

Divisions: All Divisions	Policy Number 179.10.08
Subject: DISPOSAL OF PROTECTED HEALTH INFORMATION (PHI)	
Approved: Executive Director	
Approved: Associate Director	
Approved: CADE BOD	
Effective Date: April 14, 2003	
Review Dates:	
Revised Dates:	

Purpose

The purpose of this policy is to provide management and workforce members with the procedures for the proper disposal of protected health information.

Policy

It is the duty of Center for Advanced Dental Education to protect the confidentiality and integrity of confidential Dental information as required by law and professional ethics. Protected health information may only be disposed of by means that assure that it will not be accidentally released to an outside party. Management must assure that appropriate means of disposal are reasonably available and operational. This policy is to define the guidelines and procedures that must be followed when disposing of information containing PHI.

Procedures

Summary of Disposal Policy

All personnel must strictly observe the following standards relating to disposal of hardcopy and electronic copies of PHI:

PHI must not be discarded in trash bins, unsecured bags, or other publicly-accessible locations. This information must be personally shredded or placed into secure recycling containers for proper disposal of confidential documents.

Printed material and electronic data containing PHI shall be disposed of in a manner that ensures confidentiality.

It is the individual’s responsibility to ensure that the document has been secured or destroyed. And it is the office manager and supervisor’s responsibility to ensure that all employees are adhering to the policy.

Destruction of Convenience Copies and Original Documents (Day-to-Day Destruction)

1. Center for Advanced Dental Education management and supervisor(s) shall provide users with access to shredders or secured recycling containers for proper disposal of confidential printouts containing PHI.
2. Users may elect to use shredders or use secure recycle containers for later destruction of convenience copies, as long as the destruction is in accordance with this policy.

Electronic Copies

1. Secure methods will be used to dispose of electronic data and output. Any questions of appropriateness of action or carrying out of this procedure should be brought to the attention of the Center Compliance Office, Privacy Officer, or Security Officer. Disposal of electronic data may consist of the following methods:

- a. Deleting on-line data using the appropriate utilities;
- b. “Degaussing” computer tapes to prevent recovery of data;
- c. Removing PHI from mainframe disk drives being sold or replaced, using the appropriate

initialization utilities;

- d. Erasing diskettes or disk drivers to be re-used using a special utility to prevent recovery of data;
or
- e. Destroying discarded diskettes, CDs, or other removable data forms.

Hardcopy (Bulk Destruction)

- 1. Secure methods will be used to dispose of hardcopy data and output.
- 2. PHI printed material shall be shredded and recycled by a firm specializing in the disposal of confidential records or be shredded by an employee of Center authorized to handle and personally shred the PHI.
- 3. Microfilm or microfiche must be cut into pieces or chemically destroyed.
- 4. After documents have reached their retention period, all PHI must be securely destroyed.
- 5. If hardcopy PHI (paper, microfilm, microfiche, etc.) cannot be shredded, it must be incinerated.

Documentation of Destruction

- 1. To ensure successful destruction is performed, Center personnel or a bonded destruction service must carry out the destruction of PHI.
- 2. If a bonded shredding company undertakes the destruction, the bonded shredding company shall provide Center for Advanced Dental Education with the document of destruction that contains the following information:

Date of destruction,

Method of destruction,

Description of the disposed records,

Inclusive dates covered,

A statement that the records have been destroyed in the normal course of business,

The signatures of the individuals supervising and witnessing the destruction

Enforcement

It is the duty of management and all workforce members to enforce this policy. Individuals who violate this policy are subject to disciplinary action.