

Telehealth HIPAA Self-Audit Scoring Tool

For Internal Compliance Reviews



This self-audit tool is designed to help healthcare organizations and providers evaluate their level of HIPAA compliance in telehealth operations. It supports internal monitoring, quality improvement, and risk management activities and is informed by guidance from the Center for Connected Health Policy (CCHP), Regional Telehealth Resource Centers, and federal HIPAA requirements.

Note: This content is for informational purposes only and does not constitute legal advice or interpretation. NETRC encourages you to consult the appropriate state agency, internal colleagues, or an attorney for guidance.

How to Use This Tool

1. Review each area of compliance and score your organization's current status.
2. Base scores on documented evidence (e.g., policies, training records, system configurations).
3. Use results to identify gaps, prioritize corrective actions, and track improvement over time.

Scoring Scale

Score	0	1	2
What It Means	No evidence, not yet in place	Informal or inconsistent evidence, partially in place	Documented and consistently applied, fully in place

1 | Governance and Administrative Safeguards

Item	Score		
	0	1	2
Designate HIPAA leadership			
HIPAA risk analysis includes telehealth platforms and remote workflows			
Telehealth-specific HIPAA policies and procedures are documented and current			
Subtotal	___ out of 6 points		

2 | Technology and Vendor Management

Item	Score		
	0	1	2
Telehealth platforms support encryption, access controls, and audit logs			
Business Associate Agreements (BAAs) are executed with all telehealth vendors			
Systems are regularly reviewed, updated, and securely configured			
Subtotal	___ out of 6 points		

3 | Privacy Protections and Patient Rights

Item	Score		
	0	1	2
The “minimum necessary” standard is applied to telehealth PHI access			
The Notice of Privacy Practices (NPP) addresses telehealth services			
Patient identity verification and consent processes are documented			
Subtotal	___ out of 6 points		

4 | Workforce Training and Awareness

Item	Score		
	0	1	2
Staff receive HIPAA training specific to telehealth workflows			
Remote workforce privacy and security risks are addressed in training			
Incident reporting procedures are understood and accessible			
Subtotal	___ out of 6 points		

5 | Physical, Technical, and Environmental Safeguards

Item	Score		
	0	1	2
Telehealth encounters are conducted in private, secure environments			
Devices used for telehealth are password-protected and encrypted			
Access to telehealth systems and ePHI is role-based and monitored			
Subtotal	___ out of 6 points		

6 | Breach Response and Incident Management

Item	Score		
	0	1	2
Telehealth-related incidents are included in breach response plans			
Processes exist to assess and document potential telehealth breaches			
Breach notification procedures align with HIPAA and state laws			
Subtotal	___ out of 6 points		

Overall Score

Add up the subtotal scores from each of the six sections.

Total Score: ___ out of 36 points

Interpreting the Score

Score Range	What It Means
30 - 36	Strong telehealth HIPAA compliance. Continue monitoring and improvement.
20 - 29	Moderate telehealth HIPAA compliance. Make targeted improvements in areas scoring below 2.
Below 20	Elevated risk for telehealth HIPAA compliance. Make corrective actions in areas scoring 1 or lower.

Northeast- specific Review Notes

Organizations operating in the northeast should additionally:

	Confirm alignment with state privacy and breach notification laws in your state(s).
	Ensure telehealth workflows meet state Medicaid and licensing expectations.
	Use technical assistance from the Northeast Telehealth Resource Center (NETRC) to address identified gaps.

Recommended Follow-up Actions

After completing the self-audit:

- Document findings and retain them as part of the organization's compliance program.
- Develop corrective action plans with assigned responsibilities and timelines.
- Reassess telehealth compliance at least annually or after major policy or technology changes.

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