



CHANCELLOR STEVE WRIGLEY
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

**BOARD OF REGENTS OF
THE UNIVERSITY SYSTEM OF GEORGIA**

PHONE: (404) 962-3000
FAX: (404) 962-3013
EMAIL: CHANCELLOR@USG.EDU

October 17, 2019

Presidents
University System of Georgia
sent via email

Dear Presidents:

The Board of Regents of the University System of Georgia met in Athens, Georgia, on October 15 – 16, 2019. During this meeting, a new Board of Regents policy provision was added. A new policy provision was also added at the August 8, 2019 Board of Regents meeting in Atlanta, Georgia. The new policy provisions are listed below.

Campus Affairs

➤ **Board Policy 6.15.8.2 Retention of Weapon and Badge: Retiring Officer**

Finance and Business

➤ **Board Policy 7.13 – Designation of USG as a Hybrid Entity**

The attached exhibit sets forth helpful background information for the new policy provisions, the effective date, and the policy language as approved by the Board of Regents. Please share widely with the appropriate offices at your institution to include Legal Affairs, Information Technology, Student Affairs, Public Safety, Human Resources, Fiscal Affairs, and Internal Audit.

Sincerely,

Steve W. Wrigley
Chancellor

cc: Tracey Cook, Executive Vice Chancellor for Strategy and Fiscal Affairs
Dr. Tristan Denley, Executive Vice Chancellor for Academic Affairs
Teresa MacCartney, Executive Vice Chancellor for Administration
Ashley Jones, Chief of Staff
Claire Arnold, Vice Chancellor for Internal Audit
John Fuchko, III, Vice Chancellor for Organizational Effectiveness
Dr. Juanita Hicks, Vice Chancellor for Human Resources
Jim James, Vice Chancellor for Real Estate and Facilities
Dr. Joyce Jones, Vice Chancellor for Student Affairs

Dr. Bobby Laurine, Vice Chancellor and Chief Information Officer
Karen McCauley, Vice Chancellor of Development
Jen Ryan, Vice Chancellor for Communications
Edward Tate, Vice Chancellor of Legal Affairs and Secretary to the Board
Dr. Martha Venn, Vice Chancellor for Academic Affairs
Alfred Barker, Associate Vice Chancellor, CISO
Brooke Bowen, Senior Legal Counsel
Steffanie Morrison, Senior Legal Counsel
Jason Matt, Executive Budget Director
Bruce Holmes, Director of Safety and Security
Wesley Horne, Director of Ethics and Compliance
Institutional Information Technology Officers
Institutional Chief Human Resource Officers
Institutional Chief Business Officers
Institutional Legal Officers
Institutional Effectiveness Leads
Institutional Public Safety Directors (Chief of Police)

Exhibit
BOARD OF REGENTS POLICY MANUAL
New Policies and Background Information
Meeting of August 8, 2019 & October 15 - 16, 2019

I. Board Policy 6.15.8.2 Retention of Weapon and Badge: Retiring Officer

A. Background:

The purpose of this policy provision to allow University System of Georgia (USG) law enforcement officers to retain their department weapon and receive a department badge when they have served under honorable conditions as defined by OCGA 35-1-20, and, are either receiving state employee retirement system benefits, or leaving employment as a result of a line of duty disability from service to the USG. Questions regarding this new policy provision should be directed to Bruce Holmes, Director of Safety and Security at Bruce.Holmes@usg.edu or (404) 962-3177.

B. Effective Date:

The effective date of this policy provision is August 8, 2019.

C. Board Policy 6.15.8.2 Retention of Weapon and Badge: Retiring Officer

6.15.8.2 Retention of Weapon and Badge: Retiring Officer

A USG law enforcement officer may request permission to retain their department weapon and receive a department badge denoting service when they have served under honorable conditions as defined by OCGA 35-1-20, and, are either receiving state employee retirement system benefits, or leaving employment as a result of a line of duty disability from service to the University System of Georgia. Requests will be submitted to the USG institution police chief for review and approval upon verification the employee has met the required conditions. Police chiefs meeting the criteria may submit a request to the USG Police Chief.

II. Board Policy 7.13 Designation of USG as a Hybrid Entity

A. Background:

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) sets national standards for the protection of individually identifiable health information. The USG engages in covered functions related to individually identifiable health information as defined by HIPAA. Provisions of HIPAA allow an organization to designate itself as a Hybrid organization and to apply the HIPAA privacy standards to only those portions of the organization which engages in covered activities.

The purpose of this policy is to designate the USG as a Hybrid organization in accordance with HIPAA Privacy Rules. Accordingly, any portion of the USG engaged in a covered function or performing business associate activities for another component of USG engaged in a covered function is hereby deemed part of the Health Care Component (HCC) of the USG Hybrid Entity. The University System Office (USO) and each USG Institution will be

responsible for identifying the components, business units, colleges or schools that are part of the HCC.

Procedures related to this policy will be added to the Business Procedures Manual regarding the identification of the components, business units, colleges or schools that are part of the HCC. In the interim, questions regarding this new policy provision should be directed to Steffanie Morrison, Senior Legal Counsel, at Steffanie.Morrison@usg.edu or (404) 962-3260.

B. Effective Date:

The effective date of this policy provision is October 16, 2019.

C. Board Policy 7.13 Designation of USG as a Hybrid Entity

7.13 Designation of USG as a Hybrid Entity

The Board of Regents of the University System of Georgia (USG) engages in covered functions as defined by the Health Insurance Portability and Accountability Act of 1996, including the subsequent amendment under the Health Information Technology for Economic and Clinical Health of 2009 and any regulations promulgated under those laws, (HIPAA) and is a covered entity. Because some portions of USG are not engaged in covered functions, USG designates itself as a Hybrid Entity as defined by the HIPAA regulations.

Any portion of USG engaged in a covered function or performing business associate activities for another component of USG engaged in a covered function, as those terms are defined by HIPAA, is hereby deemed part of the Health Care Component (HCC) of the USG Hybrid Entity. The University System Office (USO) and each USG Institution will be responsible for identifying the components, business units, colleges, or schools that are part of the HCC.