Policy Number: HC-29	Page: 1	Of: 2
Title: Device and Media Disposal and Re-Use		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
Effective Date: 01/19/2021		
Reviewer/Job Title: Director of Operations		

(A) DEVICE AND MEDIA DISPOSAL AND RE-USE
Electronic storage media and devices shall be cleaned of protected health information and other confidential information prior to disposal and/or re-use.

Audience

Hipaa security officer

Authority

HIPAA Privacy and Security Rules, 45 CFR Part 164; 164.310(d)(1)

1) **Media Disposal Handled by HIPAA Security Officer**. As specified in Policy 3080 Computer Usage, board employees are prohibited from storing Protected Health Information on the board's on removable media. In the event of a legitimate requirement to store data on a device such as a CD or USB drive, the employee should be instructed to give it to the HIPAA Security Officer for disposal when it is no longer needed.
2) **Technical Guidance**. In accordance with instructions from the Secretary of HHS, technical guidance regarding media disposal should be obtained from NIST SP 800-88 *Guidelines for Media Sanitization*. The board requires that at a minimum, data from electronic media should be "cleared", that is, protected against a robust keyboard attack but not necessarily against a laboratory attack.
3) **Media Disposal and Re-use**. Procedures vary based on type of storage media:
   a) **CDs, DVDs and Tapes**: CDs, DVDs and Tapes should be physically destroyed by a service who will issue a certificate of destruction.
   b) **Hard Drives and floppy disks**. Hard drives and floppy disks should be reformatted prior to disposal or re-use.
   c) **Other Media**. See NIST SP 800-88 for disposal/recycling methods for other media.
4) **Records.** Records of Media disposal should be maintained for 6 years. The following records should be maintained:
   a) Item Description
   b) Make/Model
   c) Serial number(s) / Property Number(s)
   d) Backup Made of Information (Yes/No)
   e) If Yes, location of backup

f) Item Disposition (Clear/Purge/Destroy)
   i) Date Conducted
   ii) Conducted by
   iii) Phone #
   iv) Validated By
   v) Phone #
g) Sanitization Method used
h) Final disposition of media (Disposed/Reused Internally/Reused Externally/Returned to Manufacturer /Other)