HIPAA-18: Access Termination Policy

Effective Date:	12-01-2015	Last Revised:	7-17-2017

Scope of Policy

This policy governs the termination of individual access to individually identifiable health information and Protected Health Information for **TCS**. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

Assumptions

- **TCS** must comply with HIPAA and the HIPAA implementing regulations pertaining to the termination of workforce member access to individually identifiable health information and Protected Health Information, in accordance with the requirements at § 164.308(a)(3).
- Prompt and appropriate termination of workforce member access to individually identifiable health information and Protected Health Information can greatly reduce the likelihood of data breaches and HIPAA violations.

Policy Statement

- It is the Policy of **TCS** to terminate any workforce member's access to individually identifiable health information and Protected Health Information when their employment relationship with our organization ends, or when the workforce member has been sanctioned for serious offenses or violations of policy, in accordance with our Sanction Policy.
- Termination of workforce member's access to individually identifiable health information and Protected Health Information must be effected as soon as feasible upon the occurrence of a triggering event, such as termination of employment or a positive finding of a serious policy violation or HIPAA offense.
- In no case shall the termination of access to individually identifiable health information and Protected Health Information be delayed more than 24 hours from the moment of such a triggering event. In cases of involuntary termination, access will be terminated immediately. In cases of voluntary termination, access to individually identifiable health information and Protected Health Information will be terminated within 24 hours of completion of work-related tasks.
- It is the Policy of **TCS** to fully document all access termination-related activities, in accordance with our Documentation Policy.

Procedures

- A termination checklist will be developed and maintained for use by the Executive Director and supporting staff (HR, IT, Facilities Mgt, etc.) in order to help ensure timely workflow and compliance with this Access Termination Policy. Items to be included in this checklist included but not limited to:
  a) Upon termination of any workforce member's employment, usernames and passwords to the network as well as all applications containing ePHI will be disabled within the time period defined in above termination policy.
  b) Company-owned smart phones (if assigned) will be turned in immediately upon termination of one's employment. Staff member personal cell phones that had been approved for use in TCS email will be verified as clean based on existing BYOD policy.
  c) Workplace keys will be turned in immediately upon termination of one's employment.
  d) Any TCS Identification badge will be turned in immediately upon termination of one's employment.
  e) Company-owned laptops (if assigned) will be turned in immediately upon termination of one's employment.
  f) All clinical documentation will be completed and validated prior to termination of one's employment.