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Responsible University Administrator:
Chief Information Officer

Responsible University Office:
Information Security

Policy Contact:
Information Security • security@unomaha.edu

Retention and Destruction/Disposal of Regulated Information

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Scope

This policy applies to all university personnel and entities that have access to and electronically store regulated data and/or collect, store and use personal information.

Policy Statement

Retention

It is the policy of the University of Nebraska Omaha (UNO) and its affiliated entities to ensure the privacy and security of proprietary and regulated information in the maintenance, retention, and eventual destruction/disposal of such media. All destruction/disposal of regulated information media will be performed in accordance with federal and state law and pursuant to the UNO Record Retention Schedule. Records that have satisfied the period of retention will be destroyed or disposed in an appropriate manner.

The retention schedule for destruction or disposal shall be suspended for records involved in any open investigation, audit, or litigation. Individuals who know or suspect that confidentiality has been breached by another person or persons have a responsibility to report the breach to the respective supervisor or administrator or to the Human Resources Department. Employees must not confront the individual under suspicion or initiate investigations on their own since such actions could

compromise any ensuing investigation. All individuals are to cooperate fully with those performing an investigation pursuant to this policy.

Disposal/Destruction

Department administration shall determine what information entrusted to their department is private and/or confidential (regulated) and shall communicate methods of protecting that information through the destruction/disposal process to appropriate persons associated with their department.

All paper waste that may contain regulated data must be shredded. Environmental Services (EVS) is responsible for the security, transport, and storage of confidential paper waste from internal customer locations. EVS will secure the confidential waste in locked containers provided by the UNO Recycling Center. The UNO Recycling Center will be responsible for disposing the recycled material in a secure manner and ensuring that all documentation necessary for demonstrating compliance with regulations is maintained. Failure to appropriately dispose or destroy regulated information may result in sanctions, civil or criminal prosecution and penalties, scholastic or employment corrective action which could lead to dismissal, or, as it relates to healthcare professionals or others outside of UNO, suspension or revocation of all access privileges.

All electronic media that contains regulated data must be recycled through the Mailroom or the Information Security Office. The Information Security Office maintains records of destruction for the period outlined in the UNO Record Retention Schedule.

Reason for Policy

Retention and subsequent destruction/disposal of proprietary and Protected Health Information (PHI) are governed by federal and state regulations and university policies and procedures. These regulations and guidelines include, but may not be limited to:

- Health Insurance Portability and Accountability Act of 1996 (HIPAA)
- NU Executive Memorandum 27, HIPAA Compliance Policy
- Board of Regents Bylaws
- Board of Regents Policies
- Information Security Policy
- Institutional Review Board Guidelines, Retention of Research Records for Non-Exempt Research
- Information Technology Services Procedures
- NU Record Retention Schedule

Procedures

This policy is enforced by the Executive Regulated Data Authorization Committee. Failure to comply with this policy may result in disciplinary actions.

Definitions

Information: Data presented in readily comprehensible form. (Whether a specific message is informative or not depends in part on the subjective perceptions of the person who receives it.) Information may be stored or transmitted via electronic media, on paper or other tangible media, or

Related Information

[NU Executive Memorandum 16](#)

[NU Executive Memorandum 26](#)

[NU Executive Memorandum 27](#)

[UNO Student Records Policy](#)

[State of Nebraska Consumer Notification of Data Security Breach Act of 2006](#)