

NAID® AAA CERTIFICATION PROGRAM AUDIT PREPARATION CHECKLIST

The following checklist has been prepared to help you expedite a successful Certification audit. You should review this checklist at least one week prior to your scheduled audit to ensure all items are in place.

EMPLOYEE REQUIREMENTS

- All employee must have **Confidentiality Agreements** and an I-9 form **(Item 1.1)**
- All Access Employee must have an Employment History Verification, Criminal Record Search and Drug Screening Results **(Item 1.2)**
- Ongoing annual Access Employee Drug/Substance Screenings: **(Item 1.3)**
 - Option 1 - Drug/Substance Screening on annual random basis must include a file containing documentation supporting the 50% annual random Access Employee drug testing should be available.
- OR
- Option 2 – **Substance Abuse Recognition Program Form** must be on file containing proof of completed yearly management training.
- Ongoing Access Employee Criminal Record Searches. **(Item 1.4)**
- Drivers must have a copy of a valid driver license and/or commercial driver license and any additional items required by governmental jurisdiction for drivers. **(Item 1.5)**

OPERATIONAL SECURITY

- Policies and Procedures manual** must include: **(Item 2.1a)**
 - Policy for notifying customers of a potential release of, or unauthorized access to confidential material **(Item 2.1c)**
 - Policy for notifying management of a potential release of, or unauthorized access to confidential material **(Item 2.1d)**
 - Incident Response Plan** for responding to suspected or known security incidents **(Item 2.1e)**
 - Unannounced Audit** procedure and process **(Item 2.1f)**
 - All Access employees must wear a photo I.D. badge while on duty **(Item 2.2)**
 - A Company Uniform must be worn by employees **(Item 2.3)**
 - Customer documentation process that includes customer acknowledgement, receipt or agreement of the specific services they have received (Sample of documentation must be available for the auditor) **(Item 2.4)**
 - Containers used to transport confidential materials have operable locks **(Item 2.8)**
 - The Company must perform mobile destruction services at the Customer's site. (Mobile Operation Only) **(Item 2.10)**
 - Access controls and unauthorized access to the secure destruction area (Plant-based Operations Only) **(Item 2.11)**
 - Method of physical computer hard drive destruction (if applicable) **(Item 3.3)**
 - Method of non-paper media destruction for each type of non-paper media destroyed (if applicable) **(Item 3.4)**
 - Destruction timeframe of media **(Item 3.5)**
 - Quality control procedures **(Item 3.6)**
 - If the information destruction service being proposed to the Customer is not NAID Certified or if the service will involve subcontractors, the customer must be notified in writing at the time of the bid. **(Item 3.9)**
- All drivers and destruction processing employee files must contain an annual **Acknowledgement** of the company's written policies and procedures. **(Item 2.1b)**
- All access employees have been trained to comply with NAID AAA Certification requirements (AETP) **(Item 2.1g)**
- Customers are provided with a receipt at the time of Media pickup, which includes the following: **(Item 2.4)**
 - Type of Media (Paper, Micro Media or Computer Hard Drives)
 - Quantity of Media
 - Acknowledgement of the services rendered
- Customers are notified in writing when provided with a service that is NOT NAID Certified. This notification may be contained on a materials receipt, or another written agreement between the service provider and recipient of services. **(Item 2.4)**
- Material must be protected from loss due to wind, tipping/spillage or other atmospheric conditions **(Item 2.6)**
- Most recent inspections of all commercial vehicles. **(Item 2.7)**
- The required number of vehicles to be inspected will be available on the day of audit. (Requirements are: If three or less mobile and/or collection vehicles, all must be available. If four or more mobile and/or collection vehicles, 75% must be available.) **(Item 2.8)**
- Readily accessible, operable two-way communication devices for all drivers. **(Item 2.9)**

IF APPLYING FOR PLANT-BASED OPERATION:

- All visitors must sign visitor log, be issued a visitors badge and be escorted by an Access Employee at all times. **Visitor logs** must be retained for one year. **(Item 2.12)**
- A secured area designated is available for holding confidential materials when unattended until destroyed. **(Item 2.13)**

AUDIT PREPARATION CHECKLIST

- A secured area devoted only to destroying media is available. (No baling of unshredded paper may take place in this area, except cardboard.) If the building is not devoted solely to destruction operations, then a secured area within building must meet the following requirements: **(Item 2.13)**
 - Wall or fence securing the area must be a minimum of 6ft tall. (If the wall or fence does not go all the way to the ceiling then the area must have a ceiling mounted sensor alarm inside and over the perimeter of the secured destruction area to detect breach of secured fence/wall.)
 - Wall or fence securing the area must have lockable gate or door.
- Monitored alarm system when secure destruction building is unoccupied. **(Item 2.14)**
- Closed circuit camera system (CCTV) monitoring all access points into secure destruction building/area. **(Item 2.15)**
 - The CCTV must provide sufficient clarity to identify individuals and their activities. There must be enough lighting at night or during other non-business hours to ensure that all images have sufficient clarity.
 - 90 days of CCTV recordings must be available from date of audit.
 - Alarm, Lighting, Door Locks and Visitor Logs are checked on a monthly basis and the CCTV system is checked on a weekly basis and documented via the Operational Security Maintenance Logs. Logs must be retained for one year. **(Item 2.18)**

ENDORSEMENTS & THE DESTRUCTION PROCESS

- PAPER OR PRINTED MEDIA DESTRUCTION ENDORSEMENT: (Item 3.1)

Paper/Printed Media destruction particle sizes:

 - Continuous Shred: Width (max): 5/8 inch & Length: Indefinite
 - Cross Cut or Pierce & Tear: Width (max): 3/4 inch & Length (max): 2.5 inches
 - Pulverized: (max): 2 inch diameter holes via screens Screen Changing Logs
- MICRO MEDIA DESTRUCTION ENDORSEMENT: (Item 3.2)
 - Micro Media destruction particle size must be 1/8 inch max or less.
- PHYSICAL HARD DRIVE DESTRUCTION ENDORSEMENT: (Item 3.3)

Must have the following information:

 - Recorded serial numbers of all hard drives or CPUs destroyed for each customer
 - Log of customers that have opted out of serial number recordation (if applicable)
 - Signed Opt-Out Agreements (if applicable)
 - Copies of written standards/agreements for computer hard drive destruction for these customers
- NON-PAPER MEDIA DESTRUCTION ENDORSEMENT: (Item 3.4)
 - A Standard method of destruction must be used. If any methods used deviate from the standard, the customer must be notified in writing describing the destruction process.
- PRODUCT DESTRUCTION ENDORSEMENT: (Item 3.5)

Must have the following information:

 - Consistent with the company's policies and procedures manual
 - Customer notification of a detailed account of the destruction process and must be retained on file for 3 years from the date of the destruction.
 - Employee Confidentiality Agreements must contain language stating that the employee agrees that products accepted for destruction are confidential and that removal or use by the employee is a violation punishable by dismissal and subject to possible legal prosecution.
- Signed Agreement for Responsible Disposal of Materials (or customized document with similar wording) between you and the recipient indicating the type of media being destroyed and the final disposition of the media. **(Item 3.7)**
- Transfer of custody documentation including subcontractor list, subcontractor agreements, client agreements and proof of meeting certification requirements. (if applicable) **(Item 3.8)**

COMPANY ASSURANCES

- Business license **(Item 4.1)**
- Proof of General Liability Insurance (aggregate or umbrella) of \$2,000,000.00 or more. **(Item 4.2)**

: Indicates sample forms available online at www.naidonline.org.