

A. T. STILL UNIVERSITY OF HEALTH SCIENCES

GENERAL ORDER	Date Effective: April 20, 2005 Reviewed: July 1, 2008	Order No: 85-152
Subject: Device and Media Reuse and Disposal (§164.310(d)(1))	Approval:	Page: 1 of 2

PURPOSE

The purpose of this policy and its procedures is to satisfy certain standards and requirements of HIPAA and the HIPAA regulations, including, but not limited to, Title 45, Section 164 of the Code of Federal Regulations, as the same may be amended from time to time.

POLICY

As computing equipment ages, it may be removed from a secure area and disposed of or repurposed to other functions. In order to guard against the inadvertent disclosure of protected information, including but not limited to ePHI, sensitive business information, and protected student information, all such devices and media must be disposed of or repurposed properly.

- A. The disposition or repurposing of any and all information processing equipment as well as the receipt and removal of hardware and electronic media into and out of University facilities, shall be the sole responsibility of Information Technology and Services.
- B. Any device which has, at any point in time, contained protected information must be treated at all times as still containing such data.
- C. Prior to being repurposed or disposed of, the following must be performed on any device which permanently stored protected information, e.g., hard drives, CD-ROMs, backup tapes, etc.”
 1. Create a retrievable, exact copy of electronic protected health information, when needed, before movement, repurposing, or disposing of the equipment.
 2. If the device/media cannot be erased, e.g., a non-erasable CD-ROM, then it must be physically destroyed;
 3. If the device/media can be erased, e.g., hard drive, backup tapes, etc., then the device/media must be logically destroyed through multiple passes of a specialized program to erase data such as, DataEraser in triple-pass overwrite mode meeting Department of Defense specifications. Following destruction of the data, an effort should be made to retrieve it to help guarantee its destruction.

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4. If the device/media is to be disposed of and no longer will be in use, then the device/media should be physically destroyed prior to disposing of it. Information Technology and Services will maintain a record of all such devices and their repurposing or disposition, as well as the movements of hardware and electronic media and any person responsible therefore. Annually this information will be forwarded to the Security Task Force for use in testing and revising policies related to the security of protected information.

RESPONSIBILITY

- A. It is the responsibility of the Chief Security Officer in collaboration with the Director, Information Technology and Services to implement this policy.