

## Managing HIPAA in a Local Public Health Agency: Selected Issues & Resources

HIPAA Critical Updates Workshop, May 2016

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### **Covered Entities, Hybrid Entities, & Business Associates**

- Aimee Wall, Coates' Canons Blog Post: [Should a Local Government be a HIPAA Hybrid Entity?](#)
- HHS Resources: <http://www.hhs.gov/hipaa/for-professionals/covered-entities/index.html>
- HIPAA Regulations:
  - Definitions of "covered entity" and "business associate": [45 CFR 160.103](#)
  - Definition of "hybrid entity" and "health care component": [45 CFR 164.103](#)
  - Organizational requirements for hybrid entities: [45 CFR 164.105\(a\)](#)

### **HIPAA Officers**

- HIPAA Regulations
  - Security official (responsible for security policies & procedures): [45 CFR 164.308\(a\)\(2\)](#)
  - Privacy official (responsible for privacy policies & procedures): [45 CFR 164.530\(a\)](#)
- Recommended Reading – Article about the changing role of the HIPAA privacy officer: Dimick, Chris. "The New Privacy Officer" *Journal of AHIMA* 83, no.4 (April 2012): 20-25, available at <http://bok.ahima.org/doc?oid=105340#.V9GfpU0rK7Q>.

### **Policies & Procedures**

- HHS Information on Privacy Rule
  - Summary: <http://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>
  - Guidance on specific provisions: <http://www.hhs.gov/hipaa/for-professionals/privacy/guidance/index.html>
- HHS Information on Security Rule
  - Summary: <http://www.hhs.gov/hipaa/for-professionals/security/laws-regulations/index.html>
  - Guidance documents and educational paper series: <http://www.hhs.gov/hipaa/for-professionals/security/guidance/index.html>
- NCHICA (NC Healthcare Information & Communications Alliance) has materials on various matters that are sometimes available to nonmembers as well as members: <http://nchica.org/resources/hipaahitech/>