

VANDERBILT POLICY ON DISPOSAL OF INFORMATION ON ELECTRONIC DEVICES AND MEDIA

Background: The guidelines below are designed to ensure the proper disposal of Vanderbilt information on electronic devices or media in a manner that prevents inadvertent loss or disclosure. Steps must be taken so that Vanderbilt information is not recoverable by conventional methods. Proper disposal of Vanderbilt information and licensed software on electronic devices and media is also governed by other Vanderbilt University and Vanderbilt University Medical Center policies and applicable law. Special attention must be paid to federally regulated information such as data concerning patients, research subjects, and students, as well as information created using federal grant funds.¹ In addition, proprietary information may also be subject to the terms of sponsored research agreements, Non-Disclosure Agreements, or license agreements.

Process for disposal of information

1. School/Department administrators are responsible for making sure this process is followed as described below. Administrators may choose to contact their LAN Administrator or local technology support provider for assistance.
2. Schools/Departments are responsible for removing all Vanderbilt information contained on Vanderbilt computer equipment, electronic devices, or electronic media. The information on devices or media must be erased and not recoverable before they are disposed of, surplused, or transferred within or between a school or department.² Devices include desktop computers, servers, laptops, personal digital assistants (PDA's), and any other electronic storage devices. Electronic media includes, but is not limited to tapes, hard drives, CDs, and diskettes.
3. Simply deleting files from or reformatting electronic media may not be sufficient to prevent recovery of stored information. Therefore, in order to remove information from a computer, electronic storage device, or electronic media, a school/department must choose one of the following:
 - (a) destroy the information on the hard drive or media by first reformatting it and then running additional utilities like those listed on the ITS security website located at http://www.vanderbilt.edu/its/security/safe_tools.php;
 - (b) remove the hard drive or other media and secure it indefinitely; or
 - (c) remove the hard drive or other media and physically destroy it.
4. Schools and departments are responsible for certifying that the above procedures have been followed by filling out and attaching a tracking document to every

¹ Information created using federal grant funds must not be deleted, but should be retained for a period of three years from the date of submission of the final expenditure report. For additional information see the Federal OMB Circular A-110 at <http://www.whitehouse.gov/omb/circulars/a110/a110.html>.

² Vanderbilt information may not need to be removed if the device remains within the same school or department and if it will be used by someone who needs access to the same information.

³ A tracking document is not required for transfers within the same school or department.

computer or electronic storage device that is surplus or transferred between departments.³ The tracking document may be printed from the ITS security website at <http://www.vanderbilt.edu/its/security/...> {Note: The tracking doc is attached and it will be put on web once finalized.}. The department should also maintain a copy of the tracking document as a permanent record.

5. Receiving schools or departments at Vanderbilt should verify the completeness of the required information on the tracking document before taking receipt of the equipment.
6. Outdated, decommissioned, or broken computer equipment or other electronic devices cannot be discarded in dumpsters or regular trash containers. These devices may be recycled through the Vanderbilt Computer Recycling Program at no cost to the department. Information on computer recycling can be found at http://www.vanderbilt.edu/vehs/resources/hazard_computer.htm. Questions about the recycling program should be directed to the Storage and Services Department at (93)6-4626 or Procurement Services at (34)3-1963. Vanderbilt's Virtual School will also take receipt of certain old computer equipment to be refurbished and given to community groups in need. For information on the Virtual School please see <http://www.vanderbilt.edu/virtuelschool/>.
7. Questions regarding the proper disposal of Vanderbilt information should be directed to either the VUMC Network Security Officer (network.security.vumc@vanderbilt.edu) or the ITS Network Security Officer (network.security@vanderbilt.edu).