

PROPER DISPOSAL OF PROTECTED HEALTH INFORMATION

The University of Chicago Medical Center (UCMC) strives to ensure the privacy and security of all patients' protected health information (PHI). PHI may be disposed of if the applicable retention period has passed and in a secure manner. Remember, PHI is more than just the patient's name – it is all information related to the patient, including the patient's image, medical condition, medical record number, appointment date and time, home or business address, telephone number, or email address.

All destruction/disposal of PHI will be in accordance with applicable federal and state law and UCMC policy. Please follow the below guidance when it is appropriate to dispose of PHI.

PAPER

Written material which contains protected health information (PHI) or other confidential information (i.e. financial) must be disposed of in a manner that will ensure this information's confidentiality.

Examples of documents/items on which PHI may appear are:

- Patient encounter forms and labels
- Printouts from IS systems containing PHI (e.g. EKG Strips)
- Clinical notes
- Index cards or worksheets with patient information
- Lab order forms and requisitions
- Appointment schedules
- Census reports, patient logs
- Photocopies of patient insurance cards
- Patient meal tickets/order slips
- Patient information on Post-It notes, personal reminders, etc.
- Emails, memos, telephone call logs, and communications

General guidelines on proper disposal of such documents are below:

1. All document retention standards must be followed.
2. Individuals should not destroy, alter, or discard any information which may be subject to government investigations, audit, subpoenas, and search warrants. Standard document disposal policies and destruction procedures should be immediately suspended once there is notification that the documents are part of a government investigation, or a subpoena or search warrant has been served. Contact the UCMC Legal Affairs Office at 2-1057 with questions.
3. Individual departments and clinics should have a sufficient number of locked shredding containers. To obtain a container for your area or to change the frequency of pickup, please contact the UCMC Environmental Services (EVS) Department at (773) 702-6296.
4. PHI must not be discarded in wastebaskets, recycling bins or other accessible locations. Such information must be personally shredded or placed in a designated locked shredding container.

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5. Do not place PHI or other confidential information in recycling bins. If you must use a "temporary gathering box" before transporting PHI to the locked shredding container, please make sure it is in a secure area, always in close proximity to UCMC personnel, and is clearly marked with a "to be shredded" sign (available via the HIPAA online Best Practices Library). ***Using blue recycling bins increases the chance that PHI will be recycled instead of shredded.***
6. Do not stuff the locked shredding containers with PHI so that the items are sticking out of the open drop slot. These documents are easily accessible to unauthorized individuals, therefore increase the chance of violating a patient's privacy and confidentiality. If a locked shredding container is overflowing, please contact the EVS Department for assistance.

ELECTRONIC MEDIA

If you have PHI on electronic media, it must be disposed of properly when no longer needed for legitimate use. Electronic media includes, but is not limited to:

- computers (desktop and laptop)
- floppy disks
- backup tapes
- CD-ROMs
- zip drives
- portable hard drives
- flash memory
- fax machines
- department issued digital cameras
- medical equipment (EKG and EMG machines)

NOTE: Disposal of electronic media containing PHI must be tracked and logged. Please contact the Chicago Biomedicine Information Services (CBIS) Help Desk at 2-3456 for assistance.

1. A limited number of Floppy disks and/or CD-ROMS may be disposed in a designated locked shredding container. However, if you have a large quantity, please contact the EVS Department for assistance.
2. To discard a UCMC Computer (Compaq or Hewlett-Packard) or a BSD Computer (Dell), contact the CBIS Help Desk at 2-3456.
3. Do not go through the NSIT Computer Recycling Program to dispose or donate UCMC/BSD computers.

DO NOT PLACE COMPUTERS IN THE MEDICAL CENTER'S BASEMENT FOR DISPOSAL.

LEAVING THEM IN THE BASEMENT WITHOUT REMOVING PHI POSES A RISK TO PATIENTS AND UCMC. CONTACT THE CBIS HELP DESK (2-3456) FOR ASSISTANCE.

ENVIRONMENTAL SERVICES (EVS) IS HERE TO HELP

If you need assistance with the disposal of materials containing PHI, please contact:

Environmental Services (EVS) – (773) 702-6296

- Ordering and/or adjusting the pick up schedule of locked shredding containers
- Pick-up for bulk waste containing PHI
- Diskettes and CD-ROMs (Bulk Quantity)
- Unattended bags of paper for shredding