



Subject:	Disposal Policy	Policy No:	PS105
Signature		Original Issue:	4/12/05
SEC Approval:	Marilee McGuire	Date:	4/7/05
Prepared By:	Jeff Cains	Effective Date:	4/20/05

Purpose:

The purpose is to implement policies and procedures to address the final disposition of electronic protected health information (ePHI), and/or the hardware or electronic media on which it is stored.

Scope:

This policy applies to Community Health Plan (CHP) in its entirety, all workforce members, including consultants, contractors, business associates and vendors. Further, the policy applies to all systems, networks, and applications, as well as all facilities, which process, store or transmit ePHI.

Policy:

CHP will ensure the Configuration Management Database is appropriately updated upon the disposal of components containing ePHI. This policy also applies to the following media:

- USB storage devices
- CD/R/RWs
- DVDs
- Floppy disks
- Zip disks
- Jazz drives
- Removable hard disk drives
- Internal hard disk drives
- External hard disk drives
- Tapes
- Optical disks

CHP will ensure that prior to disposal either the data will be securely overwritten or physically destroyed and that such steps will be documented.

CHP will ensure that all labels have been removed from such devices before disposal.

A copy of this Policy will be retained for a minimum period of six (6) years from the date it was created or, if revised, for a minimum period of six (6) years from the date it was last in effect.

Disposal is a required implementation specification defined within the Device and Media Controls standard (164.310 (d)(1)) in the Physical Safeguards category of the HIPAA Security Rule.

Responsibilities:

The Security Officer will be responsible for ensuring the implementation of the requirements of the Disposal Policy.

Compliance:

Failure to comply with this or any other security policy will result in disciplinary actions as described in the Sanction Policy. Legal actions also may be taken for violations of applicable regulations and laws such as HIPAA.

Procedures:

Procedures address the following media types:

- USB storage devices
 - CD/R/RWs *
 - DVDs *
 - Floppy disks
 - Zip disks
 - Jazz drives
 - Removable hard disk drives
 - Internal hard disk drives
 - External hard disk drives
 - Tapes *
 - Optical disks
- * **These media types will be destroyed by breaking or shredding. Computer tapes used for backing up data and voice systems tapes used for the voicemail system will be overwritten as needed, until such time as they become unusable in which case the tapes will be shredded.**

USB storage devices, floppy disks, zip disks, jazz drives, and optical disks will be reformatted before disposal.

Hard Disk Drive Disposal

The following steps will be taken before disposing of hard disk drives:

- The storage media will be securely overwritten (sanitized) using Norton Ghost 8.0's GDisk in conformance with U.S. Department of Defense NISPOM (National Industrial Security Program Operating Manual), DoD 5220.22-M, January 1995. The NISPOM document is available at:

<http://www.dss.mil/isec/nispom.htm>

GDisk performs a sanitize operation, when performing a disk wipe operation with the following cycle occurring six times:

1. All addressable locations are overwritten with 0x35.
 2. All addressable locations are overwritten with 0xCA.
 3. All addressable locations are overwritten with a pseudo-random character.
 4. All addressable locations are verified in hardware using the Verify Sectors command to the disk.
- Asset Control tags will be removed, destroyed and such will be documented in the Configuration Management Database.
 - The Configuration Management Database will be updated to reflect that the storage media has been securely overwritten.
 - The Configuration Management Database will be updated to reflect the date of disposal of the storage media.

Form(s):

None

Definition(s):

Definitions for all policies are included in the glossary section of the Appendix.

References:

- HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, <http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp>, February 20, 2003.
- Getting Started with HIPAA, Uday O. Ali Pabrai, Premier Press, April 2003.
- CMS, "CMS Information Systems Security Policy, Standards and Guidelines Handbook", CMS, February 2002.
- International Standards Organization (ISO/IEC 17799:2000(E))

Contact:

See Master Contacts List

Revision History		
Revision Date	Revision	Revision Made By
10/24/05	Removal of Contacts and consolidation in Master Contact List	Carrie Hardie
3/22/06	Changed all references from "Community Health Plan of Washington" to "Community Health Plan" and "CHPW" to "CHP"	Carrie Hardie