

CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION  
CALIFORNIA CORRECTIONAL HEALTH CARE SERVICES  
Health Care Department Operations Manual

**5.5.13 Confidential Information Destruction**

**(a) Policy**

- (1) California Correctional Health Care Services (CCHCS), Division of Juvenile Justice (DJJ) and Division of Health Care Services (DHCS) employees shall protect the confidential information of its contractors, staff, and patients and shall comply with State and federal regulations to protect/destroy such information when discarded.
- (2) Proper adherence to these guidelines provides an enterprise-wide approach for document management and destruction and helps to protect and reduce risk to contractors, staff, and our patients. In addition, all information for confidential destruction must comply with all CCHCS and State Administrative Manual requirements including, but not limited to, adherence to document retention practices. Failure to adhere to the requirements within the policy may result in disciplinary action.

**(b) Purpose**

To outline the official Confidential Information Destruction policy of CCHCS and provide a guideline to all staff regarding acceptable methods for destroying discarded information in order to protect confidential information (e.g., Personally Identifiable Information, Protected Health Information).

**(c) Applicability**

All CCHCS, DHCS, DJJ, California Department of Corrections and Rehabilitation staff, and contractors at the headquarters facility and regional offices are required to adhere to this policy.

**(d) Procedure**

**(1) Key to the Confidential Bins**

- (A) The vendor shall provide a key to the locks for all confidential bins in the facility to the Business Operations Section (BOS). The key shall not be shared with any other staff and shall be engraved or otherwise marked to identify it is the key to the confidential bins.
- (B) The key shall be kept in a secure, locked location within BOS, accessible only to authorized staff.
- (C) If the key to the confidential bins is lost, the BOS shall arrange for the lock to all confidential bins to be re-keyed by the vendor and for a new key to be issued.

**(2) Confidential Bins**

- (A) Confidential bins shall only be opened by an authorized BOS staff or vendor representative.
- (B) Location of confidential bins shall be according to volume of waste generated and available space within each building.
- (C) Confidential bins are located on each floor in every building.
- (D) Confidential bins shall not be moved from their designated locations.

**(3) Confidential Shredding Chain of Custody**

- (A) Staff shall deposit their documents to be destroyed into a locked confidential bin.
- (B) Paper shall be separated from items that are not considered confidential information. For example, if a binder has 50 sheets of paper and only four sheets of paper are considered confidential, only those four sheets shall be placed in the confidential bins. The remaining sheets of paper shall be deposited in the recycle bin.
- (C) Items that should **not** be placed into the bins include, but are not limited to, the following:
  1. Newspapers
  2. Magazines
  3. Boxes
  4. Cardboards
  5. Plastic
  6. Paper clips
  7. Binder clips
  8. 3-ring binders
- (D) Items that are acceptable include the following:
  1. All types and colors of office paper (rubber bands and staples are acceptable).
  2. File folders (remove hangers).
- (E) The vendor shall be on-site twice a month to shred confidential documents.
- (F) If the confidential bins are full, inquire with BOS to determine if additional bins are available. If additional bins are unavailable, the program will need to store items in a secure location.

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**References**

- Code of Federal Regulations, Title 45, Subtitle A, Subchapter C, Part 164, Subpart E, Section 164.530(c)
- Health Care Department Operations Manual, Chapter 2, Article 2, Section 2.2.4, Minimum Necessary Use and Disclosure of Protected Health Information

**Revision History**

Effective: 01/2018