

Texas Tech University Health Sciences Center El Paso HIPAA Privacy Policy

Administration	Policy: 8.1
Hybrid Designation	Effective Date: November 17, 2009
References: 45 CFR 164.102 and 103, http://www.hhs.gov/ocr/hipaa	
TTUHSC El Paso HIPAA Website: http://elpaso.ttuhscc.edu/hipaa/	

Policy Statement

This policy designates Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso) as a hybrid entity under the Health Insurance Portability and Accountability Act (HIPAA) and identifies its health care components subject to HIPAA's privacy and security provisions.

Scope

This policy applies to TTUHSC El Paso designated health care components identified in this policy.

Definitions

Refer to [HPP 1.1 for Glossary of HIPAA Terms](#)

See [Old/New HIPAA Policy Number Cross Reference Chart](#)

Policy

1. Definitions. For purposes of this policy, these terms have the following meaning:

“Hybrid Entity” means a single legal entity that is also a covered entity whose business activities include both covered and non-covered functions and that designates health care components.

“Covered Entity” means one or more of the following:

- A health plan;
- A health care clearinghouse; or
- A health care provider who transmits protected health information in electronic form in connection with a HIPAA covered transaction.

“Health Care Component” means a component or combination of components of a hybrid entity designated by the hybrid entity. The component or combination of components includes any component of the covered entity that:

- performs the functions of a covered entity;
- engages in activities that would make it a business associate of the covered entity if both were separate legal entities; or
- meets the definition of a covered entity if it were a separate entity.

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2. Designated TTUHSC El Paso Health Care Components. The following are designated by HSC as its health care components.

School/Institution	Departments
TTU System ¹	Board of Regents, Chancellor's Office
TTUHSC El Paso	General Counsel/Professional Liability and Risk Management
TTU System	Office of Audit Services
TTUHSC El Paso	Institutional Advancement
TTUHSC El Paso	President's Office
TTUHSC El Paso	Information Technology
TTUHSC El Paso	Office of Communications
TTUHSC El Paso	Human Resources Office
TTUHSC El Paso	Institutional Review Boards
TTUHSC El Paso	Institutional Biosafety Committee
TTUHSC El Paso	Sponsored Programs, Research Integrity Office
TTUHSC El Paso	Institutional Compliance and related Committees
TTUHSC El Paso	Rural and Community Health/Telemedicine
TTUHSC El Paso	Institutional Advancement and Communications & Marketing
TTUHSC El Paso	Volunteer Services
TTUHSC El Paso GSBS ²	Clinical Research
TTUHSC El Paso SOM ³	Administration, Clinical Operations ⁴ , Clinical Research
TTUHSC El Paso PLFSOM ⁵	Administration, Clinical Operations, Clinical Research
TTUHSC El Paso GGHSON ⁶	Administration, Clinical Operations, Clinical Research
TTUHSC El Paso	Graduate Medical Education (Residents Group Health Plan.)

Texas Tech University Health Sciences Center El Paso designates Resident Group Health Plan as a health care component included in the hybrid entity. The Graduate medical education department maintains resident's health information in its capacity as employer sponsor of the Group Health Plans. The Group Health Plans offered to Residents are separate legal entities covered under HIPAA, independent of the university. Although work force members of the hybrid entity perform duties for both the health care components and for the university, they must not use or disclose Protected Health Information (PHI) created in the course of the members work for the health care component in a way prohibited by HIPAA.

This policy and procedure will be documented and retained for a period of 6 years from the date of its creation or the date when it last was in effect, whichever is later.

Knowledge of a violation or potential violation of this policy must be reported directly to the Institutional Privacy Officer or to the employee Compliance Hotline at (866) 294-9352 or www.ethicspoint.com under Texas Tech University System.

¹Texas Tech University System

² Graduate School of Biomedical Sciences

³ Health Sciences Center School of Medicine-Lubbock (Lubbock, Amarillo and Permian Basin campuses)

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⁴ Clinical Operations includes, but is not limited to patient care activities, clinical research, medical records, patient services or any other activity involving protected health information.

⁵ Paul L. Foster School of Medicine

⁶ Gayle Greve Hunt School of Nursing

Frequency of Review

The TTUHSC El Paso Privacy and Security Committee have authority for HIPAA policy approval.

Questions regarding this policy may be addressed to the [Institutional Privacy Officer](#) or the [Institutional Compliance Officer](#).

This policy may be amended or terminated at any time.

Review Date: April 28, 2017

Revision Date: January 15, 2015; July 19, 2016; April 28, 2017