6.10 SURPLUS COMPUTER EQUIPMENT AND DATA DISPOSAL

A. Overview
Surplus computer equipment may have little or no residual financial value, but may still hold valuable information and/or software. For computer equipment capable of storing information (for example, Personal Computers or other computers with hard disks), compliance with HIPAA may dictate the removal of the electronic data prior to ANY movement of equipment, even within University. Surplus disposable media (for example, diskettes, tapes, CD-ROMs) must be erased or destroyed.

B. Purpose
To protect the institution from legal liability for violation of existing privacy laws like HIPAA; to allow the institution to follow state policies as established Office of Information Technology; and to reduce the probability of the institution violating existing environmental laws.

C. Scope
The scope of this policy applies to all LSUHSC-S electronic computer equipment. This policy not only applies to the computer systems but also to ALL data (including encrypted data). By default, all data should be considered potentially sensitive. Disposable media such as floppy disks (also CDR, CDRW, Zip, Jaz etc disks, CompactFlash, SmartMedia, etc.) and tapes should not accompany surplus equipment but instead should be securely erased, retained by the department, or disposed of by secure means. Other internal media devices should be securely erased prior to redistribution or surplus.

D. Methods of Disposal
Three methods are recognized and approved by the University for acceptable disposal of surplus equipment:

1. Transfer/Redistribution
An effort should be made to redistribute the computer equipment to a location within the department or University that may make use of the equipment. In this case, the computer is put back into service intact or with very minimal modification (such as adding memory).

2. Surplus
If the computer equipment cannot be transferred within the institution, then it should be disposed of in compliance with state and federal laws for environmentally responsible disposition and in accordance with University computer disposal procedures. Computers will be considered obsolete when they can no longer provide a “basic level of service” or have exceeded their useful life.

3. Destruction
Items that are not required by law to be given to surplus (because of minimal value) may be destroyed by the departments rather than routing to Auxiliary Services. Destruction is
the ONLY means of disposal for media items like floppy disks, CDR, CDRW, Zip, Jazz disks, Compact flash, Smart Media, and tapes unless prior authorization is obtained from the Information Security Officer. Systems and monitors should be given to surplus rather than destroyed.

E. Procedures for Computer and Data Disposal
1. Prior to any means of disposal (see above), systems should be adequately “sanitized”, a process that should only be performed by auxiliary Auxiliary Services. Sanitization is necessary because simply formatting hard drives or deleting files is not sufficient to adequately purge the information. Every computer transferred out of a department or given to surplus must be sanitized by Auxiliary Services. This policy does not mandate sanitization of computers transferred within a department.

2. Departments should complete the Change in Movable Equipment form together with an Internal Transaction (to pay for the sanitization) and then notify auxiliary Auxiliary Services that a computer is ready to be sanitized.

3. Auxiliary Services will either arrange pickup of the equipment through Physical Plant or dispatch a technician to clean the computer at the department’s location. After Auxiliary Services sanitizes the computer, they will sign the portion of the Change in Movable Equipment form noting that proper sanitization has been completed.

4. After “Sanitization Complete” has been indicated on the Change in Movable Equipment form, the department is free to contact Equipment Control to surplus the computer or to transfer the computer to another department.

5. Reminder: Equipment Control will not accept any computers for surplus that have not been sanitized and properly documented by Auxiliary Services. Similarly, no computer is to be transferred from a department until sanitization by Auxiliary Services occurs. Such process enables the institution to keep complete records for auditors who may ask for verification that information was adequately destroyed and enables equipment to be tracked to ensure appropriate data cleaning policies were followed.

F. Enforcement
Any employee who improperly moves computer equipment without a completed Change in Moveable Equipment form will be in violation of this policy, and any employee in possession of computer equipment that has not been properly transferred will also be in violation of this policy. Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

G. Definitions
Surplus: Computer equipment that is no longer required due to: excess of useful life, lack of continued need, obsolescence, wear, damage, deterioration, excessive cost of maintenance, or new installations.