



Oklahoma State University

Title: Requirements for a Covered Entity with Multiple Covered Functions.	Policy #: PRV-02.05
Category: HIPAA Compliance	Authority: 45 CFR § HIPAA SECTIONS: 164.504(g)
Standard: Uses and disclosures: Organizational Requirements	Responsibility: Health Care Components
Effective Date: 4/14/2003	Page 1 of 1
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

To establish the responsibilities of OSU since we operate multiple covered functions under HIPAA

POLICY:

OSU performs multiple covered functions that would make OSU any combination of a health plan, a covered health care provider, and a health care clearinghouse, must comply with the standards, requirements, and implementation specifications of the Privacy Rule, as applicable to the health plan, health care provider, or health care clearinghouse covered functions performed. §164.504(g)(1)

OSU performs multiple covered functions and may use or disclose the protected health information of individuals who receive the health plan or health care provider services, but not both, only for purposes related to the appropriate function being performed. §164.504(g)(2)

PROCEDURE:

OSU is a hybrid entity and operates as a covered health care provider and as a clearinghouse in two separate functions. OSU does not operate a health plan of any kind, and as such will not need to follow the rules specifically for health plans.

OSU's health care providers and the clearinghouse are two distinct organizational departments under the OSU umbrella. The OSU health care provider claims information does get sent to OSU's clearinghouse. The clearinghouse is for adjunct faculty who provide teaching opportunities to OSU medical students and OSU's Residency Doctor program.

REFERENCE:

§160.103 Definition of Business Associate
SEC-03.01 Isolating Health Care Clearinghouse Functions