



## **Policy Statement on HIPAA Organizational Requirements**

Concern about the privacy and confidentiality of health information led to the development of federal policies designed to protect the confidentiality of health information. The Health Insurance Portability and Accountability Act (HIPAA) was passed in 1996. The University of Mississippi is committed to protecting the confidentiality of protected health information and in complying with Federal and State regulations regarding protected health information. This document describes the policy of The University of Mississippi regarding protected health information.

### Overview of The University of Mississippi

The University of Mississippi is a broad based public university providing both general education and specialized programs. The University offers certificates, associate, baccalaureate, master's and doctoral degrees, and post-doctoral residency programs. In addition to the broad based program offerings, the University serves as Mississippi's leading institution for education in the health professions and related biological and physical sciences. The University of Mississippi delivers statewide comprehensive academic programming, professional continuing education, basic and applied research, and specialized public service in the health sciences.

### **Policy Statements:**

- The University of Mississippi serves a variety of functions; among these functions is the provision of health care and training of future health care providers. Due to the wide variety of functions, under HIPAA, The University of Mississippi is a covered entity designated as a hybrid entity engaged in health care activities as well as non-health care activities.

- Together with the Chief Privacy Officer, general counsel of The University of Mississippi, and legal counsel at the University of Mississippi Medical Center, The University of Mississippi will determine, through periodic annual review and monitoring, which individual departments, clinics, or units at The University of Mississippi are considered a Health Care Component (HCC) and Business Associates of the covered entity. All HCC's and Business Associates of HCCs must comply with this policy and associated procedures.
- An HCC is defined as a department, clinic, or individual who collects, creates, transmits, or maintains protected health information as a component of a patient-provider relationship. A "Business Associate" creates, receives, maintains, or transmits protected health information for a function or activity of a HCC or from another business associate of such HCC as a subcontractor.

**Current list of clinics/departments that are considered Health Care Components of The University of Mississippi:**

- a. The University of Mississippi's only covered functions:
  - 1. Student Health Services;
  - 2. Employee Health Services;
  - 3. Child Advocacy and Play Therapy Institute (CAPTI);
  - 4. Student Health Center Pharmacy; and
  - 5. Speech and Hearing Center
- b. The University of Mississippi Medical Center and its Affiliated Covered Entities comprised of:
  - 1. The University of Mississippi Health Care;
  - 2. UNACARE, a Division of University Nursing Associates, PLLC;
  - 3. Student Health Center Pharmacy; and
  - 4. University Hospital & Clinics-Holmes County, Lexington, MS