

UNIVERSITY OF FLORIDA
INFORMATION PRIVACY POLICIES & PROCEDURES
PRIVACY MANAGEMENT

HIPAA Organizational Requirements: Organized Health Care Arrangement

POLICY

Rev: 06/01/2005

1. The University of Florida and all its patient care areas have entered into an Organized Health Care Arrangement (OHCA) with the Shands HealthCare System; together they function as a seamless health care provider.
2. For purposes of HIPAA compliance, the UF/Shands OHCA uses a Joint Notice of Privacy Practices and have agreed, as permitted by law, to share among themselves patient health information as needed for treatment, payment, and health care operations.
3. These organizations are not in any way providing health care services mutually or on each other's behalf. Shands HealthCare and the University of Florida are separate health care providers and each is individually responsible for its own activities, including compliance with privacy laws, and all health care services it provides.

DEFINITION

Organized Health Care Arrangement (OHCA): An organized system of health care in which more than one covered entity participates, and in which the participating entities:

- a. Hold themselves out to the public as participating in a joint arrangement; and
- b. Participate in joint activities, including: Quality Assessment and Improvement activities and Payment activities.

PRIVACY REQUIREMENTS

1. A covered entity that participates in an organized health care arrangement (OHCA) may share protected health information about a patient with other covered entities that participate in the OHCA for any health care operations of the OHCA.
2. Covered entities that participate in an OHCA may present a Joint Notice of Privacy Practices (NPP), provided that all the participating covered entities agree to abide by the notice with respect to protected health information.

PROCEDURES:

1. The Privacy Officer reviews and approves any proposals to participate in an Organized Health Care Arrangement prior to the University of Florida making an agreement with another covered entity. The other covered entities or classes of covered entities participating in the OHCA are documented in the Notice of Privacy Practices.
2. Each covered entity shares protected health information with the other OHCA participants, when such information is needed for health care operations, according to the provisions of the privacy regulations.
3. Each covered entity provides the Joint NPP, if they are the first service provider. The Privacy Officer monitors the provision of the NPP by other members of the OHCA to assure that patients are, in fact, receiving the NPP as agreed.
4. The Privacy Officer periodically monitors the joint activities of the OHCA.

REFERENCES

HIPAA Regulations: 45 CFR § 164.501 (Definitions), § 164.506 (Uses and Disclosures for Treatment, Payment, and Health Care Operations), § 164.520 (Notice of Privacy Practices)

EXHIBITS: None