Data Destruction Guidelines related to the final disposal of data storage devices for the University of Idaho

Proposed University of Idaho Guidelines:

Hard drives, thumb drives, SD chips, cell phones, and other devices are capable of storing significant amounts of electronically stored information. These data storage devices shall not be disposed of other than through the University of Idaho Surplus program.

Departments are responsible for ensuring that data storage devices have no recoverable information stored in them prior to sending them to Surplus. Please contact Records Management or the ITS Help Desk for assistance in this regard.

Surplus will oversee the disposition of data storage devices consigned to it under the assumption that departments have failed to overwrite sensitive data on the devices. Surplus may choose to contract with a 3rd party to destroy the data storage devices. In any case Surplus will maintain documentation of the final disposition (sale or destruction) of the device.

Guidelines for selection of a 3rd party for data storage device destruction

1. The vendor must provide a certificate of destruction for the data storage devices they destroy to the University of Idaho. The Idaho State Board of Education retention guidelines specify that certificates of destruction are to be kept permanently.

2. The contract between the University of Idaho and the vendor must include a HIPAA and FERPA-compliant Business Associate Agreement (consult with Office of General Counsel before finalizing.).

3. In addition, the contract between the University of Idaho and the vendor should:
    a. specify the method of destruction – this should be reviewed by ITS
    b. specify the time that will elapse between acquisition and destruction of data storage device
4. Surplus and Purchasing must document the "due diligence" steps taken to verify the reliability of the vendor. For example, verifying industrial certifications, or contacting existing vendor customers for evaluations.