

TITLE

HIPAA Privacy Program Authority and Responsibilities

PURPOSE

The University of Arizona (UA) has designated itself as a Hybrid Entity in accordance with UA's HIPAA Privacy, Security and Breach Notification Policy and the Privacy, Security and Breach Notification Rules promulgated pursuant to the Health Insurance Portability Accountability Act of 1966 (HIPAA), the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH) and all regulations promulgated thereunder (hereinafter collectively referred to as "HIPAA").

REVIEW/REVISIONS

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- 06/2015

REFERENCES AND RELATED FORMS

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- Capitalized terms are defined in HIPAA Privacy Program Guidance (Definitions of Key Words) and 45 CFR Parts 160 and 164
 - The University of Arizona HIPAA Privacy, Security and Breach Notification Policy (2013)

AUTHORITY AND RESPONSIBILITIES

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1. Authority: UA has designated itself a Hybrid Entity in accordance with UA's Privacy, Security and Breach Notification Policy and 45 CFR §§ 164.103 and 164.105. UA Health Care Components (HCCs) are responsible for adopting their own operating procedures that are consistent with this procedure and the HIPAA Privacy, Security and Breach Notification Rules.

Alternatively, Components may reference procedures as their operating procedure(s) if no further information is needed relative to their specific operations. However, Component's internal procedures should be reviewed by the HIPAA Privacy Officer or his/her designee prior to implementation.

2. Responsibilities of the HIPAA Privacy Program: The HIPAA Privacy Program, located within Research Compliance Services (RCS) and led by the HIPAA Privacy Officer, will provide assistance to facilitate HCC's compliance with UA HIPAA Policy and these procedures.

Under UA Policy, the HIPAA Privacy Officer is charged with implementing this procedure and overseeing UA's HIPAA compliance program, which includes developing standard procedures. The HIPAA Privacy Program will work with the Information Security Office, in

coordination with HCCs, to protect the confidentiality, integrity and availability of Electronic Protected Health Information in the possession of Components.

3. Questions, concerns or feedback: Please contact the HIPAA Privacy Program at (520) 621-1465 or PrivacyOffice@email.arizona.edu.
4. Conflicts: These procedures and associated forms and guidance are established for HCC's ease of reference. If a conflict arises between the guidance in these procedures and HIPAA regulations, the terms of the HIPAA regulations will govern.