

Health Information Compliance Alert

Create a Vendor Scorecard for EHR Check-ups

With more and more digital issues surfacing over the past year, it is critical that practices keep a close watch on all their vendors and suppliers to steer clear of issues.

Why: Evidence and case settlements suggest that compliance relating to electronic protected health information (ePHI) and EHRs is firmly in both the **HHS Office for Civil Rights'** (OCR's) and **HHS Office of the Inspector General's** (OIG's) sights for 2020 (see p.13).

As part of your compliance planning and HIPAA risk assessment, it is a great idea to create a list of all your vendors annually and check in with them. As part of that follow-up, you should do a comprehensive investigation of your EHR products, your relationship and contracts - and whether they've had any compliance or violation issues over the past year of service.

While performing your re-evaluation, consider setting up a scorecard with weighted questions and tally the results. Here are some examples of important questions to add to your vendor checklist:

- Does your current EHR vendor offer all the necessary functions your practice needs?
- What is the pricing model of your current EHR software, and does it match industry standards?
- Does your vendor offer specialty-specific, certified EHR technology that is in line with the scope of your work?
- Is the EHR provider geographically positioned to consider your state's compliance requirements as well as the federal mandates?
- Does your software provider offer user-friendly clinical tools and is your practice using them properly?
- Has your EHR vendor been privy to a HIPAA or false claim violation over the past year?
- If unhappy with service, will you be penalized for switching to another EHR vendor?
- Do you have a business associate agreement (BAA) on file for your EHR vendor?