

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 from disposed data storage devices. Proper disposal of Vanderbilt information and licensed software on electronic devices and media is also governed by other Vanderbilt University and 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, supplier agreements or license agreements.

Process for disposal of information:

1. School and department administrators are responsible for making sure this process is followed as described below.
2. Schools and departments are responsible for removing all Vanderbilt information stored 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, cell phones, 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 or 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, such as the scrubbing tools listed on the VUIT website located at **** <https://it.vanderbilt.edu/services/catalog> ****.
 - b. Remove the hard drive or other media and secure it indefinitely.
 - c. Remove the hard drive or other media and physically destroy it.
 - d. Or go to number 5.

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 Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200, section 200.333 at ****<http://www.ecfr.gov/cgi-bin/text-idx?SID=ed90f54836feb6a994f657188eb05e33&node=2:1.1.2.2.1&rgn=div5>****

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.

4. Schools and departments are responsible for certifying that the above procedures have been followed.
5. The VUIT Chain of Custody Pegasus request will begin the process to release a data storage device(s) for disposition and ownership of the device will change at that time to VUIT for final disposition. The VUIT Chain of Custody Pegasus request will go to the VUIT Data Center Services. The VUIT Data Center Service Team accepts all data storage devices at VUH and Hill Data Centers. After destruction, you can request a copy of the destruction certificate. For more details about the workflow process, please see page 3 of this policy.

To complete the VUIT Chain of Custody Pegasus request, please use the request form at **** <https://pegasus.mc.vanderbilt.edu/CreateESS.aspx> **** or call 3-HELP and VUIT resources will assist you in creating a Pegasus request to surplus computer equipment containing a data storage device. For more details about creating the Pegasus request, please see page 4 of this policy. Use this request type when any device(s) is being sent to surplus for disposal. You can enter up to 5 devices per request or attach a file. If you are attaching an Excel spreadsheet, please use the format of Make, Model, Serial #, Type (Laptop, Server, etc.) and indicate whether or not you need a certificate of destruction for the device. One device per row in the spreadsheet. When you submit the Pegasus request you get a request number. Please retain this for future reference.

VUIT will coordinate with Cintas to ensure the information on the data storage devices has been appropriately disposed of for the final disposition. Storage & Services will securely transport all electronic devices and media. All other surplus electronic equipment can be picked up by Storage & Services. A work order for pickup can be submitted at

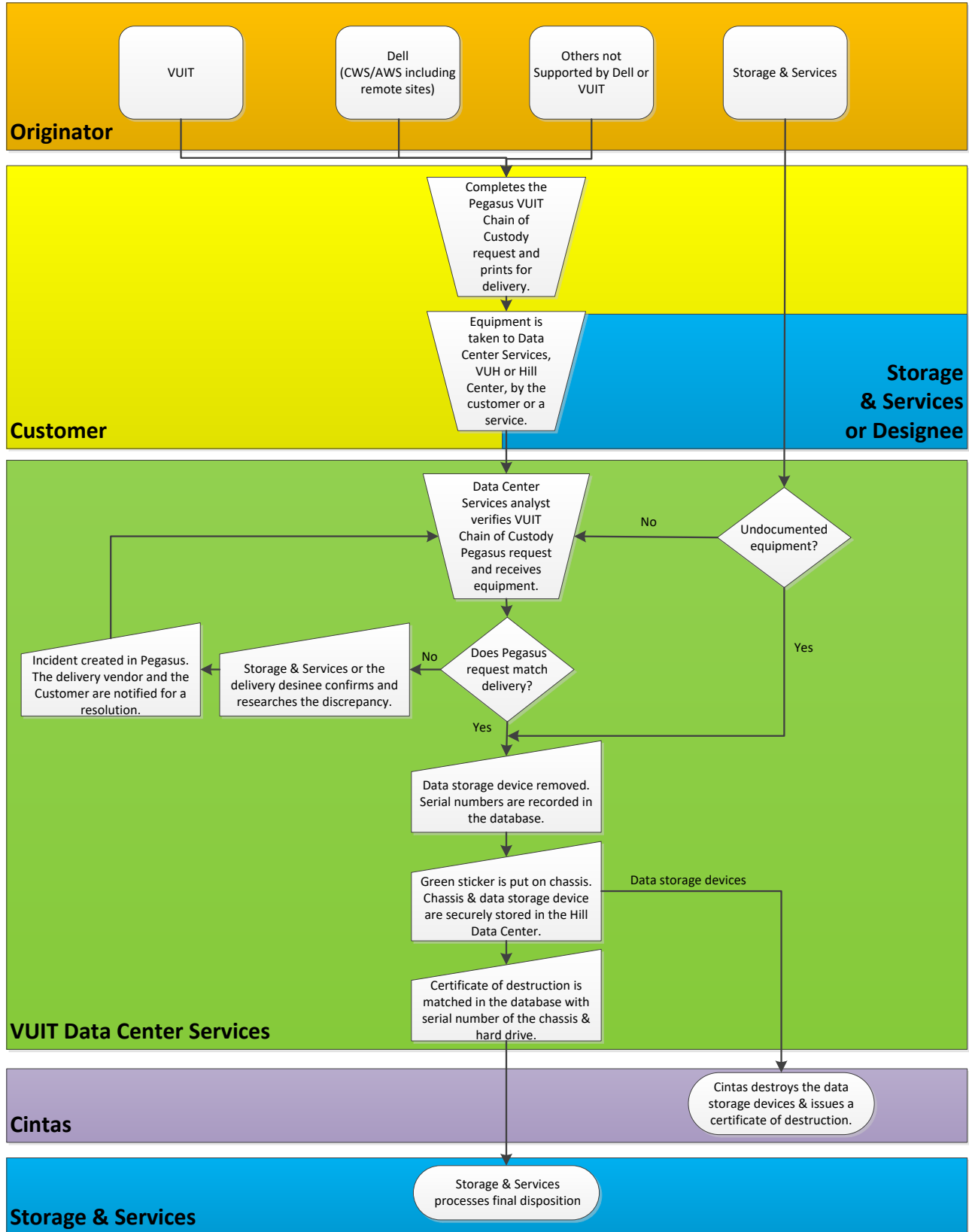
**** <https://plantservices.vanderbilt.edu/vandy/vandywo/workorder.aspx> ****

6. Outdated, decommissioned, unwanted, or broken computer equipment or other electronic devices cannot be discarded in dumpsters or regular trash containers. These devices must be recycled through the Vanderbilt Electronics Recycling Program at no cost to the department. Information regarding this recycling program can be found at *** * <http://www.vanderbilt.edu/sustainvu/what-we-do/waste-and-recycling/non-traditional-recycling-options/computers-electronics/> ****. Questions about the recycling program should be directed to the Sustainability and Environmental Management Office at (34)3-2784 or recycle@vanderbilt.edu, VUMC Storage & Services Department at (93)6-4626 or Procurement Services at (32)2-2044.
7. Vanderbilt can no longer donate used computers to external organizations.

Please see Vanderbilt's Policy on Surplus property found at

**** https://finance.vanderbilt.edu/accounting/finplan_caprep/index.php **** (Chapter 10) for more information on the proper disposition of surplus equipment. In terms of proper disposal of Vanderbilt information, direct questions to VUIT Security Operations at **** <http://it.vanderbilt.edu/security/> ****.

Disposal of Information on Electronic Devices and Media Policy Workflow Process



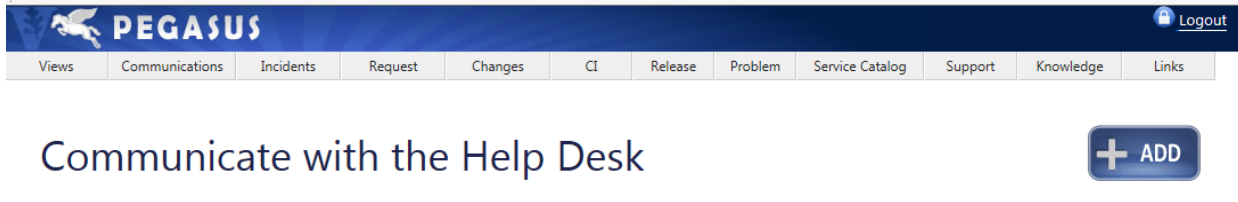
1-5-15 jd

How to Create a Pegasus Ticket

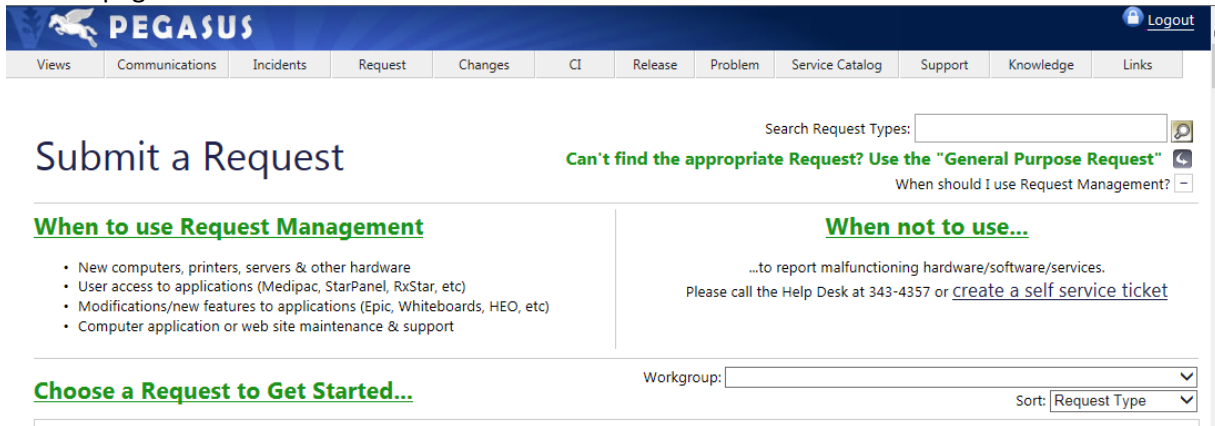
1. <https://pegasus.mc.vanderbilt.edu/CreateESS.aspx>

Enter your VUnetid and epassword.

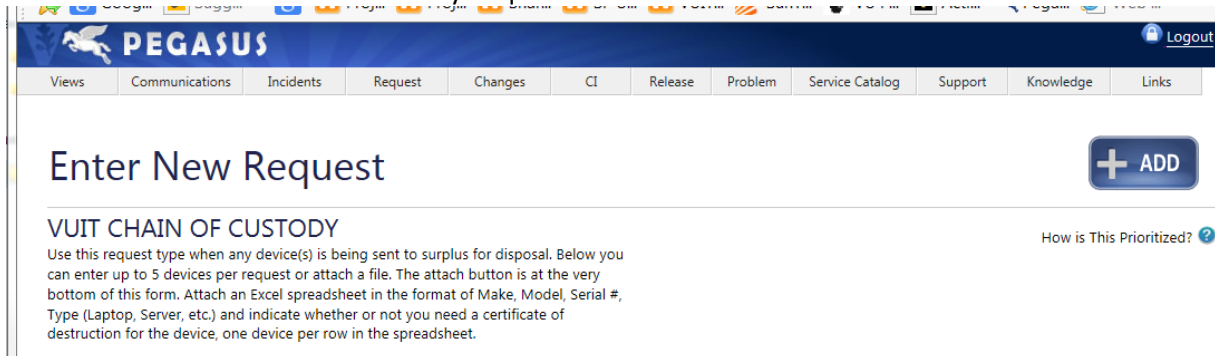
2. Choose to Request from the ribbon at the top of the page.



3. Choose New Request from the dropdown on the Request box from the ribbon at the top of the page.



4. Choose VUIT Chain of Custody Request



5. Submit the form when you entered all the information. Keep the number that submitting the form generates for future reference.

The entire Pegasus form for reference.

PEGASUS Logout

Views Communications Incidents Request Changes CI Release Problem Service Catalog Support Knowledge Links

Enter New Request + ADD

VUIT CHAIN OF CUSTODY How is This Prioritized?

Use this request type when any device(s) is being sent to surplus for disposal. Below you can enter up to 5 devices per request or attach a file. The attach button is at the very bottom of this form. Attach an Excel spreadsheet in the format of Make, Model, Serial #, Type (Laptop, Server, etc.) and indicate whether or not you need a certificate of destruction for the device, one device per row in the spreadsheet.

Requestor Information

Preferred Contact ? DERRICK,JUDY DERRICK + Required	Requestor DERRICK,JUDY DERRICK
Preferred Contact Method ? Email + Required	Request Owner ? DERRICK,JUDY DERRICK + Required
Preferred Contact # 615-322-5839 + Required	CI: <input type="text"/> Start Typing to Find a CI + ?
	Select a CI View to Add Multiple CIs + ?

Request Information

Short Description ? <input type="text"/> + Required	Requested Urgency 4 - Low + Required
Detailed Description ? <input type="text"/>	Requested Completion Date ? <input type="text"/> + Required
Benefit/Value ? <input type="text"/>	

Specific Request Form Information

Device 1 make <input type="text"/>	Device 1 model <input type="text"/>
Device 1 Serial # + Required <input type="text"/>	Device 1 Type (Desktop, Laptop, etc.) <input type="text"/>
<input type="checkbox"/> Check box if you require a certificate of destruction for device 1	Device 2 Make <input type="text"/>
Device 2 Model <input type="text"/>	Device 2 Serial # + Required <input type="text"/>
Device 2 Type (Desktop, Laptop, etc.) <input type="text"/>	<input type="checkbox"/> Check box if you require a certificate of destruction for device 2
Device 3 Make <input type="text"/>	Device 3 Model <input type="text"/>
Device 3 Serial # + Required <input type="text"/>	Device 3 Type (Desktop, Laptop, etc.) <input type="text"/>
<input type="checkbox"/> Check box if you require a certificate of destruction for device 3	Device 4 make <input type="text"/>
Device 4 model <input type="text"/>	Device 4 Serial # + Required <input type="text"/>
Device 4 Type (Desktop, Laptop, etc.) <input type="text"/>	<input type="checkbox"/> Check box if you require a certificate of destruction for device 4
Device 5 make <input type="text"/>	Device 5 model <input type="text"/>
Device 5 Serial # + Required <input type="text"/>	Device 5 Type (Desktop, Laptop, etc.) <input type="text"/>
<input type="checkbox"/> Check box if you require a certificate of destruction for device 5	

Custom Message

VUIT CHAIN OF CUSTODY

Print the Chain of Custody request to include with the equipment. If there are more than 5 devices, you will be required to fill out additional forms. If you are requesting a copy of the certificate of destruction, it could take 6-12 weeks to receive the certificate(s).

If the device(s) you are submitting for disposal has a V-tag, follow the instructions to complete a Property Transittal Form located at
https://finance.vanderbilt.edu/accounting/finplan_caprep/index.php

This ticket does not include transportation of surplus equipment. If VUMC Storage and Services is used for pick-up, create a work order located at
<https://plantservices.vanderbilt.edu/vandy/vandywo/workorder.aspx>

Attachments

<input type="text"/>	Browse...
<input type="text"/>	Browse...
<input type="text"/>	Browse...

Attach Files

+ ADD