



Minnesota State Colleges and Universities Statement on Its Designation as a Hybrid Entity Under HIPAA

Minnesota State is committed to ensuring the privacy and security of personally-identifiable health information.

The Health Insurance Portability and Accountability Act (“HIPAA”) regulations apply to organizations and individuals in the health care industry such as health plans and health care providers. These are called “covered entities,” meaning they are covered by HIPAA. Although Minnesota State does not primarily engage in the provision of health care, some units within the system may perform functions that bring Minnesota State within the definition of a covered entity. Minnesota State therefore designates itself as a “hybrid entity” -- the term for an institution performs both HIPAA-covered and non-covered functions.

As a hybrid entity, Minnesota State must designate those departments (“Health Care Components”) that perform covered functions and would meet the definition of a covered entity if they were a separate legal entity. Minnesota State designates the following departments and centers, in their entirety, as Health Care Components that are required to comply with any applicable HIPAA regulation(s):

- 1) The Dental Hygienic Clinic, Speech and Language Therapy Clinic, and Student Health Services at Minnesota State University – Mankato
- 2) The Dental Hygienic Clinic at Minnesota State Community and Technical College
- 3) The Dental Hygienic Clinic at Rochester Community and Technical College.
- 4) The St. Cloud State University Medical Clinic.

The following administrative personnel and offices within Minnesota State, to the extent they perform support functions on behalf of any of the Health Care Components listed above, and access Protected Health Information (as defined in HIPAA) in performing those support functions, are also designated Health Care Components:

- 1) System Office and Campus Business/Finance/Accounting Offices
- 2) Office of the General Counsel
- 3) System Office and Campus IT Divisions
- 4) Office of Internal Audit
- 5) Campus HIPAA Privacy and Security Officers
- 6) Campus Offices of Sponsored Programs and/or Research
- 7) Other individuals or offices who may become part of the HIPAA Health Care Component(s) for limited projects.