

Ms. Shena Acker
Elgin Bank of Texas
Texas
United States

I have been in banking for 15 years, which probably makes me still in the toddler category. It seems the easiest way to formulate this rule is in conjunction with existing rules and regulations. Most files are required to be retained 5 years after closed, except FIRREA, which can require files to be maintained for 7 years. Denied and withdrawn applications must be retained for 25 months. To limit burden to all institutions, the retention period should be the same as these established rules. I would think credit reports are normally kept with the file they pertain to.

Since lending institutions generate a huge amount of sensitive information, they should already have procedures in place for destruction of sensitive documents. If an institution was guilty of simply throwing this type of information away, they should be severely penalized. Placing rules for specific ways of disposal is not realistic for all areas. For example we are about 25 miles east of Austin Tx. However, the company we contract with to shred our sensitive documents (anything with a customer's name and/or account number) is out of San Antonio, which is about 100 miles away. I doubt this type of service is even available to some small institutions in rural areas. There may even be some out there small enough and in rural areas that are able to burn their documents. Either way, the end result is the same. The documents are destroyed in a controlled situation which does not allow access from outside parties.

To implement rules inconsistent with those already existing would be extremely burdensome, consuming many avoidable man hours and taking up storage space that is already in short supply.