

**Practice Aid for Evaluating Third Parties for
Determination of Need for Business Associate Contract(s)**

Checklist of arrangements with third parties that may need to be documented with business associate contracts. This list is provided for illustration only and is not a complete list of all arrangements that are subject to the business associate rules.

Third party professionals

Accountants

Attorneys

Actuaries

Consultants

Risk management

Information technology

Billing and coding

Management

Service Providers

Coding providers

Waste disposal and recycling companies (if PHI included in waste)

Transcription services

Microfilm and optical disk conversion providers

Clearinghouses

Billing companies

Insurance brokers

Insurance companies

Records management companies (including storage and reproduction)

Temporary staffing agencies (if personnel will have access to PHI)

Software and hardware providers (for installation, maintenance and other services that may have access to PHI)

Medical Staff Service (if not Workforce)

Hospitalists

Telemedicine

Medical Director

Physician teaching arrangements

Teaching affiliation arrangements with other institutions

Radiologists, Emergency Services, Pathology, Anesthesiology -- to the extent they are providing administrative services using Protected Health Information (and are not part of an Organized Health Care Arrangement)

Other agreements

Joint ventures

IPA/PHO/other payer contracts

Shared service arrangements

Research services

Management agreements