

University of Rochester
POLICY on Acquisition and Disposal of
Multifunctional Devices, Copiers and Similar Devices

Overview

This policy shall define a minimum standard as it relates to the acquisition and disposal of multifunctional devices, copiers, and similar devices. All activities and documentation shall be performed in such a manner that evidence of the activity can be reviewed by auditors or the University Information Security Offices. The following areas will be covered in this policy:

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01.01 Policy

Multifunctional Devices (MFD), Copiers, Scanners, Printers, Fax machines and other devices may contain hard drives or other media that store data such as images of pages that have been copied, printed or faxed.

The data on these devices, in unencrypted form, may be retrieved by a person with some prior technical knowledge. The data stored on these devices may contain Legally Restricted Information, such as student, patient and employee “Personal Identifying Information” or “Protected Health Information”. (For definitions see University IT Policy at <http://www.rochester.edu/it/policy>).

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01.02 Reason for Policy

This Policy is intended to prevent unauthorized disclosure of Legally Restricted Information and to comply with state and federal laws and regulations, including the Health Insurance Portability and Accountability Act (HIPAA) and the New York State Social Security Number Disposal Act.

01.03 Scope and Definitions

This Policy applies to all University of Rochester (UR) persons, which is defined to mean all staff, faculty, physician, volunteers, contractors and students of the University, the University itself, including all University divisions, departments, offices, and affiliates. The Policy also applies to agents and vendors of the University.

For purposes of this policy a Multifunction Device (MFD), is considered to be an office machine which

- (1) incorporates more than one component of functionality (e.g. copying, scanning, printing
- (2) has a hard drive or other method for data storage.

All UR persons who use MFDs, copiers, scanners, printers, fax machines and other devices that may contain hard drives or other media that store data must follow this policy in acquiring, maintaining and disposing of them.¹

This policy does not pertain to medical equipment, like CT scanners or MRI machines.

01.05 Leased MFD or Copiers

The current preferred University print vendor is available to assist with leases or purchases of MFD, copiers, printers and other similar devices. In some cases, leases or purchases **must** be completed through the the current preferred University print vendor. as more fully described below.

- All leases of devices outlined above must be arranged through Corporate Purchasing.
- In URMCDivisions including off-site locations, all leases **must** be completed through the current preferred University print vendor which will work with Corporate Purchasing.

¹ Any University Division that has been formally delegated authority to independently acquire the types of devices covered by this Policy shall establish a comparable policy to ensure appropriate control of data stored on hard drives or other media.

- In all leases handled by Corporate Purchasing and the current preferred University print vendor, the lease agreement will require cleaning of stored data from the equipment or surrender of the storage media to the University at the end of the lease. Cleaning may be done by the University, the current preferred University print vendor or the lease vendor, and may be included as part of the lease or purchase cost..

01.06 Purchased MFD or Copiers

The current preferred University print vendor, is available to assist with the purchases of MFD, copiers, printers and other similar devices. In some cases, the purchases **must** be completed through the current preferred University print vendor, as more fully described below.

- All purchases of devices outlined above must be arranged through Corporate Purchasing.
- In URM C Divisions including off-site locations, all purchases of MFDs and copiers must be completed through the current preferred University print vendor.

01.07 Purchase of Laser Printers, Scanners, Fax Machines and other office devices

- Purchases of devices such as laser printers, scanners, fax machines, and digital recorders that do not have a hard drive can be made in any way allowed by University Policy and approved by Corporate Purchasing.

01.08 Disposal of Purchased Equipment

For all equipment that was not acquired through current preferred University print vendor, care should be made to ensure that the device is disposed of properly. This includes:

- Purchased MFDs, copiers and any other device which may contain some type of storage media must be disposed of in the same manner as computer equipment. University IT maintains a contract with a vendor that securely destroys internal storage media before recycling or re-selling equipment. For more information on equipment disposal: See <http://www.rochester.edu/it/recycle>.

01.09 Internal Transfer of Equipment

Any MFD, copier or device that may contain storage media that is put into the University's surplus property program <https://www.urmc.rochester.edu/purchasing/SurplusIndex.cfm> or directly transferred to another University department or individual must be cleaned of stored data before it is transferred from the "selling" department. The University IT Asset Recovery program or the current preferred University print vendor will perform this function for any department that lacks the expertise or resources to do this. Further information is also available at <http://www.rochester.edu/it/recycle>.

Qualified department staff may perform this function only with the approval of your area Chief Information Security Officer.

01.10 Temporary Equipment

Occasionally it is necessary to contract for temporary use of equipment, e.g. for high-volume copying jobs. Any agreement for temporary equipment must include in writing that the vendor clean all stored data off the machine before removing it from University property. The department requesting the temporary equipment is then responsible for identifying the need to clean all stored data and for ensuring that the vendor performs this function.

01.11 Disposal of Credit Card Terminals

Users of credit card processing machines must be disposed of through University IT Recovery Program. Further information is also available at <http://www.rochester.edu/it/recycle>.

01.12 Sanctions

Violations of this Policy can result in disciplinary action up to and including separation from the University and/or exclusion from University programs and facilities.

01.13 Revision History

Modification(s) Made	Modified by:	Date of Modification	Reviewer	Review Date
Document created	University IT Security and Policy	November, 2010		
Adjusted for Xerox Print Center	University IT Security and Policy	February, 2014		

01.14 Contact Information

Please address any questions or concerns with any procedures set forth within this document to a University of Rochester Information Security Officers.

Related Policies

***I.* Patient Protected Health Information (HIPAA)**

<http://www.intranet.urmc-sh.rochester.edu/policy/HIPAA/Policy Manual. asp>

***II.* Social Security Number (SSN) and Personal Identifying Information (PII)**

<http://www.rochester.edu/it/policy/SSN-PII/index.php>

***III.* Student Information (FERPA)¹**

<http://www.rochester.edu/registrar/policies.html>

***IV.* Financial Account, Credit and Debit Card Information**

<http://www.rochester.edu/adminfinance/treasury/nocard.html>

<http://www.rochester.edu/adminfinance/treasury/docs/ecommerce.pdf>

***V.* Employee Personnel Records**

<http://www.rochester.edu/working/hr/policies/pdfpolicies/108.pdf>

<http://www.rochester.edu/working/hr/policies/pdfpolicies/404.pdf>