

Procedure for Data Removal

Purpose

To meet the requirements of

- a. Virginia Information Technologies Agency (VITA) Resource Management Standard, "Removal of Commonwealth Data from Electronic Media Standard," COV ITRM Standard SEC514-03, March 15, 2008, Revision 3 and
- b. University Policy 1114A

It is required that all technology equipment or components containing memory (e.g., the hard drives of personal computers, servers, mainframes, Personal Digital Assistants (PDAs), routers, firewalls, switches, tapes, diskettes, CDs, DVDs, cell phones, printers, and Universal Serial Bus (USB) data storage devices) have all data removed and destroyed prior to disposal per the guidelines stated in COV ITRM Standard SEC514-03.

In order to be in compliance with this requirement and university policy, Central Receiving, Technology Support Services (TSS) Desktop, and the Data Center have established the following procedures when disposing of this equipment. All equipment covered by the requirements and policy must have its memory erased within 60 days of being taken out of service.

The disposition of electronic equipment, including its transfer within the university, is also governed by University Policy Number 2104: Inventory Control of Office and Educational Equipment and Furniture and the Code of Virginia §2.2-1124.

Procedure for Transferring a Computer within the University

Anyone transferring a computer to someone else within the university must first erase the hard drive using "Dban" software prior to releasing the computer. Options are:

1. Users should contact the Information Technology Unit (ITU) Support Center to request the "Dban" software and to receive guidance on its use. This program cleans all data off the hard drive, but does not destroy it.
2. Or the user can contact the ITU Support Center and request that a technician come on site and remove the data from the hard drive and install a new software image. Desktop Support Services will charge a fee for this service, as approved through University Policy 2112 Recharge Rates (\$30 is the fee in FY13).

An exception is if a device is being transferred to an employee replacing the device owner, any files needed for the continuity of business processes can be retained and transferred to the new employee.

Procedure for Surplus

Items that do not store data can be repurposed for use within the university. These items include flat panel monitors, any input device (such as a mouse or keyboard,) RAM, video cards, power supplies, and network interface cards for computers and printers. The Warehouse Manager of Central Receiving must document and approve the removal of these non-storage items.

Equipment with data storage and deemed surplus will not be recovered, transferred or repurposed for university use. Surplus electronic equipment will be recycled, destroyed or dismantled in such a way as to make it unusable.

Technology Support Services Desktop

TSS Desktop will remove accessible hard drives from surplus technology equipment it receives. TSS Desktop will then send the equipment and the removed drive(s) to Central Receiving for data destruction processing. TSS Desktop will advise customers that surplus equipment should have all sensitive information removed and be secured until transfer to Central Receiving.

Central Receiving

Surplus electronic equipment will be sent to Central Receiving. At Central Receiving all electronic media that has stored data will be staged in an area where it is secure for data destruction processing.

A contracted recycling company (Creative Recycling Services, under University of Virginia Contract # 1096997) will take the equipment off site and perform the following procedures.

1. Creative Recycling Services (CRS) will maintain a facility with sufficient security to reasonably ensure against the loss of any equipment or data. The facility and operations must comply with all applicable laws and regulations but particularly with regard to safety and environmental issues. CRS will warrant that all its facilities will be properly licensed by the Environmental Protection Agency, applicable state environmental agencies and other applicable state and federal agencies, and permitted to receive the surplus assets and to perform the services described herein.
2. Data Removal Methods
 - a. *Hard Drives* – The three currently acceptable methods are: Overwriting, Degaussing, and Physical Destruction.

- b. *Non-Volatile Memory Device* – Data removal may be accomplished by removing the battery or electricity supply or by such other method recommended by the manufacturer for the device(s) where the battery is not removable. Examples include, but are not limited to, all computer equipment that has memory such as personal computers, Personal Digital Assistant (PDAs), routers, firewalls and switches.
- c. *Other Electronic Media Data* – Sensitive data on media other than hard drives or devices that hold data or configuration in non-volatile memory must be overwritten, degaussed, or destroyed. Disintegration, incineration, pulverization, shredding or melting is acceptable means of destruction. Examples include, but are not limited to, tapes, diskettes, Compact Disks (CDs), Digital Versatile Disc or Digital Video Disc (DVDs), WORM devices, and Universal Serial Bus (USB) data storage devices.
- d. *Asset Tags* – Any asset tags on surplus assets must be recorded, removed, and destroyed. Within two weeks of the equipment's pickup date, a listing of the equipment, serial number, and asset tag number must be sent to Mason's Central Receiving's Warehouse Manager. In addition, any other labels that might link the equipment to Mason must be removed and destroyed.
- e. *Certification* – CRS must document the data has effectively removed and provide certification to the university within 30 days of pick-up.

Central Receiving will bundle any surplus equipment not picked up by CRS for disposal. Central Receiving will record all equipment asset tags and serial numbers.

Data Center

The Data Center may transfer surplus technology equipment to Central Receiving for final data destruction. Prior to the surplus of Data Center equipment, all hard drives will be removed. Any drives containing sensitive data will be degaussed prior to transfer to Central Receiving or disposal. The following process may also be taken by Data Center staff to ensure protection of sensitive data.

- Degaussing

Degaussing is a method of data destruction used in the data center to clean data from tapes prior to physical destruction. The degaussing process is also used to clear hard drives of sensitive data prior to disposal or removal from the data center.

The Data Center maintains a log of the degaussing process that provides the:

1. **Date** – the date the item is degaussed

2. **Time** – the time the item is degaussed
3. **Media** – the type of item degaussed (hard drive, tape)
4. **System S/N** – serial # of unit item removed from
5. **System Mfg** - the manufacturer of the system
6. **Requestor** – person requesting degaussing of item
7. **Mgmt Approval** - signed by a manager upon completion
8. **Degaussed By** - the person that physically degausses the hard drive
9. **Tagged** – degaussed hard drive/media tagged prior to surplus and upon completion of the data destruction process
10. **Final Destination** – the item’s disposal location/method

All equipment casings will be tagged indicating the removal of all hard drives and media equipment. Each hard drive/media will have a visible identification marking upon the completion of the data degaussing process. This identification marking will act as proof of data destruction for each unit.

Quality of Assurance

The effectiveness of the data removal process shall be tested by a quality assurance function independent of the organizational unit performing the data removal.

References

Virginia’s Information Technology Resource Management Standard, “Removal of Commonwealth Data from Electronic Media Standard, COV ITRM Standard SEC514-03, March 15, 2008, Revision 3.

http://www.vita.virginia.gov/uploadedFiles/Library/PSGs/COV%20ITRSEC514-03_Data_Removal2008.pdf

List of resources that meet the COV ITRM Standard SEC514-03 for the removal of data from electronic media

<http://www.vita.virginia.gov/library/default.aspx?id=5046>

Information Technology Resource Management
Information Technology Security Standard
COV ITRM Standard SEC501-06

Date: July 1, 2011

http://www.vita.virginia.gov/uploadedfiles/VITA_Main_Public/Library/PSGs/Information_Security_Standard_SEC501_06_07012011.pdf

Procedures Updated August 1, 2012