

Hybrid Covered Entity Status for the University of Louisville

The following determinations have been made by University of Louisville regarding the hybrid covered entity (HCE) status.

If your department or organization is not listed below, you are not considered to be part of the UofL hybrid covered entity at this time. To access PHI from a covered entity (including those within UofL's hybrid entity or other covered entities such as University Hospital), you will be required to obtain a HIPAA compliant authorization or an IRB approved waiver of authorization.

If you are in a department or part of a department within the covered entity, you need to have completed your HIPAA training no later than April 14, 2003.

Department	Entity Status	Justification
Athletics	OUTSIDE THE HCE	Athletics expects to use written authorizations from the athletes U of L Athletic Association is a separate legal entity and cannot be a part of the UofL hybrid entity. Additional details will be forthcoming.
Schools of Nursing, Dentistry and Medicine, and affiliated Institutes and Centers	INSIDE THE HCE	All three schools are considered part of the covered entity. This designation includes Student Health on both campuses.
Psychological Services Center	OUTSIDE THE HCE	The Psychological Service Center was previously included in the HCE, however it was determined that the center does not meet the HIPAA definition of a covered entity, nor does it act in a business associate capacity to the

Information Technology (IT), Audit Services, Benefits	INSIDE THE HCE	covered components.
IRB	OUTSIDE THE HCE	The IRB Committees and its staff were previously included in the HCE, however it was determined that the IRB nor its staff meets the HIPAA definition of a covered entity nor does it act in a business associate capacity to the covered components.
College of Education and Human Development: Learning Improvement Center and Exercise Physiology Program, Health Promotion Center and Health Promotion Program within the Dept of Health Promotion, Physical Education and Sport Studies	OUTSIDE THE HCE	The listed components of the College of Education and Human Development were previously included in the HCE, however it was determined that these components do not meet the HIPAA definition of a covered entity nor do they act in a business associate capacity to the covered components.
College of Business and Public Administration, School of Urban and Public Affairs, Urban Studies Institute	INSIDE THE HCE	The activities of the USI related to the conversion of non-standard data in to a standard format for the purposes of submitting billing information to the State of Kentucky Medicaid offices on

behalf of the Cabinet of Health.

University Archives and
Records

**INSIDE
THE HCE**

The portion of this department holding
medical records is included within the
covered entity

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