

Implications of the JOA on Data Sharing

- UW-Madison is a Hybrid Entity
 - Units that perform HIPAA covered functions are designated as the Health Care Component
 - Researchers and other key personnel on human subjects protocols are included in the Health Care Component
- The UW-Madison Health Care Component is included in the University of Wisconsin Affiliated Covered Entity (ACE)
- An ACE consists of 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

Implications of the JOA on Data Sharing

- ACE entities include:
 - Most units of the UW-Madison Health Care Component
 - The University of Wisconsin Hospitals and Clinics Authority
 - The University of Wisconsin Medical Foundation
 - SwedishAmerican Hospital
- UnityPoint Health – Meriter is not part of the ACE
- Sharing of PHI cannot occur as though Meriter is part of the ACE
- The JOA forms a contractual relationship to collaborate in certain areas
- Meriter continues to be a separate legal entity from the UW ACE

Implications of the JOA on Data Sharing

- Unfortunately, the JOA does not simplify or streamline sharing of PHI for research purposes
- However, we are committed to continuing to support the excellent research that is occurring at Meriter and collaborating with researchers to ensure compliance with the HIPAA Privacy Rule