

**TERMINATION OR MODIFICATION OF ACCESS TO  
PROTECTED HEALTH INFORMATION: ELECTRONIC  
SYSTEMS PROCEDURE**

**PROCEDURE:**

1. Upon termination of employment, contract, or assignment requiring a particular level of access authorization, the department manager overseeing the employee, consultant or agent, will immediately complete a Notice of Termination or Modification of Access form (Notice).
  - 1.1. The Notice will include the individual's name, department (contractor, company, or agency), access site, known information access rights, a description of the modifications to access required by the change in status, and date that the termination or modification is effective.
  
2. The Notice will be sent to the Security Official in the most expeditious manner available. Whenever possible, this Notice is to be completed and submitted at least several days prior to the effective data of the change of access status.
  - 2.1 A copy of the Notice will be sent to the Director of Information Systems.
  - 2.2 If the termination or modification of access is for an employee, a copy of the Notice will be sent to the Human Resources department for inclusion in the employee's file.
  - 2.3 If the termination or modification of access applies to a business associate, a copy of the Notice will be sent to the Designated Attorney or Designee(s) for inclusion in the business associate's contract file.
  - 2.4 A copy of all termination or modification Notices will be maintained by the Security Official.
  
3. The Security Official will record receipt of the Notice and initiate the process of access termination or modification in the relevant information system(s) as well as the following steps, as deemed necessary to maintain overall systems' security:
  - 3.1. Retrieving Keys, Tokens, or Cards that Allow Access: The Security Official will coordinate with the Human Resources department to assure that all materials allowing access to BHHF properties, buildings, or equipment are retrieved from a terminated employee, agent, or contractor, prior to his/her final exiting of the premises. Similarly, keys, tokens and cards that allow access to types of information that an individual is no longer authorized to use must be retrieved when the change in access status becomes effective.
  - 3.2. Changing Locks: The Security Official will assure that the combinations on any locks used to secure an area are changed when a person knowledgeable of the existing combinations is no longer authorized to have access to the area. In certain circumstances, the Security Official

may deem it necessary to change a tumbler lock and issue new keys to maintain the security of an area.

- 3.3. Removal from or Modification to Access Lists: The Security Official will coordinate with the Director of Information Systems to assure the removal of a member of the workforce or business associate from lists of those with authorized access to applicable types of information as required by termination or modification of access.
- 3.4. Removal or Modification of User Accounts: The Security Official will coordinate with the Director of Information Systems to assure the deletion of an individual's access privileges to the information, systems, services, and resources for which they either no longer require authorization.

**RATIONALE:**

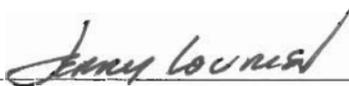
This policy and procedure for termination or modification of information access should be combined with existing BHHF policies and procedures for termination of employees, contractors, and agents. The important elements stated here are the control and oversight of the Security Official to assure immediate information systems access termination or modification, changing of locks, and retrieval of security keys, tokens, or cards. Each department manager will need to be trained in the proper procedures to maintain information systems' security as well as all Department of Human Resources requirements for termination of employment.

**REFERENCE:**

Security Requirements            164.308 (a) (1,2,3)    164.310 (b,c,d)

Effective Date: 4/14/03

Dates Revised:



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Jerome E. Lovrien, Commissioner, Bureau for Behavioral Health and Health Facilities