

For health systems and hospitals

Patient data governance checklist

Practical steps to improve data quality, consistency, and trust across your organization.

Executive summary

Poor data quality costs organizations \$12.9 million annually on average, according to Gartner. For a health system, that cost rarely traces back to one bad system. It comes from patient data governance designed for fewer systems than most health systems run today. The EHR, the CRM, and the digital front door all touch a single patient's record now. None of them catch it when that patient shows up under a different name, address, or phone number.

This checklist gives data, IT, and compliance leaders a practical, section-by-section way to audit patient data governance across five areas: standards, quality, stewardship, compliance, and oversight. Work through it with your team to see where governance already holds up, where it's fragile, and where the next audit, merger, or system migration will find the gaps first.

How to use this checklist

Work through each section with your data, IT, and compliance leads. Check off what's already in place. Anything left unchecked is your starting point.

WHAT THE CHECKLIST COVERS



\$12.9M

the average annual cost of poor data quality to an organization. For a health system, that cost rarely traces back to one bad system.

Source: Gartner





Data standards and definitions

- ☐ Establish a shared definition of a duplicate record and a matched record, including the common case of the same patient showing up under a different name, address, or phone number.
- ☐ Document required identity attributes, such as name, date of birth, address, and insurance ID, and name the system of record for each.
- ☐ Standardize how new patient records are created, including required fields before a record can be saved.
- ☐ Align data definitions across your EHR, CRM, revenue cycle, and any digital front-door systems your patients touch.



Data quality and accuracy

- ☐ Run a baseline audit to quantify your current duplicate and overlap rate across major systems.
- ☐ Set a target accuracy threshold for patient matching and measure against it every quarter.
- ☐ Identify which systems still rely on exact-match rules instead of matching that can still connect a record when a name, address, or phone number has changed or doesn't line up exactly.
- ☐ Build a remediation workflow for records flagged as likely duplicates or likely mismatches, with a clear owner and a target for closing each one.



Stewardship and accountability

- ☐ Name a data steward or team accountable for patient identity data, not just IT.
- ☐ Define escalation paths for when a steward finds a record that can't be resolved automatically.
- ☐ Give stewards visibility into match confidence, not just a yes-or-no merge decision.
- ☐ Track how many hours your team spends on manual reconciliation each month, and where that time goes.



Compliance, access, and risk

- ☐ Confirm access to patient identity data is limited to roles that need it, and review that list regularly, not just when someone leaves.
- ☐ Maintain an audit trail for every merge, split, or manual override to a patient record.
- ☐ Confirm your process for patient record access and amendment requests meets required response timelines.
- ☐ Vet any enrichment or third-party data vendor for healthcare-appropriate use before it touches patient records.



Governance oversight and continuous improvement

- ☐ Schedule a recurring governance review, not a one-time cleanup project.
- ☐ Report match rate, duplicate rate, and open steward queue to leadership on a set cadence, tied to outcomes they already track.
- ☐ Revisit your governance standards whenever you add a new system, acquire a new entity, or launch a new EHR instance.
- ☐ Ask whether your governance program could survive an audit, a merger, or a new state privacy law without a scramble.



Why this matters

Governance gaps rarely show up as a single line item. They surface as compliance exposure first, and it's usually a federal auditor, not an internal team, who finds them.

\$31.1B in federal Medicaid improper payments were reported in fiscal year 2024, and 74% of it was tied to missing or insufficient documentation.

Source: CMS

CASE STUDY

Proven in the field



A leading integrated health system in the northeast identified more than **50,000 additional duplicate records** and saved a full day per marketing campaign after strengthening the matching foundation beneath its governance program.

Good governance standards are only as strong as the matching underneath them.

Turn this checklist into a governance program

Most governance programs stall on the records that don't match perfectly. A patient's name gets misspelled, their address changes, their phone number turns over, and two records that should be one instead sit in separate systems.

Same patient. Different name. Different address. Different phone. Verato still knows it's them.

Verato's patented approach to referential matching connects identities using curated reference data, so records still match even when the attributes on file have changed or don't line up exactly. It delivers up to 98% identity resolution accuracy and is 24% more accurate than traditional or algorithm-only matching approaches.

It's why more than 100 healthcare organizations trust Verato to build the identity foundation their governance program runs on.

Ready to see where your identity data stands? Talk to Verato. →

Verato®, the identity intelligence company, solves the problem that drives everything else— Knowing Who Is Who™. Proven in healthcare. Trusted everywhere.

Verato MDM Cloud™ is the identity foundation that delivers exceptional experiences, fuels business growth, and powers AI-native efficiency all from a single, accurate, and complete view of every person, provider, and organization across your system silos. By resolving who's who once, enriching that data with native integrations and real-world context, and activating it everywhere it's needed, Verato future-proofs your data for AI so every application, agent, and analytic system operates on a foundation it can trust. Learn more at verato.com.

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