

**HIPAA Privacy Policy #40  
Workforce Training**

Effective Date: January 22, 2020	Refer to Privacy Rule Sections: 164.530
Authorized by: Equinox Board of Directors	Version #:

**Policy:** Equinox, Inc. must provide training to all members of its Workforce in accordance with the following Procedures and will not permit members of its Workforce to use or disclose Protected Health Information unless and until such members have received training in accordance with the following Procedures.

**Procedures:**

1. **Initial Training:** Equinox, Inc. must provide initial training to every existing member of the Workforce no later than thirty (30) days after their commencement of work. Training sessions should be organized to include personnel of similar job functions so that each session may focus on Privacy and Security Policies that are particularly important and relevant to specific personnel. *45 C.F.R. § 164.530(b)(2)(i)(A).*
2. **Annual Training:** Equinox, Inc. will provide periodic (at least annual) training to members of the Workforce on initiatives that are relative to job responsibilities, HIPAA, and updates to the Equinox, Inc. Compliance Program.
3. **Additional Training:** Equinox, Inc. will provide additional training and updates to members of the Workforce as required to educate personnel about changes in Equinox, Inc.'s Privacy and Security Policies and Procedures and as necessary to refresh awareness of Equinox, Inc.'s Privacy and Security Policies and Procedures. *45 C.F.R. § 164.530(b)(2)(i)(B).*
4. **Record of Training:** Equinox, Inc. shall create a log of every training session that is conducted pursuant to this Policy and shall record the names of all personnel who attend such sessions. *45 C.F.R. § 164.530(b)(2)(ii).*