



VAR 800-88R1 COMPLIANT PROTOCOL FOR ELECTRONIC MEDIA DATA SANITIZATION (AND DESTRUCTION)

This document outlines the Procedures employed by Veterans Alliance Resourcing, Inc. “VAR” or “Veterans Alliance” related to the service offerings/options, control procedures, material receipt, physical audit, hard drive removal, data sanitization and physical destruction of electronic media. These procedures are consistent with the requirements outlined in HIPAA 45 CFR 164.530(c), 45 CFR 164.310(d)(2)(i) and (ii), 45 CFR 164.306(a)(4), 164.308(a)(5), and 164.530(b) and (i). Additional procedures related proper disposal and data sanitization followed by VAR include: [HHS HIPAA Security Series 3: Security Standards – Physical Safeguards](#) and NIST Special Publication 800-88R1 – for Data Sanitization <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-88r1.pdf>.

Depot Services (Primary)

A. VAR Depot Level Data Sanitization and Destruction Procedures

Upon receipt at VAR’s depot in DeSoto (Texas), all Devices with Electronic Media (PCs, Notebooks, Tablets and certain peripherals) and stand-alone Electronic Media are palletized and shrink-wrapped and assigned a location in the warehouse until it is staged for Physical Audit.

1. Physical Audit

At Physical Audit, all Devices with Electronic Media and Stand-alone Electronic Media are scanned capturing OEM, Model, Serial Number, Client, Date and any notes regarding physical condition. Devices with Electronic Media are opened, removing all Electronic Media, which are individually scanned capturing the serial number and associated by line item to the parent device. The removed Electronic Media and all Stand-alone Electronic Media is immediately placed into sealed plastic bins and brought to VAR’s Data Wiping Stations.

2. Data Sanitization and Destruction

Upon removal from the respective sealed container, all non-hard drive Electronic Media are earmarked for Physical Destruction. Hard Drives are physically scanned to track their movement into VAR’s Data Sanitization and Destruction Station, capturing Client, order, time, technician and additional information related to the hard drive including OEM, model, size, capacity and serial number. Once the data entry and scan processes are completed, Hard Drives are physically checked to determine if they are below VAR’s “Cutline” for reuse (typically 80GB for SATA/SAS). Hard Drives below the Cutline are earmarked for Physical Destruction while Hard Drives above the Cutline are tested for “Health” to verify a performance level of 95% or better. Passed drives are then placed into VAR’s data wiping stations, testing and wiping twelve (12) drives per cycle – VAR has two (2) data wiping stations. These stations utilize software that performs Data Sanitization consistent with NIST 800-88r1 guidelines (which replaced DOD policy 5220.22-M for military grade Data Destruction procedures). Drives failing the Data Sanitization process are earmarked for Physical Destruction. Drives passing the test are placed into VAR inventory for reuse.

3. Quality Control, Data Management Exception and Containment Procedures

VAR Quality Control includes sampling of tested drives along with Random audits of Passed Hard Drives by an independent technician or manager. Any exceptions to 100% verification will generate an immediate quarantine of all Hard Drives tested, requiring a full re-certification by VAR Management. An immediate review of the affected lot (were drives sold/shipped as a stand-alone device or integrated into a



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computer) is conducted to determine both Containment and Remedial Actions necessary to ensure data is not compromised. Additionally, a Data Management Exception Report is generated, and the Client is notified regarding the discovery. **Note:** VAR has 100% compliance to date with zero (0) Data Management Exception Reports filed by our QC Department.

4. Physical Destruction

All non-hard drive related Electronic Media, failed Hard Drives and Hard Drives that are below VAR’s Cutline for reuse, are earmarked for Physical Destruction. Physical destruction may include but is not limited to:

- i. punch press destruction penetrating both the circuit board and platter
- ii. aggregation into an Electronic Media “Shred” gaylord
- iii. shipment to a vetted downstream electronics recycler, certified to perform physical shredding and smelting of electronic material.

5. Controlled Shipment of Devices with Electronic Media or Stand-Alone Electronic Media

Devices with Electronic Media can be shipped with an extra-layer of security using tracked and/or sealed-truck shipment options. Additionally, for stand-alone Electronic Media, VAR will ship directly to a customer’s site(s), shipping grade plastic bins with covers that can be locked for transport of hard drives, tape drives, removable media/memory sticks or other Electronic Media devices to VAR’s depot where VAR will perform standard Data Sanitization and Destruction processing.



On-Site Services (Optional)

B. Veterans Alliance Computer Hard Drive Data Destruction Services

In addition to VAR’s standard Depot level management of Computer Auditing and Data Destruction, VAR offers a suite of enhanced Electronic Media Data Destruction and Control Services for customers. These services include:

1. **On-Site Electronic Media - Data Sanitization** – VAR will deploy (or will optionally utilize a Specialized 3rd-Party Contractor) to perform on-site Data Sanitization using the same equipment employed by VAR’s depot which adhere to NIST 800-88R1 guidelines (which replaced DOD policy 5220.22-M for military grade Data Destruction procedures).
2. **On-Site Electronic Media - Physical Destruction** – Using a Specialized 3rd-Party Contractor (vetted and managed by VAR), VAR offers services across North America for on-site physical destruction (shredding) of Electronic Media. These services are offered optionally for both stand-alone electronic media or for devices containing electronic media whereby a designated technician will remove the electronic media device from the computer or peripheral before shredding.
3. **On-site Electronic Media - Removal and Controlled Shipment** - VAR will deploy (or will optionally utilize a Specialized 3rd-Party Contractor), to remove Electronic Media from devices on-site. The Electronic Media is then shipped in a sealed container (with locks), which are opened at VAR’s Depot where VAR will perform standard Data Sanitization processing.



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