

STANDARD ADMINISTRATIVE PROCEDURE

16.99.99.M0.01 Designation as a Hybrid Entity

Approved February 11, 2015

Revised September 7, 2018

Revised April 27, 2020

Next scheduled review: April 27, 2025

SAP Statement

This standard administrative procedure applies to Texas A&M University (TAMU) components that have been designated as a TAMU HIPAA Health Care Component. This procedure pertains to protected health information covered by the TAMU HIPAA Health Care Component’s Notice of Privacy Practices.

Definitions

[Click to view Definitions](#)

Official Procedure

Texas A&M University is designated as a hybrid entity, as defined under 45 CFR §103. In accordance with 45 CFR §105, Texas A&M University is required to designate its HIPAA health care components (“HCC”) and document such designation. Texas A&M University identifies its HCCs in the HIPAA Health Care Component Designation Memorandum Appendix A maintained by the Texas A&M University HIPAA Privacy Officer. From time to time, the Texas A&M Privacy Officer shall review the HIPAA Health Care Component Designation Memorandum, as necessary, but no less often than outlined in System Regulation 16.01.02, *Privacy*. Modifications shall be approved by the Texas A&M University Chief Risk, Ethics, and Compliance Officer in consultation with the Office of General Counsel for legal sufficiency review.

The Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009 and all their

implementing regulations as amended from time to time (collectively “HIPAA”) and the Texas A&M HIPAA Standard Administrative Procedures apply to all HCCs. From time to time, Texas A&M will make such changes to its standard administrative procedures as may be necessary, including changes required in order to comply with law.

HCCs may not share Protected Health Information, as defined under 45 CFR §103, with non-HCCs except as permitted by HIPAA. Each HCC shall appoint an individual to serve as the privacy contact and shall inform the Texas A&M Privacy Officer of this individual’s name, title and contact information. The Privacy contact shall coordinate with the Texas A&M Privacy Officer concerning implementation of the Texas A&M HIPAA Standard Administrative Procedures within the HCC.

As required under HIPAA, Texas A&M has designated the following officers to serve as the HIPAA Privacy Officer and the HIPAA Security Officer:

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Contact Office

Office of University Risk, Ethics, and Compliance