

**HIPAA Privacy Policy #36
Maintaining Documentation**

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| Effective Date: January 22, 2020 | Refer to Privacy Rule Sections: 164.316; 164.501; 164.508; 164.522; 164.528; 164.530 |
| Authorized by: Equinox Board of Directors | Version #: |

Policy: Equinox, Inc. must maintain documentation in accordance with the following Procedure.

Procedure: Equinox, Inc. must maintain the following documentation for at least six (6) years after the later of the date the documentation was created or six (6) years after the date when the documentation was last in effect:

1. Every version of Equinox, Inc.’s Policies and Procedures. *45 C.F.R. § 164.316(a), 45 C.F.R. § 164.316(b)(2)(i)*.
2. Business Associate Agreements entered into by Equinox, Inc. *45 C.F.R. § 164.316(b)(2)(i)*.
3. Designations of Affiliated Covered Entities made by Equinox, Inc. *45 C.F.R. § 164.316(b)(2)(i)*.
4. Written Authorizations obtained by Equinox, Inc. *45 C.F.R. §§ 164.316(b)(2)(i), 164.508(b)(1)*.
5. Methods and results of analysis underlying an expert’s determination that Protected Health Information could not be used by an anticipated recipient to identify the subject of the information (*See Equinox, Inc.’s Policy No. 37 entitled “Uses and Disclosures of De-identified Protected Health Information Without Patient Authorization.”*) *45 C.F.R. § 164.316(b)(2)(i)*.
6. Every version of Equinox, Inc.’s Privacy Notice and acknowledgments of receipt of the Notice (*See Equinox, Inc.’s Policy No. 4 entitled “Notice of Privacy Practices.”*) *45 C.F.R. § 164.530(j)*.
7. Agreements to Restrict Uses or Disclosures entered into by Equinox, Inc. (*See Equinox, Inc.’s Policy No. 33 entitled “Requested Restrictions on Uses and Disclosures of Protected Health Information.”*) *45 C.F.R. § 164.522(a)*.
8. All Designated Record Sets. *45 C.F.R. §§ 164.530(j)(2), 164.501*.
9. The titles and names of the following individuals:
 - a. Person responsible for receiving and processing requests for access to designated record sets;
 - b. Person responsible for receiving and processing requests for amendments of Protected Health Information;

- c. Person responsible for receiving and processing requests for accountings of disclosures;
 - d. Person responsible for receiving and processing complaints;
 - e. Person responsible for developing and implementing Equinox, Inc.'s Policies and Procedures;
 - f. Person who is responsible for providing further information upon request about matters covered by Equinox, Inc.'s Privacy Notice;
 - g. Equinox, Inc.'s Privacy Officer; *45 C.F.R. § 164.528(b)*.
10. Evidence of training that has been provided to members of Equinox, Inc.'s Workforce. *45 C.F.R. § 164.530(b)(2)(ii)*.
 11. Evidence of sanctions imposed on members of Equinox, Inc.'s Workforce for failure to comply with Equinox, Inc.'s Policies and Procedures. *45 C.F.R. § 164.530(e)(2)*.
 12. All written accountings of disclosures provided to a patient pursuant to Equinox, Inc.'s Policy No. 32 entitled "Accountings of Disclosures." *45 C.F.R. § 164.528(d)(1)*.
 13. The titles of persons or offices responsible for receiving and processing requests for accountings of disclosures. *45 C.F.R. § 164.530(j)*.
 14. All logs of disclosures required to be maintained pursuant to Equinox, Inc.'s Policy No. 32 "Accountings of Disclosures." *45 C.F.R. § 164.530(j)*.
 15. All complaints received by Equinox, Inc. pursuant to Equinox, Inc.'s Policy No. 42 entitled "Complaints" as well as a record of the disposition of each complaint; and *45 C.F.R. § 164.530(d)(2)*.
 16. All communications, certifications, and attestations that are required to be in writing by Equinox, Inc.'s Policies and Procedures. *45 C.F.R. § 164.316(a)*.