Applicability: UW Medicine

Policy Title: Designation of Healthcare Components at the University of Washington

Policy Number: PP-01

Superseded Policy(ies) or Entity Policy: N/A

Date Established: December 23, 2002

Date Effective: June 15, 2015


Next Review Date: June 15, 2018

PURPOSE AND SCOPE
This policy is applicable to all UW Medicine entities.

POLICY PRINCIPLES/STATEMENT
See POLICY.

DEFINITIONS
See UW Medicine Compliance Policy: PP-00 Glossary of Terms.

POLICY
The Health Insurance Portability and Accountability Act (HIPAA) privacy regulations (45 CFR Parts 160 and 164); require that the University of Washington (UW) designate its healthcare components. The University is a hybrid entity, having both non-healthcare components and healthcare components. Non-healthcare components are not subject to the HIPAA regulations governing privacy of protected health information (PHI).

I. The University of Washington Healthcare Components are as follows:
   Please see Attachment A – UW HIPAA Designation (University of Washington Health Sciences Healthcare Components and University of Washington UW Medicine Healthcare Components).
   A. The UW Medical Center (UWMC) and Clinics
   B. Airlift Northwest (Airlift)
   C. Hall Health Center (HHC)
   D. Autism Center at Center on Human Development and Disability (CHDD)
   E. Behavioral Research & Therapy Clinics in the College of Arts and Sciences
F. Department of Pediatrics Molecular Development Lab
G. Laboratory Medicine Reference Lab
H. Pathology Reference Lab
I. Psychology Clinics in the College of Arts and Sciences
J. School of Dentistry Clinics and Faculty Practice Plan
   (Practice Plan also known as UW Dentists)
K. Speech and Hearing Clinics in the College of Arts and Sciences
L. Student Health Services at UW Tacoma
M. UW Male Fertility Lab
N. UW Medication Therapy Management (MTM) Pharmacy in the School of Pharmacy
   (also known as UW Pharmacy Cares)

II. The UW further designates the following healthcare components to be one affiliated covered entity known as UW Medicine:
   Please see Attachment A – UW HIPAA Designation (UW Medicine – Affiliated Covered Entity - Other Healthcare Components and the UW Medicine Organized Healthcare Arrangements).

   A. Harborview Medical Center (HMC) and Clinics
   B. Northwest Hospital & Medical Center (NWH) and Clinics
   C. King County Public Hospital District No. 1 d/b/a Valley Medical Center (VMC) and Clinics
   D. The UW Medical Center (UWMC) and Clinics
   E. UW Physicians Network d/b/a UW Neighborhood Clinics
   F. The Association of University Physicians d/b/a UW Physicians
   G. Airlift Northwest (Airlift)
   H. Hall Health Center (HHC)
   I. Laboratory Medicine Reference Lab
   J. Pathology Reference Lab
   K. Department of Pediatrics Molecular Development Lab
   L. UW Male Fertility Lab
   M. Summit Cardiology
   N. Neurosurgical Consultants of Washington
   O. The Seattle Arthritis Clinic
Organized Healthcare Arrangements (OHCAs) allow entities to share PHI for clinical care services, payment for clinical care services and any healthcare operations activities of the OHCA. UW Medicine has entered into the following OHCAs:

- UW Medicine, Seattle Cancer Care Alliance (SCCA), Children’s University Medical Group (CUMG), Seattle Children’s Hospital, the UW School of Dentistry Clinics & Faculty Practice Plan, and non-UW Medicine physicians when non-UW Medicine physicians participate in and provide services to patients within UW Medicine and SCCA facilities;
- UW Medicine, SCCA, SCCA Proton Therapy, A ProCure Center and CUMG;
- UW Medicine and VIA Radiology-Meridian Pavilion.

III. Healthcare and Other Covered Components of the UW

Certain services and activities that support the healthcare components are performed by non-healthcare components of the UW. To the extent that non-healthcare components perform support functions requiring the use or disclosure of PHI for or on behalf of healthcare components, they are deemed to be functioning as healthcare components. Support functions include the following:

A. Administrative Support relating to treatment, payment or healthcare operations
B. Compliance
C. Development/Advancement
D. Document Retention Services
E. Environmental and Workplace Safety
F. Information Systems Management
G. Investigations involving clinical care or scholarly integrity
H. Medical staff peer review
I. Planning
J. Personnel Services
K. Risk Management
L. Telemedicine Support Services

IV. UW Healthcare Components Policy Governance

UW designated healthcare components are subject to the privacy and information security policies established by UW Medicine. Wherever policies refer to “UW Medicine” or specify a UW Medicine authority, each UW designated healthcare component will substitute their respective entity-specific name or authority.

REGULATORY/LEGISLATION/REFERENCES

- 45 CFR Part 160 and 164; Section 164.504 – Uses & Disclosures of Protected Health Information – Organizational Requirements
PROCEDURE ADDENDUM(s) REFERENCES/LINKS

- UW Medicine Compliance Policy: PP-00 Glossary of Terms
- UW Medicine Compliance Policy: PP-01, Attachment A: University of Washington HIPAA Designation

ROLES AND RESPONSIBILITIES
Defined within POLICY.

AUTHORITIES

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<tr>
<th>Custodian</th>
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<th>Implementation Officer</th>
<th>Administrative Officer</th>
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<td>UW Medicine Executive Compliance Committee</td>
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APPROVALS

__________________________  ___________________________
UW Privacy Official          Date
Johnese M. Spisso, Chief Health System Officer, UW Medicine & Vice President for Medical Affairs, UW