

Declaration of Hybrid Entity

This declaration is made pursuant to the requirements established by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology Economic and Clinical Health Act of 2009 (HITECH), and the Omnibus Rule update of 2013 to protect personal health information. These Acts allow entities that perform both covered and non-covered functions to designate themselves as hybrid entities. In declaring hybrid entity status, Michigan Public Health Institute (MPHI) must designate and document components of the company which are covered health care components.

HIPAA standards must be applied to health plans, health care clearing houses, and health care providers that transmit health information in an electronic format. Hybrid entities are defined as a single legal entity that performs both HIPAA covered and non-covered functions and that designates health care components in accordance with 45 CFR 164.504(c)(3)(iii). MPHI has determined that it performs both covered and non-covered functions; thus health care components must be designated.

MPHI has declared itself a hybrid entity pursuant to 45 CFR 164.103 and 164.105. The following project is designated health care components (HCC) of MPHI:

1. Eligibility Support

This declaration applies to all employees of MPHI, especially those performing work on projects or in program areas which are designated as health care components.

Documentation of this designation must be maintained for six years following termination of a covered entity and indefinitely for ongoing covered entities. Designation of HCCs will be reviewed at least annually in order to evaluate the appropriateness of the designation.