

# MANAGEMENT MEMO

NUMBER:

XXXXX-XXXX

SUBJECT:

**REMOVAL OF CONFIDENTIAL, SENSITIVE OR PERSONAL INFORMATION FROM STATE-OWNED SURPLUS PERSONAL PROPERTY, INFORMATION ASSETS, AND STATE-OWNED SURPLUS VEHICLES**

DATE ISSUED:

EXPIRES:

UNTIL RESCINDED

ISSUING AGENCY:

THE DEPARTMENT OF GENERAL SERVICES

REFERENCES:

STATE ADMINISTRATIVE MANUAL (SAM): CHAPTER 1600, SECTION 1693; CHAPTER 3500, SECTION 3520; CHAPTER 4100, SECTION 4111; Chapter 5100; CHAPTER 5300, SECTIONS 5315.2, 5320, 5335, 5350; CHAPTER 5900, SECTION 5953, GOVERNMENT CODE SECTIONS 6250-6265; CIVIL CODE SECTIONS 1798-29, 1798.3, 56 et seq; HEALTH AND SAFETY CODE SECTIONS 123100-123149.5; HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT 45 C.F.R. PARTS 160 and 164; PUBLIC CONTRACT CODE SECTION 10389.1 and 10389.2  
**Supersedes Management Memo 07-09**

**Policy**

State agencies are responsible for removing all confidential, sensitive, or personal information from their surplus property.

**Purpose of This Memorandum**

This Management Memo announces recently enacted statute (Public Contract Code Section 10389.2) and defines State agencies' responsibilities for removing confidential, sensitive or personal information from State-owned surplus personal property and surplus vehicles prior to disposition. It also defines the Department of General Services (DGS) and agency responsibilities for incident management if employees find confidential, sensitive or personal information in surplus items. Additionally, it defines the new service charges associated with the DGS sanitizing of computing surplus property not properly completed by agencies.

**Who is Affected**

All State entities under the Governor's executive authority (G.C. 11000).

**Who Should Review**

Information Security Officers, Privacy Officers, Program Managers, Business Services Officers, Property Controllers, Fleet Managers, and Warehouse Managers should review this memo.

**Definition****Personal Property**

Any property that is not real property and that is movable or not attached to the land. Personal property that may retain confidential information includes, but is not limited to, any information assets, systems, other equipment, or furniture that captures, stores, processes, or transmits information. Examples of Personal Property include, but are not limited to the following:

- **Information technology and equipment:** flash drives, personal computers, personal digital assistants, cell or smart phones, fax machines, copiers, multifunction printers, workstations, and laptops
- **Furniture:** file cabinets, desks, storage cabinets, and safes

**Agency Responsibility****Surplus Personal Property**

Before disposing of State-owned surplus personal property, disposing agencies must remove all confidential, sensitive or personal information from the surplus property. Agencies must inspect the property thoroughly for such materials, paying special attention to storage areas in file and storage cabinets, credenzas, and desks, information assets or systems, and provide for its proper disposal (see SAM Sections 1693 and 5953 for disposal requirements).

Furniture with locks, such as storage cabinets, desks, and file cabinets, must be delivered to the State Surplus Property Warehouse unlocked. If keys are available, they must be provided to State Surplus Property Warehouse staff upon the delivery of items. For safes, the combination and any key required to open each safe must be included with the delivery.

# STATE ADMINISTRATIVE MANUAL

## State-owned Surplus Vehicles

Before disposing of State-owned surplus vehicles, disposing agencies must remove from the vehicles all confidential, sensitive or personal information other than DMV-issued ownership and registration documents. Agencies must inspect vehicles thoroughly for confidential, sensitive or personal information, paying special attention to storage areas such as glove boxes, trunks, consoles, utility boxes, seat pouches and map pockets.

## Asset Sanitation

Information assets or computing devices with digital memory and storage capacity must be sanitized prior to disposal. To demonstrate compliance with SAM Section 5900, agencies must include a Certificate for Computing Media Sanitation (see attached) listing each sanitized item with the STD 152 or 158. On this form, agencies will certify the method of sanitation and the final disposition of the property. For the purposes of executing Executive Order B-1-11, agencies may continue to use the Cellular Devices Reduced Pursuant to B-1-11 Certification (see attached). Agencies are advised that it is imperative to recover value for the State's surplus assets. Therefore, agencies must use sanitizing methods that do not compromise the value of assets unless destruction is the only reasonable approach to ensure the elimination of confidential information.

## DGS Responsibilities

If DGS employees find confidential, sensitive or personal information in State-owned surplus personal property or a State-owned vehicle, DGS will notify the agency that disposed of the property. The disposing agency must retrieve the materials immediately, and is responsible for incident notification and filing of any necessary reports related to any security event or incident that occurred (see SAM Section 5350 for Agency Information Security Incident Management and Notice to Affected Individuals).

## DGS Services

The DGS can provide sanitizing services if arranged in advance of receipt. The DGS will make reasonable efforts to maintain the security of confidential, sensitive or personal information. Refer to SAM Section 5300 for definitions and agencies role and responsibility in protecting state information assets.

## References

Additional information can be found on the Certification for Computing Media Sanitation form at DGS OFAM website [www.dgs.ca.gov/ofam/](http://www.dgs.ca.gov/ofam/)

Additional online resources can be found at:

<http://www.cio.ca.gov/OIS/Government/policy.asp>

If you need additional information or assistance, please contact:

Steve Paul, Surplus Property Program Manager  
DGS Office of Fleet and Asset Management,  
1700 National Drive, Sacramento, CA 95834  
(916) 928-2183  
[steve.paul@dgs.ca.gov](mailto:steve.paul@dgs.ca.gov)

The Office of Fleet and Asset Management main number is (916) 928-5800.

Original memo signed by Fred Klass, Director

## Signature

\_\_\_\_\_  
Fred Klass  
Director, Department of General Services