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

Policy Number: 1.2
Policy Title: Designation of the University of Wisconsin Affiliated Covered Entity (UW ACE)
Effective Date: April 14, 2003
Last Revision Date: May 26, 2014
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I. Policy

The Units of the UW-Madison Health Care Component (UW HCC) (except University Health Services, State Laboratory of Hygiene and Athletics Department), the University of Wisconsin Medical Foundation and the University of Wisconsin Hospital and Clinics Authority comprise the University of Wisconsin Affiliated Covered Entity.

Researchers with appointments outside of the UW HCC (as defined below) 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 health care 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 Athletics
Department.

III. Documentation Requirements

None.

IV. Forms

None.

V. References

45 CFR 164.504(d) (HIPAA Privacy Rule)

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 or the appropriate unit HIPAA Privacy Coordinator or sub-Coordinator. Contact information is available within the “Contact Us” tab at hipaa.wisc.edu.

Reviewed By:

Chancellor
Chancellor’s Task Force on HIPAA Privacy
UW-Madison HIPAA Privacy Officer
UW-Madison Office of Legal Affairs

Approved By:

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Interim HIPAA Privacy and Security Operations Committee