LCC INFORMATION DISPOSAL GUIDE
Guidance for disposing of materials at Lansing Community College

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Introduction

The LCC Information Disposal Guide provides the information necessary for proper disposal of materials (records, non-records and other documents) at Lansing Community College.

Disposal of materials should be completed in the normal course of business and in compliance with Lansing Community College's approved records retention and disposal schedules[1]. In addition, the materials must be reviewed for the sensitivity of their content as per the Information Security Policy to ensure appropriate protection of the information during the disposal process.

Following these guidelines will help ensure the availability, integrity and confidentiality of the information in the custody of LCC. It will also help ensure that records required for business continuity purposes or for documenting the historical developments of the college are transferred to the appropriate storage location or the LCC Archives for maintenance and preservation.

Before disposing of any materials, there are two questions that need to be answered.

Question 1 – Can the materials be disposed of yet?

Non-Records

Non-Records are broadly defined as drafts, duplicates, convenience copies, reference materials and other materials that don't document the college's activities. **Non-Records can and should be disposed of as soon as they are no longer needed**.

Records

A record is defined by the Michigan Freedom of Information Act (FOIA) as recorded information "prepared, owned, used, in the possession of, or retained by a public body in the performance of an official function, from the time it is created."

A record is essentially those materials that document the college's activities. For any college materials that meet this definition, **the applicable records retention and disposal schedule will need to be consulted to verify their retention period**.

A) **If the record's retention period is not yet over, they will need to be retained** until their retention period ends. If records storage or records organization is an issue for your department, please contact Linnea Knapp, Records Information Specialist, for guidance in finding the best solution for your storage or organization needs.

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[1] Approved records retention and disposal schedules can be found at: O:\Interdivisional\LCC-Records_Management_and_College_Archives\Records Retention Schedules

B) **If the record's retention period has ended, they can be disposed of BUT … you'll need to answer question 2 (below) before disposing of them.** Understanding the record's level of sensitivity will guide you to the correct way to dispose of your eligible records.

Question 2 – Do the records contain private or confidential information?

Determining the sensitivity of the information in the materials is an important aspect of records management and disposal. Sensitive information will fall under one or both of the following categories:

Private – Information that should not be available to the general population. This includes materials such as employee procedure manuals or department financial records.

Confidential – Information that needs to be safeguarded because of laws, regulations, standards or policies such as FERPA, HIPAA or PCI or because it's been determined by the College that its loss or unauthorized release would cause devastating financial loss or loss of reputation. Confidential information includes most information about students' and employees' academic, financial and medical records.

Records that don't contain private or confidential information are considered **Public** records. They contain information that is in the public domain or information intended to be communicated to the general public or community such as course descriptions or promotional information about services at the College.

Disposal of Paper Materials

If the materials can be disposed of there are three options: **Shred**, **Recycle** or **Toss**. The option chosen will depend on the answer to Question 2 above.

1) Shred

If the materials **DO contain private or confidential information**, they need to be shredded.

Shredding at LCC

Materials can be shredded in-house with the appropriate type of shredder or they can be sent to LCC's contracted vendor for off-site secure shredding.

A) **In-House (or At Home)**:
- Always use a cross-cut shredder to shred sensitive materials. Straight cut shredders do not meet the security requirements of LCC's [Information Security Policy](#) which states that the shredder must make documents containing private or confidential information unrecognizable or beyond reconstruction.
- Once sufficiently shredded, the materials can be recycled.

B) **Vendor**:
- LCC's contracted vendor for shredding is Rapid Shred out of Grand Rapids.
- Shredding by Rapid Shred is coordinated through Moving Services in Physical Plant.
- Materials to be shredded should be placed in boxes. Once a couple of boxes have accumulated, have your Divisional Operations (Div Ops) personnel complete an online work request (through 5 Star Service Center) to have them picked up. (The 5Star link can also be found on the [Administrative Services Physical Plant](#) website.) They will be stored in a secure location in AOF until there are enough boxes to warrant scheduling Rapid Shred to come for a pickup.
- There are also locked bins in various locations on the Main Campus and West Campus: HR (ADM 103), StarZone in Gannon, Veteran Services (HB 119), HHS Divisional Office (HHS 108.01), HHS Faculty Suite (HHS 204), Registrar & Records (WCP200) and the Information Center/Student Services on West Campus. These bins have a slot in the top to drop materials through. When the bins are full, Moving Services is alerted and Rapid Shred is called to schedule a pickup.
  NOTE: The cost of using the locked bins is substantially more than the cost of shredding boxed materials, so be mindful of costs when deciding which option to use.

2) Recycle

If the materials **DO NOT contain private or confidential information**, they are considered **public** records and can be recycled.

Recycling at LCC

LCC has a contract with Granger for recycling services. There are tall, blue recycling bins located in almost every office suite. They are marked to indicate which type of recyclable materials can go in each container.

The custodial staff collects these materials and moves them to the large containers outside. The outside recycling containers resemble the large trash containers, but recycling and waste are kept separate by the trained custodial staff.

NOTE: The recycling process is not secure so it should not be used for any materials with sensitive information (as defined in Question 2 above).

Paper Recycling Guidelines

YES:	NO:
Letterhead	Copier paper wrappers (ream wrappers)
Legal pad paper (all colors)	Colored folders
Computer paper	Magazines
Fax paper ("shiny" too)	Newspaper
Manila file folders	Boxboard
Carbonless business forms	Cardboard
Envelopes (no brown or orange)	Manila, brown or orange envelopes
Index cards	Self-adhesive envelopes
Phone messages	Self-adhesive notes
Scratch paper	Carbon paper
Printed or unprinted ledger paper	Books
White or colored ledger paper	Glue bindings
STAPLES ARE OK	Paper clips & metal fasteners
	Rubber bands
	Paper towel, napkins & tissue
	Food wrappers
	Trash & food waste

For additional information about recycling guidelines at LCC, including how to recycle Styrofoam packaging materials and batteries, contact the Facilities Department main office number (517) 483-1808.

3) Toss

If the materials **DO NOT contain private or confidential information**, but they can't be recycled, the other option is to simply throw them away. For large amounts of materials, please have your Div Ops personnel complete an online work request (through 5Star) to have them picked up by Moving Services in Physical Plant.

When in Doubt … Shred

If you're not sure if the information in your materials is private or confidential, but you know that it is eligible for disposal, it's better to be safe than sorry.

Digital or Magnetic Media Disposal

For the disposal of digital or magnetic media, the two questions above, *can the materials be disposed of yet* and *do the records contain private or confidential information*, still need to be answered, but the disposal process will be different from that of paper materials.

There are two components to digital or magnetic media: the *digital component* (the file/data) and the *physical component* (the container). For digital files stored on servers, hard drives or databases, there is no physical component[2], but there is a physical component for digital materials stored on discs or USB devices.

NOTE: Whenever possible, delete the digital materials from the disc or device before disposing of the physical component. This will provide the necessary assurance that the materials are declassified and destroyed beyond recognition and reconstruction in compliance with LCC's Information Security Policy.

Digital Component

Individual files and folders on shared drives, hard drives and USB devices can be "shredded" using Spirion (formerly Identity Finder). The Spirion software provides a better option than simply clicking delete because it uses multiple levels of deletion so that files cannot be recovered.

In addition to using the following steps to "shred" digital materials when they're eligible for disposal according to the applicable records retention and disposal schedule, it is also important that these steps are followed before any device is re-used.

1) To open Spirion – click **Start**, then scroll down the alphabetical list of programs until you find Spirion.
2) If a box appears asking for a password click **Skip** to use the guest profile.
3) Click **OK** on the Guest Profile pop-up box.
4) Click the **Open Advanced Interface** button.
5) Click the **Tools** tab (along the top).
6) Click **File Shredder**.
7) Add the files you want to "shred" and then click **Shred**.

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[2] While there technically is a physical component to servers, hard drives and databases, it is not one that needs to be disposed of by LCC employees outside of ITS. ITS staff will wipe all returned computers and media using CCleaner or DBAN, and will dispose of any physical components.

NOTE: Use care when shredding digital materials. File restoration is very unlikely for materials stored on a local drive. If you shred something on a network shared drive that you didn't mean to, contact the Helpdesk (517-483-5221 or LCC1@star.lcc.edu) as soon as possible. The more information you are able to provide about the deleted materials (what, where, when), the better their chances of being able to find and restore the materials.

Physical Component

Disposing of physical media such as USB devices, CD/DVD discs or floppy disks can be done by following the steps below.

A) **USB Devices** – The memory chip inside the device needs to be damaged beyond repair, which means breaking the device. To do this there are a number of options.
   o Use pliers or scissors to crack the casing of the device open and then crush or cut the memory chip.
   o Use a hammer to crack the device and the memory chip, or for less mess and more accuracy use a hammer to drive a nail through the device.
   o Place the device under the leg of an office chair and sit down … hard.

B) **CD/DVD Discs** – The label of the disc, the side where the data is recorded, needs to be scratched or damaged enough to make it unreadable. Some paper shredders are capable of destroying discs, but if that's not an option there are other ways to damage discs.
   o Scratch the writing surface with sandpaper, scissors, a screwdriver or by using your foot to rub it across the pavement.
   o Break or cut the disc in half with scissors. (Be careful as this might create sharp edges or disc shards).

C) **Floppy Disks** – The film within the floppy disk needs to be destroyed in order to ensure that the materials can't be reproduced.
   o Open the metal slider, pull out the film and then cut it. If the film won't pull out of the opening, remove the slider and crack the case open to remove and then cut the film.

Once your physical media has been made unreadable, have your Div Ops personnel complete an online work request (through 5Star) to have the materials picked up by Moving Services in Physical Plant. The collected materials will be destroyed and properly disposed of by the college's vendor, Rapid Shred.

Further Questions

If you have further questions about the appropriate disposal of information at LCC, please contact Linnea Knapp, Records Information Specialist, at 517-483-1676 or lcc-rim@lcc.edu.

References

LCC Records Retention and Disposal Schedules

LCC Policies:
  Information Security Policy
  Student Rights under FERPA

LCC File Storage Guidelines

LCC Recycling Information

LCC Administrative Services Physical Plant

LCC 5Star Service Center

Michigan Freedom of Information Act (FOIA):
  FOIA Booklet – Prepared by the Office of the Attorney General of the State of Michigan
  Freedom of Information Act, Act 442 of 1976

US Department of Defense 5220.22-M - National Industrial Security Program Operating Manual (NISPOM) – Chapter 5, Section 7

Retention Management for Records and Information – ARMA International TR27-2015

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