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**MEMORANDUM**

**Coded: AA-2015-07**

**Date:** July 7, 2015

**To:** CSU Presidents  
CSU Provosts/Vice Presidents for Academic Affairs  
CSU Vice Presidents for Student Affairs  
CSU Vice Presidents of Business and Finance



**From:** Eric G. Forbes, Assistant Vice Chancellor

**Subject:** Executive Order 877, Designation of Health Care Components for Purposes of the Health Insurance Portability and Accountability Act (HIPAA)

Executive Order 877, *Designation of Health Care Components for Purposes of the Health Insurance Portability and Accountability Act (HIPAA)*, requires each campus to comply with the HIPAA Privacy and Security Rules and for each campus to assess whether or not it is to be designated as a CSU Health Care Component. The Executive Order can be found at <http://calstate.edu/EO/EO-877.html>.

To assist campuses with meeting the mandate established through this order, the Chancellor's Office has convened a HIPAA Task Force, comprised of members from the Office of General Counsel, Risk Assessment, Information Technology, Information Security, Student Academic Support as well as selected campus Health Center Directors and campus managers of Information Technology and Security. The specific objectives of the group have been to develop an assessment questionnaire to aid campuses in determining whether or not they are health care components AND then to develop a systemwide template for a HIPAA risk assessment.

We are seeking your assistance in coordinating the completion of the attached *Health Care Components Identification and Scoping Questionnaire* to be sure that a full assessment of your campus situation with respect to HIPAA is undertaken. Consequently, the answers may come from various perspectives including health care professionals, Chief Information Officers, Information Security Officers, Vice Presidents for Student Affairs, Provosts/Vice Presidents for Academic Affairs, Associate Vice Provosts, Academic Deans, Athletic Programs, etc. It is possible that health-related services governed by HIPAA could be provided to the campus community as well as to the general public.

**CSU Campuses**

Bakersfield • Channel Islands • Chico • Dominguez Hills • East Bay • Fresno • Fullerton • Humboldt • Long Beach • Los Angeles • Maritime Academy • Monterey Bay Northridge • Pomona • Sacramento • San Bernardino • San Diego • San Francisco • San José • San Luis Obispo • San Marcos • Sonoma • Stanislaus

Once the questionnaire is completed, you are asked formally to designate or un-designate your campus, campus department, or division as a CSU Health Care HIPAA Covered Component by submitting a campus memo to [HIPAADesignation@share.calstate.edu](mailto:HIPAADesignation@share.calstate.edu) describing your campus condition: (1) no covered entities, or (2) designated entities and/or (3) undesignated entities. The questionnaire should be used and maintained by the campus but does not need to accompany the campus memo. Whether or not your campus was previously designated as a HIPAA Covered Component can be found at <http://calstate.edu/AcadAff/codedMemos/AA-2011-22.pdf>.

If any department, division or other portion of your campus is designated as a health care component, we would then ask that the appropriate campus managers work with their respective Chief Information Officer and/or Information Security Officer to develop a plan and timeline to complete a HIPAA risk assessment. A template for completing this work will be forthcoming.

In order to assure the orderly and appropriate administration of CSU's compliance with the HIPAA privacy and security standards, we request that your campus complete the questionnaire, and then submit the HIPAA designation letter by August 14, 2015. If you have any questions about this request, please direct them to William Perry at [wperry@calstate.edu](mailto:wperry@calstate.edu) or Ray Murillo at [rmurillo@calstate.edu](mailto:rmurillo@calstate.edu).

EGF/bjc

#### Attachments

c: Dr. Timothy P. White, Chancellor  
Dr. Loren J. Blanchard, Executive Vice Chancellor of Academic and Student Affairs  
Framroze Virjee, Executive Vice Chancellor and General Counsel  
CSU Chief Information Officers  
CSU Information Security Officers  
William Perry, Chief Information Management and Security Officer  
Leslie DeCato, Application Security Manager  
Ray Murillo, Director of Student Programs