

CHELAN-DOUGLAS RSN/PHP POLICY AND PROCEDURE MANUAL		Chapter:	1.4.2.9
Title:	HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT	Page:	1 of 3
		Date Effective:	April 14, 2003
Subject:	Disposal of PIHP	Date Revised:	April 14, 2003
		Date Revised:	June 1, 2009
		Authorizing Signature:	

AUTHORITY: Authorizing Source: RCW 70.02 45 CFR 165 (HIPAA)

SCOPE: This policy applies to Chelan-Douglas Regional Support Network/Prepaid Health Plan (CDRSN/PHP) and its contractors (agencies/providers), and subcontractors (referred to as contractors or agencies or providers throughout this policy).

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

DEFINITIONS: See 1.3.2.0

POLICY: The Chelan-Douglas Regional Support Network has a duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and applicable state and federal law. PIHP 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 PIHP.

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

PIHP must not be discarded in trash bins, unsecured recycle bags or other publicly accessible locations. Instead this information must be personally shredded or placed in a secured bag or box for delivery to the shredding service.

Printed material and electronic data containing PIHP 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. It is the office manager and Privacy Officer/designee's responsibility to ensure that all employees are adhering to the policy.

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

1. The Chelan-Douglas Regional Support Network's office manager and/or Privacy Officer/designee shall provide users with access to shredders for proper disposal of confidential printouts containing PIHP.
2. If amount to be shredded is extensive, a shredding service under contract and Business Associate agreement may be utilized.

Electronic Copies

1. Secure methods will be used to dispose of electronic data and output. IS/IT Specialist is responsible for the destruction of electronic copies containing PIHP using the following methods:
 - a. Deleting on-line data using the appropriate utilities;
 - b. "Degaussing" computer tapes to prevent recovery of data;
 - c. Removing PIHP from mainframe disk drives being sold or replaced, using the appropriate initialization utilities;
 - d. Erasing diskettes to be re-used using a special utility to prevent recovery of data; or
 - e. Destroying discarded diskettes.

Hardcopy (Bulk Destruction)

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

Documentation of Destruction

1. To ensure that it is in fact performed, Chelan-Douglas Regional Support Network personnel or a bonded destruction service must carry out the destruction of PIHP.
2. If a bonded shredding company undertakes the destruction, the bonded shredding company must provide the Chelan-Douglas Regional Support Network 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
3. The bonded shredding company must provide the Chelan-Douglas Regional Support Network 's Privacy Officer with a Certificate of Destruction.

ENFORCEMENT Office manager(s) and all workforce members are responsible for enforcing this policy. Individuals who violate this policy are subject will be subject to disciplinary action.

SEE ALSO: Administrative requirements – documentation retention