



STATE OF IDAHO  
OFFICE OF THE SECRETARY OF STATE  
PHIL MCGRANE

**DIRECTIVE**  
(2023-2)

**RE: Disposal of Election Equipment**

To maintain the security and integrity of the electoral system, the Secretary of State does hereby issue Directive 2023-2 governing the Disposal of Election Equipment.

As governing bodies procure new election technologies, there will be a need to dispose of outdated election equipment. Election officials must ensure any proprietary information, election data, and any personal information has been properly sanitized from those devices before they are disposed of, sold, or destroyed.

This Directive provides procedures for election officials to follow prior to the disposal, sale, or destruction of election equipment, and includes procedures for the disposal of voting technology purchased with Help America Vote Act (HAVA) funds.

Attached is an Election Equipment Disposal Checklist and a sample Certification of Sanitization. These forms are intended to assist election officials in complying with this Directive.

Sincerely,

A handwritten signature in blue ink, appearing to be "Phil McGrane", enclosed in a blue oval.

Phil McGrane  
Idaho Secretary of State

Attachments



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## DISPOSAL OF ELECTION EQUIPMENT

### I. General Principles

There are potential security risks associated with the disposal, sale, or destruction of computer equipment and storage devices. Election officials must practice due diligence to properly account for all election equipment in their inventory. All election offices should develop an Incident Response Plan to monitor, detect, respond to, and mitigate incidents, such as a break in the chain of custody of equipment in their inventory.

Before disposing of, selling, or destroying any voting equipment or election technology, election officials should:

1. Consult with their county prosecuting attorneys to ensure all contractual obligations are met prior to the disposal, sale, or destruction of election equipment; and
2. Work with their Information Technology/Information Security support team to ensure that all necessary back-ups are made, and procedures are followed.

### II. Chain of Custody and Inventory Control

It is critical to maintain a complete and accurate inventory of all election equipment, including ballot scanners and tabulators, ballot marking devices, communication equipment, supervisor or administrator devices such as smart cards, servers and workstations, and removable storage media.

Prior to disposing any election equipment, election officials must ensure they have a complete inventory of all election equipment. This inventory must contain the following:

#### 1. Equipment

Maintain a list of equipment, serial numbers, and quantity in each physical location, such as the election office, warehouse, or storage facility.

#### 2. Machine Checkout

Inventory control should track equipment when it is:

- (a) Being released and returned for an election;
- (b) Released and returned for a demonstration; and
- (c) Accepted from or returned to the vendor for maintenance or repair.

#### 3. Usage History

Maintain a history of elections for which each piece of equipment has been tested and used.



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**4. Maintenance History**

Maintain a history of routine or preventative maintenance tasks completed on each individual device.

**5. Repair History**

Maintain a history of repairs to individual devices.

**6. Disposal**

Maintain a history of disposal for each device that includes:

- (a) The entity or persons, method, and date when data was wiped from the device;
- (b) Who oversaw each step in the disposal process; and
- (c) A record of each disposed device with the date of disposal, how it was disposed, and who authorized the disposition.

**III. Voting Technology Purchased with HAVA Funds**

Equipment purchased with [Help America Vote Act](#) (HAVA) funds can be disposed of either collectively as a system or individually as components.

Items of equipment with a current per unit fair market value of \$5,000 or less may be traded-in, sold, scrapped, or otherwise disposed of with no further responsibility to the [U.S. Election Assistance Commission](#) (EAC) beyond recording disposition in an equipment inventory log. Election officials should notify the Idaho Secretary of State's office of the action taken.

Items of equipment with a current per unit fair market value in excess of \$5,000 may be sold with the funds credited to the county's HAVA election subaccount in an amount calculated by multiplying the current market value of proceeds from sale by the HAVA (Federal and Match Funds) share in the cost of the equipment. Election officials shall report the sale to the Idaho Secretary of State's office for proper accounting and crediting to the county's HAVA election subaccount.

Equipment can also be traded-in for replacement equipment for the same purpose.

The final record retention period for equipment replacement or disposition begins on the date the State submits its final Federal Financial Report (FFR) to the EAC and continues for three years. For equipment replacement or disposal after the end of the award period, the three-year record retention period begins from the time the equipment is traded-in or disposed of and continues for three additional years.



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#### IV. Disposal and Destruction of Election Equipment

Prior to the disposal or sale of any voting system, all equipment must be wiped of all data, known as sanitization. Solely deleting the files on the device is not sufficient because it does not remove the files from memory. Deleted files remain on the device and can be recovered. Therefore, all equipment must be taken back to the condition of a non-functioning piece of hardware with no software or firmware remaining on the equipment.

Election officials must practice due diligence to properly sanitize and dispose of election equipment. At a minimum, this involves:

1. Determining if the Information Technology/Information Security support team has a process for wiping data from memory before disposing of or selling equipment. For counties that do not have a defined process, the National Institute of Standards and Technology provides [Guidelines for Media Sanitization \(NIST Special Publication 800-88\)](#).

For computer equipment, there are tools that overwrite every sector of a hard drive multiple times that meet the Department of Defense security standards for wiping data. (DOD 5220.22-M, Data Wipe Method)

2. Confirming the destruction and disposal process with the voting system manufacturer (vendor) to make sure it is sufficient for meeting the requirements of the technology and equipment to which it is applied. If replacing old equipment with new equipment from the same vendor, consider including a requirement in the contract that the vendor take back the old equipment.
3. Verifying there are no legal or contractual obligations that must be met before disposing of or selling any of the election equipment.

An election official may outsource the destruction and disposal of the election equipment. When utilizing this option, the election official must exercise due diligence, including only using a disposal company that is certified by a recognized trade association or similar third party. The election official must obtain a certificate of destruction/sanitization stating that all data stored on the election equipment has been properly wiped and all hardware has been appropriately discarded.