



CUI Notice 2017-02: Controlled Unclassified Information (CUI) and Multi-Step Destruction Process

August 17, 2017

Purpose

This notice provides recommendations for Controlled Unclassified Information destruction.

Background

The Director of the Information Security Oversight Office (ISOO), exercises Executive Agent (EA) responsibilities for the CUI Program. The 32 CFR part 2002, "Controlled Unclassified Information," September 14, 2016, establishes the CUI Program requirements for designating, safeguarding, disseminating, marking, decontrolling, and disposing of CUI. The 32 CFR 2002 requires that the destruction of CUI be accomplished "in a manner that makes it unreadable, indecipherable, and irrecoverable," (32 CFR 2002.14(f)(2)). The methods prescribed for this destruction include the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-88, Revision 1: "Guidelines for Media Sanitization," December 2014, as well as any method of destruction approved for Classified National Security Information (32 CFR 2001.47).

Multiple Step Destruction Authorization

As part of the EA's ongoing effort to improve the CUI program and clarify existing requirements it has been noted that the primary method of destruction of paper documents in the NIST SP 800-88 is costly and may have negative effects on recycling waste paper after the shredding process. While the standard of destroying "paper using cross cut shredders which produce particles that are 1 mm x 5 mm (0.04 in. x 0.2 in.) in size (or smaller), or pulverize/disintegrate paper materials using disintegrator devices equipped with a 3/32 in. (2.4 mm) security screen" (Table A-1: Hard Copy Storage Sanitization) is still required for single step destruction, NIST notes in Appendix A that "Methods not specified in this table may be suitable as long as they are verified and found satisfactory by the organization" (Appendix A – Minimum Sanitization Recommendations). One such practice may be a multiple step destruction process as outlined in the attached document.

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Director

Attachment

Recommended Multi-Step Destruction Process For Controlled Unclassified Information (CUI)

1. Ensure that CUI is secured while awaiting destruction.

Many agencies use a locked container to store CUI waiting to be shredded (commonly referred to as “shred bins.”).

2. Determine whether material will be shredded on-site or at another location.

If the material is being moved to another location before shredding it must be protected with all the requirements of the CUI Program up and until it is destroyed to the standards of the CUI Program.

3. Establish the frequency of destruction or “pick up” to ensure large quantities of CUI are not being accumulated unnecessarily.
4. Verify and ensure the physical safeguarding measures for all stages of the destruction process, including, as applicable: pick up, transportation to storage, storage, transportation to final destruction site, and storage at final destruction site while awaiting destruction.
5. Limit the time between pick up and final destruction.
6. Ensure that only authorized and vetted employees are given access to any interim storage locations.
7. Ensure there is a process to document and record that all material provided for destruction has been completely destroyed and has not been misplaced during any step in the process.
8. Ensure and verify that the end product is unreadable, indecipherable, and irrecoverable.
9. Establish a validation/inspection timeline and process to ensure that destruction is occurring as expected and in compliance with all requirements.
10. Document verification, validation, and acceptance of any multi-step destruction methods used.