



# RM *At-A-Glance*

## Subject: Secure Destruction of Sensitive Information that are not FHFA Records

<p><b>What is sensitive information?</b></p>	<p>The Computer Security Act of 1987 defines “<i>sensitive information</i>” as “any information, the loss, misuse, or unauthorized access to, or modification of, which could adversely affect the national interest or the conduct of federal programs, or the privacy to which individuals are entitled under Section 552a of Title 5, United States Code (the Privacy Act (PA))...”</p> <p>FHFA maintains sensitive information, including personally identifiable information (PII) such as names, social security numbers, and home addresses. Additionally, FHFA maintains other sensitive information pertaining to employees, Federal Home Loan Banks, and Government Sponsored Enterprises (GSEs), which is confidential or proprietary (non-public). Improper handling of information or documents by employees or contractor personnel can result in serious security breaches and possible violations of the PA.</p> <p>This guidance focuses on the destruction of paper or electronic documents that contain FHFA sensitive information that are not agency records, but that do contain sensitive or proprietary information related to FHFA, the regulated entities, or agency employees.</p>
<p><b>What are examples of sensitive information that are not FHFA records?</b></p>	<p>Examples of documents that may contain sensitive information but are not FHFA records include: extra copies of official records; information from one of the regulated entities that contains proprietary information that was <i>not used</i> to conduct agency business; source documents that include personally identifiable information that does not need to be retained after the system input has been validated; and drafts no longer needed to support the final record.</p> <p><b>Note: Drafts which contain information that is needed to support the final record must be retained as part of the agency record (e.g., a draft that contains substantive changes or important comments, rather than just editorial changes).</b></p>
<p><b>What should I do with sensitive information that is not an FHFA record, but that is subject to a legal hold?</b></p>	<p>Never destroy information (paper and electronic) that is subject to an active legal hold or is related to discovery, a court order, a pending or ongoing investigation, an audit, a Freedom of Information Act request, or a Congressional inquiry.</p> <p>The list of active legal holds is available for review on the Office of General Counsel intranet page.</p>

<p><b>How can I safely destroy sensitive information that are not FHFA records?</b></p>	<p>There are two options for safely destroying sensitive information that are not FHFA records.</p> <ol style="list-style-type: none"> <li>1. <b><i>For paper and electronic information (on floppies, CDs, or DVDs)</i></b> - Use a self-serve GBC Shredmaster machine to securely shred sensitive information. The machines are conveniently located on each floor.</li> <li>2. For secure shredding of <b><i>paper documents that are not FHFA records</i></b> - Use the secure shred consoles located throughout the office. The secure shred consoles are conveniently located on each floor.</li> </ol>
<p><b>Can I destroy FHFA records using the Shredmaster machine or secure shred consoles?</b></p>	<p>No. If you have FHFA records that have met their retention requirements, please contact FHFA's Records Officer, Susan Sallaway at 202-649-3674 (<a href="mailto:susan.sallaway@fhfa.gov">susan.sallaway@fhfa.gov</a>).</p>
<p><b>Where can I find more information about Records Management?</b></p>	<p>Contact your office's Records Liaison; contact a member of the Records and Information Management team by telephone or email: Karen Rogers at 202-649-3673 (<a href="mailto:karen.rogers@fhfa.gov">karen.rogers@fhfa.gov</a>) or Brigitte Tolbert at 202-649-3675 (<a href="mailto:brigitte.tolbert@fhfa.gov">brigitte.tolbert@fhfa.gov</a>); and review the Records Management Intranet page.</p>