HIPAA AUDITORS

Disposal of ePHI and Media Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.310(d)(2)(i) — Disposal of ePHI and Media

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How to use this document. This is a working template, not a finished compliance artefact. Replace every bracketed placeholder with your organisation's own detail, delete the guidance notes, and have the result reviewed and formally adopted by your Privacy or Security Officer before you rely on it.

Regulatory basis. References are to the HIPAA Administrative Simplification regulations at 45 CFR Parts 160, 162 and 164, and to NIST SP 800-66 Rev. 2, *Implementing the HIPAA Security Rule*.

The requirement

Implement policies and procedures to address the final disposition of ePHI, and/or the hardware or electronic media on which it is stored.

45 CFR 164.310(d)(2)(i) · Physical Safeguards

Risk level	Difficulty	Typical cost	Timeframe
High	Moderate	Medium	2-4 months

Implementation steps

- [ ] **Develop comprehensive device and media control policies including:**
- [ ] **Device and media disposal procedures**
- [ ] **Data sanitization and destruction procedures**
- [ ] **Hardware disposal and recycling procedures**
- [ ] **Media destruction and disposal procedures**
- [ ] **Documentation and certification of disposal**
- [ ] **Regular review and update of disposal procedures**
- [ ] **Key components:**
- [ ] **- Device disposal procedures**
- [ ] **- Media destruction procedures**
- [ ] **- Data sanitization methods**
- [ ] **- Disposal documentation**
- [ ] **- Disposal certification**
- [ ] **- Regular procedure review**

Evidence to produce and retain

Tick only where the artefact exists and you can say where it lives.

- [ ] **Device and media disposal policies**
  Location: _____ Owner: _____
- [ ] **Data sanitization and destruction procedures**
  Location: _____ Owner: _____
- [ ] **Hardware disposal and recycling procedures**
  Location: _____ Owner: _____

- [ ] **Media destruction and disposal procedures**
  Location: _____ Owner: _____
- [ ] **Disposal documentation and certification**
  Location: _____ Owner: _____
- [ ] **Disposal vendor agreements**
  Location: _____ Owner: _____
- [ ] **Regular review and update procedures**
  Location: _____ Owner: _____

How this gets tested

These are the procedures an auditor is likely to run. Self-test first.

- [ ] **Review disposal policies and procedures**
  Result: _____ Tested by / date: _____
- [ ] **Test data sanitization methods**
  Result: _____ Tested by / date: _____
- [ ] **Verify hardware disposal procedures**
  Result: _____ Tested by / date: _____
- [ ] **Test media destruction procedures**
  Result: _____ Tested by / date: _____
- [ ] **Review disposal documentation**
  Result: _____ Tested by / date: _____
- [ ] **Verify disposal certifications**
  Result: _____ Tested by / date: _____
- [ ] **Review policy compliance**
  Result: _____ Tested by / date: _____

Common failures to check yourself against

- Lack of device and media disposal policies
- Inadequate data sanitization procedures
- Insufficient hardware disposal procedures
- Poor media destruction procedures
- Inadequate disposal documentation
- Insufficient disposal certification

Beyond the minimum

- Develop comprehensive disposal policies
- Use proper data sanitization methods

- Implement secure hardware disposal
- Use certified media destruction
- Document all disposal activities
- Obtain disposal certifications
- Regular review and update of procedures

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.2.4 NIST Cybersecurity Framework: PR.DS-1, PR.DS-2, PR.DS-3, PR.DS-4, PR.DS-5, PR.DS-6, PR.DS-7, PR.DS-8 NIST SP 800-53: MP-1, MP-2, MP-3, MP-4, MP-5, MP-6, MP-7, MP-8

Sign-off

Completed by	Title	Date
Reviewed by	**Title**	**Next review due**