



**HYBRID ENTITY DESIGNATION FOR UNIVERSITY OF VIRGINIA
UNDER THE HIPAA PRIVACY RULE
June 8, 2021**

University of Virginia (the “University”) conducts both Covered and Non-Covered Functions and is eligible for treatment as a Hybrid Entity under the privacy regulations issued under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA Privacy Rule”). The University, therefore, has surveyed its divisions and activities to identify its Covered Functions and to designate its Health Care Components under the HIPAA Privacy Rule.

The University Compliance Office, the Office of University Counsel, and the University Medical Center Corporate Compliance and Privacy Office identify and confirm the following are and have been Covered Functions of the University under the provisions of the HIPAA Privacy Rule:

Covered (Health Care) Functions:

I. Covered Entity Components

All workforce of Covered Entity Components are subject to HIPAA.

- Claude Moore Health Sciences Library
- COVID Testing Clinic – Student Activities Building
- School of Education - Applied Metabolism & Physiology Laboratory
- School of Education - Sheila C. Johnson Center for Human Services, excluding McGuffey Reading Services
- School of Medicine
- School of Nursing
- UVA Health Plan
- Transitional Care Hospital
- Medical Center

II. Business Associate Components

Personnel of University departments and divisions, including those listed below, are Business Associate Components to the extent they provide Business Associate services (using or disclosing protected health information) to those University Covered Entity Components listed above, in the course of the Covered Entities' health care provider treatment, payment and health care operations or health plan activities under HIPAA.

- Audit and Compliance
- Board of Visitors, including any applicable Committee members
- Center for Survey Research
- Environmental Health & Safety
- Facilities Management: Recycling and Surplus
- Human Resources: employees who support the Health Plan and Faculty and Employee Assistance Program (FEAP)

- Information Technology Services (ITS): Academic Division technical support for health care components and UVA Health Plan
- McCue Center
- Office for Equal Opportunity and Civil Rights
- Office of Vice President for Research (including Institutional Review Board for Health Sciences Research and Post Approval Monitoring Program)
- Office of the Executive Vice President and COO
- Office of the Executive Vice President for Health Affairs
- Office of the Executive Vice President and Provost
- Office of the President
- Office of the University Counsel
- Procurement & Supplier Diversity Services
- Property and Liability Risk Management
- Records and Information Management
- University Advancement
- University Communications
- University Health Foundation

Non-Covered Functions:

All divisions and activities of the University that are not explicitly designated as Covered Functions are designated as Non-Covered Functions of the University.

Organized Health Care Arrangement (OHCA)

Because many healthcare settings are clinically integrated but are separate legal entities **not commonly owned or controlled**, the HIPAA privacy rule also permits providers that typically provide healthcare to a common set of patients to designate themselves as an OHCA for purposes of HIPAA, which permits the use of a joint notice of privacy practices and provides the ability to share protected health information throughout the OHCA for treatment, payment, and healthcare operations.

- University of Virginia Physicians Group
- Monticello Community Surgery Center, LLC
- University of Virginia Covered Entity Components

Affiliated Covered Entity (ACE)

Legally separate covered entities that are affiliated may designate themselves as a single covered entity for purposes of the HIPAA privacy rule. Under this affiliation, the organizations share one notice of privacy practices. To be an ACE, the separate covered entities **must be under common ownership or control**.

- UVA Northridge Community Medicine, LLC
- UVA Imaging Center, LLC
- University of Virginia Covered Entity Components

This designation is effective as of the 8th day of June 2021.