

Document Security for Sensitive but Unclassified Paper and Electronic Building Information

Excerpts from PBS Order 3490.1, March 8, 2002

9. Reasonable care for dissemination of sensitive but unclassified (SBU) building information.

Those who are disseminating SBU building information (which includes flowdown dissemination by prime/general contractors, subcontractors, suppliers, architects/engineers, Federal Agencies, lessors, private sector planrooms, state and local governments, printshops/reprographic firms, etc.) must obtain a signed copy of the Document Security Notice (attached) by authorized users of SBU building information that they will exercise *reasonable care* when handling SBU building documents.

“Reasonable care” is defined as:

- a. Limiting dissemination to authorized users. Dissemination of information shall only be made upon determination that the recipient is *authorized* to receive it. The criterion to determine authorization is *need-to-know*. Those with a *need-to-know* are other Federal Government agencies (who shall make requests through their agency management), and non- Government entities that are specifically granted access for the conduct of business on behalf of or with GSA. This includes those necessary to do work at the request of the Government, such as architects and engineers, consultants, contractors, subcontractors, suppliers, planrooms, and others that the contractor deems necessary in order to submit an offer/bid or to complete the work or contract, as well as maintenance and repair contractors and equipment service contractors.

**NOTE: It is the responsibility of the person or firm disseminating the information to assure that the recipient is an authorized user and to keep the Document Security Notice records of recipients.**

Authorized users shall provide identification as set forth below:

- (1) Valid identification for Federal Government users. Valid identification of authorized Government users receiving SBU building information shall be verification of Government employment.
- (2) Valid identification for non-Government users. Authorized non-Government users shall provide valid identification to receive SBU building information. Valid identification shall be all items I through III, and including item IV, as necessary:
  - I. A copy of a valid business license or other documentation granted by the state or local jurisdiction to conduct business. The license at a minimum shall provide the name, address, phone number of the company, state of incorporation, and the name of the individual legally authorized to act for the company. The business must be of the type required to do the work. A general contractor’s license may be substituted for the business license in states that issue such licenses. In

the rare cases where a business license is not available from the jurisdiction, the information shall be provided and testified to by the submitter; **and**

- II. Verification of a valid DUNS Number against the company name listed on the business license or certification. Verification may be obtained through <http://www.fpdc.gov>, or by calling Dun & Bradstreet at 703-807-5078 to set up an account; **and**
  - III. A Valid IRS Tax ID Number of the company requesting the information; **and, as necessary,**
  - IV. A Valid picture state driver's license shall be required of person(s) picking up SBU documents. Phone verification must be made to a previously validated authorized user that the individual(s) picking up the documentation is/are authorized to do so by the company obtaining the documents. SBU documents will not be released to any individual or firm who has not, either previously or at the time of pickup, supplied the required documentation as outlined in paragraphs I through III, above.
- b. Record keeping. Those who disseminate SBU building information must require a signed Document Security Notice from those who receive the information. Records of the signed Document Security Notices shall be maintained by the disseminator pursuant to the GSA system of keeping long-term records and plans. At the completion of work, secondary and other disseminators shall be required to turn over their Document Security Notice dissemination records to GSA to be kept with the permanent files.
  - c. Retaining and destroying documents. The efforts required above shall continue throughout the entire term of contract and for whatever specific time thereafter as may be necessary. Necessary record copies for legal purposes (such as those retained by the architect, engineer, or contractor) must be safeguarded against unauthorized use for the term of retention. Documents no longer needed shall be destroyed (such as after contract award, after completion of any appeals process, or completion of the work). Destruction shall be done by burning or shredding hardcopy, and/or physically destroying CD's, deleting and removing files from the electronic recycling bins, and removing material from computer hard drives using a permanent erase utility or similar software.
  - d. Notice of disposal. For all contracts using SBU building information, the contractor shall notify the GSA contracting officer that he and his subcontractors have properly disposed of the SBU building documents, with the exception of the contractor's record copy, at the time of Release of Claims to obtain final payment.

7.d.(1) Labeling of information. All SBU building information, either in electronic or paper formats, shall have imprinted on *each* page of the information:

**PROPERTY OF THE UNITED STATES GOVERNMENT  
FOR OFFICIAL USE ONLY**

**Do not remove this notice**

**Properly destroy documents when no longer needed**

(2) The following paragraph will be included on the *cover* page of the information (such as the cover page on the set of construction drawings and on the cover page of the specifications) and on the label of all magnetic media:

**PROPERTY OF THE UNITED STATES GOVERNMENT  
COPYING, DISSEMINATION, OR DISTRIBUTION OF THESE DRAWINGS, PLANS,  
OR SPECIFICATIONS TO UNAUTHORIZED USERS IS PROHIBITED**

**Do not remove this notice**

**Properly destroy documents when no longer needed**

(3) The previous two statements shall be **prominently** labeled in bold type in a size appropriate for the document. On a set of construction drawings, for example, the statements should be in a minimum of 14 point bold type.