The University of Toledo Medical Center, Department of Radiology (Radiology), will ensure the privacy and security of protected health information (“PHI”) in the form of Radiological Images (Images). Destruction and disposal of protected health information (Images) will be carried out in accordance with federal and state law, and as defined in the University’s retention policy. The schedule for destruction and disposal shall be suspended for Images involved in any open investigation, audit or litigation.

(B) Purpose of Policy

Radiology is responsible for maintaining images generated for each inpatient and outpatient. These records will be properly maintained and accessible. After the retention requirements have been met, destruction of these images will be carried out by a method that ensures no possibility of reconstructing the images.

(C) Procedure

This policy shall apply to images that are generated during the health care process for patients in any of the University’s patient care units, patient care centers, or faculty practices as well as human subject research under the auspices of the university or by any of its agents. It also applies to any images obtained from other institutions for purposes of patient diagnosis.

1. Image Retention

a. Film Images are to be retained as follows
   1. Mammography Images: MQSA is concerned with medical records related to actual original mammograms (images) and mammography reports.

      Medical records must be maintained for:
      • A period of not less than five years, or not less than 10 years if no additional mammograms of the patient are performed at the facility, or longer if mandated by state or local law, or
      • Until a request is made by or on behalf of the patient that her records be permanently or temporarily transferred to a medical institution, her physician or health care provider, or to the patient herself.
   2. Pediatric Images: Until patient has attained 18+3 years of age.
   3. All other Images: For 7 years from the exam-perform date.
b. Digital Images are to be retained forever in the Picture Archiving and Communication System (PACS).

2. Image Destruction and Disposal

a. Film Images are to be destroyed by shredding or pulverizing.
b. Film jackets are to be destroyed by incinerating, shredding or pulverizing.
c. Any other relevant provisions of Policy 3364-100-90-16, “Medical Record Retention and Destruction; Disposal of Protected Health Information” which apply to images, will be deemed applicable to this policy.