County of San Bernardino
Department of Behavioral Health

Device and Media Controls Policy

Effective Date 2/1/07
Approval Date 2/1/07

Allan Rawland, Director

Policy

The Department of Behavioral Health (DBH) will standardize the physical attributes necessary to control the disposal or reuse of electronic media devices, which may contain ePHI client or departmental confidential data to ensure its availability, confidentiality and integrity.

Purpose

To establish guidelines that define the physical attributes for the disposal of data and the reuse of media storage devices.

Definition of Media Devices

Media devices are defined as, but are not limited to the following:

- Internal hard drives (Servers and Desktops)
- External hard drives
- Zip drives
- Memory Sticks
- Removable Disks
- Personal digital Assistants (PDA's)
- All other devices capable of housing or providing access to or transmitting ePHI

Media Destruction/ Reuse Procedures

The table below gives the procedures for destruction or reuse of media devices and under no circumstances will media that contains the only copy of the data be destroyed or reused, unless it can be recreated with minimal effort.

Media Destruction	When the useful life of a media device has expired, the devices will be submitted to Information Technology for destruction. **Useful life-** is defined as a single use for CD-ROMS, Memory Sticks, and Removable Disks (Floppies).
Media Reuse	Prior to useful life expiration any media to be distributed to another user will be given to Information Technology (IT) for content cleansing.

System Backups

Any media that is used for the purpose of system backups and/or disaster recovery and the media is transported and/or stored in a secured environment; the use of a data destruction device between uses is not required.

Information Technology

IT will review the procedures for the destruction, reuse, and the creation of back-up media and/or storage of media devices that is completed by a third party or IT on a semi-annual basis.

Exceptions

In some cases, outside reporting mandates may dictate the use of transferring ePHI on removable storage media and will require the following:

- A signed authorization by the Department's Security Officer and the IT Manager.
- Media device to be new (not previously used).
    - Use maximum effort to only use CD-ROMS as a distribution media.
- Media device to be password protected.
- Media distribution to be completed by IT to maintain the Media Release Log.
- A copy of the previous months Media Release Log to be given to the Privacy Officer by the fifth (5th) business day of each month for concurrence.

Consequences of Violations

If a staff member violates the use of DBH systems as described in this policy or in other County polices, DBH will take disciplinary action consistent with the County Personnel Rules, which could lead to termination.

Related Policies

Computer and Network Appropriate Use Policy