

BC 6.920 – DISPOSAL OF CONFIDENTIAL HARDCOPY (paper) INFORMATION

POLICY:

Baystate Health considers all hardcopy/paper PHI and sensitive business information confidential and will be disposed of in approved recycle bins or shredded when there is no access to approved recycle bins. These bins may be used to dispose of all recyclable paper, but must, at a minimum, be used for confidential material. In addition, obsolete plastic addressograph cards will be disposed of in bio-hazard needle boxes, when such boxes are available. Otherwise addressograph cards may be disposed of using the same procedures as that for IV bags and plastic medicine vials, which may be disposed of in the normal trash unless more secure destruction methods are available.

PURPOSE:

To ensure that all discarded PHI and sensitive business information are disposed of in a manner which protects privacy and confidentiality.

SCOPE:

This policy covers all BH departments generating paper PHI and sensitive business information. Also, this policy covers computer printed documents, handwritten messages and notes, faxes, etc. and plastics that contain PHI or sensitive business information. A separate policy addresses the disposal of confidential information in electronic formats such as diskette, hard-drive, CDs, DVDs, videotapes (movies), etc.

PROCEDURE:

1. Springfield area Managers (BMC, 3300 Main St. VNAH, etc) will coordinate with the BMC Director of Environmental Services the proper method of disposal for their specific areas. At MLH disposal services are coordinated by the Manager of Food and Environmental Services and at FMC by the Manager – Environmental Services.
2. Where bins are used, Environmental Services management will allow keys to be left with managers upon request only when managers can provide evidence showing that large quantities of material must regularly be disposed of in such quantity that use of the slot would not be practical and when such bins are kept in secured areas.
3. Bins will remain locked (unless otherwise authorized by the Environmental Services management) and in a secure location pending pickup by the authorized vendor. Locally shredded materials may be disposed of with ordinary trash.

4. Departments will coordinate with Environmental Services, the location of the approved bins considering ready access, such as a central collection point, for staff and the vendor.
5. Each bin will be assigned to a department manager who will ensure that the contents are protected through close monitoring and also report to Environmental Services when a bin has reached its full capacity.
6. Environmental Services or the vendor will routinely empty these recycle bins and handle the contents in a confidential manner.
7. Environmental Services is the only department authorized to contract for recycle bins. Individual departments may not contract for shredding services, unless authorized by Environmental Services.
8. The vendor shall ensure destruction of these materials by providing certification of each pick-up. Certifications of destruction will be maintained by Environmental Services.

CROSS REFERENCE:

Disposal or Re-Use of Electronic Media – BC 6.930

		Date:
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