

## **Data Center Decommissioning Checklist**

### **Phase 1: Shutdown Strategy**

- O Confirm ITAD partner is certified (ISO 9001, 14001, 45001; NAID AAA, R2v3)
- O Validate vendor's experience with compliance standards such as HIPAA, HITECH, GLBA, SOX, NIST, PCI, and others
- Complete a full physical and digital asset inventory
- O Conduct a risk assessment and classify data-bearing devices
- O Define roles and responsibilities (site contact, decision maker, sign-off authority)
- Develop a project timeline with cross-team coordination (IT, compliance, legal, facilities)
- O Validate chain-of-custody procedures and secure transport
- C Ensure GPS-tracked vehicles and DLA/DOT clearance if required
- O Define on-site vs. off-site data destruction preferences
- O Schedule a site walk-through and gather photos of racks/equipment
- O Verify access requirements (badges, escorts, hours, contact info)
- Validate loading dock specs (location, size, access times, dock plates)
- Confirm broom sweep expectations, floor protection needs
- O Document internal layout (stairs/elevators, equipment distance from dock)
- Clarify staging area location and workspace constraints
- O Determine on-site vs. off-site destruction preference

#### Phase 2: Secure Data Destruction

- O Verify that the destruction equipment used is NSA-approved for shredding/disintegration, where needed
- Request Certificates of Destruction linked to serial numbers
- O Verify ITAD partner is creating an auditable inventory of assets
- O Clarify staging area location and workspace constraints
- O Clarify witness destruction requirements and ensure witness is onsite if needed
- Identify all types of data-bearing media (HDDs, SSDs, NAS, mobile, embedded)
- O Choose appropriate destruction methods (wiping, shredding, degaussing, disintegration

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- O Request a fair market value assessment
- O Review ITAD partner's revenue-sharing model
- O Plan for internal redeployment or lab/testing use
- O Ensure donations follow secure sanitization and vetting procedures
- Align donations with ESG or CSR initiatives
- O Capture model numbers, serials, and resale

### Phase 4: Sustainable Recycling

- O Confirm R2v3 certification and downstream recycler vetting
- O Verify the separation and handling of hazardous materials (lead, mercury, cadmium)
- O Request full traceability documentation for recycled components
- O Ensure compliance with EPA and GSA e-waste disposal standards

### Phase 5: Reporting & Compliance

- Receive Certificates of Destruction and serialized asset reports
- O Get access to a secure reporting portal
- O Confirm turnaround time for reports (average should be 3 business days)
- O Ensure audit readiness for both internal and external stakeholders