



Banner Health Organizational Structure for HIPAA Compliance Purposes

Banner Health has elected to designate the following organization structure to facilitate implementation of the Privacy Rules as permitted in the regulations 45 CFR §164.105 Organizational Requirements.

Banner Health and the legally separate entities listed below, each of which is under the common ownership or common control of Banner Health (each, an “ACE Entity”), hereby designate themselves as a single affiliated covered entity (“ACE”). As an ACE, the single affiliated covered entity combines the functions of provider and health plan. Because the ACE functions as a combination of provider and health plan, the ACE must comply with requirements for “multiple covered functions” set forth in 45 CFR §164.504(g).

If any ACE entity takes common ownership or common control of another HIPAA covered entity, that entity is automatically added to the ACE without any further action. If any ACE Entity changes its practices and/or structure and no longer (i) meets the definition of a HIPAA covered entity; or (ii) functions under Banner Health’s common ownership or common control, that ACE Entity is automatically removed from the ACE without any further action.

The ACE Entities are establishing the ACE for HIPAA compliance purposes only. This designation has no effect on any other legal relationship between and among the ACE Entities

1. Banner Health, and all HIPAA Covered Entities operating under the Banner Health entity or other ACE Entity, and doing business under another name
2. Banner Baywood Medical Center, Mesa, AZ
3. Banner Behavioral Health Hospital, Scottsdale, AZ
4. Banner Boswell Medical Center, Sun City, AZ
5. Banner Casa Grande Medical Center, Casa Grande, AZ
6. Banner Churchill Community Hospital, Fallon, NV
7. Banner Del E Webb Medical Center, Sun City West, AZ
8. Banner Desert Medical Center, Mesa, AZ
9. Banner Estrella Medical Center, Phoenix, AZ
10. Banner Fort Collins Medical Center, Fort Collins, CO
11. Banner Gateway Medical Center, Gilbert, AZ
12. Banner Goldfield Medical Center, Apache Junction, AZ
13. Banner Heart Hospital, Mesa, AZ
14. Banner Ironwood Medical Center, San Tan Valley, AZ
15. Banner Lassen Medical Center, Susanville, CA
16. Banner Ocotillo Medical Center, Chandler, AZ
17. Banner Payson Medical Center, Payson, AZ
18. Banner Thunderbird Medical Center, Glendale, AZ
19. Banner--University Medical Center Phoenix, Phoenix, AZ
20. Banner--University Medical Center South, Tucson, AZ
21. Banner--University Medical Center Tucson, Tucson, AZ
22. Banner Children’s at Desert f/k/a Cardon Children Medical Center, Mesa, AZ
23. Torrington Community Hospital, Torrington, WY
24. East Morgan County Hospital, Brush, CO
25. McKee Medical Center, Loveland, CO
26. North Colorado Medical Center, Greeley, CO
27. Ogallala Community Hospital, Ogallala, NE
28. Page Hospital, Page, AZ
29. Platte County Memorial Hospital, Wheatland, WY
30. Sterling Regional Medcenter, Sterling, CO
31. Washakie Medical Center, Worland, WY
32. Wyoming Medical Center, Inc., Casper, WY
33. Banner Air, LLC
34. Banner Ambulatory Provider Group Colorado LLC
35. Banner Ambulatory Provider Group, LLC



Banner Health.

36. Banner Anesthesiologists West, LLC
37. Banner Anesthesiologists—Colorado, LLC
38. Banner Cancer Center Specialists Colorado, LLC
39. Banner Cancer Center Specialists, LLC
40. Banner Children's—Banner Health Clinic, LLC
41. Banner Concierge Service, LLC
42. Banner Employer Services, LLC
43. Banner Employer Services Team, LLC
44. Banner Employer Solutions, LLC
45. Banner Executive Health, LLC
46. Banner Health Insurance Group, Inc.
47. Banner Health Physicians—Colorado, LLC
48. Banner Health Physicians—West, LLC
49. Banner Health Plan, Inc.
50. Banner Hospital-Based Physicians—Arizona, LLC
51. Banner Hospital-Based Physicians—Colorado, LLC
52. Banner Hospital-Based Physicians—West, LLC
53. Banner Imaging Services Colorado, LLC
54. Banner Imaging Services, LLC
55. Banner MD Anderson Cancer Center, Gilbert, AZ
56. Banner Medical Group (various locations in AZ, CA, NE, NV, WY)
57. Banner Medical Group Care Gap, LLC
58. Banner Medical Group Colorado (various locations in CO)
59. Banner Occupational Health – Arizona, LLC
60. Banner Occupational Health – Colorado, LLC
61. Banner Occupational Health Colorado, LLC
62. Banner Occupational Health Onsite, LLC
63. Banner Pharmacy Services, LLC
64. Banner Physician Specialists—Arizona, LLC
65. Banner Physician Super-Specialists—Arizona, LLC
66. Banner Primary Care Physicians—Arizona, LLC
67. Banner Telehealth, LLC
68. Banner University Care Advantage
69. Banner University Family Care
70. Banner Urgent Care Services, LLC
71. Banner Urgent Care—Arizona, LLC
72. Banner Urgent Care—Colorado, LLC
73. Banner—University Hospital Based Physicians, LLC
74. Banner—University Medical Group (various locations in Phoenix and Tucson, AZ)
75. Banner—University Physician Specialists, LLC
76. Banner—University Primary Care Physicians, LLC
77. Banner—University Super Specialists, LLC
78. B—UMCP Hospital Based Physicians LLC
79. B—UMCP Physician Specialists LLC
80. B—UMCP Primary Care Physicians LLC
81. B—UMCP Super Specialists LLC
82. B—UMG Integrated Health Clinic, LLC
83. B—UMG Tucson AP Physicians LLC
84. Horizon Laboratory, LLC
85. Laboratory Sciences of Arizona, LLC.
86. The University of Arizona Health Plans - University Healthcare, Inc.
87. TOCA at Banner Health, LLC (multiple locations in Arizona)

Approved on July 17, 2025

By: Elizabeth Ortmann-Vincenzo, Chief Privacy Officer

Original 3/13/03 signed by Peter S. Fine

Previous Updates: 2/9/2009, 2/7/2010, 6/21/2011, 6/18/14, 4/15/16, 7/20/16, 4/16/18, 8/16/19, 7/21/21, 2/12/25