**PRIVACY Considerations in screening archival records**

**Where does PII fit in the screening process?**

Screening occurs when there is an indication in the transfer process that the records may contain exempted information and the records are less than 75 years old.

- **Records less than 30 years old**
  - No screening necessary for PII or privacy information (see NARA 1601 for screening guidelines.)
- **Records between 30 & 75 years old**
  - For records between 30 and 75 years old, records should be spot checked for sensitive information. If you find sensitive private information, screen more thoroughly.
- **Records older than 75 years or court records**
  - Look for records that may contain information about a living individual which reveals details of a highly personal nature, that if released would constitute a clearly unwarranted invasion of privacy.
- **No screening necessary for PII or privacy information**
  - (see NARA 1601 for screening guidelines.)

**Social Security Numbers** • SSNs of living persons are exempt from disclosure. Screen records that are name retrievable or that have been requested under FOIA for SSNs. Do not screen textual records for SSNs if the records are not name retrievable. For example, if records are arranged chronologically or by subject, such as military operations reports, screen them for SSNs only if otherwise screening. Do not screen for SSNs in records that have previously been made available to the public by the originating agency.

Do not digitize records without redacting SSN of living persons.

---

**Records less than 12 years old** (primarily PRA material) Personal phone numbers • home address • personal e-mail address

**All records**, Social Security number, including truncated SSNs of living persons • Finger print • Iris Scan • DNA Voice print • Taxpayer or Employee ID number for sole proprietorships

**The 100 year rule**

Assume a person is alive until they are 100 years old if you have no other information. Redact accordingly.

**Records less than 30 years old**, Financial information • Credit/debit card numbers (alone or when coupled with PIN numbers) • Bank account information

**Records less than 75 years old**, Place and date of Birth Religion Photographs (graphic photographs that may impact on privacy of subject or surviving family members) Medical History/Criminal history • Investigative Files • Witness Information • Discipline information • Performance ratings • Disciplinary actions • ADR/EEO process Alien registration number • mother’s maiden name