

MAY 2024

BU EXIT PROCESS

HIPAA SECURITY



Dear Colleagues:

When a workforce member leaves BU, several tasks must be completed to ensure a smooth transition. The university's [Exiting Employee Checklist](#) contains a comprehensive list of these tasks. Human Resources recently updated the checklist to include a reminder for HIPAA Components to have employees complete the [HIPAA Attestation Upon Departure from BU form](#).

What is the HIPAA Attestation?

The HIPAA Attestation confirms that the workforce member has returned or [destroyed](#) all HIPAA data, which is required by HIPAA. Most workforce members are using BU managed computers that must be returned by the last day of employment. Additionally, some workforce members use a personal device, which would require the workforce member to remove any HIPAA data anywhere on the personal device, including sent mail, stored on the desktop, documents, or download folders, or even in trash folders. The HIPAA Attestation also will confirm paper and other media containing HIPAA data has been returned to the HIPAA component prior to leaving.

How does the Exit Process Work for HIPAA Components?

In addition to standard BU requirements, [BU HIPAA Policy 8.2.2](#) requires managers in HIPAA components to do the following:

- Conduct an exit interview or provide exit training prior to last day of employment
 1. The interview or training should cover their ethical duty to protect patient data, and to return or destroy all HIPAA data
- Require employees to sign the HIPAA Attestation Upon Departure from BU form, found on the BU HIPAA forms page: <https://www.bu.edu/hipaa/forms-for-health-care-providers/>
 1. What about employees who work remotely or leave without notice? Copy the form into an email and ask them to complete it. Make sure to include a [delivery receipt](#) to the message when sending the email. If they don't respond, keep a copy of the sent email (along with the delivery receipt) to show your attempt.
- Keep a paper or electronic copy of all Attestations (or attempts to obtain an Attestation, if obtaining an Attestation was not possible) in a department location for six years.
 1. We may periodically audit to ensure components are completing the Exit Process properly.

If you have questions, reach out to your HIPAA Privacy and Security Officers at hipaa@bu.edu. We thank you for your commitment to help protect HIPAA data.



Boston University Information Security

buinfosec@bu.edu

www.bu.edu/infosec