

Objectives

[a]

System media containing CUI is sanitized or destroyed before disposal.

[b]

System media containing CUI is sanitized before it is released for reuse.

MP.L2-3.8.3

Media Protection

Media Disposal [CUI Data]

"Sanitize or destroy system media containing CUI before disposal or release for reuse."

Key Discussion Points

Two Triggers:

Sanitization is required before both disposal AND reuse — a drive wiped for reuse and a drive thrown away both require action.

NIST SP 800-88:

Clearing, purging, cryptographic erase, and destruction all qualify — method selection depends on media type and sensitivity.

Includes Peripherals:

Copiers, printers, and scanners store images internally — they contain CUI and must be sanitized before disposal or resale.

Non-Digital Too:

Paper CUI must be shredded, not recycled — printouts, microfilm, and faxes are all in scope for sanitization.

Assessment Methods

EXAMINE

System media protection policy; procedures addressing media sanitization and disposal; applicable standards addressing media sanitization; system security plan; media sanitization records; system audit logs; system configuration settings.

INTERVIEW

Personnel with media sanitization responsibilities; personnel with information security responsibilities; system or network administrators.

TEST

Organizational processes for media sanitization; mechanisms supporting or implementing media sanitization.

Plain English

What this control is really saying:

Deleting files is not enough — the data is still on the drive and can be recovered. Before any media containing CUI is thrown away or repurposed, it must be sanitized so the CUI cannot be recovered, or physically destroyed so it cannot be read at all. This applies to hard drives, USB sticks, CDs, paper, and the internal memory of printers and copiers.

How it is used:

- Hard drives removed from decommissioned workstations are either cryptographically erased or physically shredded before the hardware is disposed of.
- USB drives containing CUI are shredded using a cross-cut media shredder — they are not reformatted and reused without a documented purge process.
- Printer and copier hard drives are purged before the equipment is returned to the leasing company or resold.
- Media sanitization is documented — a sanitization record is created for each item, including the method used, date, and responsible individual.

MP.L2-3.8.3

MEDIA PROTECTION — Media Disposal [CUI Data]

Real World Example

The Scenario

Acme Defense retired four workstations last month. The IT admin deleted all files and reformatted the hard drives. The machines were donated to a local school. One machine had CUI design files stored outside the main project folder — the delete missed them.

What the assessor finds

A forensic tool recovers 847 files from the donated machines including CUI drawings and contract documentation. The files were not wiped — formatting does not destroy data. No sanitization procedure exists and no records were kept for the disposals.

SPRS Score Impact

3.8.3 carries a point value of 1. Improperly disposed media is a direct CUI exposure event — donated or sold equipment with unsanitized drives has resulted in recoverable CUI being found on secondhand hardware.

What Good Looks Like

Sanitization procedure documented for each media type, hard drives cryptographically erased or shredded before disposal, USB drives physically destroyed, printers and copiers purged before return or resale, sanitization records retained, paper CUI shredded.

Common Gaps

What assessors actually find in the field:

- ✗ **Hard drives simply deleted**
Old workstations have their drives formatted and are donated — deleted files are fully recoverable.
- ✗ **No sanitization records**
Media is disposed of informally with no documentation — there is no evidence of what was sanitized or how.
- ✗ **Printers/copiers not addressed**
Leased copiers are returned to the vendor at end of contract — internal hard drives containing CUI images are not purged first.
- ✗ **USB drives thrown in trash**
Old USB drives containing CUI are discarded in the office trash — no shredding or sanitization is performed.
- ✗ **Reused media not purged**
USB drives are reformatted and reassigned to new projects without a full purge — prior CUI may be recoverable.