

You Can't Throw IT in the Dumpster Anymore: Tips for Finding a Qualified Electronic Waste Disposal Service

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by Joseph P. Harford and Karen Rizzo

One of the many challenges of the HIPAA age is handling the millions of outdated computers and associated peripheral devices. Once a back-burner issue, computer disposal is now front and center in the healthcare industry. The need to secure a health organization's network goes well beyond wireless access points, Web servers, and tablet PCs. It extends to the closets, rooms, and overflowing warehouses filled with old computer equipment.

How is your IT department getting rid of its outdated electronics? Is it donating them to charitable organizations? Putting them up for online or employee auction? Or simply throwing them into a dumpster or compactor?

These options may have once saved time and space, but they actually increase your organization's exposure to liability. Incidents of identity theft have spurred the development of more government legislation. Some states are not waiting for the federal government and are enacting their own legislation. (For more information on state laws for the protection of personal data, visit www.ncsl.org/programs/lis/privacy/IDTheft2005.htm.) In addition to the added liability associated with a data breach, environmental concerns about dumping computer equipment are also growing.

As with other waste streams, the organization that generates the waste is ultimately responsible for its proper disposal. The same rule applies to healthcare organizations that dispose of surplus computer equipment and all forms of digital storage media.

Outsourcing Disposal

IT departments should have a comprehensive erasure procedure that they follow for destroying data on computer hard drives. It is important to spot check the processed drives and confirm that the information is deleted and unable to be retrieved. Such a program allows you to test the integrity of your internal data destruction process and minimize your vulnerability to identity theft and its associated penalties.

Organizations can also outsource electronic waste data destruction and recycling. A qualified electronic waste service provides the organization with documentation confirming destruction. This information also serves as an inventory log for the IT department. Professional service providers are also in the business of recycling and reusing electronics, thus keeping metals and hazardous materials out of landfills.

Using a consulting company to identify service providers can save time and money when disposing of outdated computers. Some consultants specialize in delivering cost savings to health systems through waste assessments, contract negotiations, and a stringent vendor selection process.

Identifying a Qualified Service

In the course of identifying a qualified electronic waste disposal service, organizations are recommended to perform a facility site visit. This can be helpful in evaluating a service provider as well as educational. A qualified service provider should have a professional security system operational 24 hours a day, 365 days a year. They should possess all required permits.

Since the disposal service handles confidential and sensitive information, it should be able to assure clients of employee integrity. Background checks, drug testing, confidentiality agreements, and nondisclosure agreements must be standard practice for your service provider.

Companies that model their security standards on those of an organization such as the National Association for Information Destruction are the most favorable because their standard operating procedures exceed local expectations and meet more stringent nationally recognized standards. Standard procedures should meet recommended Environmental Protection Agency guidelines, and a zero-landfill policy for all material is desirable.

Department of Defense (DoD) data destruction standards achieve the goal of nonretrievable data while providing a back-up plan of physical destruction if electronic erasure methods fail. The service provider should also have a quality assurance procedure in place with DoD comparable standards. [Editor's note: for more on the DoD standards, see the July–August 2005 issue of the journal.]

Assessment Checklist

Healthcare organizations should use an assessment checklist when choosing a vendor. Questions to ask include:

- Are employees bonded, and have they signed a nondisclosure agreement regarding customer data? Have they had background checks and drug tests?
- Can the organization obtain a copy of the service provider's written landfill policy regarding electronic equipment?
- What training do the employees receive for the security of customer data?
- Does the service provider have a written policy for quality control?
- What types of insurance do the service provider carry and what are the limits to protect the organization?
- Can the service provider provide documentation on where your organization's residual electronic scrap is sent?
- What customer references can the service provider provide?

Your organization's selection process should also meet its logistical needs. Determine if you would benefit most from a local, regional, or national service provider. There are several options available pertaining to electronic waste disposal needs and pricing (e.g., for resale, no-cost commodity for items of small value, or recycling of material).

Organizations should also determine the service's expected response time and eliminate the potential for stockpiled inventory and dumpster or compactor disposal. The industry standard for a reasonable response time is 24 hours for an estimate and scheduled service for removal within seven business days.

As with any other vendor that will sign a business service agreement with you, make the process of due diligence vigorous. Your job and the security of your patient and employee data are depending on you.

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