

Department: UW Medicine Compliance

Subject: PP-01 Designation of Health Care Components at the University of Washington

Policy Number: 01

Established Date: December 23, 2002

Revised Date: August 23, 2004, May 21, 2007, January 23, 2009

Review Date: January 31, 2003

---

---

***Policy:***

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

**I.** The Health Care Components at the University are as follows:

- The University of Washington Medical Center and clinics;
- Harborview Medical Center, as operated and managed by the University of Washington under the contract between the Board of Regents and the Harborview Board of Trustees;
- Hall Health Primary Care Center;
- UW Physicians Sports Medicine Clinic;
- The Association of University Physicians d/b/a University of Washington Physicians (UWP);
- UW Medicine Eastside Specialty Center; and
- UW Medicine Neighborhood Clinics (University of Washington Physicians Network (UWPN)).
- School of Dentistry Clinics and Faculty Practice Plan (Practice Plan also known as “UW Dentists”);
- Autism Clinic;
- Speech and Hearing Clinics in the School of Arts and Sciences;
- Psychology Clinics in the School of Arts and Sciences;
- Behavioral Research & Therapy Clinics in the School of Arts and Sciences; and
- UW MTM Pharmacy in the School of Pharmacy (also known as “UW Pharmacy Cares”).

Please see UW Medicine Privacy Policy PP01 Attachment A – UW Designation.

**II.** The University of Washington further designates the following health care components to be one affiliated covered entity known as UW Medicine:

- ◆ The University of Washington Medical Center (UWMC) and clinics;
- ◆ Harborview Medical Center (HMC) as operated and managed by the University of Washington pursuant to agreement with the HMC Board of Trustees;
- ◆ Hall Health Primary Care Center (HHPCC);
- ◆ UW Physicians Sports Medicine Clinic;
- ◆ The Association of University Physicians d/b/a University of Washington Physicians (UWP);
- ◆ UW Medicine Eastside Specialty Center; and
- ◆ UW Medicine Neighborhood Clinics (University of Washington Physicians Network (UWPN)).

UW Medicine has entered into an Organized Health Care Arrangement with the Seattle Cancer Care Alliance (SCCA), Children’s University Medical Group (CUMG), Children’s, and Non-UW Physicians when non-UW physicians participate in and provide services to patients within UW Medicine and SCCA facilities. This arrangement allows these entities to share PHI for clinical care services, payment for clinical care services, and perform joint health care operations.

**III. Health Care and Other Covered Components of the University of Washington**

Certain services and activities that support the health care components are performed by non-health care components of the UW. To the extent that non-health care components perform support functions requiring the use or disclosure of protected health information for or on behalf of health care components, those non-health care components are deemed to be functioning as health care components in performing those support functions. Support functions include the following:

- ◆ Administrative Support relating to treatment, payment, or healthcare operations;
- ◆ Compliance;
- ◆ Development;
- ◆ Document Retention Services;
- ◆ Environmental and Workplace Safety;
- ◆ Information Systems Management;
- ◆ Investigations Involving Clinical Care or Scholarly Integrity;
- ◆ Medical Staff Peer Review;
- ◆ Planning;
- ◆ Personnel Services;
- ◆ Risk Management; and
- ◆ Telemedicine Support Services.

---

---

**References:**

- I. 45 CFR Part 160 and 164; Section 164.504 – “Uses & Disclosures of Protected Health Information – Organizational Requirements”

---

---

UW Privacy Officer: \_\_\_\_\_ Date: \_\_\_\_\_  
Johnese M. Spisso, Vice President for Medical Affairs, UW & COO UW Medicine

---

---