

# State of Vermont

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## Digital Media and Hardware Disposal Policy



Date:

Date of review:

Approved by:

Policy Number:

*11/21/12*  
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*[Signature]*  
*Deary*

SOV – Digital Media and Hardware Disposal Policy

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## **1.0 Introduction**

### **1.1 Authority**

The State of Vermont is authorized to undertake the development of enterprise architecture policies and standards. The Department of Information and Innovation (DII) is authorized “to provide direction and oversight for all activities directly related to information technology, including telecommunications services, information technology equipment, software, accessibility, and networks in state government.” See 22 VSA §901(1).

Managers, employees, records personnel, third party vendors and all others who connect to or handle State of Vermont networks and data are responsible for reviewing this policy in concert with business, legal, and information technology staff. Each must ensure this policy (1) satisfies each agency’s and/or department’s legal requirements, and (2) that its data requirements can be effectively performed by State employees. If applicable State laws or regulations require more stringent requirements, each agency must adopt its own policy explicitly stating the more stringent legal requirements. Agencies shall not develop an internal policy that lowers the minimum requirements listed in this policy.

### **1.2 Purpose**

The purpose of this policy is to define the methods for disposal of digital media and hardware used by state agencies, departments, vendors and contractors that do business on behalf of the state.

### **1.3 Scope**

This policy applies to all electronic hardware and digital media owned or leased by the State of Vermont that is capable of storing state information or data. All vendors and contractors that do business on behalf of the state, who store State information on their systems shall also adhere to this policy. Any personally owned devices that are used for State of Vermont business are also subject to this policy.

## **2.0 Policy**

### **2.1 Introduction**

Agencies/departments shall develop appropriate documentation for any requirements that exceed those outlined in this document. This may include: outlining steps employees should follow for proper disposal of digital media and electronic hardware, including transfer of equipment to BGS surplus. Proper chain of custody for all digital media and hardware must be followed. (A sample *Chain of Custody* form is located at [http://dii.vermont.gov/Policy\\_Central](http://dii.vermont.gov/Policy_Central).)

## **2.2 Requirements**

### **Hardware Transferred Within State Agencies/Departments:**

Transfer of any digital media or hardware between state agencies/departments that stores State of Vermont data, must adhere to the requirements in this policy. Copiers have different requirements; please see section 2.5 to reference those differences.

Prior to releasing any digital media or hardware to a new user, the device must be fully encrypted. When transferred to a new user, the device must be reformatted.<sup>1</sup> This practice will ensure data does not remain on a device prior to transfer between users, no matter what type of media is used.

Agencies/departments may choose to use more stringent standards when handling data protected by federal or state regulations, statutes or law. The agency/department is responsible for appropriately documenting those additional requirements.

Agencies/departments are required to have written procedures describing best practice for data removal from media containing digital media storage devices that do not support encryption. The procedure must assure that data recovery is not possible. These procedures will require the review and approval of the DII Security Director prior to agency/department implementation.

### **Hardware Transferred Externally:**

All hardware transferred externally (outside of state agencies/departments), sold, donated, or destroyed, must be handled in accordance with the Technical Guidance on Disposal section of this policy. Equipment, minus the digital media storage devices, will be handled by Buildings and General Services (BGS) or a state contracted vendor.

## **2.3 Technical Guidance on Disposal**

Physical destruction will be the primary method to dispose of digital media and data storage devices contained in equipment that will be transferred externally.

Digital media may be incinerated, shredded, crushed, or pulverized. The agency IT department must remove digital storage devices from computing and mobile device equipment before it leaves a department or agency for disposal or redistribution. Vendors must remove hard drives from copiers prior to removal from a department. (See section 2.5 for more detail concerning proper removal of copiers.)

The agency/department will lock digital storage devices in a secure area until they are retrieved by a state contracted vendor for destruction. Agencies/departments are

responsible for contacting the vendor. (See the Digital Media and Hardware Disposal Standard located at [http://dii.vermont.gov/Policy\\_Central](http://dii.vermont.gov/Policy_Central).)

Agencies/departments are responsible for appropriately documenting this process.

**Exception:** Some routers and switches under warranty are required to be intact when returned to the company. These devices will have media storage returned to default settings, when applicable, prior to shipping to the company. This equipment will be delivered in a fashion that results in a signed verification of receipt by the company. Each agency IT department is responsible for having a written procedure for this process.

## 2.4 Surplus Items

*Title 29: Public Property and Supplies, Chapter 59, § 1552. Authority and duties,* states that the department of Building and General Services (BGS) is responsible for the disposal of all State owned property. Hardware, minus the data storage devices, will be sent to BGS unless BGS specifically indicates that the equipment is to be recycled via a contracted vendor directly from the department or agency. If BGS does not want to accept the hardware, it is the responsibility of the agency/department to contact the contracted vendor to remove the hardware for recycling. In the case of recycling, a contracted vendor will pick up the equipment from the agency/department upon notification.

## 2.5 Copiers

If a copier is being removed from an agency or department, it is the responsibility of the agency/department to contact the appropriate copier vendor to remove the hard drive prior to removing the machine. Once the hard drive is removed from the machine, the copier may be removed from the agency/department. Copier hard drives are to be handled as other hard drives in this policy.

Copiers being decommissioned may need to be returned to the vendor per lease agreement. It is the responsibility of the agency/department to determine the appropriate disposal destination for copiers.

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<sup>i</sup> **Reformatting** is a high-level formatting performed on a functioning disk drive to free the contents of its medium. Reformatting is unique to each operating system because the procedure varies by OS. The most important aspect of the process is to free disk space for other data.