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Defense Reutilization and Marketing Service  
Guide for Disposal of IT Equipment  
Starting July 14, 2003



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## **1 Introduction**

This guide supports the migration of the disposition oversight of CONUS DoD Information Technology Assets from The Defense Information Systems Agency (DISA) to Defense Reutilization and Marketing Service (DRMS). The guide seeks to clarify the responsibilities, processes and communication flow for the disposal of excess Information Technology (IT) equipment within DoD.

### **1.1 Background**

In March 2002, the Business Initiative Council (BIC) approved, as a formal tasking, an initiative aimed at streamlining the DoD excess IT equipment disposal process. An Integrated Process Team (IPT consisting of representatives from the Defense Logistics Agency (DLA), DRMS, DISA, Defense Supply Service (DSS) Washington, and the Military Departments was established.

The purpose of the IPT was to identify potential duplication of processes, information, roles, and responsibilities, with respect to how DoD redistributes excess and surplus IT equipment; more specifically, to examine the respective policies, procedures, and processes of DRMS and DISA.

The IPT recommended that the current process be reengineered and to require all excess IT equipment to be turned-in to DRMS for potential reuse within DoD (and customers authorized under the Computers for Learning program). Once deployed, the (new) process is to treat excess IT equipment, not as the exception, but as the norm, and consistent with the process used for all other non-sensitive excess property.

A working group was formed of representatives from DLA, DRMS and DISA to finalize the process whereby duplication of effort is eliminated, conforming more closely to DoD's overall policy for excess property disposal, establishes a single point-of-contact for customers seeking to obtain excess property, and offers a degree of cost-savings to DoD.

### **1.2 Purpose**

This process guide provides the necessary procedures and guidelines for the disposal of excess IT equipment. The guide is to provide

- Processes to turn-in excess IT equipment. See attached workflow.
- Processes to transfer IT equipment via the Computers for Learning Program.

### **1.3 Issues Being Worked**

At this time DRMS is working with the data owners of the Air Force Equipment Management System (AFEMS) and Defense Priority, Accountability System (DPAS) and various other systems in order to implement an automated process to excess equipment. The goals of this initiative are to support the Warfighter by improving descriptions of IT property and eliminate double entry of data.

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## **2 Excess Inventory**

IT assets located within (CONUS) that were previously submitted to DISA for disposition instructions are to be reported directly to DRMS/DRMO as excess.

### **2.1 DoD Hard Drive Policy**

#### **2.1.1 Treatment of hard drives:**

The Memorandum dated June 4, 2001, Disposition of Unclassified DoD Computer Hard Drives, disseminated by the Assistant Secretary of Defense (Command, Control, Communications and Intelligence) is applicable. Attachment 1.

#### **2.1.2 Sanitation**

Hard drive sanitation is to be accomplished by overwriting or removal for equipment that is in serviceable condition or has reuse value when possible. Equipment that is degaussed or destroyed does not have reutilization potential.

### **2.2 COTS software**

COTS software licenses that are no longer needed for their original purpose must be reported to the DRMO unless redistribution is an infringement of the licensing agreement or the licenses are otherwise exempted in this document. It is the responsibility of the reporting activity to ensure no infringement on vendor licensing agreements. COTS software subject to an upgrade action is normally not eligible for redistribution.

### **2.3 Reporting Methods and Options.**

#### **2.3.1 Automated.**

(Batch) Electronic Reporting.

Excess reporting can be made by submitting electronically prepared records. Depending on the service system, arrangements can be made for electronic interchange of data by contacting DRMS-BA.

#### **2.3.2 Mechanically or manually generated 1348-1A**

Electronic Turn In Document (ETID) is a web based method for preparing a disposal turn-in document (DD 1348-1A) and can be used by those Generating Activities that currently prepare manually generated DD 1348-1As. See [www.drms.dla.mil/etid.html](http://www.drms.dla.mil/etid.html)

In order to promote the greatest DoD utilization possible, it is recommended that:

- A Standardize list of component descriptions is used for the item nomenclature for turn-in information. Attachment 2.

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- Like items that are in serviceable condition can be reported on a single Disposal Turn-in Document (DTID).
- Example: all CPUs that are in serviceable condition on a DTID and non-serviceable CPUs would be reported on a separate DTID.

### **2.4 Property Location.**

#### **2.4.1 In-Place Receipts.**

Property to be received in-place requires that an MOA be established between the appropriate generating activity and the DRMO. Accountability responsibility is accepted by the DRMO whereas the custodial responsibility remains with the generating activity. Many facilities currently have these types of MOAs established. Contact the DRMO nearest you or DRMS-BL to see if your facility or warehouse has an MOA in place.

Property that is to be designated by the Generating Activity as a possible transfer to an educational institution is to be received in-place and maintained to the maximum extent possible in its original functionality. At the end of DoD-wide screening (7 days accumulation period plus 14 days DoD screening period) if no DoD requirement is applicable, the equipment may be transferred to a school, Chapter 3 provides details concerning such transfers.

#### **2.4.2 Take to the DRMO.**

The generating activity should schedule all turn-ins prior to delivery and are encouraged to provide the DRMO advance notification (i.e., electronic data interchange).

## **3 DoD Computers for Learning**

The DoD Computers for Learning (CFL) program enables DoD to transfer unneeded excess IT equipment to educational institutions. Educational institutions that qualify for CFL include elementary/secondary schools, Historically Black Colleges and Universities (HBCU) and Minority Institutions (MI).

### **3.1 Eligible Assets**

#### **3.1.1 Requirements of Property.**

- 1) DoD IT equipment that is located CONUS and has been accepted to a DRMO's accountability records is for transfer within CFL.
- 2) Only IT equipment with a DEMIL Code of A is eligible for transfer within CFL

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- 3) The types of IT equipment available for transferring within the program include mainframes, minicomputers, microcomputers, modems, disk drives, printers and items that are defined within the Federal Supply Group 70 and are appropriate for use in CFL.
- 4) IT equipment is available on an “as-is” basis, without warranties on the part of DoD as to the condition of the equipment.

### **3.1.2 Authority**

DRMS-NOS has final approval of all equipment to be authorized for transfer within CFL.

### **3.1.3 Transportation**

Schools that have been authorized a transfer are responsible for coordination of arrangements involving the pickup or shipping of IT equipment.

### **3.1.4 Costs**

All costs incurred in connection with the transfer of equipment through the CFL will be the responsibility of the school and include:

- 1) Expenses incurred in connection with the school’s inspection of the IT equipment at DoD sites.
- 2) Cost of packing, crating, marking the IT equipment, and the cost of loading it on the carrier’s conveyances for transportation.
- 3) Cost of transportation of the IT equipment from DoD sites.

## **3.2 Procedures**

### **3.2.1 Generating Activity**

Generating Activities may identify specific IT equipment and schools to be considered for transfer within CFL. DRMS-NOS will authorize the transfer after the DoD excess screening is completed, providing there are no DoD requests.

Generating Activities can designate IT equipment for placement to schools. The equipment and school can be designated via the CFL web based application. DRMS-NOS will authorize the transfer after the DoD excess screening is completed, providing there are no DoD requests.

DRMS-NOS will make provisions for schools to receive information concerning DoD IT equipment that is available for transfer. The schools will be notified of available equipment as it matches the profile submitted by the school. DRMS-NOS will authorize the transfer after the DoD excess screening is completed, providing there are no DoD requests.

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DRMS-NOS will review, approve, and notify the Generating Activities of the approved transfer to a school.

## **3.3 Educational Institutions Transfer Policy**

### **3.3.1 Eligibility**

- 1) A public school servicing pre-kindergarten through grade 12 students. An educational nonprofit is eligible if it is classified as tax-exempt under section 501(c) of the United States tax code and serves pre-kindergarten through grade 12. Schools and educational nonprofits must be located within the United States of America or its territories
- 2) Historically Black Colleges and Universities. Attachment 3.
- 3) Minority Institutions. Attachment 4.

### **3.3.2 Process**

- 1) DoD IT equipment is reported as excess to the DRMO. Generating Activities can specify a school for intended transfer once DRMS has accountability of the equipment.
- 2) When a Generating Activity designates a school, the school will be notified electronically to verify interest.
- 3) If a school verifies need for the equipment offered, the equipment is to be “frozen” so that other schools cannot be offered the same equipment.
- 4) If a school refuses the offer of equipment, the equipment will then be offered to other schools that have expressed an interest in like equipment.
- 5) If the Generating Activity has not designed a school within 7 days of DRMO acceptance of accountability, the equipment will then be offered to other schools that have expressed an interest in like equipment.
- 6) DRMS-NOS approves or disapproves transfer requests on-line generating a MILSTRIP to the Generating Activity and transfer authorization to the school.
- 7) The authorized school is responsible for coordination with the Generating Activity in the removal of equipment.
- 8) The authorized school has 14 days after receipt of authorization in which to remove the equipment.
- 9) If the school does not remove the equipment within the allotted time period, the DRMO will contact DRMS-NOS to process the cancellation of the MILSTRIP. See Receipt-In-Place instructions and 4140.14, vol 3, ch4H

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## 4 Responsibilities

### 4.1 Generating Activity

- 1) Excess hard drives will be processed in compliance with current DoD policy. For IT in serviceable condition or that has reutilization potential, the hard drives will be overwritten or removed.
- 2) Excess IT equipment will be reported to DRMO utilizing a DD 1348-1A or via electronic interchange with DRMS.
- 3) Equipment that is in serviceable condition or has reutilization potential should be reported as individual line items and kept as suites when applicable.
- 4) Generating Activities may designate a school for possible transfer of equipment via the CFL web based application located on the DRMS Web site.
  - If equipment is to be designated for the CFL then it must be received-in-place and care taken that equipment remains in the condition as when reported for excess.
  - When DoD excess screening is completed, providing there are no DoD requests, the equipment may be approved for transfer to the designated school.

### 4.2 DRMS/DRMO

- 1) DRMS-NOS will oversee and approve all equipment eligible for CFL.
- 2) DRMS-NOS will oversee and approve all schools entered into the CFL.
- 3) DRMS-NOS will oversee and approve all transfers of equipment to CFL.

### 4.3 SCHOOLS

- 1) Schools are to ensure that IT equipment transferred shall be used for student and faculty training, to augment existing IT equipment, to strengthen their infrastructure, or for other academic-related programs.
- 2) Contact the Generating Activity of the available IT equipment to ensure that the IT equipment is in good condition and is suitable for the purposes for which it is intended.
- 3) Update all POC and profile information.

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## **Attachment 1, Disposition of Unclassified DoD Computer Hard Drives Memorandum**

June 4, 2001

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS  
CHAIRMAN OF THE JOINT CHIEFS OF STAFF  
UNDER SECRETARIES OF DEFENSE  
DIRECTOR, DEFENSE RESEARCH AND ENGINEERING  
ASSISTANT SECRETARIES OF DEFENSE  
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE  
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE  
DIRECTOR, OPERATIONAL TEST AND EVALUATION  
ASSISTANTS TO THE SECRETARY OF DEFENSE  
DIRECTOR, ADMINISTRATION AND MANAGEMENT  
DIRECTORS OF THE DEFENSE AGENCIES  
DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: Disposition of Unclassified DoD Computer Hard Drives

References: (a) Deputy Secretary of Defense Memorandum, "Destruction of DoD Computer Hard Drives Prior to Disposal," dated January 8, 2001  
(b) Deputy Secretary of Defense Memorandum, "Disposition of Unclassified DoD Computer Hard Drives," dated May 29, 2001

Reference (a) directed that immediate steps be taken to ensure that all hard drives of unclassified computer equipment being disposed of outside Department of Defense (DoD) be removed and destroyed. Reference (b) directed that the January 8, 2001 guidance be amended to provide Department-wide procedures, methods and specifications regarding the disposition of unclassified hard drives, to include allowing hard drives to be overwritten before leaving DoD custody or control. However, while meaningful information cannot be recovered from a hard drive that has been properly overwritten with qualified software, there may be situations where the nature of the unclassified information (e.g., law enforcement) is such that the preferred course of action is to degauss or destroy the hard drive in question.

Attachment 1 specifies methods and procedures for sanitization and provides guidance on disposition of hard drives, depending on ownership. Attachment 2 provides specifications for overwriting, degaussing or destruction. Attachments 3 and 4 provide definitions and examples of verification labels and destruction records, respectively.

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Components are to take immediate steps to implement the guidance in the attachments, including arranging for required training and certification of personnel. All contracts for computer support initiated after September 30, 2001 must comply with the guidance. This office will examine the feasibility of enterprise licensing of qualified overwriting software.

Additional guidance regarding this subject will be issued as necessary. Questions concerning this memorandum or the attachments may be directed to Mr. Donald Jones, OASD(C3I), at(703)614-6640.

Linton Wells II  
Acting

Attachments

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## **Disposition of Unclassified DoD Computer Hard Drives Sanitization and Disposition of Unclassified Computer Hard Drives**

1. Purpose: This attachment provides specific guidance on methods, processes and procedures to ensure no data remains on unclassified computer hard drives that are to be permanently removed from DoD custody. It addresses disposition of hard drives in three cases:

- DoD owned computers;
- Leased computers; and,
- Warranty repair or replacement (DoD owned or leased computers)

The attachment outlines specific procedures and steps for hard drive sanitization in the three cases, including consideration of whether the storage device is operable or inoperable and cost effectiveness, as appropriate. Attachment 2 provides detailed specifications and guidance to support sanitization by overwriting, degaussing, or destruction. The term “user” herein refers to the DoD organization with effective ownership or control of a hard drive, not an individual using a computer.

2. Methods and procedures for hard drive sanitization and clearing:

2.1. Overwriting is the process of replacing information (data) with meaningless data in such a way that meaningful information cannot be recovered from a hard drive. Software meeting the specifications are outlined in Attachment 2, paragraph 2.1., Overwriting Software Specifications, will be used to overwrite all DoD owned or controlled hard drives. The individual performing the overwriting must be properly trained and will be responsible for certifying that the process has been successfully completed. Once overwriting has been certified, a signed label verifying that the drive has been purged will be affixed to the hard drive or the computer housing the hard drive, as appropriate. The certifier will maintain separate documentation recording the same information for a minimum of five years. Overwritten hard drives will also be sampled on a random basis by a trained individual other than the one who performed the overwrite process to verify that the overwriting process has been successfully completed. No fewer than 20% of all overwritten hard drives will be examined in the sampling process. See Attachment 4 for examples of an acceptable verification label and required documentation.

2.2. Degaussing (i.e., demagnetizing) is a procedure that reduces the magnetic flux of a medium to virtual zero by applying a reverse magnetizing field. Properly applied, degaussing renders any previously stored data on magnetic media unreadable. For specific instructions on degaussing procedures and where to obtain a listing of approved degaussing products, see Attachment 2, paragraph 3, Degaussing Procedures. Individuals performing degaussing will certify that the process has been completed by affixing a signed verification label to the hard drive or the computer housing the hard drive, as appropriate, indicating the date and degaussing product used for the procedure. Persons performing the degaussing function must be properly trained and certified. Separate documentation recording the same information will be maintained for a minimum of five years. Supervisory personnel should closely monitor the degaussing process.

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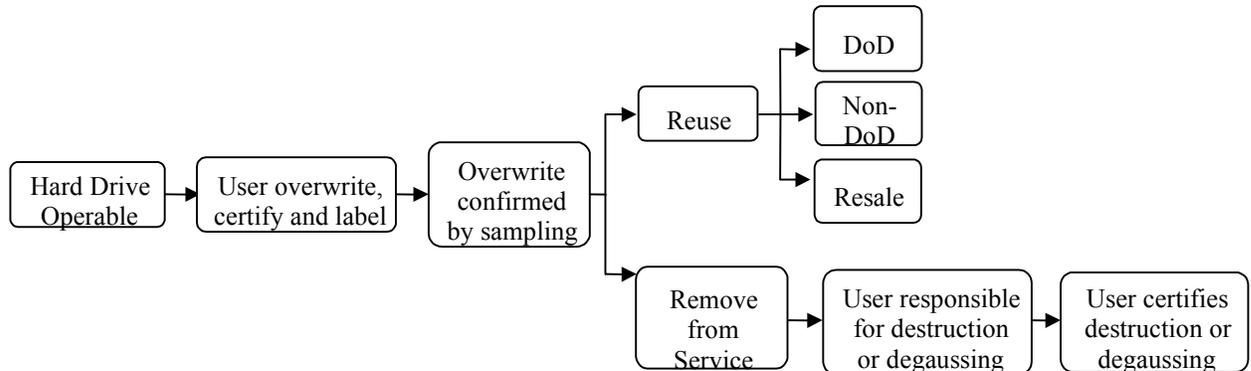
2.3. Destruction of a hard drive is the process of physically damaging a medium so that it is not usable in a computer and so that no known exploitation method can retrieve data from it. For acceptable methods of destruction, refer to Attachment 2, paragraph 4., Physical Destruction Procedures. Destruction of hard drives will be certified by affixing a signed label to the computer indicating the date and method of destruction. The certifier will maintain separate documentation recording the same information for a minimum of five years.

2.4. Clearing data (deleting files) removes information from storage media in a manner that renders it unreadable unless special utility software or techniques are used to recover the cleared data. However, because the clearing process does not prevent data from being recovered by technical means, it is not an acceptable method of sanitizing DoD owned or controlled unclassified hard disk storage media.

3. Disposition: Hard drives may be scheduled for reuse, repair, replacement, or removal from service for a variety of reasons and disposed of in various ways as described below.

### 3.1. Government-owned hard drives:

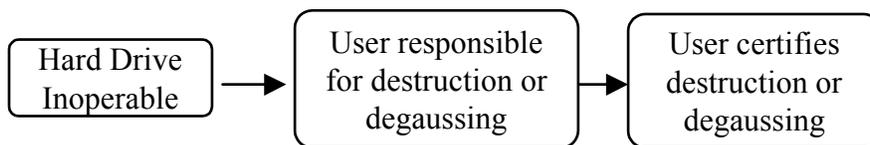
3.1.1. Operable hard drives that will be reused must be overwritten in accordance with (IAW) the procedures in paragraph 2.1. above, prior to transfer. If the operable hard drives are to be removed from service completely for any reason, they should also be destroyed or degaussed IAW paragraph 2.2. or 2.3. above. Figure 3.1-1. highlights the process flow for the disposition of operable Government-owned hard drives.



**Figure 3.1-1. Purging an Operable DoD-Owned Hard Drive**

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3.1.2. If the hard drive is inoperable and has reached the end of its useful life, it will be destroyed or degaussed IAW paragraph 2.2. or 2.3. above. Figure 3.1-2 highlights the process flow for the disposition of inoperable Government-owned hard drives.



**Figure 3.1-2. Purging an Inoperable DoD-Owned Hard Drive**

3.2. Leased computers, including assets provided under service level agreements:

3.2.1. If the leased hard drive is operable, and is simply being relocated within a contract umbrella (i.e., it will remain under the authority of the DoD leasing agent or seat manager), overwrite is not required. However, if the hard drive is to be redirected from the contract umbrella, then the leasing agent/seat manager will overwrite, certify, and label the hard drive IAW paragraph 2.1 above.

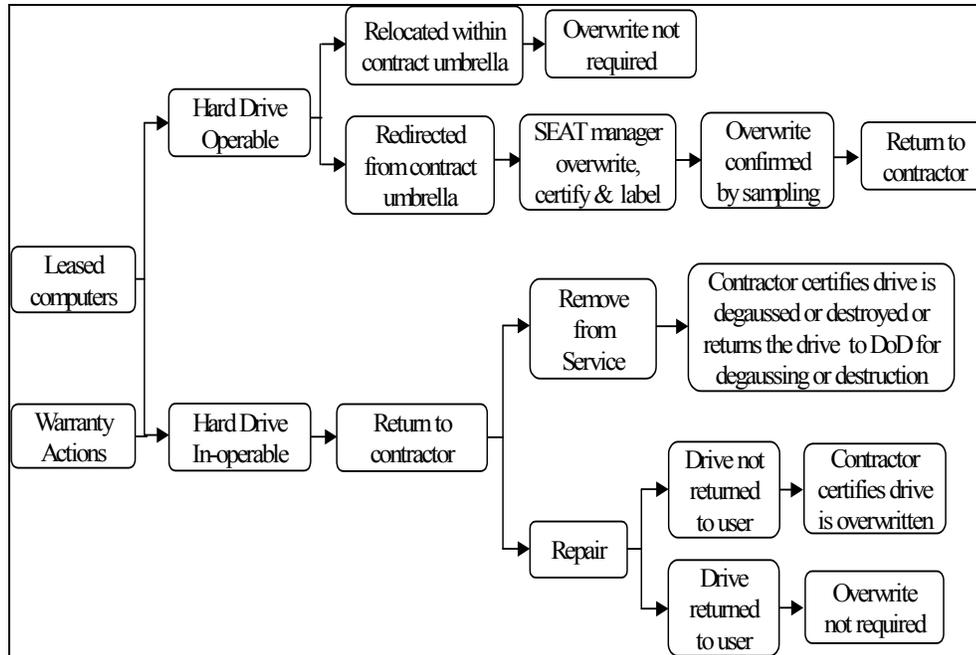
3.2.2. If the leased hard drive is inoperable, the contractor will make a determination as to whether the hard drive is repairable or should be removed from service.

3.2.2.1. Repaired leased hard drives that are returned to the user need not be overwritten. If the hard drive is not returned to the user specified in the contract, the contractor will certify to the DoD leasing agent/seat manager that the hard drive has been overwritten using an approved DoD process and product.

3.2.2.2. If the hard drive is determined to be not repairable and is to be removed from service, the contractor may degauss or destroy the hard drive, or return the drive to DoD for degaussing or destruction, depending on the terms of the lease agreement. If the contractor is responsible for the destruction or degaussing of the drives, the contractor will certify in writing that this process has been completed IAW one of the methods specified in Attachment 2. If the inoperable hard drive is returned to DoD for destruction, the procedures outlined in paragraph 3.1.2 above will be followed.

3.2.3. Figure 3-2.1 highlights the process flow for the disposition of hard drives which have been leased or provided under a service level agreement:

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**Figure 3.2-1. Purging Hard Drives That Have Been Leased and Warranty Actions.**

3.2.4. All new contracts initiated after September 30, 2001 must accommodate the requirements in paragraphs 3.2.1 and 3.2.2.

3.3. Warranty Actions: The warrantor will make a determination as to whether the hard drive is to be repaired and returned to the original Government user, repaired but redirected to another user, or permanently removed from service. The processes and procedures for handling inoperable hard drives that are returned for warranty action are exactly the same as those for inoperable hard drives that are returned to the contractor under lease agreements as shown in Figure 3.2-1.

4. Certain storage technologies are such that data are saved across an array of hard drives in a manner that results in no intelligible information being recoverable from any single drive (i.e., each byte is spread among different drives on the array). In these situations, where individual drives are removed from an array for repair or replacement, there is no requirement to overwrite, degauss, or destroy the drive in question.

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## **Disposition of Unclassified DoD Computer Hard Drives Specifications For Sanitization Of Hard Drives**

1. Purpose: This attachment provides guidance on sanitization by overwriting, degaussing and destruction of unclassified hard drives. Components may supplement these specifications to meet their operational needs. System users will ensure supplemental instructions to this policy meet with the approval of the responsible Designated Approving Authority (DAA). Sanitization removes sensitive information from storage media in a manner that gives assurance that the information cannot be recovered by keyboard or laboratory attack. Before the sanitization process begins, the computer should be disconnected from any external network to prevent accidental damage to the network operating system (OS) or other files on the network. In addition, users should audit the sanitizing process to ensure data is no longer retrievable. This means a trained knowledgeable person should witness the sanitization process and verify that the hard drive was sanitized.
2. Overwriting Hard Drives for Sanitization: Overwriting is an approved method for sanitization of hard disk storage media containing unclassified data. Overwriting of data means replacing previously stored data on a drive or disk with a predetermined pattern of meaningless information. This effectively renders the data unrecoverable, but the process must be correctly understood and carefully implemented. Overwriting consists of recording data onto magnetic media by writing a pattern of fluxes or pole changes that represent binary ones (1) and zeros (0). These patterns can then be read back and interpreted as individual bits, 8 of which are used to represent a byte or character. If the data is properly overwritten with a pattern (e.g., "11111111" followed by "00000000") the magnetic fluxes will be physically changed and the drives read/write heads will only detect the new pattern and the previous data will be effectively erased. To purge the hard drive, the DoD requires overwriting with a pattern, and then its complement, and finally with another pattern (e.g., overwrite first with "00110101", followed by "11001010", then "10010111"). Sanitization is not complete until all six passes of the three cycles are completed.
  - 2.1. Overwriting Software Specifications: The software specifications discussed below are the minimum that Components must apply to overwriting hard drives. Software products and applications not meeting the minimum stated specifications are not acceptable for sanitizing unclassified hard drives. Overwriting software that merely reformats or repartitions a hard drive is not accepted within the scope of this policy. Further, some software products may not run on systems with lower end central processing unit (CPU) chipsets, and may require a minimum of a 386 or greater processor. Software users should verify the compatibility of selected software products with the particular hard disk being sanitized. In addition, some software product versions may not have the capability to remove the OS during the overwriting process. To ensure the integrity of the sanitization process, overwriting software must have the following functions and capabilities:
    - 2.1.1. The ability to purge all data or information, including the OS, from the physical or virtual drives, thereby making it impossible to recover any meaningful data by keyboard or laboratory attack.
    - 2.1.2. A compatibility with, or capability to run independent of, the OS loaded on the hard drive.

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2.1.3. A compatibility with, or capability to run independent of, the type of hard drive being sanitized (e.g., ATA/IDE or SCSI type hard drives).

2.1.4. A capability to overwrite the entire hard disk drive independent of any BIOS or firmware capacity limitation that the system may have.

2.1.5. A capability to overwrite using a minimum of three cycles (six passes) of data patterns on all sectors, blocks, tracks, and slack or unused disk space on the entire hard disk medium.

2.1.6. A method to verify that all data has been removed from the entire hard drive and to view the overwrite pattern.

*2.1.7. Although not mandatory, selected software should also:*

2.7.1.1. Provide the user with a validation certificate indicating that the overwriting procedure was completed properly.

2.7.1.2. Provide a defects log, or listing of any bad sectors, that could not be overwritten by the software.

*2.2. Software Available for Overwriting: Listed below are products and manufacturers that produce overwriting software tools. These products are currently in use by DoD Components and are considered to meet the minimum standards called out in this policy. Note: This listing is not all-inclusive and there may be other products that meet the required specifications in addition to the products listed below.*

2.2.1. Product Name: "No Trace"

Communication Technologies, Inc.,

14151 Newbrook Drive, Suite 400, Herndon, VA 20170

Tel: (703) 961-9080

Fax: (703) 961-1330

Web: [www.comtechnologies.com](http://www.comtechnologies.com)

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Product Name: "DataEraser"

**ONTRACK Data International, Inc.**

9023 Columbine Rd, Eden Prairie, MN 55347

Toll Free: (800) 872-2599

Tel: (952) 937-5161 Fax: (952) 937-5750

Web: [www.ontrack.com](http://www.ontrack.com)

Tech Support: (952) 937-2121

Product Name: "UniShred Pro"

**Los Altos Technologies,**

1381 Kildaire Farm Rd, Ste 415, Cary, NC 27511

Toll Free: (800) 999-8649

Tel: (919) 233-9889 Fax: (919) 233-6761

Web: [www.lat.com](http://www.lat.com)

Tech Support: (919) 223-9889

Product Name: "CleanDrive"

**Access Data Corporation**

2500 North University Ave., Suite 200, Provo, UT 84604-3864

Toll Free: (800) 574-5199

Tel: (801) 377-5410 Fax: (801) 377-5426

Web: [www.accessdata.com](http://www.accessdata.com)

Tech Support: 1 (800) 489-5199

2.2.5. Product Name: "Sanitizer" D 4.01

**Infraworks**

6207 Bee Cave Road Austin, TX 78746

Tel: (512) 583-5000 Fax: 1 (512) 583-5075

Web: [www.infraworks.com/products/santizer.html](http://www.infraworks.com/products/santizer.html)

2.3. Damaged Hard Disks: A hard disk platter may develop damaged or unusable tracks and sectors. However, sensitive data may have been recorded in areas of the disk that should be purged. If features or malfunctions of the storage media inhibit overwriting, the storage media should be degaussed or destroyed.

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3. Degaussing Hard Drives for Sanitization: Degaussing is a process whereby the magnetic media are erased, (i.e., returned to a zero state). Degaussing (demagnetizing) reduces the magnetic flux to virtual zero by applying a reverse magnetizing field. Properly applied, degaussing renders any previously stored data on magnetic media unreadable by keyboard or laboratory attack.

3.1. Degaussing hard drives often destroys the drive's timing tracks and servo motors, and usually demagnetizes the permanent magnets of the spindle motor on sealed (e.g., Winchester) drives, thus they can seldom be used after degaussing. In addition, the process of removing the hard drives from the computer, taking off the hard drive's housing, degaussing and placing the hard drive back into the computer, and testing to ensure it still operates and no longer contains its original data, may make reutilization after degaussing cost ineffective.

3.2. Each type of magnetic media is distinguished by the rate of coercivity required to ensure the medium is brought back to its zero state. Due to the variation of media formats and their corresponding magnetic densities, a correct and effective degaussing process is often difficult to achieve, and it is essential that DoD Components utilize a degausser with the right coercivity specifications to degauss the target media. Coercivity strength of an applied magnetic field determines which type of degausser should be applied to the particular magnetic media being targeted for sanitization. Higher coercivity rates are usually required to degauss hard disk storage media and many degaussers designed for commercial uses do not have the magnetic energy required to erase media with a higher coercivity rate.

3.3. Degaussing standards and procedures:

3.3.1. Degaussers used on DoD hard drives must have a nominal rating of at least 1700 Oersted.

3.3.2. Degaussers must be operated at their full magnetic field strength.

3.3.3. Follow the product manufacturer's directions carefully. Deviations from an approved method or rate of coercivity could leave significant portions of data remaining on a hard drive.

3.3.4. All shielding materials (e.g., castings, cabinets, and mounting brackets), which may interfere with the degausser's magnetic field, must be removed from the hard drive before degaussing.

3.3.5. Hard disk platters must be in a horizontal direction during the degaussing process.

3.3.6. For degaussing hard drives with very high coercivity ratings, it may be necessary to remove the magnetic platters from the hard drive's housing.

3.4. Degaussing products should be acquired from the National Security Agency's (NSA) Degausser Products List, which can be obtained by contacting:

National Security Agency

Attn: S7 Media Technology Center

9800 Savage Road, Ft. George G. Meade, MD 20755-6877

Tel: 1 (800) 688-6115 (Option #3) or 1 (410) 854-7661 Fax: (410) 854-7668

## DRAFT

4. Physical Destruction Procedures: Hard drives should be destroyed when they are defective or cannot be economically repaired or sanitized for reuse. As an added security measure, when practical, operable hard drives no longer deemed economically viable should be overwritten or degaussed prior to destruction. Physical destruction must be accomplished to an extent that precludes any possible further use of the hard drive. The following are acceptable means for destruction of hard disk storage media:

4.1. Physical destruction/impairment beyond reasonable use: Remove the hard drive from the chassis or cabinet. Remove any steel shielding materials, mounting brackets, and cut any electrical connection to the hard drive unit. In a suitable facility with individuals wearing appropriate safety equipment, subject the hard drive to physical force (e.g., pounding with a sledgehammer) that will disfigure, bend, mangle, or otherwise mutilate the hard drive so that it cannot be re-inserted into a functioning computer. Sufficient force should be used directly on top of the hard drive unit to cause shock/damage to the disk surfaces. In addition, any connectors that interface into the computer must be mangled, bent, or otherwise damaged to the point that the hard drive could not be re-connected without significant rework

4.2. Destruction at an approved metal destruction facility, i.e., smelting, disintegration, or pulverization.

4.3. Application of an abrasive substance (emery wheel or disk sander) to a magnetic disk or drum recording surface. Make certain that the entire recording surface is completely removed. Ensure proper safety measures to include protection from inhaling abraded dust and use of protective eyewear.

4.4. Application of concentrated hydriodic acid (55% to 58% solution) to a gamma ferric oxide disk surface. Acid solution use should be done in a well-ventilated area, and personnel must wear eye protection.

4.5. Application of acid activator Dubais Race A (NSN 8010 181 7171) and stripper Dubais Race B (NSN 8010 181 7170) to a magnetic drum recording surface. Technical acetone (NSN 6810 184 4796) should then be applied to remove residue from the drum surface. The above should be done in a well-ventilated area, and personnel must wear eye protection.

**NOTE: Extreme caution must be observed when handling acid solutions. The application of chemical substances to remove data should be accomplished only by qualified and approved personnel.**

# DRAFT

## Disposition of Unclassified DoD Computer Hard Drives

### Definitions

**Clearing** – Rendering stored information unrecoverable unless special utility software or techniques are used.

**Coercivity** – Defines the magnetic field necessary to reduce a magnetically saturated material's magnetization to zero. Coercivity strength of an applied magnetic field determines which type of degausser may be applied to a particular type of magnetic material. Demagnetizing the magnetic material of data storage media removes data remanence.

**Degaussing** – Degaussing (i.e., demagnetizing) is a procedure that reduces the magnetic flux to virtual zero by applying a reverse magnetizing field. Properly applied, degaussing renders any previously stored data on magnetic media unreadable and may be used as a method of sanitization.

**Erasing** – An ambiguous term which can refer to purging, clearing, or removing file allocation.

**Keyboard attack** – Extracting information from data storage media by executing software utilities, keystrokes, or other system resource executed from a keyboard. For example, disk and file recovery utilities and memory scavenging procedures can be used to carry out keyboard attacks.

**Laboratory attack** – Using sophisticated signal recovery equipment in a laboratory environment to recover stored information from data storage media.

**Media** – Short for storage media. Physical objects on which data can be stored, such as hard drives, floppy disks, CD-ROMs, and tapes.

**Memory Scavenging** – Searching through data storage to collect residue thereby acquiring data. Data may be stored on records, blocks, pages, segments, files, directories, words, bytes, fields, or peripheral devices, such as printers or video displays.

**Overwriting** – Process of writing patterns of data on top of the data stored on a magnetic medium.

**Oersted** – A unit of magnetic field strength.

**Remanence** – Residual information remaining on data storage media after clearing.

**Sanitize** – To expunge data from storage media (e.g., diskettes, CD-ROMs, and tapes) so that data recovery is impossible. Sanitizing includes overwriting, degaussing and destruction. Clearing data does not constitute sanitizing.

**Sensitive Information** – “Sensitive” information is any information the loss, misuse, or unauthorized access to, or modification of, could adversely affect the national interest or the conduct of Federal programs, or the privacy to which individuals are entitled under Section 552a of Title 5, United States Code (The Privacy Act), but which has not been specifically authorized under criteria established by Executive Order or an Act of Congress to be kept secret in the interest of national defense or foreign policy. This

## DRAFT

includes information in routine DoD payroll, finance, logistics, and personnel management systems. (Certain information that the disclosure of which would constitute an unwarranted invasion of personal privacy is exempt from mandatory disclosure under the Freedom of Information Act of 1974.)

**User** – The DoD organization with effective ownership or control of a hard drive, not an individual using a computer.

# DRAFT

## Disposition of DoD Computer Hard Drives

### Sanitization/Destruction Verification Labels and Records

1. Figure A-3.1 provides a suggested label format to be attached to a hard drive or computer housing, as appropriate. At a minimum the label should include the following information:

Certification of Hard Drive Disposition	
This certifies this hard drive,	
Serial Number _____,	
Make and Model _____	
Was <u>Overwritten/Degaussed/Destroyed</u> in accordance with DOD Memorandum <b>XXX</b> on _____ ( date )	
<u>(Manufacturer, Product Version, Date Used)</u> _____	
Software or Degausser Used	
- or -	
<u>(e.g., Approved Metal Destruction Facility)</u> _____	
Method of Destruction	
_____	
Printed Name and Rank/Grade	
_____	
Signature	Date

**Figure A-3.1. Format for Sanitization/Destruction Validation Label**

Attachment 4

2. Below is an example format letter for verifying that a hard drive was overwritten, degaussed, and/or destroyed.

(Date)

1. *The following listed hard drives were overwritten in accordance with Attachment 2, DoD Memorandum "Disposition of Unclassified DoD Hard Drives," dated April 2001, using the following software: (Manufacturer, Product Version).*

- or -

## DRAFT

*The following listed hard drives were degaussed in accordance with Attachment 2, DoD Memorandum “Disposition of Unclassified DoD Hard Drives,” dated April 2001, using the following degausser: (Manufacturer, Product Version).*

*- or -*

*The following listed hard drives were destroyed in accordance with Attachment 2, DoD Memorandum “Disposition of Unclassified DoD Hard Drives,” dated April 2001, using the following method: (Smelting, Disintegration, Pulverization, Abrasion, or Acid Application, etc.).*

*2. (Hard Drive Make, Model, and Serial Number).*

*(Hard Drive Make, Model, and Serial Number).*

*(Hard Drive Make, Model, and Serial Number).*

*(Hard Drive Make, Model, and Serial Number).*

*3. The sanitization/destruction process was performed by (Name and Rank/Grade).*

*Verifying Official*

*(Name, Rank/Grade, and*

*Organization)*

**Figure A-3.2.1. DoD Verification of Sanitization/Destruction of DoD Hard Drives**

# DRAFT

## Attachment 2 Standardized List of Components

<b>COMPUTERS</b>
MAINFRAME SUPERCOMPUTER
MAINFRAME
MAINFRAME MINICOMPUTER
HANDHELD COMPUTER
PEN BASED COMPUTER
SPECIALIZED SYSTEMS
APPLE MACINTOSH
WORKSTATIONS
WORD PROCESSORS/WORD PROCESSING EQUIPMENT
UNIX WORKSTATION
MULTIMEDIA WORKSTATION
ALL-IN-ONE COMPUTER
PERSONAL DIGITAL ASSISTANT (PDA)
<b>DESKTOP/TOWER COMPUTER</b>
DESKTOP/TOWER COMPUTER 286
DESKTOP/TOWER COMPUTER 386
DESKTOP/TOWER COMPUTER 486
DESKTOP/TOWER COMPUTER PENTIUM/COMPATIBLE (60MHZ-233MHZ)
DESKTOP/TOWER COMPUTER PENTIUM PRO/COMPATIBLE (150MHZ-200MHZ)
DESKTOP/TOWER COMPUTER PENTIUM II/COMPATIBLE (201MHZ-450MHZ)
DESKTOP/TOWER COMPUTER PENTIUM III/COMPATIBLE (451MHZ-866MHZ)
DESKTOP/TOWER COMPUTER PENTIUM 4(1300MHZ-2.2GHZ)
<b>PORTABLE COMPUTER</b>
LAPTOP COMPUTER 286
LAPTOP COMPUTER 386
LAPTOP COMPUTER 486
LAPTOP COMPUTER PENTIUM/COMPATIBLE 60-133MHZ
MACINTOSH LAPTOP
LAPTOP COMPUTER PENTIUM PRO/COMPATIBLE 150-200MHZ

# DRAFT

LAPTOP COMPUTER PENTIUM II/COMPATIBLE 201-450MHZ	
LAPTOP COMPUTER PENTIUM III/COMPATIBLE 451-1.06GHZ	
LAPTOP COMPUTER PENTIUM III/COMPATIBLE 451-1.06GHZ	
LAPTOP COMPUTER PENTIUM 4/COMPAT 1.06GHZ-1.7GHZ	
<b>MULTIMEDIA (MM)DESKTOP/TOWER COMPUTER</b>	
MM DESKTOP/TOWER COMPUTER PENTIUM/COMPATIBLE 60-133MHZ	
MM DESKTOP/TOWER COMPUTER PENTIUM PRO/COMPATIBLE 150-200MHZ	
MM DESKTOP/TOWER COMPUTER PENTIUM II/COMPATIBLE 201-450MHZ	
MM DESKTOP/TOWER COMPUTER PENTIUM III/COMPATIBLE 451-1000MHZ	
<b>MULTIMEDIA (MM) PORTABLE COMPUTER</b>	
MM PORTABLE COMPUTER PENTIUM/COMPATIBLE 60-133MHZ	
MM PORTABLE COMPUTER PENTIUM PRO/COMPATIBLE 150-200MHZ	
MM PORTABLE COMPUTER PENTIUM II/COMPATIBLE 201-450MHZ	
MM PORTABLE COMPUTER PENTIUM III/COMPATIBLE 451-1000MHZ	
TAPE UNIT	
TAPE UNIT, REEL-TO-REEL	
TAPE UNIT, CARTRIDGE	
TAPE UNIT, CASSETTE	
BACKUP TAPE UNIT PC	
<b>DIRECT ACCESS STORAGE DEVICE (DASD)</b>	
DISK DRIVE, DISKETTE/FLEXIBLE/FLOPPY	
DISK DRIVE, PORTABLE	
CD-ROM DISK DRIVE	
FIXED/REMOVABLE DISK DRIVE	
CD-ROM DISK DRIVE, RECORDABLE	
OPTICAL JUKEBOX	
CD-ROM DUPLICATOR	
DIGITAL VERSATILE DISK (DVD)	
CD-ROM TOWER	
REDUNDANT ARRAY OF INDEPENDENT DISKS (RAID)	
SMALL COMPUTER SYSTEM INTERFACE (SCSI) DRIVE	
ZIP DRIVE	
HARD DRIVE DUPLICATOR	

# DRAFT

DVD-RAM
<b>DATA TRANSMISSION SYSTEMS</b>
MODEM
MULTIPLEXORS
EXTERNAL FAX
EXTERNAL FAX MODEM
INTERNAL FAX MODEM BOARDS
DATA SERVICE UNIT/CHANNEL SERVICE UNIT
COMMUNICATIONS SPECIAL EQUIPMENT
<b>CONTROLLERS</b>
CONTROLLER, TAPE CONTROL
CONTROLLER, TERMINAL
<b>LAN EQUIPMENT</b>
FILE/NETWORK SERVER
ACTIVE HUB
BRIDGE
BROADBAND HI-LEVEL DATA LINK
ETHERNET LAN DEVICES/CARDS
GATEWAY
REPEATER
ROUTER/ATM HUB
UNIX SERVER
PRINT SERVER
MODEM SERVER
FAX/MODEM SERVER
AUDIO SERVER
SWITCHING ROUTER
COMMUNICATIONS MODEM
STORAGE AREA NETWORK
ETHERNET SWITCH
<b>MICROCOMPUTER ACCESSORIES</b>
JOYSTICK *
KEYBOARD *
MOTHERBOARD *
MOUSE *

# DRAFT

TRACKBALL *
PC DOCKING STATION
MACINTOSH DOCKING STATION
SPEAKERS *
AUDIO EQUIPMENT
VISUAL EQUIPMENT
DIGITAL CAMERA
COMPUTERIZED ENGRAVER
<b>SPECIAL NEEDS EQUIPMENT</b>
BRAILLE EMBOSSER
CLOSED CIRCUIT TELEVISION (CCTV)
ELECTRONIC AIDS TO DAILY LIVING (EADL) SYSTEMS
EXTERNAL SPEECH SYNTHESIZER
HAPTIC DEVICES
NEURAL INTERFACE DEVICES
REFRESHABLE BRAILLE DISPLAY
SCREEN MAGNIFIER
<b>GRAPHICS EQUIPMENT</b>
DIGITAL IMAGE PREVIEWER
DIGITIZER/GRAPHICS BOARD
GRAPHICS SYSTEM
IMAGE PROCESSING SYSTEM
INTEGRATOR
SKETCHBOARD/SKETCHPAD
<b>POWER EQUIPMENT</b>
BATTERY PACK PC *
POWER CONDITIONER
POWER SUPPLY UNIT *
POWER SUPPLY (UPS)
<b>EAM AND PCAM EQUIPMENT</b>
COLLATOR
READER, VIEWER APERTURE CARD
RECORDER/REPRODUCER
<b>MEMORY, GENERAL</b>
PROGRAMMER, EHPROM/EEPROM

# DRAFT

RANDOM ACCESS MEMORY CHIP
<b>SCANNERS/READERS</b>
BARCODE READER
FLATBED SCANNER
IMAGE SCANNER
LASER/SCANNER READER
MAGNETIC CARD ENTRY SYSTEM
MAGNETIC INK READER
OPTICAL CHARACTER READER
OPTICAL MARK READER
OPTICAL SCAN UNIT
SCANNER/PRINTER/COPIER/FAX
PC PARALLEL PORT IMAGE CARD READER
SMART CARD READER
<b>DATA COMMUNICATIONS EQUIPMENT</b>
ASYNCHRONOUS COMMUNICATIONS UNIT
AUTOCALLING UNIT
COAX SWITCH BOX
CONVERTER BOX/CONVERT DATA ANALOG/DIGITAL
DATA CONCENTRATOR
DATA TRANSMISSION EQUIPMENT
DECODER
LINE DRIVER/CONDITIONER
SWITCHBOX/SWITCHING UNIT
TELEMETRY SYSTEM
TRANSCEIVER
VOICE SYSTEM/DIGITIZER
COMMUNICATIONS CONTROLLER
<b>SECURITY EQUIPMENT</b>
DEGAUSSER
ENCRYPTION UNIT
FIREWALL BRICK
INTRUSION DETECTION SYSTEM (IDS)
<b>DIAGNOSTIC/TEST EQUIPMENT</b>
ANALYZER

# DRAFT

<b>SOFTWARE</b>
EMULATOR, SOFTWARE
DATA COMMUNICATIONS, SOFTWARE
TELECOMMUNICATIONS, SOFTWARE
PC SYSTEMS SOFTWARE
PC APPLICATIONS SOFTWARE
MAINFRAME SYSTEMS SOFTWARE
MAINFRAME APPLICATIONS SOFTWARE
COMPUTER-AIDED DESIGN & DRAFTING (CADD) SOFTWARE
SCREEN READER SOFTWARE
WORD PREDICTION SOFTWARE
<b>PLOTTERS</b>
PLOTTER
<b>PRINTERS</b>
LINE PRINTER
LASER PRINTER
DOT MATRIX PRINTER
INK JET PRINTER
BAR CODE PRINTER
FILM PRINTER/PALETTE
LASER PRINTER (COLOR)
INK JET PRINTER (COLOR)
PORTABLE PRINTER
THERMAL PRINTER
THERMAL WAX TRANSFER & DYE SUBLIMATION PRINTER
SOLID INK PRINTER
WIRE MARKER PRINTER
<b>DISPLAY UNITS</b>
CONSOLE
MONITORS
COLOR COMPUTER PROJECTOR
PRINTER TERMINAL
TERMINAL
MULTIMEDIA MONITOR (CONTAINS BUILT-IN SPEAKERS)

# DRAFT

## **Attachment 3, List of Historically Black Colleges & Universities by State**

### **ALABAMA**

- Alabama A&M University
- Alabama State University
- Bishop State Community College
- Concordia College
- J. F. Drake State Technical
- Lawson State Community College
- Miles College
- Oakwood College
- Selma University
- Stillman College
- TalladegaTrenholm State
- Tuskegee University

### **ARKANSAS**

- Arkansas Baptist College
- Philander Smith College
- Shorter College
- University of Arkansas at Pine Bluff

### **DELAWARE**

- Delaware State University

### **DISTRICT OF COLUMBIA**

- Howard University
- University of the District of Columbia

### **FLORIDA**

- Bethune Cookman College
- Edward Water College
- Florida A&M University
- Florida Memorial College

# DRAFT

## GEORGIA

- Albany State College
- Clark Atlanta University
- Fort Valley State College
- Interdenominational Theological Center
- Morehouse College
- Morehouse College of Medicine
- Morris Brown
- Paine College
- Savannah State College
- Spelman College

## KENTUCKY

- Kentucky State University

## LOUISIANA

- Dillard University
- Grambling State University
- Southern University A&M at Baton Rouge
- Southern University at New Orleans
- Southern University A&M University at Shreveport
- Xavier University

## MARYLAND

- Bowie State University
- Coppin State College
- Morgan State University
- University of Maryland-Eastern Shore

## MICHIGAN

- Lewis College of Business

## MISSISSIPPI

- Alcorn State University
- Coahoma Community College
- Hinds Community College
- Jackson State University
- Mary Holmes College
- Mississippi Valley State University
- Rust College
- Tougaloo College

# DRAFT

## MISSOURI

- Harris-Stowe State College
- Lincoln University

## NORTH CAROLINA

- Barber-Scotia College
- Bennett College
- Elizabeth City State University
- Fayetteville State University
- Johnson C. Smith University
- Livingston College
- North Carolina A&T State University
- North Carolina Central University
- St. Augustine's College
- Shaw University
- Winston-Salem State University

## OHIO

- Central State University
- Wilberforce University

## OKLAHOMA

- Langston University

## PENNSYLVANIA

- Cheyney University
- Lincoln University

## SOUTH CAROLINA

- Allen University
- Benedict College
- Claflin College
- Clinton Jr. College
- Denmark Technical College
- Morris College
- South Carolina State College
- Voorhees College

# DRAFT

## TENNESSEE

- Fisk University
- Lane College
- Knoxville College
- LeMoyne-Owen College
- Meharry Medical College
- Tennessee State University

## TEXAS

- Huston-Tillotson College
- Jarvis Christian College
- Paul Quinn College
- Prairie View A&M University
- Saint Phillip's College
- Southwestern Christian College
- Texas College
- Texas Southern University
- Wiley College

## VIRGINIA

- Hampton University
- Norfolk State University
- Saint Paul's College
- Virginia State University
- Virginia Union University

## VIRGIN ISLANDS

- University of The Virgin Islands

## WEST VIRGINIA

- West Virginia State College
- Bluefield State College

# DRAFT

## Attachment 4, List of Minority Institutions by State

### ALABAMA

- CHAUNCEY SPARKS STATE TECHNICAL COLLEGE
- ITT TECHNICAL INSTITUTE, BIRMINGHAM
- REID STATE TECHNICAL COLLEGE
- SOUTH COLLEGE
- SOUTHERN COMMUNITY COLLEGE
- VIRGINIA COLLEGE

### ARIZONA

- AMERICAN INDIAN COLLEGE OF THE ASSEMBLIES OF GOD INC
- APPOLLO COLLEGE
- ARIZONA AUTOMOTIVE INSTITUTE
- ARIZONA INSTITUTE OF BUSINESS AND TECHNOLOGY, PHOENIX
- ARIZONA WESTERN COLLEGE
- CENTRAL ARIZONA COLLEGE
- CHAPARRAL CAREER COLLEGE
- COCHISE COLLEGE
- DINE COLLEGE
- ESTRELLA MOUNTAIN COMMUNITY COLLEGE
- HIGH TECH INSTITUTE
- ITT TECHNICAL INSTITUTE
- PHOENIX COLLEGE
- PIMA COMMUNITY COLLEGE
- PIMA MEDICAL INSTITUTE
- REFRIGERATION SCHOOL, INC.
- SOUTH MOUNTAIN COMMUNITY COLLEGE
- THE ART CENTER
- THE BRYMAN SCHOOL

### CALIFORNIA

- ACADEMY OF CHINESE CULTURE AND HEALTH SCIENCES
- ALLAN HANCOCK COLLEGE
- AMERICAN BAPTIST SEMINARY OF THE WEST
- ANDON COLLEGE
- BAKERSFIELD COLLEGE
- BROOKS COLLEGE
- CALIFORNIA COLLEGE FOR HEALTH SCIENCES
- CALIFORNIA DESIGN COLLEGE
- CALIFORNIA PARAMEDICAL AND TECHNICAL COLLEGE
- CALIFORNIA STATE POLYTECHNIC UNIVERSITY, POMONA
- CALIFORNIA STATE UNIVERSITY, BAKERSFIELD
- CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS
- CALIFORNIA STATE UNIVERSITY, FRESNO
- CALIFORNIA STATE UNIVERSITY, FULLERTON
- CALIFORNIA STATE UNIVERSITY, HAYWARD
- CALIFORNIA STATE UNIVERSITY, LONG BEACH
- CALIFORNIA STATE UNIVERSITY, LOS ANGELES

# DRAFT

- CALIFORNIA STATE UNIVERSITY, NORTHRIDGE
- CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO
- CALIFORNIA STATE UNIVERSITY, STANISLAUS
- CENTRAL CALIFORNIA SCHOOL
- CERRITOS COLLEGE
- CHABOT COLLEGE
- CHAFFEY COMMUNITY COLLEGE
- CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE
- CITRUS COLLEGE
- CITY COLLEGE OF SAN FRANCISCO
- COLLEGE OF ALAMEDA
- COLLEGE OF THE DESERT
- COLLEGE OF THE SEQUOIAS
- COMPTON COMMUNITY COLLEGE
- COMPUTER LEARNING CENTER, LOS ANGELES
- COMPUTER LEARNING CENTER, SAN JOSE
- COMPUTER LEARNING CENTER, SAN FRANCISCO
- CONCORDE CAREER INSTITUTE
- CONTRA COSTA COLLEGE
- COPPER MOUNTAIN COLLEGE
- CYPRESS COLLEGE
- D-Q UNIVERSITY
- DE ANZA COLLEGE
- DEVRY INSTITUTE OF TECHNOLOGY, FREMONT
- DEVRY INSTITUTE OF TECHNOLOGY, LONG BEACH
- DEVRY INSTITUTE OF TECHNOLOGY, POMONA
- DON BOSCO TECHNICAL INSTITUTE
- DONGGUK ROYAL UNIVERSITY
- EAST LOS ANGELES COLLEGE
- EAST SAN GABRIEL VALLEY REGIONAL OCCUPATIONAL PROG.
- EDUCORP CAREER COLLEGE
- EL CAMINO COLLEGE
- EVERGREEN VALLEY COLLEGE
- FASHION INSTITUTE OF DESIGN AND MERCHANDISE, LOS ANGELES
- FASHION INSTITUTE OF DESIGN AND MERCHANDISE, ORANGE COUNTY
- FASHION INSTITUTE OF DESIGN AND MERCHANDISE, SAN DIEGO
- FRESNO CITY COLLEGE
- FULLERTON COLLEGE
- GAVILAN COLLEGE
- GLENDATE COMMUNITY COLLEGE
- HARTNELL COLLEGE
- HEALD COLLEGE SCHOOL OF BUSINESS, CONCORD
- HEALD COLLEGE SCHOOL OF BUSINESS, SALINAS
- HEALD COLLEGE SCHOOL OF BUSINESS, STOCKTON
- HEALD COLLEGE SCHOOL OF BUSINESS AND TECHNOLOGY, FRESNO
- HEALD COLLEGE SCHOOL OF TECHNOLOGY, MILPITAS
- HEALD COLLEGE SCHOOL OF TECHNOLOGY, MARTINEZ
- HEALD COLLEGE SCHOOLS OF BUSINESS AND TECHNOLOGY, SAN FRANCISCO
- HEALD COLLEGE SCHOOLS OF BUSINESS AND TECHNOLOGY, HAYWARD
- HIGH-TECH INSTITUTE, SACRAMENTO
- IMPERIAL VALLEY COLLEGE
- INSTITUTE OF COMPUTER TECHNOLOGY
- ITT TECHNICAL INSTITUTE, WEST COVINA

# DRAFT

- ITT TECHNICAL INSTITUTE, ANAHEIM
- ITT TECHNICAL INSTITUTE, HAYWARD
- ITT TECHNICAL INSTITUTE, OXNARD
- ITT TECHNICAL INSTITUTE, SAN DIEGO
- ITT TECHNICAL INSTITUTE, SANTA CLARA
- ITT TECHNICAL INSTITUTE, SYLMAR
- ITT TECHNICAL INSTITUTE, TORRANCE
- LA SIERRA UNIVERITY
- LANEY COLLEGE
- LEE COLLEGE
- LONG BEACH CITY COLLEGE
- LOS ANGELES CITY COLLEGE
- LOS ANGELES COUNTY COLLEGE OF NURSING AND ALLIED HEALTH
- LOS ANGELES HARBOR COLLEGE
- LOS ANGELES MISSION COLLEGE
- LOS ANGELES SOUTHWEST COLLEGE
- LOS ANGELES TRADE TECHNICAL COLLEGE
- LOS ANGELES VALLEY COLLEGE
- MARIC COLLEGE, SAN DIEGO
- MARIC COLLEGE, VISTA
- MASTERS INSTITUTE
- MERCED COLLEGE
- MERRITT COLLEGE
- MISSION COLLEGE
- MODERN TECHNOLOGY SCHOOL OF XRAY
- MOUNT SAINT MARY'S COLLEGE
- MT SAN ANTONIO COLLEGE
- MT SIERRA COLLEGE
- NAZARENE BIBLE COLLEGE
- NEW SCHOOL OF ARCHITECTURE
- NOVA INSTITUTE OF HEALTH TECHNOLOGY, LOS ANGELES
- NOVA INSTITUTE OF HEALTH TECHNOLOGY, ONTARIO
- NOVA INSTITUTE OF HEALTH TECHNOLOGY, WHITTIER
- OHLONE COLLEGE
- OXNARD COLLEGE
- PALO VERDE COLLEGE
- PASADENA CITY COLLEGE
- PATTEN COLLEGE
- PLATT COLLEGE, CERRITOS
- PLATT COLLEGE, LOS ANGELES
- PLATT COLLEGE, ONTARIO
- PORTERVILLE COLLEGE
- PROFESSIONAL SKILLS INSTITUTE
- REEDLEY COLLEGE
- RIO HONDO COLLEGE
- RIVERSIDE COMMUNITY COLLEGE
- SACRAMENTO CITY COLLEGE
- SAINT JOHNS SEMINARY COLLEGE
- SAINT JOHNS SEMINARY
- SAN BERNARDINO VALLEY COLLEGE
- SAN DIEGO CITY COLLEGE
- SAN FRANCISCO STATE UNIVERSITY
- SAN JOAQUIN VALLEY COLLEGE OF LAW

# DRAFT

- SAN JOSE CITY COLLEGE
- SAN JOSE STATE UNIVERSITY
- SANTA ANA COLLEGE
- SANTA MONICA COLLEGE
- SCHOOL OF COMMUNICATIONS ELECTRONICS
- SEQUOIA INSTITUTE
- SKYLINE COLLEGE
- SOUTH BAYLO UNIVERSITY
- SOUTHERN CALIFORNIA COLLEGE OF OPTOMETRY
- SOUTHERN CALIFORNIA INSTITUTE OF TECHNOLOGY
- SOUTHERN CALIFORNIA INTERNATIONAL COLLEGE
- SOUTHWESTERN COLLEGE
- THE NATIONAL HISPANIC UNIVERSITY
- THE UNIVERSITY OF WEST LOS ANGELES
- UNIVERSITY OF CALIFORNIA, BERKELEY
- UNIVERSITY OF CALIFORNIA, IRVINE
- UNIVERSITY OF CALIFORNIA, LOS ANGELES
- UNIVERSITY OF CALIFORNIA, RIVERSIDE
- UNIVERSITY OF LAVERNE
- UNIVERSITY OF PHOENIX, SOUTHERN CALIFORNIA CAMPUS
- VENTURA COLLEGE
- VISTA COLLEGE
- WEST HILLS COMMUNITY COLLEGE
- WEST LOS ANGELES COLLEGE
- WESTERN CAREER COLLEGE
- WHITTIER COLLEGE
- WOODBURY UNIVERSITY

## **COLORADO**

- COMMUNITY COLLEGE OF DENVER
- OTERO JUNIOR COLLEGE
- PUEBLO COMMUNITY COLLEGE
- TECHNICAL TRADES INSTITUTE
- TRINIDAD STATE JUNIOR COLLEGE
- UNIVERSITY OF SOUTHERN COLORADO

## **CONNECTICUT**

- CAPITAL COMMUNITY COLLEGE
- GIBBS COLLEGE
- GOODWIN COLLEGE

## **DISTRICT OF COLUMBIA**

- POTOMAC COLLEGE
- SOUTHEASTERN UNIVERSITY
- STRAYER COLLEGE, TAKOMA PARK CAMPUS
- STRAYER COLLEGE, WASHINGTON CAMPUS
- TRINITY COLLEGE

## **FLORIDA**

# DRAFT

- ART INSTITUTE OF FORT LAUDERDALE
- ATI ENTERPRISES OF FLORIDA
- ATI HEALTH EDUCATION CENTER
- ATLANTIC COAST INSTITUTE
- BARRY UNIVERSITY
- BROWARD COMMUNITY COLLEGE
- CARLOS ALBIZU UNIVERSITY, MIAMI CAMPUS
- CITY COLLEGE, FORT LAUDERDALE
- CITY COLLEGE, SOUTH MIAMI
- FLORIDA COLLEGE OF NATURAL HEALTH, POMPANO BEACH
- FLORIDA COLLEGE OF NATURAL HEALTH, MIAMI
- FLORIDA INTERNATIONAL UNIVERSITY
- FLORIDA METROPOLITAN UNIVERSITY
- FLORIDA NATIONAL COLLEGE
- FMU-ORLANDO COLLEGE
- INSTITUTE OF CAREER EDUCATION
- INTERNATIONAL FINE ARTS COLLEGE
- ITT TECHNICAL INSTITUTE, FORT LAUDERDALE
- ITT TECHNICAL INSTITUTE, MIAMI
- JOHNSON & WALES UNIVERSITY
- JONES COLLEGE
- MIAMI-DADE COMMUNITY COLLEGE
- NATIONAL SCHOOL OF TECHNOLOGY INC, NORTH MIAMI BEACH
- NATIONAL SCHOOL OF TECHNOLOGY INC, HIALEAH
- NATIONAL SCHOOL OF TECHNOLOGY INC, MIAMI
- ORLANDO COLLEGE
- PROSPECT HALL SCHOOL OF BUSINESS
- SAINT JOHN VIANNEY COLLEGE SEMINARY
- SAINT THOMAS UNIVERSITY
- SOUTH COLLEGE
- TRINITY INTERNATIONAL UNIVERSITY
- UNIVERSITY OF MIAMI, GORAL GABLES

## GEORGIA

- AMERICAN INTERCONTINENTAL UNIVERSITY
- ASHER SCHOOL OF BUSINESS EDUCATION CORPORATION
- ATLANTA METROPOLITAN COLLEGE
- AUGUSTA TECHNICAL INSTITUTE
- BAUDER COLLEGE
- BEULAH HEIGHTS BIBLE COLLEGE
- COLUMBUS TECHNICAL INSTITUTE
- DEKALB TECHNICAL INSTITUTE
- DEVRY INSTITUTE OF TECHNOLOGY
- FORT VALLEY STATE COLLEGE
- GEORGIA MILITARY COLLEGE, FORT BENNING
- GEORGIA MILITARY COLLEGE, FORT GORDON CENTER
- GEORGIA MILITARY COLLEGE, FORT MCPHERSON CENTER
- GUPTON JONES COLLEGE OF FUNERAL SERVICE
- HERZING COLLEGE
- INTERACTIVE COLLEGE OF TECHNOLOGY
- INTERDENOMINATIONAL THEOLOGICAL CENTER
- KELLER GRADUATE SCHOOL OF MANAGEMENT INC

# DRAFT

- MACON TECHNICAL INSTITUTE
- SAVANNAH TECHNICAL INSTITUTE
- SPELMAN COLLEGE

## GUAM

- GUAM COMMUNITY COLLEGE
- UNIVERSITY OF GUAM

## HAWAII

- CHAMINADE UNIVERSITY OF HONOLULU
- EDUCATION AMERICA INC.
- HAWAII COMMUNITY COLLEGE
- HAWAII PACIFIC UNIVERSITY
- HEALD COLLEGE SCHOOL OF BUSINESS AND TECHNOLOGY
- HONOLULU COMMUNITY COLLEGE
- INTERNATIONAL COLLEGE AND GRADUATE SCHOOL
- KAPIOLANI COMMUNITY COLLEGE
- KAUAI COMMUNITY COLLEGE
- LEEWARD COMMUNITY COLLEGE
- MAUI COMMUNITY COLLEGE
- UNIVERSITY OF HAWAII, HILO
- UNIVERSITY OF HAWAII, MANOA
- UNIVERSITY OF HAWAII, WEST OAHU
- UNIVERSITY OF PHOENIX
- WINDWARD COMMUNITY COLLEGE

## ILLINOIS

- CAREER COLLEGES OF CHICAGO
- CHICAGO STATE UNIVERSITY
- CITY COLLEGES OF CHICAGO-HAROLD WASHINGTON COLLEGE
- CITY COLLEGES OF CHICAGO-HARRY S TRUMAN COLLEGE
- CITY COLLEGES OF CHICAGO-KENNEDY-KING COLLEGE
- CITY COLLEGES OF CHICAGO-MALCOLM X COLLEGE
- CITY COLLEGES OF CHICAGO-OLIVE-HARVEY COLLEGE
- CITY COLLEGES OF CHICAGO-RICHARD J DALEY COLLEGE
- CITY COLLEGES OF CHICAGO-WILBUR WRIGHT COLLEGE
- DEVRY INSTITUTE OF TECHNOLOGY
- EAST-WEST UNIVERSITY
- INTERNATIONAL ACADEMY OF MERCHANDISING AND DESIGN
- ITT TECHNICAL INSTITUTE, HOFFMAN ESTATES
- ITT TECHNICAL INSTITUTE, MATTESON
- LEXINGTON COLLEGE
- KNOWLEDGE SYSTEMS INSTITUTE
- MCCORMACK THEOLOGICAL COLLEGE
- MORTON COLLEGE
- NORTHEASTERN ILLINOIS UNIVERSITY
- NORTHWESTERN BUSINESS COLLEGE, CHICAGO
- NORTHWESTERN BUSINESS COLLEGE, HICKORY HILLS
- RAVENSWOOD HOSPITAL MEDICAL CENTER-HENRY KUTSCH SCHOOL OF NURSING

# DRAFT

- ROBERT MORRIS COLLEGE
- SAINT AUGUSTINE COLLEGE
- SOUTH SUBURBAN COLLEGE
- TAYLOR BUSINESS INSTITUTE
- THE COLLEGE OF OFFICE TECHNOLOGY

## INDIANA

- MARTIN UNIVERSITY
- SAWYER COLLEGE

## KANSAS

- DONNELLY COLLEGE
- HASKELL INDIAN NATIONS UNIVERSITY

## KENTUCKY

- FUGAZZI COLLEGE

## LOUISIANA

- CAMELOT COLLEGE
- CAMERON COLLEGE
- DELGADO COMMUNITY COLLEGE
- DELTA COLLEGE OF ARTS AND TECHNOLOGY
- LOUISIANA TECHNICAL, BATON ROUGE
- LOUISIANA TECHNICAL, EVANGELINE CAMPUS
- LOUISIANA TECHNICAL, FOLKES CAMPUS
- LOUISIANA TECHNICAL, JUMONVILLE
- LOUISIANA TECHNICAL, SIDNEY COLLIER
- LOUISIANA TECHNICAL, TALLULAH CAMPUS
- LOUISIANA TECHNICAL, WEST JEFFERSON CAMPUS

## MARYLAND

- BALTIMORE CITY COMMUNITY COLLEGE
- CAPITOL COLLEGE
- COLUMBIA UNION COLLEGE
- COPPIN STATE COLLEGE
- PRINCE GEORGES COMMUNITY COLLEGE
- SOJOURNER-DOUGLAS COLLEGE
- WASHINGTON BIBLE COLLEGE

# DRAFT

## MASSACHUSETTS

- BUNKER HILL COMMUNITY
- FRANKLIN INSTITUTE OF BOSTON
- ROXBURY COMMUNITY COLLEGE
- URBAN COLLEGE OF BOSTON

## MICHIGAN

- BAY MILLS COMMUNITY COLLEGE
- DETROIT COLLEGE OF BUSINESS, DEARBORN
- KEWEENAW BAY OJIBWA COMMUNITY COLLEGE
- WAYNE COUNTY COMMUNITY COLLEGE

## MINNESOTA

- FOND DU LAC TRIBAL AND COMMUNITY COLLEGE
- LEECH LAKE TRIBAL COLLEGE
- WHITE EARTH TRIBAL AND COMMUNITY COLLEGE

## MISSISSIPPI

- ANTONELLI COLLEGE, JACKSON
- ANTONELLI COLLEGE, HATTIESBURG
- HINDS COMMUNITY COLLEGE
- MISSISSIPPI DELTA COMMUNITY COLLEGE

## MISSOURI

- SANFORD-BROWN COLLEGE

## MONTANA

- BLACKFEET COMMUNITY COLLEGE
- DULL KNIFE MEMORIAL COLLEGE
- FORT BELKNAP COLLEGE
- FORT PECK COMMUNITY COLLEGE
- LITTLE BIG HORN COLLEGE
- SALISH KOOTENAI COMMUNITY COLLEGE
- STONE CHILD COLLEGE

## NEBRASKA

- LITTLE PRIEST TRIBAL COLLEGE
- NEBRASKA INDIAN COMMUNITY COLLEGE

## NEVADA

- ACADEMY OF MEDICAL AND BUSINESS CAREERS

# DRAFT

## NEW JERSEY

- BERLELEY COLLEGE
- BLOOMFIELD COLLEGE
- ESSEX COUNTY COLLEGE
- GIBBS COLLEGE
- HUDSON COUNTY COMMUNITY COLLEGE
- NEW BRUNSWICK THEOLOGICAL SEMINARY
- NEW JERSEY CITY UNIVERSITY
- PASSAIC COUNTY COMMUNITY COLLEGE
- PHILADELPHIA COLLEGE OF BIBLE
- SAINT PETERS COLLEGE

## NEW MEXICO

- ALBUQUERQUE TECHNICAL VOCATIONAL INSTITUTE
- CROWNPOINT INSTITUTE OF TECHNOLOGY
- EASTERN NEW MEXICO UNIVERSITY, MAIN CAMPUS
- EASTERN NEW MEXICO UNIVERSITY, ROSWELL CAMPUS
- INSTITUTE OF AMERICAN INDIAN ARTS
- ITT TECHNICAL INSTITUTE
- LUNA VOCATIONAL TECHNICAL INSTITUTE
- MESA TECHNICAL COLLEGE
- METROPOLITAN COLLEGE OF COURT REPORTING
- NATIONAL AMERICAN UNIVERSITY
- NAZARENE INDIAN BIBLE COLLEGE
- NEW MEXICO HIGHLANDS UNIVERSITY
- NEW MEXICO JUNIOR COLLEGE
- NEW MEXICO STATE UNIVERSITY, CARLSBAD
- NEW MEXICO STATE UNIVERSITY, DONA ANA
- NEW MEXICO STATE UNIVERSITY, GRANTS
- NEW MEXICO STATE UNIVERSITY, MAIN CAMPUS
- NORTHERN NEW MEXICO COMMUNITY COLLEGE
- PARKS COLLEGE
- PIMA MEDICAL INSTITUTE
- SANTA FE COMMUNITY COLLEGE
- SOUTHWESTERN INDIAN POLYTECHNIC INSTITUTE
- THE ART CENTER
- UNIVERSITY OF NEW MEXICO, GALLUP CAMPUS
- UNIVERSITY OF NEW MEXICO, LOS ALAMOS CAMPUS
- UNIVERSITY OF NEW MEXICO, MAIN CAMPUS
- UNIVERSITY OF NEW MEXICO, TAOS EDUCATION CENTER
- UNIVERSITY OF NEW MEXICO, VALENCIA COUNTY BRANCH
- UNIVERSITY OF PHOENIX, ALBUQUERQUE NM CAMPUS
- WESTERN NEW MEXICO UNIVERSITY

## NEW YORK

- AMERICAN ACADEMY MCALISTER INSTITUTE OF FUNERAL SERVICE
- AUDREY COHEN COLLEGE
- BERKELEY COLLEGE OF NEW YORK CITY
- BORICUA COLLEGE

# DRAFT

- BRYANT AND STRATTON BUSINESS INSTITUTE
- CATHOLIC MEDICAL CENTER SCHOOL OF NURSING
- COLGATE
- COLLEGE OF AERONAUTICS
- COLLEG OF MOUNT SAINT VINCENT
- COLLEGE OF NEW ROCHELLE
- CUNY BERNARD M BARUCH COLLEGE
- CUNY BOROUGH OF MANHATTAN COMMUNITY COLLEGE
- CUNY BRONX COMMUNITY COLLEGE
- CUNY CITY COLLEGE
- CUNY HOSTOS COMMUNITY COLLEGE
- CUNY HUNTER COLLEGE
- CUNY JOHN JAY COLLEGE CRIMINAL JUSTICE
- CUNY KINGSBOROUGH
- CUNY LA GUARDIA COMMUNITY COLLEGE
- CUNY LEHMAN COLLEGE
- CUNY MEDGAR EVERS COLLEGE
- CUNY NEW YORK CITY TECHNICAL COLLEGE
- CUNY QUEENSBOROUGH COMMUNITY COLLEGE
- CUNY YORK COLLEGE
- DEVRY INSTITUTE OF TECHNOLOGY
- DOROTHEA HOPFER SCHOOL OF NURSING-MT VERNON HOSPITAL
- ERIE COMMUNITY COLLEGE
- HELENE FULD SCHOOL OF NURSING
- INSTITUTE OF DESIGN AND CONSTRUCTION
- INTERBORO INSTITUTE
- KATHARINE GIBBS SCHOOL, NEW YORK CITY
- LONG ISLAND COLLEGE HOSPITAL SCHOOL OF NURSING
- LONG ISLAND UNIVERSITY, BROOKLYN CAMPUS
- MACHZIKEI HADATH RABBINICAL COLLEGE
- MERCY COLLEGE
- MONROE COLLEGE, MAIN CAMPUS
- NEW YORK CAREER INSTITUTE
- NEW YORK INSTITUTE OF TECHNOLOGY
- NEW YORK RESTAURANT SCHOOL
- NYACK COLLEGE
- PHILLIPS BETH ISRAEL SCHOOL OF NURSING
- PLAZA BUSINESS INSTITUTE
- SAINT JOSEPHS COLLEGE, MAIN CAMPUS
- SUNY COLLEGE AT OLD WESTBURY
- TAYLOR BUSINESS INSTITUTE
- TECHNICAL CAREERS INSTITUTE
- UNIFICATION THEOLOGICAL SEMINARY
- WOOD TOBE-COBURN SCHOOL

## **NORTH CAROLINA**

- BLADEN COMMUNITY COLLEGE
- EDGECOMBE COMMUNITY COLLEGE
- FAYETTEVILLE TECHNICAL COMMUNITY COLLEGE
- ROANOKE-CHOWAN COMMUNITY COLLEGE
- ROBESON COMMUNITY COLLEGE
- VANCE-GRANVILLE COMMUNITY COLLEGE

# DRAFT

## **NORTH DAKOTA**

- CANDESKA CIKANA COMMUNITY COLLEGE
- FORT BERTHOLD COMMUNITY COLLEGE
- SITTING BULL COLLEGE
- TURTLE MOUNTAIN COMMUNITY COLLEGE
- UNITED TRIBES TECHNICAL COLLEGE

## **OHIO**

- BRYANT AND STRATTON COLLEGE
- EDUCATION AMERICA, REMINGTON

## **OKLAHOMA**

- AMERICAN BIBLE COLLEGE AND SEMINARY
- BACONE COLLEGE
- MOUNT ANGEL SEMINARY

## **OREGON**

- MOUNT ANGEL SEMINARY

## **PENNSYLVANIA**

- COMMUNITY COLLEGE OF PHILADELPHIA
- COMPUTER LEARNING CENTER, PHILADELPHIA
- JNA MARKETING
- LINCOLN TECHNICAL INSTIUTE
- METROPOLITAN CAREER CENTER
- PEIRCE COLLEGE
- PENNSYLVANIA COMMERICAL COLLEGE

## **PUERTO RICO**

- AMERICAN UNIVERSITY OF PUERTO RICO, BAYAMON
- AMERICAN UNIVERSITY OF PUERTO RICO, MANATI
- BAYAMON CENTRAL UNIVERSITY
- CARIBBEAN UNIVERSITY, BAYAMON
- CARIBBEAN UNIVERSITY, PONCE
- CARLOS ALBIZU UNIVERSITY
- COLEGIO TECNOLOGICO DEL MUNICIPIO DE SAN JUAN
- COLEGIO UNIVERSITARIO DEL ESTE
- COLUMBIA COLLEGE, CAGUAS
- COLUMBIA COLLEGE, YAUCO
- CONSERVATORY OF MUSIC OF PUERTO RICO
- ELECTRONIC DATA PROCESSING COLLEGE OF PUERTO RICO, SAN SABASTIAN
- ELECTRONIC DATA PROCESSING COLLEGE OF PUERTO RICO, HATO REY
- ESCUELA DE ARTES PLASTICAS DE PUERTO RICO, SAN JUAN
- HUERTAS JUNIOR COLLEGE
- HUMACAO COMMUNITY COLLEGE

# DRAFT

- ICPR JUNIOR COLLEGE, ARECIBO
- ICPR JUNIOR COLLEGE, HATO REY
- ICPR JUNIOR COLLEGE, MAYAGUEZ
- INTER AMERICAN UNIV OF PUERTO RICO, AGUADILLA
- INTER AMERICAN UNIV OF PUERTO RICO, ARECIBO
- INTER AMERICAN UNIV OF PUERTO RICO, BARRANQUITAS
- INTER AMERICAN UNIV OF PUERTO RICO, BAYAMON
- INTER AMERICAN UNIV OF PUERTO RICO, FAJARDO
- INTER AMERICAN UNIV OF PUERTO RICO, GUAYAMA
- INTER AMERICAN UNIV OF PUERTO RICO, RIO PIEDRAS
- INTER AMERICAN UNIV OF PUERTO RICO, PONCE
- INTER AMERICAN UNIV OF PUERTO RICO, SAN GERMAN
- INTER AMERICAN UNIV OF PUERTO RICO, SCHOOL OF LAW
- INTER AMERICAN UNIVERSITY SCHOOL OF OPTOMETRY
- NATIONAL COLLEGE OF BUSINESS AND TECHNOLOGY, ARECIBO
- NATIONAL COLLEGE OF BUSINESS AND TECHNOLOGY, BAYAMON
- PONCE SCHOOL OF MEDICINE
- PONTIFICAL CATHOLIC UNIV OF PUERTO RICO, GUAYAMA
- PONTIFICAL CATHOLIC UNIV OF PUERTO RICO, MAYAGUEZ
- PONTIFICAL CATHOLIC UNIV OF PUERTO RICO, PONCE
- PUERTO RICO TECHNICAL JUNIOR COLLEGE INC.
- RAMIREZ COLLEGE OF BUSINESS AND TECHNOLOGY
- SAN JUAN BAUTISTA SCHOOL OF MEDICINE
- UNIVERSIDAD ADVENTISTA DE LAS ANTILLAS
- UNIVERSIDAD CENTRAL DEL CARIBE
- UNIVERSIDAD DEL TURABO
- UNIVERSIDAD METROPOLITANA
- UNIVERSIDAD POLITECNICA DE PUERTO RICO
- UNIVERSITY OF PHOENIX, PUERTO RICO CAMPUS
- UNIVERSITY OF PUERTO RICO, AGUADILLA REGIONAL COL
- UNIVERSITY OF PUERTO RICO, ARECIBO CAMPUS
- UNIVERSITY OF PUERTO RICO, BAYAMON TECH UNIV COLLEGE
- UNIVERSITY OF PUERTO RICO, CAYEY UNIVERSITY COLLEGE
- UNIVERSITY OF PUERTO RICO, HUMACAO UNIVERSITY COLLEGE
- UNIVERSITY OF PUERTO RICO, LA MONTANA REGIONAL COLLEGE
- UNIVERSITY OF PUERTO RICO, MAYAGUEZ
- UNIVERSITY OF PUERTO RICO, PONCE UNIVERSITY COLLEGE
- UNIVERSITY OF PUERTO RICO, RIO PIEDRAS CAMPUS
- UNIVERSITY OF SACRED HEART

## **SOUTH CAROLINA**

- COLUMBIA JUNIOR COLLEGE
- ORANGEBURG CALHOUN TECHNICAL COLLEGE
- WILLIAMSBURG TECHNICAL COLLEGE

## **SOUTH DAKOTA**

- OGLALA LAKOTA COLLEGE
- SI TANKA COLLEGE
- SINTE GLESKA UNIVERSITY
- SISSETON-WAHPETON COMMUNITY COLLEGE

# DRAFT

## TENNESSEE

- ITT TECHNICAL INSTITUTE
- SHELBY STATE COMMUNITY COLLEGE
- SOUTHEAST COLLEGE OF TECHNOLOGY

## TEXAS

- AMERICAN COLLEGE OF ACUPUNCTURE AND ORIENTAL MEDICINE
- AUSTIN BUSINESS COLLEGE
- BORDER INSTITUTE OF TECHNOLOGY
- CENTRAL TEXAS COLLEGE
- CEDAR VALLEY COLLEGE
- CENTER FOR ADVANCED LEGAL STUDIES
- COASTAL BEND COLLEGE
- COMMONWEALTH INSTITUTE OF FUNERAL SERVICE
- DEL MAR COLLEGE
- EDUCATION AMERICA, HOUSTON
- EDUCATION AMERICA, GARLAND
- EDUCATION AMERICA, FT WORTH
- EL CENTRO COLLEGE
- EL PASO COMMUNITY COLLEGE
- ESS COLLEGE OF BUSINESS
- HOUSTON COMMUNITY COLLEGE SYSTEM
- HOWARD COUNTY JUNIOR COLLEGE DISTRICT
- INTERNATIONAL BUSINESS COLLEGE
- ITT TECHNICAL INSTITUTE, AUSTIN
- ITT TECHNICAL INSTITUTE, HOUSTON
- K.D. STUDIO
- LAREDO COMMUNITY COLLEGE
- MIDLAND COLLEGE
- MOUNTAIN VIEW COLLEGE
- MTI COLLEGE OF BUSINESS AND TECHNOLOGY, HOUSTON
- OBLATE SCHOOL OF THEOLOGY
- ODESSA COLLEGE
- OUR LADY OF THE LAKE UNIVERSITY, SAN ANTONIO
- PALO ALTO COLLEGE
- SAINT EDWARDS UNIVERSITY
- SAN ANTONIO COLLEGE
- SAN JACINTO COLLEGE
- SOUTH PLAINS COLLEGE
- SOUTH TEXAS COMMUNITY COLLEGE
- SOUTHWEST COLLEGE INSTITUTE FOR THE DEAF
- SOUTHWEST SCHOOL OF ELECTRONICS
- SOUTHWEST TEXAS JUNIOR COLLEGE
- ST MARY'S UNIVERSITY
- SUL ROSS STATE UNIVERSITY
- TEXAS A&M INTERNATIONAL UNIVERSITY, LAREDO
- TEXAS A&M UNIVERSITY, CORPUS CHRISTI
- TEXAS A&M UNIVERSITY, KINGSVILLE
- TEXAS SOUTHMOST COLLEGE
- TEXAS STATE TECHNICAL COLLEGE, HARLINGEN CAMPUS
- THE UNIVERSITY OF TEXAS AT BROWNSVILLE

# DRAFT

- THE UNIVERSITY OF TEXAS AT EL PASO
- THE UNIVERSITY OF TEXAS AT SAN ANTONIO
- THE UNIVERSITY OF TEXAS HEALTH SCIENCE, SAN ANTONIO
- THE UNIVERSITY OF TEXAS OF THE PERMIAN BASIN
- THE UNIVERSITY OF TEXAS, PAN AMERICAN
- UNIVERSITY OF HOUSTON
- UNIVERSITY OF HOUSTON, UNIVERSITY PARK
- UNIVERSITY OF SAINT THOMAS
- UNIVERSITY OF THE INCARNATE WORD
- VICTORIA COLLEGE
- WESTERN TECHNICAL INSTITUTE

## **VIRGIN ISLANDS**

- UNIVERSITY OF THE VIRGIN ISLANDS
- UNIVERSITY OF THE VIRGIN ISLANDS, KINGSHILL

## **VIRGINIA**

- BRYANT AND STRATTON COLLEGE, RICHMOND
- BRYANT AND STRATTON COLLEGE, VIRGINIA BEACH
- COMPUTER LEARNING CENTERS INC., ALEXANDRIA
- STRAYER UNIVERSTIY, ALEXANDRIA
- STRAYER UNIVERSITY, ARLINGTON
- TIDEWATER TECH

## **WASHINGTON**

- HERITAGE COLLEGE
- NORTHWEST INDIAN COLLEGE
- YAKIMA VALLEY COMMUNITY COLLEGE

## **WISCONSIN**

- BRYANT AND STRATTON COLLEGE
- COLLEGE OF THE MENOMINEE NATION
- LAC COURTE OREILLES OJIBWA COMMUNITY COLLEGE