

UNIVERSITY OF FLORIDA  
INFORMATION PRIVACY POLICIES & PROCEDURES  
PRIVACY MANAGEMENT

## HIPAA Organizational Requirements: Hybrid Entity

### □ POLICY

Rev. 06/01/2005

The requirements of the federal privacy regulations apply only to the health care (medical) components of the University of Florida.

### □ DEFINITION

1. *Hybrid Entity*: The University of Florida has identified itself as a hybrid entity, according to the definition in the federal privacy regulations, as follows:
  - a. The University is a single legal entity that is a covered entity;
  - b. The University's business activities include both covered and non-covered functions; and
  - c. The University is able to designate some of its components as medical components that are separate and distinct from non-medical components.
2. *Affiliated Covered Entity*: Legally separate covered entities that are associated in business.

### □ PRIVACY REQUIREMENTS

1. It is understood that the University of Florida, as a hybrid entity, has the following responsibilities:
  - a. To comply with all federal compliance and enforcement requirements.
  - b. To implement policies and procedures to ensure compliance with the safeguard requirements of the privacy regulations, including:
    - 1) The health care components do not disclose protected health information to other components in circumstances in which such disclosure would be prohibited if the components were separate and distinct legal entities;
    - 2) None of the components use or disclose protected health information in a way prohibited by law; and
    - 3) If a person performs duties for both a health care component and for another component as a member of the workforce, that person must not use or disclose protected health information in a way prohibited by law.
  - c. To designate the components that are part of one or more health care components of the covered entity and to document the designation.
2. Identification of Medical and Non-Medical Components
  - a. Medical Components of the University of Florida are as follows:
    - 1) The University of Florida Health Science Center, with locations in Gainesville and Jacksonville, FL, together including:
      - a) University of Florida clinics and physicians' offices (including those components commonly referred to as University of Florida Physicians (UFP) or Faculty Group Practice (FGP)),
      - b) University of Florida Colleges of Medicine, Dentistry, Nursing, Pharmacy, and Health Professions, and
      - c) University of Florida College of Veterinary Medicine, in limited circumstances,
      - d) Health Science Center General Counsel's Office
    - 2) The University of Florida Student Health Care Center,
    - 3) The University of Florida Speech and Hearing Clinic,
    - 4) The McKnight Brain Institute,

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**HIPAA Organizational Requirements: Hybrid Entity (continued)**

- 5) IFAS Dietetics Intern Program,
- 6) The Wellness Center's Cardiac Rehab Program
- 7) The Physical Plant Department at the Health Science Center
- b. Affiliated Entities as Medical Components:
  - 1) Direct Support Organizations and Health Service Support Organizations for the various Health Science Center Colleges, 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) University of Florida Research Foundation, Inc.
  - 3) The Institutional Review Boards 01, 03 and 04
- c. Non-Medical Components: All other colleges and departments of the University of Florida

**REFERENCES**  
HIPAA Regulations: 45 CFR § 164.504 (Organizational Requirements)

**EXHIBITS** None