

Platform Anatomy PHI Worksheet

For each subsystem of your platform, answer four questions. Every unanswered row is audit scope you have not priced.

	PHI here?	BAA(s) signed?	Audit events?	Retention rule?
☐ 1. Patient & provider apps device cache, push notifications, screenshots; WCAG 2.1 AA	☐	☐	☐	☐
☐ 2. Identity & consent consent artifacts versioned + timestamped; MFA; NIST 800-63	☐	☐	☐	☐
☐ 3. Scheduling & reminders appointment = PHI; reminders carry time + link, nothing clinical	☐	☐	☐	☐
☐ 4. Waiting room & triage intake answers are PHI before any clinician is in the room	☐	☐	☐	☐
☐ 5. Real-time video core DTLS-SRTP in transit; TURN/SFU operator inside the boundary	☐	☐	☐	☐
☐ 6. In-call clinical tools chat, files, screen, vitals — each tool creates its own PHI store	☐	☐	☐	☐
☐ 7. Recording & documentation recording bucket, transcript, note; un-BAA'd bucket = classic miss	☐	☐	☐	☐
☐ 8. EHR integration FHIR R4 / US Core; the EHR owns the record, you own the visit	☐	☐	☐	☐
☐ 9. e-Rx, labs, billing NCPDP SCRIPT, HL7 v2, X12 837/835 — PHI flows to outside parties	☐	☐	☐	☐
☐ 10. Analytics & observability no trackers in the logged-in product; PHI filter before any SDK	☐	☐	☐	☐

Rule of thumb

One 20-minute visit leaves PHI in ~7 persistent stores (appointment, intake, chat+files, recording, transcript, note, claim).
'Encrypted' is not 'compliant': a vendor without a signed BAA is non-compliant regardless of its encryption. Addressable does not mean optional - implement it or document why an alternative is reasonable (45 CFR 164.312).



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This worksheet walks ten platform subsystems through four questions: PHI present, BAA signed, audit events and retention. We wrote seven volumes on the video stack under those subsystems. Volume 3 covers WebRTC calls, TURN and SFU delivery, Volume 7 covers compliance in production, and Volume 1 covers recording and encoding.

WHAT YOU WILL FIND INSIDE

- WebRTC calls, TURN and SFU topology
- Recording, storage and retention design
- Regulation and audit trails in production
- Encoding for clinical recordings

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Need a PHI map of your telemedicine platform before the audit?

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