

MAY 2002 - 73/5

Get Serious About Paper Record Destruction

By Kevin Mead

How serious are you about your document destruction processes? There are steps that you can take that ensure protection from liability and embarrassment after the records are tagged for disposal. Merely saying "we shred our old records" and "we have a certificate of destruction" is an inadequate defense when things have gone wrong.

Even though a record may be of no use to you and may have met all of its business needs, it remains your responsibility. Your duty of care over records extends from the time of their creation to the time of their ultimate destruction, no matter whose hands the documents or records pass into. Therefore, the controls that you establish must be capable of ensuring that risk is addressed at all stages of a record's life.

Taking Control

A strong system of security is one with centralized control over all records at all times. The owner assumes direct physical responsibility for the destruction of the records. Yet, in many instances, this is impractical. First, HIM professionals are educated in the efficient storage, indexing, and availability of records. Secure destruction may not be their first priority. Second, the financial investment in secure records disposal can be considerable. In all but the largest and most active institutions, these assets will likely remain idle for long time periods.

If you chose to outsource your destruction process, make sure that the vendor has the processes in place to ensure record protection to your satisfaction.

Making Good Choices

Company Size: Local Versus Global

The real trade-off is reputation. In the case of records destruction, the hiring of a nationally or globally known company may assist in the event of a mistake. However, for a number of larger companies, secure destruction is just one of many lines of business.

Destruction Location: On-site Versus Off-site

You are at risk any time a readable recording any format leaves your premises. Many organizations have therefore opted for an on-site service where a self-contained shredding unit visits your location. However, these are not inherently more secure. Inadequate storage and handling of records at your site before the shredding truck visit, the equipment on the truck, and the subsequent disposal method could all render the increased security afforded by on-site destruction invalid.

Destruction Methods

For paper documents, shredding is the most usual method. Shredding has the advantage of being portable and easily available and is often an economical option. Unfortunately, shredding is also easily compromised. Strip-shred documents have been easily reconstructed. Crosscut shredders offer a higher degree of security, but are less available.

Pulverizing has a clear readability advantage. Documents and storage media are fed into a pulverizer that uses hydraulic or pneumatic action to reduce the materials to loose fibers and shards. The disadvantages are cost and availability, as few commercial disposers use this method.

Both incineration and pulping have been used as disposal methods in a number of industries. Pulping reduces paper to liquid slurry before reusing it in post-consumer products. The disadvantages here are the transportation, receipt, and disposal of documents before they are either incinerated or pulped. The preferred answer may therefore be to have the documents rendered unreadable through shredding or pulverization, and then made irretrievable by pulping or incineration.

Make sure you are aware of the ultimate destination of the records that you consign for destruction.

A certificate of destruction offers scant protection from embarrassment, although it may be a useful "fig leaf." Unfortunately, that fig leaf will disappear if all the certificate says is "34 boxes of medical records: 1991-1994." Your certificate of destruction should be able to connect each of the individual records destroyed through a valid audit trail. The ideal audit trial would resemble the following example: you have paperwork showing that an inpatient record from April 1, 2001, was located in file folder #42-01-12. Additionally, you have paperwork showing that the file folder #42-01-12 was part of a block of files placed in secure destruction box #912837 on April 1, 2001, and that the box was sealed and countersigned by another employee. Finally, box #912837 was part of a consignment of 34 boxes signed for by an employee of a destruction company on April 2, 2001. This consignment of 34 boxes was then issued a certificate of destruction.

This admittedly lengthy process provides evidence of care and control that would be far more robust than the possession of a mere certificate from a vendor.

Visit our website

www.ahutton.com and click
shredders for more information....