

# Tulane University

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| <b>DEPARTMENT:</b> General Counsel's Office -- HIPAA | <b>POLICY DESCRIPTION:</b> Designation of Health Care Components and Hybrid Entities |
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| <b>APPROVED:</b> April 1, 2003                       | <b>REVISED:</b> April 25, 2003, July 24, 2013, January 16, 2020, May 18, 2023        |
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## DESIGNATION OF HEALTH CARE COMPONENTS AND HYBRID ENTITIES

**April 1, 2003**

**Updated as of May 18, 2023**

The Health Insurance Portability and Accountability Act of 1996, Public Law 104-91 ("HIPAA"), as amended, and regulations promulgated thereunder by the United States Department of Health and Human Services establishing standards to protect the privacy of individually identifiable health information (the "HIPAA Privacy Regulations"), will impose new obligations on Tulane University to protect the privacy of such information.

Tulane University intends to take any and all necessary action to comply fully with the University's obligations under HIPAA and the HIPAA Privacy Regulations.

Tulane University hereby designates itself as a hybrid entity consistent with the HIPAA Privacy Regulations.

Tulane University further designates the following components of Tulane University as its health care component in accordance with the HIPAA Privacy Regulations, including, but not limited to, 45 C.F.R. §§ 164.103 and 164.105, and hereby documents such designation in accordance with the HIPAA Privacy Regulations as required by 45 C.F.R. §§ 164.105(a)(2)(iii) and 164.530(j).

Tulane University Medical Group and Tulane University Campus Health, each component's participating physicians and clinicians, and all University employees and departments that provide management, administrative, financial, legal and operational support services to or on behalf of Tulane University Medical Group and/or Tulane University Campus Health, to the extent that such employees and departments use and disclose individually identifiable health information in order to provide administrative and support services to Tulane University Medical Group and/or Tulane University Campus Health and would constitute a "business associate" of Tulane University Medical Group and/or Tulane University Campus Health if separately incorporated.

An annual review will be conducted by the University Privacy Office of all Tulane University organizations to determine which organizations meet this definition and are required to be included in the Tulane University health care component. These finding will be reviewed and approved by the Clinical Compliance Operations Committee.

All other departments, personnel, and employees of Tulane University are excluded from the Health Care Component.