HIPAA 2026 Migration Checklist for Video Platforms

The proposed Security Rule change set (90 FR 898, Jan 6, 2025) mapped to a telemedicine video stack. Check what you already have; the gaps are your backlog.

KNOW YOUR ESTATE — prop. §164.308(a)(1)–(2)

- ☐ Written asset inventory covers signaling, TURN, SFU, recording nodes, transcripts, and every vendor
- ☐ ePHI network map is ≤ 12 months old and shows where media is decrypted (SFU) and where it is relayed (TURN)
- ☐ Risk analysis starts from the inventory and assigns a risk level to each threat–vulnerability pair

KEEP CHECKING — prop. §164.308(a)(4), §164.312(d), (h)

- ☐ Vulnerability scans every 6 months include TURN and SFU nodes, not just the web tier
- ☐ Penetration test completed within the last 12 months
- ☐ Patch path proven: critical ≤ 15 / high ≤ 30 calendar days; media fleet rotates without dropping consults
- ☐ Audit trail answers who accessed which session, when, from where — and is exportable

PROVE IT ANNUALLY — prop. §164.308(a)(14), (b)

- ☐ Annual Security Rule self-audit is on the calendar with a named owner
- ☐ SME-verified written safeguards analysis ready to hand to covered-entity customers
- ☐ Annual verifications collected from every ePHI-touching vendor (cloud, media, transcription)

HARDEN BY DEFAULT — prop. §164.312(b), (c), (f)

- ☐ Recordings, transcripts, chat, attachments, and backups encrypted at rest; signed URLs expire
- ☐ MFA on patient, provider, admin, cloud-console, and CI/CD logins — patient UX designed, not bolted on
- ☐ Media plane, control plane, and data plane sit in segmented network zones
- ☐ Consistent baselines: anti-malware, extraneous software removed, unused ports disabled

SURVIVE THE HIT — prop. §164.308(a)(13), §164.312(i)–(j)

- ☐ Documented, tested 72-hour restore for consult-critical systems (signaling, media, schedule)
- ☐ Criticality ranking exists: tomorrow's consults outrank last month's archive
- ☐ Exact backups under separate technical controls; 24-hour customer-notice page in the incident runbook

Status: proposed rule as of 2026-06-11 — no final rule published. Once final: effective +60 days, compliance +180 more (≈240 total). Verify status at federalregister.gov, RIN 0945-AA22.

THE ANNUAL CADENCE UNDER THE PROPOSAL — put owners and dates on each

With six ePHI-touching vendors: 2 vulnerability scans + 1 penetration test + 1 compliance audit + 1 risk-analysis refresh + 1 inventory & map refresh + 1 incident-response plan test + 6 vendor verifications collected + 1 verification produced for your customers = 13 scheduled compliance events a year.

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This checklist maps the proposed 2026 Security Rule families onto signaling, TURN, SFU, recording and transcript components, so the gaps become a backlog. Our seven-volume handbook covers the whole video stack those controls sit on; start with Volume 7 for compliance and serving infrastructure, then Volume 3 for WebRTC, DRM and delivery.

WHAT YOU WILL FIND INSIDE

- Compliance and biometrics rules (Vol. 7)
- WebRTC, TURN and real-time (Vol. 3)
- Serving and cost per stream-hour (Vol. 7)
- DRM for protected recordings (Vol. 3)

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Vol. 1 · Video Encoding — pixels and color to H.264, HEVC, AV1, quality metrics and AI
Vol. 2 · Video Streaming I — network transport, contribution and ingest, HLS, MPEG-DASH, CMAF
Vol. 3 · Video Streaming II — ABR, CDNs, players, WebRTC, DRM and the economics of delivery
Vol. 4 · Audio for Video I — PCM, codecs, loudness, accessibility, real-time voice processing
Vol. 5 · Audio for Video II — jitter buffers, lip sync, Atmos, quality metrics, neural codecs
Vol. 6 · AI for Video I — models and inference, computer vision, speech, search, generative video
Vol. 7 · AI for Video II — real-time pipelines, agents, serving, cost, compliance, verticals

Need your telehealth video stack mapped to the 2026 HIPAA Security Rule?

We will inventory your media components, check encryption, MFA and restore paths against the proposal, and hand you a prioritised gap backlog. 250+ video products shipped since 2005.

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