

**HIPAA Privacy Policy #6
Identifying Protected Health Information**

Effective Date: January 22, 2020	Refer to Privacy Rule Sections: 164.103
Authorized by: Equinox Board of Directors	Version #:

Policy: Equinox, Inc. is committed to ensuring the privacy and security of patient health information. To support this commitment, Equinox, Inc. will ensure that the appropriate steps are taken to properly identify and secure patient’s Protected Health Information, as required under HIPAA and other applicable federal, state, and/or local laws and regulations.

Procedure:

1. Designation of Protected Health Information:

- a. The following information will be designated as Protected Health Information, except when such information is contained in education records covered by the Family Educational Rights and Privacy Act or employment records held by Equinox, Inc. in its role as employer:

Any health information, including demographic information collected from an patient, transmitted or maintained in any form or medium, that:

- i. is created or received by Equinox, Inc.;
 - ii. relates to the past, present, or future physical or mental health or condition of a patient; the provision of health care to a patient; or the past, present, or future payment for the provision of health care to an patient;
 - iii. that identifies the patient; or
 - iv. with respect to which there is a reasonable basis to believe the information can be used to identify the patient.
- b. For more information regarding creating de-identified information, *see* Policy No. 37 entitled “Uses and Disclosures of De-identified Protected Health Information Without Patient Authorization.”

- 2. Privacy Officer: In the event of any questions regarding what constitutes Protected Health Information, the Privacy Officer should be consulted.

REFERENCES

Health Insurance Portability and Accountability Act of 1996; 65 FR 82462, Dec. 28, 2000, as amended at 67 FR 53182, Aug. 14, 2002; 78 FR 5566, Jan. 25, 2013.
4818-3105-3743, v. 1