

# Tulane University

<b>DEPARTMENT:</b> General Counsel's Office -- HIPAA	<b>POLICY DESCRIPTION:</b> Designation of Health Care Components and Hybrid Entities
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<b>APPROVED:</b> April 1, 2003	<b>REVISED:</b>
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## DESIGNATION OF HEALTH CARE COMPONENTS AND HYBRID ENTITIES

**April 1, 2003**

The Health Insurance Portability and Accountability Act of 1996, Public Law 104-91 ("HIPAA"), and regulations promulgated thereunder by the United States Department of Health and Human Services establishing standards to protect the privacy of individually identifiable health information (the "HIPAA Privacy Regulations"), will impose new obligations on Tulane University to protect the privacy of such information.

Tulane University intends to take any and all necessary action to comply fully with the University's obligations under HIPAA and the HIPAA Privacy Regulations.

Tulane University hereby designates itself as a hybrid entity consistent with the HIPAA privacy regulations.

Tulane University further designates the following components of Tulane University as its health care component in accordance with the HIPAA Privacy Regulations, including, but not limited to, 45 C.F.R. §§ 164.504(a), 164.504(b), and 164.504(c) and hereby documents such designation in accordance with the HIPAA Privacy Regulations as required by 45 C.F.R. §§ 164.504(c)(3)(iii) and 164.530(j):

Tulane University Medical Group, its participating physicians and clinicians, and all University employees and departments that provide management, administrative, financial, legal and operational support services to or on behalf of Tulane University Medical Group to the extent that such employees and departments use and disclose individually identifiable health information in order to provide administrative and support services to Tulane University Medical Group and would constitute a "business associate" of Tulane University Medical Group separately incorporated.

All other departments, personnel, and employees of Tulane University are excluded from the Health Care Component.

Acknowledged by:

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[Senior Management Official]