Cabinet Agencies' Performance Audit Action Item(s) & Status

Safe Data Disposal — Protecting Confidential Information

(See also cabinet agency response for full context to Washington State Auditor's Office (SAO) report, April 2014)

Agencies included in the performance audit: Office of the Chief Information Officer (OCIO) and the departments of Ecology (ECY), Enterprise Services (DES), Employment Security (ESD), Fish and Wildlife (DFW), Health (WDOH), Labor and Industries (L&I), Revenue (DOR), Social and Health Services (DSHS), Transportation (WSDOT), and the State Parks and Recreation Commission (Parks).
Note: the OCIO merged into a new organization — Washington Technology Solutions (WaTech) on July 1, 2015.

SAO Findings Summary:
1. Computers released as surplus contained confidential data that should have been erased.
2. Organizations did not always comply with the OCIO's requirements or employ best practices for disposing of computers.

SAO Recommendations (Rec) in brief:
1. OCIO should engage state IT and security leaders to modernize methods available to organizations to meet the OCIO Standards (hard drive destruction & recycling services).
2. OCIO should revise the current version of the OCIO Security Standards 8.3 to:
    a. require state organizations to employ NIST best practices, which would address OCIO step 8.3.3 by replacing the word "ensure" with "verify"
    b. require proper documentation stating that data has been properly deleted from computer hard drives, or that hard drives have been properly destroyed
3. OCIO should review the state organizations' documented media handling and disposal procedures to ensure they meet the OCIO Standards Section 8.3
4. OCIO should continue to halt the release of end-of-life digital media storage devices for organizations wherever the OCIO has reason to doubt their compliance with the OCIO Standards Section 8.3
5. DSHS, WSDOT and Parks should establish documented procedures to ensure safe and secure disposal of sensitive and confidential information.
6. As a best practice, the Departments of ECY, DFW, WDOH, L&I, DOR, DSHS, WSDOT and Parks should include in their procedures a step to verify and record that confidential data is appropriately removed from computer hard drives before releasing to surplus.

The table below shows the current status of action items the agency initiated to address issues identified in the performance audit report. Please see the *cabinet agency response* for additional context and any additional steps already taken.

For an explanation of the columns below, see the legend.

Issue /Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
1		(See OCIO's actions under SAO's recommendations 1-4 and 6)						As of July 1, 2015, OCIO was integrated into Washington Technology Solutions (the

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								Consolidated Technology Services Agency per RCW 43.105.006). As such, WaTech has inherited all tasks formally assigned to OCIO. For the sake of consistency, for the following, any reference to WaTech shall mean both OCIO and WaTech.
2/1-4	Completed	Complete cross-agency task force work, resulting in more robust methods for agencies to meet the data disposal standards identified in state IT security policy.	WaTech	4/30/ 2014	Yes	No	No	**October 2015:** WaTech conducted several meeting with agencies to identify more robust methods to be used to meet the data disposal standards identified in state IT security policy.
2/1-4	In Progress	Strengthen IT security standards, including the addition of a verification step to ensure that the data has been destroyed.	WaTech	~~12/15~~ ~~9/16~~ 8/17	Yes	No	No	**July 2017:** WaTech has completed work on a totally revised section of the IT security standards relating to data disposal. This has been socialized with the agencies and approval by the Technology Services Board is expected in August 2017.
2/1-4	Completed	Work with DES and agencies to update surplus procedures as an additional safeguard.	WaTech	5/30/ 2014	Yes	No	No	**October 2015:** WaTech met with officials at DES and its partnering surplus entities to ensure that additional safeguards are put in place to ensure that any re-purposed media is properly sanitized.
2/1-4	Completed	Update data-wiping procedures and tools available to agencies.	WaTech	5/30/ 2014	Yes	No	No	**October 2015:** WaTech has created and maintains a page on the OCIO website containing current data disposal best practices and currently available data wiping tools.
2/1-4	Completed	Review each state agency's documented data handling and removal processes.	WaTech	9/30/ 2014	Yes	No	No	**October 2015:** WaTech reviewed each agencies' data disposal procedures in the fall of 2014.

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2/5	Completed	Institute a process to document that data was destroyed or removed across all program areas.	DSHS	N/A	Yes	No	No	**October 2015:** This action was complete prior to the SAO publishing the performance audit report.
2/5	Completed	Issue a technical bulletin to all program areas to institute a process to document safe data disposal and prevent surplus of any machines with data.	DSHS	N/A	Yes	No	No	**October 2015:** This action was complete prior to the SAO publishing the performance audit report.
2/5	Completed	Complete a Lean process to improve all aspects of surplus, including data destruction/disposal.	DSHS	12/31 /2014	Yes	No	No	This action was completed in 2/2015.
2/5	Completed	Finalize safe data disposal procedures.	DSHS	12/31 /2014	Yes	No	No	This action was completed in 7/2015.
2/5	Completed	Prior to the audit, WSDOT purchased a hard drive shredder. After making related electrical system improvements in its facility, WSDOT began operating the shredder in November 2013. WSDOT now shreds all hard drives.	WSDOT	N/A	Yes	No	No	**October 2015:** This action was complete prior to the SAO publishing the performance audit report.
2/5	Completed	Update procedures for safe data disposal to align with OCIO standards.	WSDOT	6/30/ 2014	Yes	No	No	**October 2015:** Procedures have been updated to align with the recommendations. Procedures will continue to be monitored and updated, as needed, to coincide with the ever-changing IT environment.
2/5	Completed	Document safe data disposal procedures.	Parks	4/18/ 2014	Yes	No	No	Written documentation finalized in April 2014.
2/6	In Progress	The OCIO will work with all state agencies/organizations	WaTech	~~5/16~~ ~~9/16~~	Yes	No	No	**July 2017:** The soon-to-be-published amended version of Section 8.3 of the IT

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		to require them to include a verification step in their data disposal procedures.		8/17				security standards includes the requirement that agencies verify that data have been disposed properly.