



**Designated Components of the FIU HIPAA Hybrid Covered Entity  
#1610.005**

| INITIAL EFFECTIVE<br>DATE: | LAST REVISION<br>DATE: | RESPONSIBLE UNIVERSITY<br>DIVISION/DEPARTMENT |
|----------------------------|------------------------|---|
| September 1, 2009          | July 1, 2025           | Office of Compliance and Integrity            |

**POLICY STATEMENT**

Florida International University (“FIU”) is committed to protecting the privacy of Protected Health Information in compliance with all applicable federal and state laws, regulations and rules. For purposes of compliance with the Health Insurance Portability and Accountability Act (HIPAA), FIU has determined that it is a “Hybrid Covered Entity” and has designated the facilities and programs that constitute HIPAA Hybrid Components (Components).

**SCOPE**

This policy applies to the Components specifically identified as part of the FIU HIPAA Hybrid Designation, its Workforce members, and Business Associates as identified in this policy and procedure.

**REASON FOR POLICY**

The purpose of this policy is to define the Components of the FIU Hybrid Covered Entity and describe the process for designation and review of any new or existing Components.

**DEFINITIONS**

Please refer to the following link for a complete list of definitions pertaining to all HIPAA policies.

[HIPAA Policies Definitions](#)

**ROLES AND RESPONSIBILITIES**

**Compliance Oversight:** The Director of Compliance and Privacy for Health Affairs:

- Evaluates all federal and state healthcare privacy laws, regulations, rules and ordinances (Rules) to ensure compliance with the Rules

- Develops and maintains in coordination with the Office of General Counsel and the HIPAA Hybrid Designated Component Privacy Coordinators all required University-wide Privacy Rule policies and procedures.
- Partners with the Division of Information Technology HIPAA Security Officer to ensure compliance with all federal and state healthcare privacy and security laws, regulations rules, and ordinances.

#### **HIPAA Components:**

- Each FIU HIPAA Hybrid Designated Health Care Component must designate a Privacy Coordinator responsible for overseeing and ensuring their Component's implementation and compliance with the HIPAA Privacy Rule, FIU's associated HIPAA Privacy Policies and Procedures, and any applicable federal and Florida state healthcare privacy laws, regulations, rules and ordinances (Rules) governing the confidentiality, integrity and availability of PHI and electronic PHI (ePHI).
- Each FIU HIPAA Hybrid Designated Health Care Component must designate a Security Coordinator responsible for overseeing and ensuring their Component's implementation and compliance with the HIPAA Security Rule, FIU's associated HIPAA Privacy Policies and Procedures, and any applicable federal and Florida state healthcare security laws, regulations, rules and ordinances (Rules) governing the technical, administrative, and physical safeguarding of electronic PHI (ePHI).

#### **RELATED RESOURCES**

##### **References**

- 45 CFR §164.105(a)(2)(iii)(D)

##### **Related Policies**

- FIU Policy and Procedure #1660.070 (Designation of HIPAA Privacy Officer and Component Privacy and Security Coordinators)
- FIU Policy and Procedure #1610.010 (HIPAA Privacy and Security: Responsibilities of University IT Security Officer and HIPAA Security Administrators)
- FIU Policy and Procedure #1660.015 (Business Associate Agreements)

#### **CONTACTS**

For further information concerning this policy, please contact the Director of Compliance and Privacy for Health Affairs at (305) 348-0622 or [hipaaprivacy@fiu.edu](mailto:hipaaprivacy@fiu.edu), or contact the appropriate Component Privacy Coordinator.



## HISTORY

**Initial Effective Date:** September 1, 2009 (Formerly known as “Designated Health Care Components of FIU Community (faculty, staff students))

**Review Dates** (*review performed, no updates*): n/a

**Revision Dates** (*review performed, updates made to document*): June 8, 2015, December 31, 2017, and March 3, 2020; August 31, 2021; February 29, 2024; July 1, 2025.



**Designated Components of the FIU HIPAA Hybrid Covered Entity  
#1610.005a**

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**PROCEDURE STATEMENT**

**I. Designation of FIU's HIPAA Hybrid Health Care Component (Health Care Component)**

A. The following facility and program engages in certain functions covered by the HIPAA Privacy and Security Rules. FIU has designated the following facility and program that will comprise its Covered Health Care Component:

- The College of Arts and Science Center for Children and Families, excluding research.

**II. Designation of FIU's HIPAA Hybrid Components (Support Components)**

A. There are certain FIU facilities and programs that support Health Care Components. These Components perform specific business associate type activities and are therefore included in the FIU Health Hybrid Designation to the extent these Components are engaged in HIPAA-related activities or provide business associate-type support to the Health Care Component/s. The FIU Components performing specific business associate type activities are:

- The Office of General Counsel.
- The Office of Internal Audit.
- The Office of Compliance & Integrity.
- The Division of Information Technology (DoIT) Security Unit, Network Services Unit, Operations Unit, and the Windows Enterprise Unit.

B. The FIU Health Care Component and Support Components must adhere to the HIPAA Privacy and Security Rules, Florida state statutes, and all FIU HIPAA associated policies and procedures. HIPAA compliance matters must be reported to the Director of Compliance and Privacy for Health Affairs (HIPAA Privacy Officer), the HIPAA Security Officer, and/or the Component Privacy and/or Security Coordinator.

C. The designation of Health Care Components and Support Components is subject to change, as necessary and appropriate. Such change is made by the Director of Compliance and Privacy for Health Affairs in consultation with the Office of General Counsel, and the Director of Compliance and Privacy for Health Affairs.