SB 272 Catalog of Enterprise Systems

What is SB 272?
SB 272 requires local agencies (excluding school districts) to create catalogs of all enterprise systems that store information about the public, and to post this catalog on their websites, if they have websites. If they do not have a website, they are required to publish the catalog in a way that can be provided to anyone who asks. This law applies to all California special districts, cities and counties, and compliance is required by July 1, 2016.

Governor Brown approved SB 272 in October 2015, adding section 6270.5 to the California Public Records Act (the "Act," Government Code Sections 6250-6276.48). Because it was added to the Public Records Act, local agencies will not be able to seek reimbursement from the State for costs associated with compliance.

What is covered by SB 272?
Section 6270.5 defines an enterprise system as a software application or computer system that collects, stores, exchanges, and analyzes information that the agency uses that is:
A multidepartment system or system that contains information collected about the public and
A system of record

A system of record means a system that serves as an original source of data within an agency.

 SB 272 requires local agencies to create a catalog of multi-departmental systems or systems containing information about the public that store original records and post the catalog on their agency website.

What is excluded?
Enterprise systems do not include cybersecurity systems, infrastructure and mechanical control systems, or information that would reveal vulnerabilities to, or otherwise increase the potential for an attack on, a public agency's IT system. Additionally, section 6270.5 does not automatically require disclosure of the specific records that the IT systems collect, store, exchange or analyze, however, the Act's other provisions pertaining to disclosure of such records still apply.

What is required in the catalog?
For each enterprise system included in the catalog list, agencies must disclose:
Current system vendor
Current system product
The purpose of the system
What kind of data is stored in it
The department that serves as the system's primary custodian
How frequently system data is collected
How frequently system data is updated

For the full text of the bill, see https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB272

Salton Sea Authority
Enterprise System Catalog
SB 272 (2016) / Government Code 6270.5

Vendor	Product	Purpose	Data Type	Custodian	Frequency Collected	Frequency Updated
Microsoft	Microsoft Outlook/ Office 365	Email and calendaring	Email, Calendar, Contacts	Administration	Daily	Daily
Microsoft	Microsoft Office 2013 and 2010	Email, calendar, document creation	Email, Calendar, Contacts, Documents	Administration	Daily	Daily
Constant Contact	Constant Contact	Online email service with contact storage	Email contacts, outgoing email announcements	Administration	Periodically	Periodically
Abbyy	Abbyy Reader	Business Card Scanning Software	Contact information from business cards	Administration	Periodically	Periodically