



Health Insurance Portability and Accountability Act (HIPAA)
Overview of Florida Atlantic University's Covered Components¹
September 1, 2020

INTRODUCTION

The Florida Atlantic University Board of Trustees, a public body of the State of Florida ("FAU"), has elected to be treated as a Hybrid Entity as defined in 45 C.F.R. §164.103 (i.e., a single legal entity that is a Covered Entity with business activities that include both Covered and non-Covered Functions). A Hybrid Entity must specifically designate components as HIPAA health care components ("Covered Components").

The following health care components of FAU are Covered Components:

1. The Charles E. Schmidt College of Medicine and its clinics;
2. The Christine E. Lynn College of Nursing and its clinics;
3. FAU Student Health Services (SHS); and
4. The College of Education's Communications Disorders Clinic.

APPLICABILITY

Solely for purposes of compliance with the Privacy Rule, the foregoing Covered Components will be treated as one common entity. To the extent a Covered Component performs Covered and non-Covered Functions, it shall be deemed a Covered Component only for its Covered Functions. All components not designated as a Covered Component are designated as non-Covered Components.

SCOPE

The Privacy Policies and Security Standards for Health Information, developed and approved by FAU, shall apply to all of FAU's Covered Components (including those working on behalf of the Covered Components) designated as such for purposes of complying with the privacy provisions of HIPAA and its implementing regulations.

¹ In accordance with 45 C.F.R. §§164.103 and 164.105(a)(2)(iii)(D).

POLICY STATEMENT

All Covered Components of FAU (including those working on their behalf) must comply with HIPAA and this policy. Covered Components should develop and incorporate appropriate additional procedures (within the confines of FAU's HIPAA policies) that correspond to the particular needs and functions of the specific Covered Component to assure compliance with HIPAA and its implementing regulations. All Covered Components are responsible for updating their specific procedures as needed to comply with changes in the law.

EXHIBIT

Overview of Florida Atlantic University's Covered Components: Designation of Internal Business Associates attached as Exhibit A.

Exhibit A

Below is a designation by FAU, a Hybrid Entity under HIPAA, of components that engage in activities that would make each component a Business Associate of a Covered Component if the two components were separate legal entities. [See definition of Covered Component]. The following list includes, but is not limited to, such components functioning as designated internal business associates. The list is not intended to be exhaustive, and FAU reserves the right, from time to time, to designate additional components as internal business associates as it deems necessary or appropriate and consistent with Minimum Necessary rules and requirements.

Academic Affairs/Provost
Administrative Affairs
Athletics
Compliance Office
Controller's Office
Division of Research
Environmental Health and Safety
Financial Affairs
Financial Aid
Housing and Residential Life
Human Resources
Office of Equity and Inclusion
Office of Information Technology
Office of the General Counsel
Ombuds
President's Office
Public Affairs
Public Safety
Registrar
Student Accessibility Services
Student Affairs
The Center for Inclusion, Diversity Education and Advocacy
University Police Department
Victim's Advocate