

# HIPAA Omnibus Rule

## Business Associate Agreements Contact Log

BUSINESS NAME	KEY CONTACT	ADDRESS	EMAIL	PHONE NUMBER	SENT BAA	FOLLOW UP ON BAA	RECEIVED BAA

**BAA is Required for : (Data Collection Agencies)**

- Confirmation Service
- Consultants, IT Tech, etc.
- Data Storage Company
- Collection Agency
- Credit Card Processing Companies
- Patient Financing Companies
- Data Software Providers

**BAA is Recommended: (to be safe)**

- Temp Employees / Volunteers / Students
- After Hours Services
- Repair Maintenance Services

**BAA Not Necessary for:**

- Doctor-to-Doctor
  - Doctor Referrals
  - Pharmacy
  - Insurance Company
  - Conduit: UPS Fed Ex USPS
- Considered Course-of-Doing-Business:**  
 Sharing PHI is necessary for patient treatment  
 PHI sharing is to a “minimum necessary”