

## The University of Arizona Health Care Component Designation

The University of Arizona (UA) has designated itself as a Hybrid Entity in accordance with UA's HIPAA Privacy, Security and Breach Notification Policy and the Privacy, Security and Breach Notification Rules promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH) and all regulations promulgated thereunder (hereinafter collectively referred to as "HIPAA").

A single legal entity that otherwise qualifies as a hybrid entity must designate a component or combination of components as its HIPAA Health Care Components in accordance with 45 C.F.R. §§ 164.103 and 164.105(a)(2)(iii)(D). When determining which University of Arizona departments, clinics, programs and functions meet the definition of "Health Care Component" the following criteria were considered:

- A component's use of individually identifiable health information for research and/or education purposes;
- The extent the component acts as a business associate for covered entities;
- The extent the component performs activities that would make it a business associate if it were a separate legal entity;
- The extent a component would meet the definition of a covered entity if it were a separate legal entity or many of the workforce members are part of another covered entity (e.g., healthcare providers).

After consideration the UA has designated the following departments, clinics, programs and functions as Health Care Components under its hybrid designation.

- UA Center for Population Science and Discovery
- UA Center for Applied Genetics & Genomic Medicine
- Arizona Telemedicine and Telehealth Center
- Biomedical Informatics and Biostatistics – Clinical Data Warehouse
- College of Medicine – Tucson
- College of Nursing
- College of Pharmacy
- College of Public Health
- Campus Health Services
- Speech, Language, and Hearing Clinic
- LIFESteps Program
- UA Genetics Core
- Research Laboratory Safety Services

Effective Date	Version #	Authors	Description
11/18/2018	001	John F Howard	Draft Designation
12/12/2018	002	John F Howard	Final Designation
2/27/2019	003	John F Howard	Updated Covered Components
8/30/2019	004	John F Howard	Updated Covered Components – Added MRB GMP Facility



10/21/2020	005	John F Howard	Updated Covered Components – Added Petersen Clinic; Removed Medication Management Center
01/05/2021	006	Jon F Howard	Adding COM-T, CON, COP, & CPH. Removed covered components that belong to the new additions.