

**UNIVERSITY OF FLORIDA**  
**INFORMATION PRIVACY POLICIES & PROCEDURES**  
**HEALTH INFORMATION OPERATIONAL GUIDELINES**

**I. Relationship of University of Florida Components and Entities Explained**

**A. POLICY**

**Rev. 01/01/2006**

1. **Designations:** The following components and entities have been designated as parts of one common entity for purposes of complying with the federal privacy regulations found at 45 CFR Parts 160 and 164, commonly referred to as HIPAA or the Privacy Rule:
  - a) *University of Florida Medical Components:*
    - (1) The University of Florida Health Science Center (with locations in Gainesville and Jacksonville), together including:
      - (a) *University of Florida clinics and physicians' offices, including those entities commonly referred to as University of Florida Physicians (UFP);*
      - (b) *University of Florida Colleges of Medicine, Nursing, Health Professions, Dentistry and Pharmacy;*
      - (c) *University of Florida College of Veterinary Medicine, in limited circumstances,*
    - (2) University of Florida Student Health Center,
    - (3) University of Florida Speech and Hearing Clinic,
    - (4) The McKnight Brain Institute
  - b) *Affiliated Entities*
    - (1) All direct support organizations and health service support organizations for the various Health Science Center components, including, but not limited to:
      - (a) *Florida Clinical Practice Association, Inc.,*
      - (b) *University of Florida Jacksonville Physicians, Inc.;*
      - (c) *University of Florida Jacksonville Healthcare, Inc.;*
    - (2) The University of Florida Research Foundation, Inc.
    - (3) The Florida Proton Therapy Institute
    - (4) Other health care providers, health care plans or health care clearinghouses that have been or may be designated as affiliated entities for purposes of compliance with the Privacy Rule.
2. **Application:** Solely for purposes of compliance with the Privacy Rule, these components or entities will be treated as one common entity. (See Organizational Requirements for further explanation of hybrid entity status and affiliated covered entity status, and associated requirements.)
3. **Scope:** As a result of the decision to utilize permitted designations to pursue compliance with the federal Privacy Rule by the components and entities named above, the Privacy of Health Information policies, procedures, and operational guidelines developed and approved by the University of Florida shall apply to all the above named entities equally, to the extent that they apply to the functions of that component or entity.

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**B. DEFINITIONS**

1. **A Covered Entity** is any person or organization that transmits health information in electronic format for billing purposes, including:
  - a) *Health plans*
  - b) *Health care clearinghouses*
  - c) *Health care providers*
2. **Common control** exists if an entity has the power, directly or indirectly, significantly to influence or direct the actions or policies of another entity.
3. **Common ownership** exists if an entity or entities possess an ownership or equity interest of 5 percent or more in another entity.

**C. PRIVACY REQUIREMENTS**

1. **Legally separate covered entities** that are affiliated may designate themselves as a single covered entity for purposes of the privacy regulations.
2. **The covered entity is responsible for designating the components** that are part of one or more health care components of the covered entity and documenting the designation.
3. **A covered entity must implement policies and procedures** with respect to protected health information that are designed to comply with the standards, implementation specifications, or other requirements of the privacy regulations.

**D. PROCEDURE**

1. **Application:** Any of the components or entities named above shall simply substitute its own name for “the University of Florida” wherever found throughout this manual.
2. **Specific Procedures:** Entities and components should develop and incorporate appropriate additional procedures (within the confines of the policies and guidelines) that correspond to the particular needs and functions of the entity to assure compliance with the privacy regulations. The Privacy Officer must approve these additional guidelines before they become effective.
3. **Updates:** All entities and components named above are responsible for updating entity-specific procedures as needed to comply with changes in the law.

**E. REFERENCES:**

1. **HIPAA Regulations:** 45 CFR §164.530(i) Administrative requirements: Policies and procedures; §164.504(a-d) Uses and disclosures: organizational requirements

**F. EXHIBITS: None**