Proper Disposal of Protected Health Information

The University of Chicago Medicine 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 and disposal of PHI must be made in accordance with applicable federal and state law and UCM policy. Please follow the below guidance when it is appropriate to dispose of PHI.

PAPER

Paper includes written material which contains protected health information (PHI) or other confidential information (i.e. financial). Examples of paper documents on which PHI may appear are:

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

General guidelines for proper disposal of such paper documents:
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, search warrants, etc. Standard document disposal policies and destruction procedures are immediately suspended once there is notification that the documents are part of a government investigation, a subpoena, or a search warrant has been served. Contact UCM Legal Affairs Office at 773-702-1057 with questions.
3. Individual departments and clinics should ensure there are a sufficient number of locked shredding containers available. To obtain a container for your area or to change the frequency of pickup, please contact the UCM Environmental Services (EVS) Department at (773) 702-6296.
4. Paper documents with PHI should never be discarded in wastebaskets, recycling bins or other accessible locations. This must be personally shredded or placed in a designated locked shredding container.

5. Do not place PHI or other confidential information in recycling bins. Using blue recycling bins increases the chance that PHI will be recycled instead of shredded. If you must use a “temporary gathering box” before transporting PHI to the locked shredding container, please ensure it is in a secure area, always in close proximity to UCM personnel, and is clearly marked with a “to be shredded” sign.

6. Do not stuff the locked shredding containers with PHI so that the items are sticking out of the open drop slot. These documents could be easily accessible to unauthorized individuals and 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 a legitimate use. Electronic media includes, but is not limited to:

- Computers (desktop and laptop)
- Portable electronic devices (tablets, phones, etc.)
- Portable hard drives
- Thumb drives or other flash memory
- Backup tapes
- Fax machines
- Copy machines
- CDs
- Department issued digital cameras
- Medical equipment (EKG and EMG machines)

Disposal of electronic media containing PHI must be tracked and logged. Please contact the Chicago Biomedicine Information Services (CBIS) Help Desk at 773-702-3456 for assistance.

1. CDs may be disposed of in designated locked shredding containers. However, if you have a large quantity, please contact the EVS Department for assistance.

2. To discard a UCM or BSD Computer you should always contact the CBIS Help Desk at 773-702-3456.

3. Do not place computers or portable electronic devices, medical equipment, fax or copy machines, etc. in the medical center’s basement for disposal. Leaving them in the basement without removing PHI poses a risk to patients and UCM.

Any questions/comments/concerns please feel free to reach out to the Privacy Program at:

773-834-9716 or hpo@bsd.uchicago.edu