



**The University of North Carolina Chapel Hill
 HIPAA Hybrid Entity & Covered Component Designation**

Since 2002, the University of North Carolina Chapel Hill (UNC-CH) has designated itself as a Hybrid Entity in accordance with the HIPAA Privacy, Security and Breach Notification Rules promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH) and all regulations promulgated thereunder (hereinafter collectively referred to as “HIPAA”).

By making this Hybrid Entity designation, only the parts of UNC-CH performing covered functions (each a "Covered Component") are subject to HIPAA. When determining which UNC-CH units, departments, clinics, programs and functions meet the definition of a Covered Component the following criteria were considered:

- The extent a component meets the definition of a covered entity if it were a separate legal entity.
- The extent a component performs covered functions (e.g., treatment).
- The extent a component performs activities that would make it a business associate if it were a separate legal entity.
- The extent a component uses individually identifiable health information for research and/or education purposes.

One consequence of designating UNC-CH as a Hybrid Entity according to the location where Covered Functions are performed is a need to continually assess whether other locations at UNC-CH should be included in the Hybrid Entity designation. After consideration, UNC-CH has designated the following units, departments, divisions, clinics, programs and functions as Covered Components under its hybrid designation:

UNC-CH Unit	Covered Component	UNCHCS ACE¹
School of Dentistry	All	
School of Medicine	All, except for Student Health Action Coalition (SHAC) Medical Clinic	Yes
College of Arts & Sciences	UNC Community Psychology Services Clinic Exercise & Sports Science, Brain Body Health Program & Milestone Wellstone Program Office of Arts & Sciences Information Services (OASIS)	

¹ In 1998, the University of North Carolina Healthcare System (UNCHCS) was established with responsibility for the clinical patient care programs established or maintained by the UNC-CH School of Medicine. See NCGS §116-350.5. HIPAA allows covered entities under common ownership or control to join together to form a single affiliated covered entity for purposes of compliance with HIPAA. See 45 C.F.R. § 164.105(b). As a health care provider, UNCHCS has formed the UNCHCS ACE which includes certain UNC-CH Covered Components as reflected in this chart. Under the ACE, UNCHCS has been designated as having HIPAA compliance responsibility for clinical uses of Protected Health Information (PHI) while UNC-CH maintains HIPAA responsibility for research and some teaching uses of PHI created or maintained by the School of Medicine.



Student Affairs	Campus Health Counseling and Psychological Services (CAPS) Student Affairs Information Technology (SAIT)
Information Technology Services (ITS)	All
Office of University Counsel	Office of University Counsel Institutional Privacy Office University Policy Office Public Records IT support for Office of University Counsel
Internal Audit	All
Finance & Budget	Accounting Services Accounts Payable Payroll
Facility Services	Office of Waste Reduction & Recycling
Development Office	Grateful Patient Program; Information Technology Services of Development Office
Office of the Vice Chancellor of Research (OVCR)*	Vice Chancellor for Research Senior Associate Vice Chancellor for Research Office of Human Research Ethics Office of Clinical Trials Sheps Secure Research Workspace Enclave (Sheps SRW) Sheps Research Computing Cluster (SRCC) Sheps Integrated Solutions Hybrid Covered Entity (SIRS HCE) Sheps Cecil (Hybrid Covered Entity paths only) Researchers and key personnel on human subjects research ² Office of Research Information Systems Research Data Management Core (RDMC) Odum Institute for Research in Social Science Research Integrity Officer and all other individuals responsible for and involved with investigation of scientific misconduct allegations or the IRBs
Renaissance Computing Institute (“RENCI”)	RENCI Advanced Cyberinfrastructure Support Team (ACIS) RENCI Covered Research Area
Eshelman School of Pharmacy	Eshelman Institute for Innovation’s “Project Goldie”

Review & Revision History:

March 2021 (Version 1.0); April 2022 (Version 2.0); September 2022 (Version 3.0); November 2022 (Version 4.0); November 2023 (Version 5.0); June 2024 (Version 6.0); December 2024 (Version 7.0); February 2025 (Version 8.0)

² Researchers with appointments outside the UNC Covered Components who conduct research involving PHI in collaboration with researchers with appointments in the UNC Covered Components or UNCHCS are considered members of the UNC Covered Components for the duration of such research and are subject to applicable UNC HIPAA Privacy and Security policies and procedures, including applicable training policies.