

STANDARD ADMINISTRATIVE PROCEDURE

16.01.02.M0.01 Designation as a Hybrid Entity

Approved February 11, 2015

Revised September 7, 2018

Revised April 27, 2020

Revised October 09, 2024

Revised June 12, 2025

Revised October 3, 2025

Revised December 4, 2025

Revised April 17, 2026

Next scheduled review: April 17, 2026

SAP Statement

This standard administrative procedure applies to Texas A&M University (TAMU) components that have been designated as a TAMU HIPAA Health Care Component. This procedure pertains to protected health information covered by the TAMU HIPAA Health Care Component’s Notice of Privacy Practices.

Definitions

[Click to view Definitions](#)

Official Procedure

Texas A&M University is designated as a hybrid entity, as defined under 45 CFR §103. In accordance with 45 CFR §105, Texas A&M University is required to designate its HIPAA health care components (“HCC”) and document such designation. Texas A&M University identifies its HCCs in the HIPAA Health Care Component Designation Memorandum Appendix A maintained by the Texas A&M University HIPAA Privacy Officer. From time to time, the Texas A&M Privacy Officer shall review the HIPAA Health Care Component Designation Memorandum, as necessary, but no less often than outlined in System Regulation 16.01.02, *Privacy*. Modifications shall be approved by the Texas A&M University Chief Risk, Ethics, and Compliance Officer in consultation with the Office of General Counsel for legal sufficiency review.

The Texas A&M Privacy Officer conducts at least bi-annual documented reviews of all HIPAA SAPs and implements even driven updates in response to operational, regulatory, or risk-based changes. Texas A&M University will retain documentation of its HIPAA privacy policies for (6) six years from the date of creation or the date it was last in effect (whichever is later). 45 CFR §164.308 (a)(8); 45 CFR §164.316 (b)(2).

The Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009 and all their implementing regulations as amended from time to time (collectively “HIPAA”) and the Texas A&M HIPAA Standard Administrative Procedures apply to all HCCs. From time to time, Texas A&M will make such changes to its standard administrative procedures as may be necessary, including changes required in order to comply with law.

HCCs may not share Protected Health Information, as defined under 45 CFR §103, with non-HCCs except as permitted by HIPAA. Each HCC shall appoint an individual to serve as the privacy contact and shall inform the Texas A&M Privacy Officer of this individual’s name, title and contact information. The Privacy contact shall coordinate with the Texas A&M Privacy Officer concerning implementation of the Texas A&M HIPAA Standard Administrative Procedures within the HCC.

As required under HIPAA, Texas A&M has designated the following officers to serve as the HIPAA Privacy Officer and the HIPAA Security Officer:

Mark Allen | Privacy Officer
Texas A&M University
Division of Risk, Ethics, & Compliance
General Services Complex, Ste. 2101
College Station, TX 77843-1280
979-845-9853 | privacy@tamu.edu

Adam Mikeal | Chief Information Security Officer
Texas A&M University
College Station, TX 77840-7896
979-458-1342 | ciso@tamu.edu

Related Policies, Statutes, Procedures

[Health Insurance Portability and Accountability Act](#)

[Health Information Technology for Economic and Clinical Health Act](#)

[System Regulation 16.01.02, Privacy](#)

Contact Office

Division of Risk, Ethics, and Compliance

[Privacy Office](#)

General Services Complex, Suite 2101

(979) 845-9853

privacy@tamu.edu