
**University of Wisconsin-Madison
Policy and Procedures**

Policy Number: 1.2
Policy Title: Designation of the University of Wisconsin Affiliated Covered Entity
(also known as the “UW ACE”)
Effective Date: April 14, 2003
Last Revision Date: July 12, 2018 (Supersedes the prior policy dated May 26, 2014)

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I. Policy

The following entities or units thereof comprise the University of Wisconsin Affiliated Covered Entity:

- A. The Units of the UW-Madison Health Care Component, except University Health Services, the State Laboratory of Hygiene, and the Athletics Department;
- B. The University of Wisconsin Hospitals and Clinics Authority;
- C. The University of Wisconsin Medical Foundation, Inc.; and
- D. SwedishAmerican Hospital, including SwedishAmerican Medical Group, SwedishAmerican Home Health Care, and SwedishAmerican Medical Center Belvidere.

UW-Madison researchers with appointments to departments or programs which are not included in the UW HCC (as defined below) and who conduct research involving the use of protected health information in collaboration with researchers with appointments in the UW HCC (as defined below) are considered members of the UW HCC and, thus, the UW ACE for purposes of such research.

II. Definitions

- A. Affiliated Covered Entity (“ACE”): Legally separate covered entities that are affiliated (under common ownership or control) and designate themselves as a single covered entity for purposes of complying with HIPAA.
- B. Covered Entity: A health plan, health care clearinghouse, or health care provider that transmits any health information in electronic form in connection with a transaction covered by HIPAA.
- C. Health Care Component (“HCC”): A component or combination of components of a hybrid entity designated by the hybrid entity as covered by HIPAA.
- D. Hybrid Entity: A single legal entity that meets the definition of a covered entity, but whose business activities include both covered and non-covered functions, and that designates a health care component(s).
- E. UW-Madison Health Care Component (“UW HCC”): Those units of UW-Madison that have been designated as part of its health care component. For purposes of this policy, the UW HCC excludes

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University Health Services, State Laboratory of Hygiene and the Athletics
Department.

III. Documentation Requirements

In accordance with HIPAA, the UW ACE is formally documented by the members of the UW ACE in an "Affiliated Covered Entity Designation Agreement" dated July 1, 2018.

IV. Forms

None.

V. References

45 CFR 164.105

VI. Related Policies

Policy Number 1.1: "Designation of the UW-Madison Health Care Component"

VII. For Further Information

For further information concerning this policy, please contact the UW-Madison HIPAA Privacy Officer. Contact information is available at compliance.wisc.edu/hipaa.

Reviewed By:

UW-Madison HIPAA Privacy Officer
UW-Madison Office of Legal Affairs
UW-Madison HIPAA Privacy & Security Operations Committee

Approved By:

UW-Madison HIPAA Executive Board