Disposition of Brown University Surplus Property

Introduction
The purpose of this policy is to provide guidance on the proper disposition of surplus University property.

Policy Statement
Property and materials that are purchased with University funds or with grant funds, donated to the University, or acquired for the University through other means, are the property of Brown University and do not belong to specific individuals. The University will dispose of its surplus property in an environmentally and fiscally responsible manner in accordance with local, state and federal regulations.

Definitions
Responsible Department: The University organizational unit that controls and manages the use of the surplus property or materials on behalf of the University.

Surplus Property: Any equipment, furniture, scrap or salvaged materials or other tangible property that is no longer needed by the Responsible Department, regardless of its existing condition or estimated value.

Equipment: Items having a useful life of at least one year with an acquisition cost of $5,000 or more or the current amount established by the government negotiation agreement for indirect costs. (Refer to the Movable Equipment Manual for additional information.)

University Property: Any property or materials purchased with University funds or with sponsored funds, donated to the University or acquired for the University through other means.

Responsibilities
University Departments

- Accurately reflect property inventory by disposing of surplus property according to policy and related procedures.
- For Surplus Property that does not have an asset tag (items valued below $5,000) Responsible Department must keep records of proper disposition. Such records should include information sufficient to document proper sanitizing of computers and electronics.
- Take actions necessary to ready property for disposition, i.e., sanitize computers, label monitor as Universal Waste, etc. See CIS website for guidelines.
- Use furniture trade website, Josiah’s Attic to dispose of unwanted office furnishings. (The surplus disposition form is not required.)
- Complete the surplus disposition form, when required, with department manager approval and submit to surplus@brown.edu prior to any action. The surplus disposition form is required for all lab equipment (regardless of value) and items valued over $5,000 with an asset tag number.
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• Research departments are responsible for evaluating the hazards and decontaminating lab equipment in accordance with all biological, radiation, and hazardous waste procedures. A decontamination form must be completed when necessary to ensure the safety of workers who move the equipment. This work is not appropriate for research administrative staff and should be completed by laboratory trained faculty or staff. If no such lab personnel are available the department shall be responsible for hiring an appropriate and approved contractor in coordination with EHS (e.g., Triumvirate Environmental, Clean Harbors).

• Equipment should not be moved to hallways, stairwells, loading docks or other areas that are not secured by the department. This should help maintain safe fire egress paths and prevent improper handling or movement of equipment prior to completion of a hazard assessment and decontamination.

• Be available to meet with Environmental Health & Safety staff to help locate equipment and ensure that all hazards have been evaluated prior to equipment disposal or transfer.

• Upon Purchasing Department approval, execute a service request with Facilities Management for final disposition or transfer of equipment of office furniture through Josiah's Attic. The Facilities Management charge for removing the surplus items will be the responsibility of the University department claiming the items through the Josiah's Attic website. For items not claimed through the website or that are claimed by a non-profit organization, the department declaring the items as surplus will be responsible for the fee. There is no Facilities Management charge for the pickup of surplus computer items.

• Follow University policies regarding use of University Resources and Assets. Departments are strictly prohibited from gifting or selling surplus materials directly to Brown faculty, staff, students, and other individuals. (See related policies below.)

• When disposing of or re-using computer/mobile devices DCC's should document appropriate sanitizing of items and obtain Department Head signature. Documentation should be kept in the department.

• Maintain copy of completed documents for department records.

Purchasing Services/Controller’s Office

• Provide advice and direction to the community regarding the policy and procedures related to declaring property as surplus and acts as central point of contact for surplus inquiries.

• Facilitate and document the flow of declaration forms through the Purchasing Department, Controller's Office, Environmental Health and Safety, and Facilities Management.

• Execute the Release, Waiver and Transfer of Title form for any disposition involving transfer to
another individual or organization.

- Ensure that the information is complete on the forms (e.g., detailed equipment description, asset tags, serial numbers). Incomplete forms will be returned to the department.

- Notify Facilities Management of property ready for disposition and advise department of document tracking number to be used in the service request process for equipment and items that require use of the Surplus Disposition Form.

- Provide copy of fully executed disposition to the department for their records.

- Maintain records of all surplus equipment for audit purposes. Documentation of final disposition of all surplus equipment (i.e., Completed Service Orders, Disposal Records) should be maintained. Purchasing should ensure that the Facilities Management provides documentation of removal as indicated on surplus form.

- Act as administrator of Josiah's Attic.

- Coordinate the identification of non-profit organizations approved to receive donated items.

**Controller's Office, Property Accounting Specialist**

- Review the Surplus Disposition Form and, through the Office of Sponsored Projects (OSP), ascertain title status and restrictions to disposition, if any.

- If title is held by Brown, acknowledge OSP’s review of the form and generate the appropriate entries for asset accounting. If request is denied, provide rationale for denial to the department and to Purchasing.

- If an item of federally-owned property is declared surplus, the Property Accounting Specialist will request disposition instructions from the appropriate federal agency through OSP. Some private sponsors may also specify retention of title to equipment acquired under a sponsored project. In this case, disposition will be handled as noted for federally-owned items unless specified otherwise in the award document.

- If title is held by other than Brown, notify both University department and Purchasing Services that disposition is pending approval or notification of other action by the external agency. Departments can expect this process to take up to 90 days depending on the agency.

- Respond to external agency recommendations as required.
Remove and/or update items in University Inventory database as appropriate.

**Environmental Health & Safety (EHS)**

- Ensure that the University has met all environmental and safety requirements prior to the final disposition of surplus equipment.
- Department representatives must be available to help perform hazard assessments, particularly in research areas, as follows:
  - Assess environmental and safety conditions for property,
  - Conduct visual inspection of the property with department representative,
  - Determine what action should be taken and by whom to remove hazards,
  - Will affix a Inspected or Decontaminated sticker on research equipment once it is deemed safe for disposal or transfer.
  - Provide assistance as requested by department or Facilities Management.

**Facilities Management (FM)**

- Pick up surplus property from departments and ensure proper disposal.
- Shall only move (for disposal or transfer) research and similar equipment if affixed with Inspected or Decontaminated sticker from EHS or a remediation contractor. This should prevent equipment that contains hazardous materials (e.g., oil) from being placed in a dumpster.
- Will properly segregate metals recycling and e-waste (used electronics) recycling.
- Facilitate pickup of donated items and ensure delivery to proper location.
- Provides documentation of removal as indicated on surplus form to purchasing.
- When surplus is managed as part of an FM Project, the Project Manager must ensure that the surplus policy is followed. The process will commence during the project planning phase and be coordinated within the overall project schedule and account for all cost within the project budget. During the planning phase the list of unwanted furnishings will be developed and
reviewed for possible reuse on other projects. If furnishings are identified for reuse on another project and need to be temporarily stored to accommodate project schedules, the planner or project manager will seek approval from the Director of Design & Construction. Items designated for reuse will transferred in accordance with the surplus policy. For furnishings that are broken, unusable or at the end of useful life and designated for trash, a supplier will be hired for removal and will be required to provide a certificate of disposal.

**Procedures**

In order to properly dispose of University property that is not being transferred or donated, a Surplus Disposition form must be completed for computers or furniture with an acquisition value greater than $5,000 (with an asset tag number) and all equipment and lab equipment items, and sent to Purchasing Box 1845 or email surplus@brown.edu. The Responsible Department must indicate the Inventory Asset Tag Number, location and description of the item on this form.

**Computer Equipment and Used Electronics (Universal Waste)**

Computers, including monitors, CRTs, CPUs, and related components, contain toxic elements such as lead, cadmium, and other heavy metals that are harmful to the environment when improperly disposed. Used electronics must be properly disposed of and include but are not limited to:

- Desktop Computers
- Laptop Computers
- Computer Peripherals
- Computer Monitors
- Scanners
- Printers
- Radios
- Televisions
- Camcorders
- Digital Cameras
- Digital Picture Frames
- Video Cassette recorders ("VC R's")
- Compact Disc ("CD") players
- Digital Video Disc ("DVD") Players
- MP3 Video players
- Game Consoles
- Portable Telephones, including Global Positioning System ("GPS") phones
Stereos, Shredders

Similar computer or electronic related devices once part of a larger piece of equipment that have been detached, removed or unplugged also require recycling as Universal Waste. (e.g., a monitor disconnected from an electron microscope, a cathode ray tube {CRT} pulled from a display device, a car radio removed from the car.)

Computers that were purchased with University funds or grant funds, donated to the University, or acquired for the University through other means are the property of the University and do not belong to specific individuals. The University must manage surplus computers and electronics in an environmentally responsible and fiscally responsible manner that ensures safeguarding of sensitive data and licensed software.

Used computers contain stored data and licensed software that are at risk of unauthorized use. These risks are related to potential violation of software license agreements; unauthorized release of personal information; and inadvertent release of NetID and password combinations, financial information, and computers and used electronics are prohibited from disposal as solid waste in landfills and as scrap metal in conventional recycling programs.

DCC’s should document appropriate handling of computers/electronics to be re-used or donated and obtain Department Head signature. Department must maintain records in order to demonstrate proper handling and disposal.

DCC’s who plan to dispose of computers can choose one of the following three options.

1. Sanitize computers yourself, then initiate the service request to Facilities Management by clicking here. When completing the request, remember to Select Moves in Step 2 (Select Services). Departments are not charged a fee for pickup and/or disposal of surplus computer items from their office.

2. Remove the hard drive from the computer and bring it to CIS service desk and have it crushed. CIS will properly dispose of all crushed hard drives.

3. Initiate a Service Request with Facilities Management (FM). Departments can arrange for FM to pick up surplus items by submitting a service request by clicking here. When submitting the request, remember to select Moves in Step 2 (Select Services). Brown University has an agreement with an outside recycling company for surplus desktop computers, laptop computers and other mixed electronic technology. This recycling company will provide Brown with a sophisticated destruction, and certify that items have been destroyed. Departments would not need to sanitize their own computers if this option is used. FM will pick up the items and deliver the designated surplus to the recycling company’s waystation for destruction. Departments are not charged a fee for pickup and/or disposal of surplus computer items from their office.

If donating or reusing computers, DCC’s are required to sanitize computers (erase data stored on
University computers). All information must be rendered unreadable and unrecoverable through secure erasure or destruction before any form of disposal, recycling or reuse occurs. Donation forms will be required for donations to nonprofit organizations. Departments are expected to maintain disposition records of University computers.

Note: The Surplus Disposition Form is not required for computer equipment unless the item is valued over $5000 and there is a university Asset Tag Number. For items below this value and that are not in the University inventory system, Departments must maintain records.

**Equipment**

Equipment includes but is not limited to items such as refrigerators, freezers, centrifuges, sterilizers, blood counters, lasers, spectrometers and similar equipment must be accompanied by a Surplus Disposition Form, regardless of value. These items may contain Freon, oils, mercury switches, batteries, or other potentially hazardous components. Before disposing of surplus equipment, Responsible Departments must certify that reasonable means have been taken to clean and decontaminate the equipment by removing all materials including but not limited to radioactive materials, biohazardous materials and chemical materials. The Responsible Department should ensure that all hazardous materials have been properly removed and that the equipment has been certified as "decontaminated". This work (cleaning and decontaminating) is not appropriate for research administrative staff and should be completed by laboratory trained faculty or staff. Environmental Health & Safety should be consulted to assist with hazard assessment and hazardous materials removal.

**Furniture**

A website called Josiah’s Attic has been designed to promote recycling and reusing unwanted Brown University owned office furnishings that do not have an inventory tag. To dispose of unwanted Brown University office furnishings, authorized departmental representatives will be required to post the items through Josiah’s Attic. These items will be made available to the Brown Community for University use only, then if unclaimed, will be made available to local approved non-profit organizations for donation. Once the items have posted for the established timeframe noted on the website, departments will be notified with instructions for submitting a service order to move the items. Please be sure to indicate in the service order description that the item has surpassed 30 days on Josiah’s Attic and this is now considered trash.

For furnishings that are broken and unusable, a service order should be submitted for Facilities Management to pick up as trash. Please be sure to indicate in the service order description that the item is trash and will not be posted in Josiah’s Attic. Facilities Management will properly dispose of these items. (Please note that furniture that has an inventory tag requires the use of the surplus disposal form so that they can be removed from the University’s inventory system).

**Vehicles**

The disposal of motor vehicles is the responsibility of the department in cooperation with Purchasing Services, The Office of Sponsored Projects and the Fleet & Equipment Safety Manager. A Surplus Disposition Form is necessary to begin the process.

**Transfer**

To transfer equipment (items with an inventory tag) to another department within the University complete the Inventory Control Form and return to the Property Accounting Specialist.
To transfer an item to another institution when a faculty member/researcher is leaving Brown and is requesting to take equipment with them to their new institution:

Prior to releasing the items the following steps are required:

- Complete a Surplus Disposition Form indicating Transfer as the reason for disposal, send to surplus@brown.edu.

- Attach proof of department/division approval.

- Release, Waiver and Indemnity: A representative from the non-profit organization needs to sign first, then Department Manager, and then the Associate Director of Purchasing.

- Note: Computers need to be sanitized before it is transferred to an educational institution outside of Brown University (if item is being transferred to another institution for continued work on a specific project, it may be appropriate to keep the data and remove Brown's software).

- Please visit the Property Management Manual for specific instructions on the transfer of a lab or item to another institution.

**Donations**

Purchasing Services partners with Brown’s Office of Government Relations and Community Affairs (GRCA) to identify local non-profit organizations to receive donated items. The University has identified, as a priority, providing support to Providence Public Schools. Items available for donation are offered to organizations identified through GRCA with a focus on Providence Public Schools and local organizations.

Donations of office furnishings (items with no inventory tag) are handled through the Josiah’s Attic website.

Donations of any other equipment or property require the following steps:

- Submit the Surplus Disposition Form so that it can be properly reviewed by the Property Accounting Specialist, EHS and Purchasing Services.

- Release, Waiver and Indemnity: A representative from non-profit organization needs to sign first, then Department Manager, and then the Associate Director of Purchasing.

- Donation of Brown University Property to a Non-Profit Organization Form signed by the Department Chair or Director.

- 501 (C) (3) This is documentation of non profit status.
Computers must be sanitized by department DCC before being donated.

Forms/Instructions
- Surplus Disposition Form
- Donation of Brown Property Form
- Release & Waiver for Transfer
- Inventory Control Form
- Universal Waste Monitor Labels
- EHS Decontaminating Laboratory Equipment Form
- Movable Equipment Manual

Related Policies
- CIS Electronic Equipment Disposition Policy
- CIS Data Removal Recommendations
- Conflict of Interest and Commitment
- General Conditions of Employment
- Fiscal Misconduct Policy & Procedures

Policy Owner
Approved by Director of Insurance & Purchasing Services

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