacy Officer](#).

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