

NAVREF Guidance
(Submitted for ORD consideration in January 2008)

**Requirements for Portable IT Equipment Purchased or Owned by
Non-VA Organizations and Used for VA Research**

The recent VA-wide Wall-to-Wall Inventory of IT equipment uncovered instances where there was lack of understanding about responsibility for IT equipment, such as laptop computers, that were not purchased with VA funds, but are used for VA research purposes. Such laptops may have been purchased by NPCs, universities or may be on loan from pharmaceutical companies for use during a clinical trial.

Policy: VA requirements for information security outlined in VA Handbook 6500 apply to non-VA purchased and non-VA owned IT equipment used for VA research purposes if the equipment will be used to store VA-sensitive information or may be connected to a VA server.

Please make note of the following:

- Portable data storage devices, such as laptop computers, that are used to store VA sensitive information **or** that may be connected to a VA server, must be encrypted in compliance with VA Handbook 6500. Use of commercially available, NIST-compliant encryption software is an acceptable alternative to VA-supplied encryption. Contact the facility ISO for encryption guidance and assistance.
- VA IT security policies regarding securing laptops and immediate reporting of any loss or theft apply to non-VA owned or purchased laptops that are used to store VA sensitive information or that may be connected to a VA server.

In regard to NPC-purchased or owned IT devices:

- A laptop purchased by an NPC is the property of the NPC. It does not become the property of the investigator for whose use it was purchased. However, subject to the following, it may be donated to VA.
- If an NPC purchases a laptop with non-federal funds, the NPC may donate it to the VA provided that the VA officially agrees to accept the equipment. Consult the facility Administrative Officer for Research (AO/R) for guidance on the VA equipment accession process. Upon acceptance, the laptop becomes the property of VA and VA assumes full responsibility for it. If an NPC uses federal funds (such as NIH or DOD funds) to purchase a laptop costing \$5,000 or more it qualifies as "equipment" under 2 CFR 215.2 [Definition of equipment] and 215.34(a-b) [Equipment]. Consequently, the NPC must retain ownership of the laptop and is responsible for ensuring compliance with VA policies.
- NPCs are responsible for insuring, tracking and accounting for laptops they own. This includes knowing who is in possession of laptops and conducting a periodic physical inventory.
- When an individual no longer requires use of an NPC-owned laptop or leaves that VA facility, the laptop must be returned to the NPC. Obsolete and non-functioning equipment also must be returned to the NPC. An NPC should turn obsolete and non-functioning laptops over to the VA ISO for wiping of the hard drive, destruction or final disposal. Also, NPCs should retain documentation verifying proper handling.