

Name of Policy: [HIPAA organizational structure and administrative responsibilities](#)

Policy Number: 3364-15-01

Ap

- (3) Define the organizational structure and administrative responsibilities as required by HIPAA; and
- (4) Designate a privacy officer and information security officer and identify their administrative responsibilities.

(C) Scope

This policy applies to UTP (ACE) and all UToledo healthcare components (hybrid) and their respective workforce members. Healthcare components are designated routinely by the privacy and security committee. Healthcare components are identified on the UToledo healthcare compliance and institutional privacy website and include the health science campus, the university of Toledo medical center (UTMC), the student health center, and designated departments of the main campus that perform HIPAA covered functions. A reference in this policy to the covered entity refers to UTP (ACE) and the designated components of UToledo (hybrid).

(D) Designation as a hybrid entity

- (1) UToledo designates itself as a hybrid entity - a single entity that is a covered entity whose business activities include both HIPAA covered and non-covered functions, and that designates healthcare components.
- (2) The privacy and security committee determines and maintains the list of healthcare components. The healthcare components for purposes of HIPAA compliance include UToledo's entire health science campus and designated departments or units on the UToledo main campus.
- (3) The HIPAA requirements apply only to the health care components of UToledo and UTP referred to as covered entity going forward in this policy.

Although UToledo is a single legal entity, the covered entity must treat units not designated as part of the covered entity as an external entity with respect to uses and disclosures of PHI.

If a person performs duties for both the covered entity and for another unit of the university such workforce member must not use or disclose PHI created or received in the course of, or incident to, the member's work for the covered entity.

(E) Designation as a single affiliated covered entity (ACE)

- (1) UToledo and UTP are affiliated, legally separate entities under common ownership that have joined together as an affiliated covered entity (ACE) for purposes of complying with HIPAA, to be known as UToledo ACE.
- (2) The UToledo ACE will name a single HIPAA privacy officer and information security officer, adopt common HIPAA policies and procedures, and issue a single notice of privacy practices. The UToledo ACE may use a single consent form to obtain consent for uses and disclosures for treatment, payment, or healthcare operations.
- (3) The UToledo ACE will comply with all UToledo policies that address HIPAA privacy and security regulations.
- (4) PHI may be used and disclosed among the UToledo entities for purposes of providing healthcare services to patients and for other purposes permitted by HIPAA.

- (ii) Provides a method for documenting complaints and the investigation in such a manner that protects the confidentiality of the reporting individual.
- (e) Investigates all reports of HIPAA privacy incidents by documenting the investigation response, notification, and remediation. ati-1.22-c1.2 1 2 405 25.56

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