

Subcontractor Business Associates & Covered Entity Clients - BAAs

A current list of **Subcontractor Business Associates (Sub-BA) and Covered Entities (CE)**, with documentation of executed business associate agreements, should be maintained and reviewed at least on an annual basis. This list will also be an important part of a disaster recovery plan and a copy should be stored with that plan.

A Sub-BA may receive, maintain and/or transmit PHI. Examples include the following:

Collection Agency	Accountant (if receiving PHI)
Attorney (if receiving PHI)	Transcription services
Regional Health Information Organizations (Exchanges)	e-Prescribing Gateway
Companies or individuals which: <ul style="list-style-type: none"> • Process claims for services provided • Produce bills for medical services • Shred documents which include PHI • Provide technology or systems support if accessing PHI • Provide file hosting services (i.e. Dropbox) 	Companies or individuals which: <ul style="list-style-type: none"> • Create Personal Health Records • Store back-up data • Communicate appointment reminders • Handle after hour calls • Provide accreditation services

* Available in electronic format on the TMC Client Portal in HIPAA forms

Document Subcontractor Business Associates along with contact information. Ensure the BAA reflects changes required since 2013.

If a list is developed, attach to this document or document the location of the list: _____

Business Associate Name Type of Business	Address, Phone, Email	Contact Name, Phone, Email	BAA Date (should be 2013 or after)

Reviewed by:	Date:	Reviewed by:	Date:	Reviewed by:	Date:

Maintain a list of Covered Entities (CE) and their contact information. Ensure the BAA reflects changes required since 2013.

If a list is developed, attach to this document or document the location of the list: _____

Covered Entity/Client Name Type of Business	Address, Phone, Email	Contact Name, Phone, Email	BAA Date (should be 2013 or after)

Reviewed by:	Date:	Reviewed by:	Date:	Reviewed by:	Date: