

## CUI Notice 2019-03: Destroying Controlled Unclassified Information (CUI) in paper form

July 15, 2019

### Purpose

1. This Notice provides guidance for destroying (via single and multi-step methods) Controlled Unclassified Information in paper form.
2. This Notice rescinds CUI Notice 2017-02, Controlled Unclassified Information and Multi-Step Destruction.

### Background

3. The Director of the Information Security Oversight Office (ISOO), exercises Executive Agent (EA) responsibilities for the CUI Program. Title 32 CFR Part 2002, Controlled Unclassified Information (September 14, 2016), establishes CUI Program requirements for designating, safeguarding, disseminating, marking, decontrolling, and disposing of CUI.
4. The CUI regulation requires that agencies destroy CUI “in a manner that makes it unreadable, indecipherable, and irrecoverable,” (32 CFR 2002.14(f)(2)). It also prescribes National Institute of Standards and Technology (NIST) Special Publication (SP) 800-88, Revision 1: Guidelines for Media Sanitization (December 2014) (NIST SP 800-88, rev 1) destruction methods, or any destruction method approved for Classified National Security Information (32 CFR 2001.47), unless the CUI category’s authority mandates other destruction methods (CUI Specified categories). Agencies must also use any destruction method specifically required by law, regulation, or Government-wide policy for CUI Specified categories.
5. This Notice clarifies certain aspects of the requirements for destroying paper CUI. NIST SP 800-88, rev 1, describes authorized methods for destroying other media types that contain CUI.

### Single-step paper destruction standard

6. For the single-step paper destruction method, agencies must:
  - a. Use cross-cut shredders that produce 1 mm x 5 mm (0.04 in. x 0.2 in.) particles (or smaller);  
or
  - b. Pulverize/disintegrate paper using disintegrator devices equipped with a 3/32 in. (2.4 mm) security screen.

(NIST SP 800-88, rev 1, Table A-1: Hard Copy Storage Sanitization)

7. The National Security Agency (NSA) maintains an Evaluated Products List (EPL) of equipment it authorizes to destroy hard copy (paper) Classified National Security Information. This equipment also meets CUI single-step paper destruction standards. The most updated NSA EPL for “Paper Shredders” can be found at:


<https://www.nsa.gov/resources/everyone/media-destruction/>

**Multi-step paper destruction standard**

8. We have noted concerns raised by agencies that the primary destruction method for paper can be costly and may have negative effects on recycling waste paper after the shredding process. Paragraph 9 of this Notice is intended to help address these concerns while still satisfying the regulatory requirement for disposing of CUI.
9. A multi-step destruction process in which an agency shreds CUI to a degree that doesn't meet the Table A-1 standards, and then recycles or destroys it (or has a contractor or shared service provider shred and/or recycle/destroy), is a permitted alternative once your organization has verified and found this method satisfactory. Agencies that use a multi-step destruction process must follow the guidelines in this Notice and the attached document, and the process must result in CUI that is unreadable, indecipherable, and irrecoverable. However, the standards described in paragraph 6 of this Notice (NIST SP 800-88, rev 1, Table A-1: Hard Copy Storage Sanitization) are still required for destroying CUI via a single-step method.
10. The alternative method provided for in paragraph 9 is supported by NIST SP 800-88, rev 1, which states, "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).
11. Recycling hard copy (paper) satisfies CUI destruction requirements as part of a multi-step destruction process only if the process recycles the CUI into new paper. Recycling processes that convert paper into other products do not always render the CUI unreadable, indecipherable, and irrecoverable, and thus may not meet the CUI Program's standards.

**Consolidating CUI and physical security**

12. The physical security standards for CUI remain in effect until the information is destroyed in accordance with the standards of the CUI Program. Agencies maintain discretion to determine those controls necessary to meet the safeguarding requirements set forth in 32 CFR 2002.14.
13. Agencies may consolidate CUI prior to shredding, recycling, or destroying it. This includes shred bins and burn bags within the agency's controlled environments, and interim storage or contractor facilities.
  - a. Agencies must protect consolidated (e.g., baled) material that they collect and/or store at interim storage facilities (or by contractors) within a controlled environment that prevents access by unauthorized people.
  - b. Procedures must be in place to account for and track consolidated CUI until it is destroyed/recycled to the standards of the CUI Program.

  
MARK A. BRADLEY  
Director

Attachment

## **Multi-Step Paper Destruction Guidelines for Controlled Unclassified Information (CUI)**

Agencies must:

1. Ensure they secure CUI 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.

Material that an agency consolidates and collects or stores, or that it shreds to a degree not meeting the CUI destruction standard and then consolidates and collects or stores, at interim storage facilities (or by subcontractors) must be protected within a controlled environment that prevents access by unauthorized individuals. Procedures must be in place to account for and track consolidated CUI 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: consolidation locations, pick-up, transportation to storage locations, any interim storage locations, transportation to interim or final shredding, recycling, or destruction sites, and storage at such sites while awaiting shredding, recycling, or destruction.

This requirement extends to any contractor or subcontractor facilities where consolidated CUI is stored prior to final destruction or recycling.

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 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 quality control process to ensure that destruction is occurring as expected and in compliance with all requirements.
10. Document any multi-step destruction methods used.