



PRACTICES GUIDE

DISPOSITION PLAN

Issue Date: <mm/dd/yyyy>
Revision Date: <mm/dd/yyyy>

Document Purpose

This Practices Guide is a brief document that provides an overview describing the best practices, activities, attributes, and related templates, tools, information, and key terminology of industry-leading project management practices and their accompanying project management templates.

Background

The Department of Health and Human Services (HHS) Enterprise Performance Life Cycle (EPLC) is a framework to enhance Information Technology (IT) governance through rigorous application of sound investment and project management principles, and industry best practices. The EPLC provides the context for the governance process and describes interdependencies between its project management, investment management, and capital planning components. The EPLC framework establishes an environment in which HHS IT investments and projects consistently achieve successful outcomes that align with Department and Operating Division goals and objectives.

The Disposition Plan is developed by the Project Team if the Operational Analysis concludes that the investment should be terminated.

Practice Overview

The practice of Disposition is the last phase of EPLC. It involves either the transitioning of information, hardware, software, and documentation from the current system to another system, or the archiving or destroying of it. Each must ensure that the transition of the various components is done in an orderly fashion and ensures the confidentiality, integrity, and possible availability of the information in the future. It involves planning for the possibility of having to reinstall and bring the system back to an operational status, if necessary, and to preserve the data so it is effectively migrated to another system or archived for potential future access. The practice also ensures that media is properly sanitized, and that hardware and software is disposed of in conformance with all relevant legal and IT Security requirements.

The practice of Disposition consists of three main activity groups:

Information Preservation – Ensures that information is retained in a usable format. Information can be moved to another system, archived, discarded, or destroyed. When archiving, consider what retrieval method will be used in the future to access the data. The retrieval method that is currently used may not be available in the future. Also consider what type of encryption should be applied for long term storage. In addition, you will need to consider the legal requirements for records retention. Work with your agency office responsible for retaining and archiving federal records to work out the best solution.

Media Sanitization – Ensures that the data is irretrievable from the retired storage media. The National Institute of Standards and Technology (NIST) publication, “Guidelines for Media Sanitization” (NIST Special Publication 800-88), defines the removal of information from a storage medium (such as a hard disk or tape) as *sanitization*. Different categories of sanitization can provide different levels of protection for your data. Working with your Security Office, you need to determine the purging technique that most accurately matches the level of security your data requires:

- Overwriting uses special software to overwrite every bit in every sector of memory.
- Degaussing is more destructive and involves physically destroying the magnetic image.
- Destruction is the most reliable technique since the media is taken to an approved facility for incineration or application of an abrasive substance.

Hardware and Software Disposal – Ensures that the hardware and software are disposed of as directed by your Security Office. Data contained in full or partial files can include potentially sensitive information. Since it is still on the drive, it can be recovered using commercially

available software. Also, various types of temporary files created by the system can contain passwords to websites and old emails which can be easily recovered. It is essential that sanitization is performed on the system components prior to the disposal of the hardware and software to protect the confidentiality of the information. The disposition of software needs to be in keeping with its license or other agreements, if applicable. Some licenses are site specific or contain other agreements that prevent the software from being transferred.

For additional information on hardware or software disposal, refer to the following materials:

Protection of Sensitive Information Memo (May 19, 2008)	http://intranet.hhs.gov/infosec/docs/policies_guides/EPF/Protection_of_Sensitive_Information_Memo.html
Encryption Plan Format Memo (June 16, 2008)	http://intranet.hhs.gov/infosec/docs/policies_guides/EPF/Encryption_Plan_Format_for_Protection_of_Sensitive_Information_Desktops_FINAL.html
HHS Policy for Information Systems Security and Privacy (IS2P)	http://intranet.hhs.gov/infosec/policies_memos.html
Federal Guidance on performing C&A activities	http://csrc.nist.gov/publications/drafts/800-37-Rev1/SP800-37-rev1-IPD.pdf

Planning during this phase of the EPLC is as important as any other even though it is often the last major process of a project's or system's life.

The key elements of Disposition are:

1. Gather Stakeholder Impact Input

Communicate with different stakeholder communities that most use the system. Determine the current usage of the data, functionality of the system and nature of the usage (mission critical, very useful, marginally useful, or optional). Also consider whether other systems can absorb the data or functionality that is still heavily used. In addition, be sure to identify any technical interdependencies with other systems which may need to be addressed.

2. Communicate Decision to Stakeholders

Draft an initial communication for distribution to the stakeholder community. If different potential audiences are likely to have different priorities in regard to the system disposition, then the communication should be customized to address the unique sensitivities of the different audiences. This communication should be reviewed and approved by appropriate management. At a minimum, the contents of this initial communication should include:

- The rationale for disposing of the system.
- The plan for transitioning any data or functionality that will be retained.
- The tentative timeline for disposition.

3. Prepare and Review Disposition Plan

Use the Disposition Plan Template to develop a draft plan. This plan should be reviewed and approved by appropriate management and stakeholders.

4. Communicate Schedule to Stakeholders

Prepare a second communication that is customized to address the different stakeholder audiences identified earlier. At a minimum, it should include the planned schedule for the system disposition and any planned outages that will occur during the disposition. This communication should be reviewed and approved by appropriate management.

5. Archive System Data and Documentation

Transfer the following items to the archive specified in the Disposition Plan:

- A complete copy of all system data.
- A complete copy of all system documentation including all EPLC artifacts.
- A copy of any external software that is required for proper system operation.
- Transition any data that is to be absorbed by other systems to those systems.
- Transition any ongoing operations to other systems.
- Take the system that is being disposed offline.

- Process any dedicated system hardware and software as specified in the Disposition Plan.

6. Dispose of System

Transition any ongoing operations to other systems and take the system offline. Process any dedicated system hardware and software as specified in the Disposition Plan.

7. Disposition Stage Gate Review

Conduct the Disposition Phase Gate Review.

8. Notify Stakeholders that Disposition is Complete

Draft the final communication for distribution to the stakeholder community to notify them that the disposition is complete. This communication should be reviewed and approved by appropriate management and Communications. This communication must include, at a minimum, the following:

- Official confirmation that the system has been retired.
- Overview of how the “retired” functionality has been replaced by other systems.

9. Conduct Lessons Learned

Lessons learned should draw on both positive experiences where good ideas have improved efficiency or saved money and negative experiences where an undesirable outcome has already occurred. Lessons learned sessions are a valuable closure mechanism for team members, regardless of the disposition’s outcome.

The lessons learned session is typically a meeting that includes:

- Disposition team
- Stakeholder representation including external project oversight, auditors, and/or Quality Assurance (QA)
- Executive management
- Maintenance and operations staff
- Disposition support staff

Participants in lessons learned sessions typically discuss questions similar to the following:

- Was the customer satisfied with the disposition? If not, why not?
- Where costs budgets met? If not, why not?
- Was the schedule met? If not, why not?
- Were risks identified and mitigated? If not, why not?
- Did the project management methodology work? If not, why not?
- What could be done to improve the process?
- What bottlenecks or hurdles were experienced that impacted the disposition?
- What procedures should be implemented in future dispositions?
- What can be done in future dispositions to facilitate success?
- What changes would assist in speeding up future dispositions while increasing communication?

Lessons learned and comments regarding disposition assessment should be documented, presented, and openly discussed with the intent of eliminating the occurrence of avoidable issues on future dispositions.

10. Conduct Post-Disposition Review and Evaluation

A post-disposition review should be conducted within six months after retirement of the system. It provides written documentation of the planned and actual budget, the baseline and actual schedule, and documents recommendations for other dispositions of similar size and scope.

Be certain to identify in the report the project successes, problems on the project, and new ideas that were successful on the project. Make recommendations on how these processes might be adapted for other dispositions.

Share the disposition's success with other organizations. In the same way that problem identifications can lead to improvements, successes must be shared so they can be repeated. Where possible, successes should be translated into procedures that will be followed by future projects.

11. Recognize and Celebrate Outstanding Project Work

Celebrating the success of completing the disposition with positive reinforcement can be extremely rewarding for project teams. When the disposition is completed successfully, be certain to provide some kind of recognition to the team. If individuals are singled out for significant achievements, do not forget to recognize the entire team as well.

Management may also want to express recognition of a successful team effort by praising the team at a key meeting or a large gathering of staff. People are proud to have senior management's appreciation openly expressed, and such recognition is a motivation to other dispositions to be successful.

Best Practices

The following approaches are recommended best practice to Disposition:

- **Involve Stakeholders** - Involve all participants and stakeholders in the Disposition process.
- **Use a Checklist** - Review the Disposition Checklist template to make sure all key items have been completed.
- **Solicit Feedback** - Conduct a post-disposition survey to solicit feedback from the disposition team, customers, and stakeholders who were well-acquainted with the management of the disposition.
- **Identify Lessons Learned** - Convene a lessons learned session to promote the success of future dispositions.
- **Archive Data** - Archive all disposition data in a central repository. Include best practices, lessons learned, and any other relevant disposition documentation. Formal data archives should be stored in compliance with US National Archives and Records Administration (NARA) regulations.
- **Celebrate** - Celebrate and reward disposition success.
- **Manage Resources** - The disposition manager may face requests to release staff from the disposition team before all tasks are finished. The disposition manager should anticipate these requests, considering both disposition goals and staff capabilities.

Practice Activities

- Convene a meeting with disposition leadership, managers and appropriate team members
- Discuss activities on the Disposition Checklist
- Assign leads to relevant activities to make sure the disposition activity is completed
- Conduct a post-disposition survey
- Compile a Disposition Close-out report showing final status of system(s) issues, changes, risks, costs, etc.
- Consider rolling unresolved issues and changes into the next phase of a new project
- Obtain final, formal approvals on the disposition
- Reassign remaining disposition staff to other assignments
- Conduct post-disposition training for project team, customers, Help Desk personnel, and/or operations team
- Regulatory close-out requirements
- Conduct lessons learned review meeting
- Conduct a client wrap-up meeting or disposition close-out meeting
- Archive disposition data
- Perform a team outing to celebrate the completion of the project
- Dispose of sensitive information based on OPDIV policies for sensitive but not classified information