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|  <p><b>HAWAII HEALTH SYSTEMS</b><br/>CORPORATION<br/><i>"Touching Lives Everyday"</i></p> <p align="center"><b>Policy</b></p> | <b>Department:</b><br>Information Technology<br>Department            | <b>Policy No.:</b><br><b>ITD 0023</b> |
|  | <b>Issued by:</b><br>Barbara Kahana<br>Vice President & CIO           | <b>Revision No.:</b><br>N/A           |
| <b>Subject:</b><br><b><i>Disposal/Reuse of Electronic Storage Media</i></b>  | <b>Approved by:</b><br><br>Thomas M. Driskill, Jr.<br>President & CEO | <b>Effective Date:</b><br>10/04/04    |
|  |   | <b>Supersedes Policy:</b><br>N/A      |
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- I. **PURPOSE:** This policy mandates establishment of procedures to prevent unauthorized disclosure of information stored on electronic storage media scheduled to be disposed or reused. It is based on final HIPAA security rule requirements, and generally acknowledged IT best practices.
- II. **POLICY:** Electronic protected health information (ePHI) stored on electronic storage media must be removed prior to disposal or reuse. The method of removal must ensure that the likelihood of successful recovery of the deleted data will be extremely low. For floppy disk and hard disk drive (standalone or mirrored) storage media, reformatting is not an acceptable method of data removal. Acceptable methods for removing ePHI from various types of electronic storage media are presented below:

Acceptable ePHI Data Removal Methods

| Storage Media | Media Disposition  |  |
|---------------|--|--|
|               | Disposal   | Reuse <sup>1</sup>   |
| Floppy Disk   | <ul style="list-style-type: none"> <li>• Destroy<sup>2</sup></li> <li>• Degauss with a commercial grade degausser</li> </ul> | <ul style="list-style-type: none"> <li>• Overwrite with random characters more than 30 times</li> <li>• Degauss with a commercial grade degausser</li> </ul> |
| Magnetic Tape | <ul style="list-style-type: none"> <li>• Destroy</li> <li>• Degauss with a commercial grade degausser</li> </ul>             | <ul style="list-style-type: none"> <li>• Degauss with a commercial grade degausser</li> </ul>  |

Acceptable ePHI Data Removal Methods (Cont'd)

| Storage Media  | Media Disposition   |  |
|--|---|--|
|  | Disposal  | Reuse <sup>1</sup>   |
| Hard Disk Drive<br>(Standalone or Mirrored)                            | <ul style="list-style-type: none"> <li>• Destroy</li> <li>• Overwrite with random characters more than 30 times</li> <li>• Degauss with a commercial grade degausser</li> </ul> | <ul style="list-style-type: none"> <li>• Overwrite with random characters more than 30 times</li> <li>• Degauss with a commercial grade degausser</li> </ul> |
| Hard Disk Drive<br>(From RAID Array)                                   | <ul style="list-style-type: none"> <li>• Separate from Array and destroy</li> <li>• Separate from Array and leave As-Is</li> </ul>  | <ul style="list-style-type: none"> <li>• Separate from Array and leave As-Is</li> </ul>  |
| Flash Memory-Type Media<br>(i.e. USB drives, Flash Memory Cards, etc.) | <ul style="list-style-type: none"> <li>• Destroy</li> <li>• Overwrite with random characters more than 30 times</li> </ul>  | <ul style="list-style-type: none"> <li>• Overwrite with random characters more than 30 times</li> </ul>  |
| CD-R / Optical Disk  | Destroy   | N/A  |
| CD-RW  | <ul style="list-style-type: none"> <li>• Destroy</li> <li>• Overwrite with random characters more than 30 times</li> </ul>  | <ul style="list-style-type: none"> <li>• Overwrite with random characters more than 30 times</li> </ul>  |
| Random Access Memory<br>(RAM)  | <ul style="list-style-type: none"> <li>• Remove power, including battery power</li> <li>• Destroy</li> </ul>  | Remove power, including battery power  |

1. Reuse is for purposes other than originally intended (i.e. reused media will be used to store non-ePHI data in a non-ePHI controlled environment).
2. Pulverize or shred.

Unless required per specific service contracts, failed hard drives shall be disposed as specified above. Bad magnetic tapes shall also, be disposed as specified above.

Procedures for operationalizing the data removal methods described above shall be developed and must subsequently be followed.

**III. SCOPE:** This policy applies to Technical Services Division (TSD), Application Services Division (ASD), the Regional End-User Support Team (REST), and any User who stores information on floppy disks.

**IV. REFERENCES/RELATED POLICIES:**

- CMP 0008: Retention of Medical and Other Records