

Procedure 1609 PR.01

Disposal of Media Containing Confidential or Protected Health Information

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Disposal of Media Containing Confidential or Protected Health Information

Overview

When use or retention of any media containing confidential information (including protected health information) is completed, the confidential information must be destroyed, rendered unrecoverable, or returned to the system owner.

Disposal of Paper Media

The primary means of disposal of paper media containing confidential information is via shredding. All such media should be deposited in designated, locked boxes for shredding or otherwise kept secure until shredded.

If an outside vendor is employed, the shredding services must implement a process that maintains the security of the contents from pick up within the organization to the point of destruction.

Recycle bins are not to be used for confidential information as the process to dispose of this material does not guarantee security from point to point.

Re-use or Disposal of Electronic Media

The primary means for electronic media *reuse* is zeroing, or degaussing and the primary means for electronic media *disposal* is zeroing, degaussing, or physical destruction, as applicable to the medium.

Deleting data or reformatting the disk is NOT sufficient under the following circumstances:

1. If electronic media contains electronic Protected Health Information or other confidential information, the hard disks must be zeroed or degaussed before the computing device is recycled to another user and/or before it is taken out of service at the University (redeployment, donation, selling, or recycling).
 - Zeroing uses a disk utility (e.g., Data Removal Service software) to write "zero" to all areas of a disk, thereby overwriting any data that may be on the disk. Zeroing is required rather than simply formatting or initializing the disk which simply marks the disk as blank, so that it only appears empty - other disk utilities are available that can "unformat" the disk and recover the data, so formatting/reformatting is not an acceptable practice.
 - Degaussing or demagnetizing is a procedure that reduces the magnetic flux on the disk to virtual zero by applying a reverse magnetizing field. Degaussing a magnetic storage medium removes all the data stored on it.

In general, other electronic media (DVD, CD, diskette, zip drive etc.,) must be physically destroyed to be rendered unreadable.

For instructions on proper disposal of electronic media, call the Help Desk at (203) 432-9000.

Disposal of Media in Other Formats that Contains Protected Health Information

Disposal of other media varies with the nature of the item and the material.

- To the extent possible and practical, material containing patient identification that cannot be removed from the material to which it is affixed should be given to the patient to take home. This would include the patient's wrist band, prescription bottles, etc.
- Material that is reusable for the individual patient, such as embosser plates should be filed in the patient's medical record.
- Material that is reusable, such as some IV preparations and prescription bottles, can have either an opaque label placed on top of the original label (recording any pertinent information on the new label, such as data of contents expiration), or Protected Health Information obliterated with a non-water soluble black marker.
- Material that is not reusable and contains any chemical or biological substance must be disposed of according to any appropriate hazard or bio-hazard waste process.
- The Radiology Department is responsible for the disposal of x-ray film.

For guidance on the disposal or re-use of any material not covered in this procedure or about which any University employee is uncertain, contact the Chief Privacy Officer.

The official version of this information will only be maintained in an on-line web format. Any and all printed copies of this material are dated as of the print date. Please make certain to review the material on-line prior to placing reliance on a dated printed version.
