This newsletter is one in a series that provides general information on key components of the HIPAA Privacy and Security Regulations. More detailed information and policies are available on the MCW HIPAA website. In this newsletter we’ll cover retention and disposal of Protected Health Information (PHI).

**Retention**
All MCW patient records are retained indefinitely. This applies to all MCW medical records, including the MCW central outpatient record and medical records maintained by Departments.

**Disposal Policy**
Patient-identifiable information belonging to MCW must be disposed of in a confidential manner. Wisconsin law prohibits medical businesses from disposing of any records that contain personal medical information, regardless of medium, without taking one of the following steps:

1. Shredding the record before disposal;
2. Erasing the personal information contained in the record before disposal;
3. Modifying the record to make the personal information unreadable; or
4. Taking actions that the entity reasonably believes will ensure that no unauthorized person will have access to the personal information contained in the record for the period between the record’s disposal and its destruction.

**Disposal Procedure**
Paper documents that contain patient identifiable information belonging to MCW should be confidentially disposed of in one of the following ways:

1. A locked recycling receptacle; or
2. A paper shredder.

You should check with your Supervisor to determine how to specifically dispose of such information properly in your clinic/department.

Any disposal of medical records must be consistent with the retention requirement detailed above.

**Disposal Process for Thermal Rolls, Videotapes and Old Films**
The used thermal printer label rolls, videotapes and old films should be placed in an interdepartmental envelope with the appropriate label of “To: MCW Medical Records” and the purpose: “Thermal Printer Label, Videotapes, or Old Film Disposal”. Both FH HIM (Health Information Management) and MCW Medical Records (MR) staff will pick up the appropriately labeled interdepartmental envelopes from those clinic/department areas that are currently on an established pick up route. For those clinics/departments not on an established pick up route, the interdepartmental envelopes should be sent via interdepartmental mail. FH HIM staff will be responsible for delivering any of these interdepartmental envelopes from their routes to MCW MR. The MCW MR staff will be responsible for emptying the interdepartmental envelopes with the used thermal rolls, videotapes or old films into the confidential disposal bins located in the East (Pavilion basement level room B026) and West (West Clinic lower level Room 1536) MCW Medical Records rooms.

For Dynacare Lab sites, the Dynacare Transporter will take any “used thermal printer rolls” in a labeled interdepartmental envelope, to MCW East MR location. (Contact- Sally Ranthun: Manager Processing/Hospital Phlebotomist ext 57651). For off site clinics including Sargent, Lincoln, Tosa Center, Sunny Slope and the WAC, the procedure is the same; however the MCW courier will pick up the interdepartmental envelopes and deliver them to MCW Clinic Operations who will in turn deliver them to MCW Medical Records.

For off site clinics without service by MCW courier (i.e. Eye Clinic Pewaukee, Spine Care Oconomowoc), staff are to use the United States Postal Service to send used thermal rolls, video tapes and old films to MCW Medical Records c/o MCW Clinic Operations, FEC Rm 1996, 9200 W Wisconsin, Wauwatosa, WI 53226. Label the outside envelope “Confidential”, inside place the thermal roll, video tape or old films in another envelope marked “used thermal printer roll, video tape, or old film”.

**HIPAA PRIVACY TIP:**
Documents discarded in the “blue or gray recycling bins” are not necessarily shredded. You should inquire with your Supervisor whether the contents are shredded prior to disposing of any confidential documents in these bins. Your area may have other designated bins or an alternate process for ensuring confidential information is shredded.

YOU CAN REFERENCE ADDITIONAL INFORMATION ON HIPAA PRIVACY AND SECURITY AT:
The MCW HIPAA website: [http://infoscope.mcw.edu/display/router.asp?docid=7961](http://infoscope.mcw.edu/display/router.asp?docid=7961)