

 <p>HAWAII HEALTH SYSTEMS C O R P O R A T I O N "Touching Lives Everyday"</p> <p>Policy</p>	Department: Information Technology Department	Policy No.: ITD 0008
	Issued by: Barbara Kahana Vice President & CIO	Revision No.: N/A
Subject: Termination	Approved by: Thomas M. Driskill, Jr. President & CEO	Effective Date: 07/01/02
		Supersedes Policy: N/A
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- I. **PURPOSE:** This document outlines the requirements that must be met when an individual, independent contractor, or vendor either terminates their working relationship with HHSC, or is transferred from one department to another.
- II. **POLICY:** This policy has been established in order to comply with Public Law 104-191, a federal law enacted on August 21, 1996, that is otherwise known as the Health Insurance Portability and Accountability Act (HIPAA).

Procedures shall be developed so that appropriate information system access privileges can be properly modified when an individual, independent contractor, or vendor either terminates their working relationship with HHSC, or is transferred from one department to another, which may result in a change of duties or roles that were associated with this individual, independent contractor, or vendor.

These procedures must ensure that access is disabled in a timely and consistent manner for all individuals, independent contractors, or vendors who either terminate their working relationship with HHSC, or is transferred from one department to another, which results in a change in duties or roles.

Upon terminations of working relationships with HHSC, or department/role changes, relevant HHSC keys, identification cards and/or badges, access control tokens, and any other objects that facilitate physical access to HHSC property or areas that are no longer authorized must be recovered. Combinations must also be changed, as appropriate.

User accounts must be revoked on the date of termination, or appropriate access privileges must be properly modified in the case of department transfers or role changes on the effective date of these changes.

Special procedures must be developed to address instances of involuntary terminations, and terminations regardless of cause for individuals, independent contractors, or vendors who are granted system administrative privileges. In cases of involuntary termination, all access privileges must be immediately revoked upon notification.

Termination procedures for HHSC employees will be conducted in accordance with applicable collective bargaining unit agreements, if any.

III. SCOPE: This policy applies to all HHSC employees, independent contractors, volunteers, trainees, physicians and healthcare providers, and any other persons under the direct control of HHSC.

IV. RESPONSIBILITIES: It will be the responsibility of department managers to immediately notify their respective Human Resources office of changes in worker duties or employment status. Human Resources must notify appropriate regional end-user support managers and system administrators about employee separations from employment, changes in duties or roles, or changes in work location at least five (5) working days prior to the effective date of these changes.

In cases of involuntary HHSC employee separations from employment, department managers must immediately and directly notify system administrators, in addition to their respective Human Resources office.

In cases of changes in status with respect to physicians and healthcare providers, independent contractors, and vendors, Contracts Administration must notify system administrators about these changes.

V. REFERENCES/RELATED POLICIES

- ITD 0005 - Information Systems Access Policy
- "Guidelines for Academic Medical Centers on Security and Privacy," Version 1.0.
- Association of American Medical Colleges, May 2001.

VI. POLICY DEVELOPMENT

DEVELOPER: HRC Policy Committee
Taylor Summers
Miles Sato, CISSP