

Designation of the Palmer College of Chiropractic Health Care Component

RATIONALE

Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulations apply to businesses and individuals in the health care industry such as health plans, health care clearinghouses, and health care providers as defined by “covered entities” (see “Definitions” below in this policy) and such covered entities must comply with the requirements to protect the privacy and security of health information and must provide individuals with certain rights with respect to their health information.

PURPOSE

Palmer College of Chiropractic Affiliated Covered Entity is a “hybrid entity” in that it has both health care units that perform HIPAA-covered functions (e.g. provide health care) and those that do not. As a hybrid entity, Palmer College of Chiropractic Affiliated Covered Entity, Institutional Policy has designated those health care units that perform covered functions, and those individuals or units that perform support functions on behalf of the health care units, as its “Health Care Component.”

SCOPE

The Designation of the Palmer College of Chiropractic Health Care Component policy (Policy) applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus.

DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

- > The term “**affiliated covered entity**” (ACE) refers to 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.
- > The term “**College community**” refers to all students, faculty, staff (including administration), and any other person(s), groups, or organizations affiliated with any Palmer campus.

- > The term **“covered entity”** refers to 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.
- > The acronym **“EAH”** refers to Ecumenical Association of Housing Facility.
- > The acronym **“EHC”** refers to Emergency Housing Consortium Facility.
- > The term **“Health Care Component”** (HCC) refers to a component or combination of components of a hybrid entity designated by the hybrid entity as covered by HIPAA.
- > The term **“hybrid entity”** refers to 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).
- > The term **“Palmer College of Chiropractic Health Care Component”** (PCC HCC) refers to those health care units of Palmer College Foundation and Palmer College of Chiropractic West that have been designated as part of its health care component.

DESIGNATED UNITS OF PALMER COLLEGE OF CHIROPRACTIC HEALTH CARE COMPONENT (PCC HCC)

The following are designated units of Palmer College of Chiropractic Health Care Component (PCC HCC):

- 1. Palmer College Foundation; dba: Palmer College of Chiropractic and Palmer College Foundation Inc. dba: Palmer College of Chiropractic Florida:**
 - a) Palmer Chiropractic Clinics, Quad Cities, Iowa/Illinois;
 - i. Campus Health Center, Davenport, IA
 - ii. Academic Health Center, Davenport, IA
 - iii. Moline Clinic, Moline, IL
 - iv. Community Outreach, Salvation Army, Moline, IL
 - v. Community Outreach, Davenport, IA

m) Business Associates; and

n) Limited Projects

i. Other individuals or offices may become part of the Health Care Component for limited projects. Such individuals must contact the HIPAA Privacy Officer if their work necessitates the need to access protected health information prior to such access.

ii. Researchers and other key personnel on human subject protocols.

iii. Researchers with appointments outside the Health Care Component who conduct research involving the use of Protected Health Information in collaboration with researchers with appointments in the Health Care Component are considered members of the Health Care Component for the duration of such research.

2. Palmer College of Chiropractic West:

a) Palmer Chiropractic Clinics, San Jose, CA;

i. Tasman Clinic, San Jose, CA

ii. Outreach Clinics

- Belovida at Newbury Park (EAH) San Jose, CA
- Elena Gardens Apartments (EAH) San Jose, CA
- Emergency Housing Consortium (EHC) San Jose, CA
- Home First (EHC) San Jose, CA
- Parkview Senior Apartments (EAH) San Jose, CA

b) Palmer Student Services personnel to the extent any personnel use and disclose individually identifiable health information;

c) Palmer Information Services personnel assigned to health care components

d) Privacy and Security Officers;

- e) Palmer College Institutional Review Board to the extent any personnel use and disclose individually identifiable health information; and
- f) Business Associates

STANDARD INSTITUTIONAL POLICY PROVISIONS

Institutional Policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- > [Standard Provisions Applicable to All Institutional Policies](#)

Additional Information

ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

POLICIES

- > [Designation of the Palmer College of Chiropractic Affiliated Covered Entity](#)

PROCESSES AND/OR PROCEDURES

- > N/A

FORMS/INSTRUCTIONS

- > N/A

OTHER RELATED INFORMATION

- > 45 CFR 164.504(c)(3) (HIPAA Privacy Rule)
- > 45 CFR 164.105 (HIPAA Privacy Rule)

CONTACTS

Privacy Officers

- > Davenport Clinics
Ron Boesch, D.C.
1000 Brady Street
Davenport, IA 52803
(563) 884-5567
ron.boesch@palmer.edu

- > San Jose, Clinics
Tammi Clark, D.C.
90 E. Tasman Drive
San Jose, CA 95134
(408) 944-6085
tammi.clark@palmer.edu

- > Port Orange Clinics
Shane Carter, D.C.
4705 S. Clyde Morris Blvd.
Port Orange, FL 32129-4153
(386) 763-2628
shane.carter@palmer.edu

HISTORY

Responsible Officer:..... Dan Weinert, M.S., D.C., Ph.D.
Provost
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5761
dan.weinert@palmer.edu

Issuing Office: Office of Compliance
Earlye Julien, PHR, M.S.Ed., CQIA
Senior Director for Compliance
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5476
Fax: (563) 884-5883
earlye.julien@palmer.edu