

OMB Granicus Review

Granicus Title	Resolution declaring Pinellas County Government as a hybrid entity for Health Insurance Portability and Accountability Act.				
Granicus ID#	26-0979A	Reference #		Date	6/15/2026

Mark all Applicable Boxes:

Type of Review									
CIP		Grant		Other	X	Revenue		Project	

Fiscal Information:

New Contract (Y/N)	N	Original Amount	\$ NA
Fund(s)	NA	Amount of Change (+/-)	\$ 0
Cost Center(s)	NA	Total Amount	\$NA
Program(s)	NA	Amount Available	Total: \$ NA
Account(s)	NA	Included in Applicable Budget? (Y/N)	Resolution declaring Pinellas County Government as a hybrid entity for Health Insurance Portability and Accountability Act.
Fiscal Year(s)	FY26		

Description & Comments

(What is it, any issues found, is there a financial impact to current/next FY, does this contract vary from previous FY, etc.)

Human Services is requesting Adoption by the Board of County Commissioners of the Health Insurance Portability and Accountability Act (HIPAA) Resolution.

- This resolution designates Pinellas County Government as a HIPAA hybrid entity and identifies the specific departments, divisions, and programs that serve as healthcare component covered entities and business associates. Healthcare components must maintain HIPAA compliant procedures, to safeguard protected health information (PHI) and appoint a HIPAA Privacy and Compliance Officer.
- Effective immediately upon adoption this resolution authorizes the County Administrator to modify healthcare component and business associate designations as organizational changes occur and supersedes all prior hybrid entity designations,
- Federal HIPAA regulations establish standards for compliance by covered entities and business associates. Several Pinellas County departments function as health care providers or health plans and therefore qualify as healthcare components, while others operate as business associates because they handle PHI in support of those components.
- The County previously designated itself as a HIPAA Hybrid Entity in 2003, with an amendment in 2010 to reflect departmental restructuring. A recent review determined that further updating the County's Hybrid Entity designation would best serve the public and ensure compliance with applicable laws. The County now seeks to formally ratify and restate its Hybrid Entity status, identifying the healthcare components and business associates responsible for HIPAA compliance.
- The County Attorney's Office confirmed that no public hearing or advertisement is needed for this resolution.
- There is no fiscal impact. No funding will be allocated towards this resolution.

Fiscal Impact:

There is no direct fiscal impact to Pinellas County under this resolution. This agreement by itself, has no fiscal impact on Pinellas County.

Analyst: **Toni Merrill**

Ok to Sign: ☐