

**HIPAA Privacy Policy #34**  
**Storing and Safeguarding Protected Health Information**

Effective Date: January 22, 2020	Refer to Privacy Rule Sections: 164.310; 164.312; 164.530
Authorized by: Equinox Board of Directors	Version #:

**Policy:** Equinox, Inc. must store and safeguard Protected Health Information in accordance with the following Procedures.

**Procedures:**

1. **Safeguard Information When Unattended:** Equinox, Inc. personnel shall ensure that Protected Health Information is safeguarded when left unattended, even temporarily. It is acceptable to leave Protected Health Information in a locked file cabinet, locked desk, locked office, locked drawer, or similar area that is only accessible by authorized Equinox, Inc. personnel. Equinox, Inc. personnel shall return Protected Health Information to its appropriate permanent storage location when the information is not required for immediate purposes. All permanent storage areas must be locked when unattended. *45 C.F.R. §§ 164.312(a)(2)(iii), 164.310(a)(2)(iv).*
2. **Safeguard Information During Use:** When using Protected Health Information, it may be impossible to prevent certain inadvertent disclosures to by-standers. However, reasonable precautions shall be taken to ensure that Protected Health Information is appropriately safeguarded when being used. The following precautions shall be taken:
  - a. **Post Information in Non-public Locations:** Protected Health Information shall be posted only when necessary for treatment, safety or security purposes and only in locations that minimize the unnecessary exposure of such information to the public. *45 C.F.R. § 164.530(c)(2).*
  - b. **Take Precautions with Computer Monitors:** Computer screens shall be positioned to face low traffic areas. Where possible, computers shall be equipped with active screen savers that are password protected. *45 C.F.R. §§ 164.530(c)(2), 164.310(b).*
  - c. **Carry Information in Concealed Fashion:** Protected Health Information shall be carried whenever possible in a folder, envelope, briefcase or in a manner that conceals the information from unnecessary exposure to the public. *45 C.F.R. § 164.530(c).*
  - d. **Exercise Care in Public Areas:** When using or disclosing Protected Health Information in public or semi-public areas, Equinox, Inc. personnel shall make reasonable efforts to lower their voice and take similar steps to minimize the unnecessary exposure of such information to the public. *45 C.F.R. §§ 164.530(c)(2), 164.310(b).*
  - e. **Take Precautions with Printers, Scanners and Photocopiers:** When using a printer, scanner or photocopier with internal memory storage, it is necessary to clear the hard drive on a routine basis to prevent an improper disclosure of Protected Health Information. *45 C.F.R. § 164.310(d)(2)(ii).*