

EVMS Medical Group		
POLICY: Affiliated Entities	DATE:	3/2003
CATEGORY: PRIVACY	REVIEWED/ REVISED: 04/2013	Page 1 of 1

**DESIGNATION OF AFFILIATES AND COMPONENTS AS
A SINGLE COVERED ENTITY**

Section 164.504(d) of the HIPAA Privacy regulations permits legally separate covered entities to self-designate as a single entity if they are under common ownership or control. If the EVMS Medical Group Board of Directors designates the separate covered affiliates and components of the EVMS as a "single entity", we can reduce the administrative burden of HIPAA compliance. The affiliates can share information across corporate boundaries with a single notice of privacy practices.

Outside legal counsel has confirmed that EVMS Medical Group fits the "common control" definition because it has the power to exert significant influence over the actions and policies of all affiliates and components. Based on this analysis, EVMS Medical Group Security and Privacy Committees have recommended that the Board approve the single entity designation for the clinical affiliates and components of EVMS Medical Group effective on or before the April 14, 2003 compliance date.