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United States  
Department of  
Agriculture

Office of the Chief  
Information Officer

1400 Independence  
Avenue SW

Washington, DC  
20250

TO: Agency Administrators  
Agency Deputy Administrators for Management  
Agency Chief Information Officers

FROM: Christopher L. Smith  
Chief Information Officer  
Office of the Chief Information Officer

SUBJECT: Sanitizing Multifunctional Devices to Safeguard Sensitive But  
Unclassified and/or Personally Identifiable Information



This memo is a reminder that Agencies are responsible for media sanitization. Recently, it was reported in the news that Personally Identifiable Information (PII) data was retrieved from the hard drives of previously owned copiers. In the investigative report, the hard drives were removed and a significant amount of PII was retrieved by unauthorized individuals. The news event only discussed copiers but USDA is establishing policy for all multifunction devices that create and store images that can be retrieved at a later date, such as copy/print/fax machines.

Protecting SBU and PII data is taken seriously by the Department therefore; Agencies must enhance media sanitization procedures to include procedures for sanitizing hard drives housed in multifunctional devices. USDA's Media Sanitization guidance can be found in Department of Agriculture Directives Manual (DM) 3575-001, Security Controls In the System Life Cycle/Systems Development Life Cycle, Chapter 15, Part 1, Section 5 (b) Hardware and Software Disposal, and Section 5(c) at <http://www.ocio.usda.gov/directives/doc/DM3575-001.pdf>.

Agencies at a minimum are required to: (1) inventory multifunctional devices, (2) sanitize the multifunctional device hard drives prior to disposition, (3) annually review the inventory to ensure the process is being followed, and (4) validate the removal of all SBU and PII data. The inventory should include the following information about the device: name, location, serial number, purchase or leased equipment, purchase/lease date, life cycle termination date, media sanitization services, sanitization method used, sanitization completion date, person that validated the sanitization was completed, and the completed Sanitization Validation Form or agency approved paper or electronic inventory system that tracks sanitization and disposal. This multifunction inventory must be updated appropriately, and available upon request. Additional guidance regarding media sanitization can be found in National Institute of Standards and Technology (NIST)'s September 2006 Special Publication 800-88, Guidelines for Media Sanitization ([http://csrc.nist.gov/publications/nistpubs/800-88/NISTSP800-88\\_rev1.pdf](http://csrc.nist.gov/publications/nistpubs/800-88/NISTSP800-88_rev1.pdf)). NIST 800-88 developed "Table A-1 Media Sanitization Decision Matrix" which Agencies shall use in developing or enhancing their media sanitization procedures.

Agencies are also required to use and maintain copies of the completed NIST "Appendix F - Sample Sanitization Validation Form" to document the validation of the sanitization.

Agencies leasing multifunctional devices must comply with the above requirements and work with their Contracting Officer Technical Representative to determine (1) if sanitization services are included in their current contracted services agreements, and (2) incorporate this requirement into multifunctional procurements.

If you have any questions regarding this memo, please contact Ms. Ray Payton, Chief Privacy Officer at [ravoyne.payton@ocio.usda.gov](mailto:ravoyne.payton@ocio.usda.gov).

Cc: Information System Security Program Managers

**Appendix F: Sample Sanitization Validation Form**

Organization: _____	
Item Description: _____	
Make/Model: _____	
Serial Number(s)/Property Number(s): _____ _____	
Backup Made of Information: <input type="checkbox"/> Yes <input type="checkbox"/> No	
If Yes, Backup Location: _____	
Item Disposition: <input type="checkbox"/> Clear <input type="checkbox"/> Purge <input type="checkbox"/> Destroy	Date Conducted: _____ Conducted By: _____ Phone #: _____ Validated By: _____ Phone #: _____
Sanitization Method Used: _____	
Final Disposition of Media: <input type="checkbox"/> Disposed <input type="checkbox"/> Reused Internally <input type="checkbox"/> Reused Externally <input type="checkbox"/> Returned to Manufacturer <input type="checkbox"/> Other: _____	