

SAMPLE FACILITY ASSESSMENT TOOL CONFIDENTIAL PAPER DISPOSAL

Objective: *To assess and minimize the risks of confidential document disposal and destruction in a manner that promotes environmental responsibility that is fiscally responsible and sustainable.*

***ALL TRASH LEAVING MEDICAL FACILITY SHOULD BE CONSIDERED AS
CONFIDENTIAL***

POLICIES AND PROCEDURES

POLICY:

- *Develop a Confidential Material Handling Policy and procedure that includes:
 - Confidential Waste Handling and Disposal Policy
 - Provisions to ensure all staff are properly trained (including orientation and annually),
 - Confidential material handling responsibilities are included in personnel policies and staff job descriptions*
- *Ensure all staff have a copy of the Confidential Waste Handling and Disposal Policy*
- *Using the HIPAA PHI (personal health identifiers) definitions, develop list of paper materials that should be included on the list of acceptable materials to include in collection containers.*

DEVELOP POLICIES AND PROCEDURES THAT INCLUDE WASTE MINIMIZATION:

- *When you are considering process options for the collection of confidential materials for disposal, assess probable levels of staff compliance. Variables to consider include:
 - Staff access to multiple bins for confidential and non-confidential materials
 - Ability to easily determine category of confidentiality
 - Ability of staff to understand waste handling processes enough to understand disposition of all waste streams.*
- *If you are not confident that all confidential materials are going into designated containers, consider collecting ALL paper in a commingled fashion that will be treated as confidential. This will more than likely improve compliance and will definitely increase the amount of paper collected for recycling.*
- *Consider including recycling as the preferred disposal "option" as a strategic and integral part of your confidential document disposal program?*

Edited from Kaiser Permanente – Facility Assessment Tool

CONFIDENTIAL PAPER AUDIT TRAIL - CHAIN OF CUSTODY

INTERNAL CHAIN OF CUSTODY

POINT OF ORIGIN - CONTAINER ASSESSMENT

	<p>Area has public access but staffed most of the time – May require receptacle with lid:</p> <ul style="list-style-type: none"> • Exam Rooms • Waiting Rooms • Nurses' Stations • Offices with public visitors
	<p>Area has public access but unstaffed and potentially unsecure – May require a locked receptacle but assess risk first:</p> <ul style="list-style-type: none"> • Corridors • Copy Centers • Central holding areas for paper collection • Conference Rooms • Other:
	<p>Area does not have public access – Open Container OK</p> <ul style="list-style-type: none"> • Pharmacies • Most offices • Medical Records • Laboratory
	<p>Document Destruction at Point of Origin* – Assess level of confidentiality, access and security risks</p> <ul style="list-style-type: none"> • Human Resources • Financial Offices - payroll • Medical Records • Research

NOTES:

- Generators are responsible for security of confidential materials and the security of containers in their areas. Continuous assessments should be done and changes to container type made accordingly.
- Container placement is critical for compliance at point of origin. Ensure ALL staff have adequate access to paper collection bins (or confidential paper will end up in the trash).
- LABELING –
- CHOOSING A CONTAINER

COLLECTION AND TRANSPORTATION

- Assess paper collection schedule to assess proper bin size and is frequency or time of collection will affect security assessment.
- Are bags tied securely at point of collection?
- Are tied bags left in hallway or behind building to accumulate before transport to compactor/waste bin? If yes, assess holding area security. Ensure generator does not place trash in the hallway or corridor
- Are cans/carts with waste ever left unattended? If yes, reconsider collection and interim storage procedures and whether containers or holding areas should be locked..

NOTES:

- *Environmental Services staff and transporters are responsible for maintaining the paper collection systems in place that maximizes document security. They can also help identify problem areas where security issues might be breached (bags in hallways).*
- *Clear bags are often preferred to do visual inspections of waste or recycling. Confidentiality issues should not prevent the use of clear bags but may make the assessment of procedures of material removal and hauling to trash/recycling area more relevant.*

PRIMARY CONTAINMENT AREA (typically the trash dock):

- _____ • *Is waste containment area gated & securely locked? If yes, then unlocked containers may be okay*
- _____ • *If not, is the receptacle a compactor? If Yes then ok*
- _____ • *If not, receptacles should be locked.*
- _____ • *Does the waste collection container have a lid? (open roll-offs are unacceptable)*
- _____ • *Are any temporary waste bins used? If so, they should be covered and locked.*

NOTES:

- *Facilities and/or Environmental Services staff are responsible for maintaining the paper collection systems in place that maximizes document security*

EXTERNAL CHAIN OF CUSTODY:

LEASED SPACE WITH JANITORIAL CONTRACTS:

- _____ • *Include contract language to hold vendors and contractors accountable to facility corporate confidential waste policy.*
- _____ • *If security cannot be ascertained, generator must pursue alternate means of ensuring secure waste/paper disposition .*
- _____ • *In such situations, can confidential waste be separated and transferred to main facility?*

DUE DILIGENCE/SITE AUDITS OF WASTE/RECYCLING FACILITY:

- _____ • *Examine all waste handling/recycling contracts.*
- _____ • *Contracts should have language to hold suppliers to facility's Confidential Waste policies.*
- _____ • *Ensure vendor will provide "certificates of destruction"*
- _____ • *Put in place mechanism to track vendor compliance.*
- _____ • *Conduct due diligence visits (audits) to transfer stations and processing facilities*
- _____ • *Ensure un-shredded paper being transported to a shredding and/or recycling facility is "secure." Perform a paper trail audit of the paper leaving your facility to the point of destruction or at least to a point where secure management is confirmed.*

NOTES:

- See Due Diligence Policy
- See sample Certificate of Destruction