



VI. POLICY

UMDNJ Schools, Units, Departments and University owned or operated facilities shall appropriately protect the privacy of health information that can identify an individual in compliance with federal and state law. UMDNJ will act responsibly in the maintenance, retention and eventual destruction and disposal of all material containing PHI.

The destruction and disposal of PHI will be carried out in accordance with HIPAA regulations and University policy. All PHI will be destroyed in a manner in which it cannot be recovered or reconstructed. Medical records will be maintained and destroyed in accordance with the University policy, Records Management, 00-01-10-50:00.

VII. PROCEDURE

- A. The destruction/disposal of all PHI will be accomplished by shredding, incineration or other comparable fashion that ensures that the PHI cannot be recovered or reconstructed. Material that has been destroyed must be stored in a secure container or receptacle, which is not in a publicly accessible location, until such time that the material is collected by Housekeeping Services or outside agency responsible for trash collection.
- B. Until such time as destruction/disposal of PHI is permissible, all PHI will be secured against unauthorized or inappropriate access.
- C. If utilizing an outside agency for destruction/disposal of PHI, a contract and a business associate agreement must be executed between UMDNJ and the outside agency. The contract must provide that upon termination of same, the agency will return or destroy/dispose of all PHI, including proof of destruction/disposal and the methodology by which the material was destroyed.

By Direction of the President:

---

Vice President for Legal Management