

# Identifying Issues in Facility and Provider Mergers and Acquisitions. Appendix A: Information Management Checklist for Mergers and Acquisitions

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Action Item	Responsible Party	Comments	Completion Date
<p>Obtain a list of all health information and technology systems. For example:</p> <ul style="list-style-type: none"> <li>• Practice A Encoder</li> <li>• Practice B Encoder</li> <li>• Practice A Lab Module</li> <li>• Practice B Lab Module</li> <li>• Practice A Billing System</li> <li>• Practice B Billing System</li> </ul>			
Identify office space considerations (e.g., whether new space is needed or current space needs to be converted).			
Determine how communication to staff will occur (e.g., staff meetings, staff newsletters).			
Determine how employee issues will be addressed (e.g., through management, human resources).			
Determine whether the acquisition will result in new technology. If so, identify training needs.			
Obtain copies of all HIM vendor agreements. Identify opportunities to consolidate vendor agreements (e.g., transcription, billing, encoder, release of information).			
Obtain a list of all litigation activities and ensure health records are protected.			
Obtain copies of HIM organization charts.			
Determine whether a single HIM department will result.			
Identify potential staffing needs.			
Identify each HIM department functions (e.g. coding, transcription).			
Identify who will be the privacy and/or security officer.			
Review and compare all privacy and security policies and ensure they are revised			
Train staff on privacy and security policies and procedures.			
Define role-based access.			

Define the privacy and security complaint and audit processes.			
Identify an acquisition team.			
Schedule acquisition team meetings.			
Appoint a team leader for key activities.			
Identify responsible parties for each action item.			
Obtain and compare job titles and job descriptions.			
Obtain and compare salary information.			
Identify a consolidated medical records committee.			
Identify a consolidated forms committee.			
Determine whether one site will close. If so, develop a plan of action for workflow transition.			
Determine if health records will be combined or remain separate.			
Determine how legacy paper records will be handled.			
Determine whether additional system licensures, software, or hardware are needed.			
Determine whether separate EHR systems can be integrated Determine whether a single system will be chosen. Determine how legacy system information will be maintained.			
Determine whether new business associate agreements are needed and who will manage that process.			
Obtain and compare HIM departmental policies.			
Obtain and compare delinquency policies and procedures.			
Obtain and compare privacy and security policies and training requirements.			
Obtain and compare medical staff bylaws.			
Obtain and review any supply agreements (e.g., file folders or toner).			
Obtain and compare any rental agreements (e.g., copy machine rentals).			
Ensure human resources issues will be covered (e.g., changes to paid time off accrual, or comp time).			
Obtain copies of all staff certifications (e.g., RHIA, RHIT, CCS).			
Obtain and compare notice of privacy practices,			
Obtain copies of any recent third-party audits (e.g., coding or financial).			
Ensure third-party audits have a single point person (e.g., RAC, MIC, MAC audit correspondence).			

Obtain and compare copies of documentation requirements.			
Review individual record retention schedules and policies and procedures. Consolidate into one plan.			
Review state, federal, and accreditation specific requirements for health information management during a merger/acquisition.			
Create an agreement outlining which organization is responsible for legacy health records. Ensure the agreement complies with state requirements.			
Develop a plan to address existing and future patient identifiers (e.g., medical record number, account number).			
Consult legal counsel throughout the process to ensure compliance.			

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