



APS JUSTIFICATION

Policy Title: HIPAA Hybrid Entity Designation

APS Number: 5055

APS Functional Area: **HUMAN RESOURCES**

Date Submitted:	November 8, 2024
Proposed Action:	Revise
Brief Description:	To establish formal HIPAA hybrid entity declaration and health care component designations.
Desired Effective Date:	January 1, 2025
Responsible University Officer:	Vice President for Employee Services
Responsible Office:	Employee Services
Last Reviewed/Updated:	July 1, 2014
Applies to:	University-wide.

Reason for Policy: To comply with the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH Act) obligations.

I. REASON FOR PROPOSED ACTION

Due for review.

II. STAKEHOLDERS *ENGAGED* (OR TO BE ENGAGED) IN THE POLICY REVIEW:

- Associate Director, Privacy, University of Colorado Denver, Anschutz Medical Campus
- Office of University Counsel, University of Colorado System

III. LEGAL REVIEW

- A. Do you think legal review would be required for these proposed changes? **Legal review of this policy is required and will be completed upon presentation of the final policy for approval.**
- B. **Legal review is in progress.**
- C. Person completing legal review: **Melissa Martin, Senior Associate University Counsel**

IV. FISCAL REVIEW Are there any financial (human resources, technology, operations, training, etc.) or other resource impacts of implementing this policy (e.g. cost savings, start-up costs, additional time for faculty or staff, new systems, or software)? If yes, please explain: **N/A**