Disposition Checklist

Purpose

The purpose of this document is to identify the required activities and approvals to retire an information system in compliance with CMS and federal laws and mandates. Tailor this checklist to fit the needs/situation of your program. Not all steps are applicable to every situation – please indicate on the form if a step was not applicable.

Disposition Planning Support

The CMS Technical Review Board (TRB) has provided an in-depth guide to help you plan the disposition of your technical elements at TRB Disposition Guidance. You can also request a meeting with the TRB for individualized help with your disposition requirements and process. Contact them at cms-trb@cms.hhs.gov.

Checklist

1. Develop a System Disposition Plan which identifies the disposition activities, timeline, and key points of contact. The System Disposition Plan should address the timing of specific activities identified within this checklist.
2. Review and closeout any Plan of Action & Milestones (POA&Ms) associated with the system.
3. Coordinate with the Office of Strategic Operations and Regulatory Affairs (OSORA) to support records storage and transfer to the National Archives. For more information contact Records_Retention@cms.hhs.gov.
4. Coordinate the removal of all references to the information system on external and internal CMS web pages. Consider identifying the expected date when service will be either turned off or transitioned to another information system.
5. Submit a ticket to the CMS enterprise Help Desk to identify end of service date for information system.
6. Communicate end of support date to information system users. Programs should consider a multifaceted communications approach including adding an acknowledgement or banner within the information system user interface to identify the end of service date for the information system and a series of emails to end users to prepare and remind users of the impending disposition. Once you decommission your system, coordinate the system URL to redirect to a replacement system or information page.
7. Coordinate with interfacing information systems and services (e.g., EUA) to turnoff/decommission integrations. Time your turn-off of integrations and services to reduce end user impact and information security risks. If applicable, coordinate to turn-off automated job schedules for data or other batch processes.
8. Revoke access to users and administrators, as necessary.
9. Coordinate with hosting provider to deprovision, decommission and/or uninstall the information system supporting infrastructure.
10. Coordinate with the disaster recovery (DR) site to deprovision, decommission, or uninstall the infrastructure and terminate (or update) support agreements.

11. [Complete a SF 1428](#) - Inventory Disposal Schedule and coordinate with Office of Security, Facility & Logistics Operations (OSFLO)
12. [Complete the HHS 22](#) - Request for Property Access and coordinate with Office of Security, Facility & Logistics Operations (OSFLO)
13. Coordinate with the CMS Cybersecurity Integration Center (CCIC) to have the information system removed from monitoring. Contact Email: CCIC@cms.hhs.gov
14. Coordinate with the Vendor Management Office (VMO) to transfer software licenses for reuse (as appropriate)
15. Obtain Federal Information Security Management Act (FISMA) System Disposition Memo
    a. Coordinate with the Information System Security Officer (ISSO)
    b. Obtain the [FISMA System Disposition Policy](#)
16. Obtain the Destruction Certificate
    a. Coordinate with the Information System Security Officer (ISSO).
17. Coordinate with OAGM to modify or terminate information system support contracts.
    a. Contact your Contracting Officer (CO) to support administrative close-out of support contracts. Be sure to address FAR 52.245-1 Government Property requirements as part of contract closeout.
18. As appropriate, terminate any Data Usage Agreements (DUAs), Memorandums of Agreements (MOAs) and Service Level Agreements (SLAs).
19. Coordinate budget / investment closeout actions

Verification

We the undersigned, have reviewed and completed all of the applicable system disposition documentation and disposition procedures listed above for our application in accordance with all CMS policies and Federal laws.

System Name_____ Life Cycle ID #_____

Printed Name_____ Signature_____ _____
                  Business Owner   Date

Printed Name_____ Signature_____ _____
              System Developer/Maintainer   Date

Please sign this form and provide to the CMS IT Governance Review Team (GRT) at it_governance@cms.hhs.gov to confirm completion of the above requirements and to record your system as retired in the CMS FISMA Controls Tracking System (CFACTS), System Profile in the CMS System Census, and Life Cycle ID (LCID) in the EASi System.