

**HIPAA Privacy Policy #43**  
**Changes to HIPAA Policies and Procedures**

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

**Policy:** It is the Policy of Equinox, Inc. to promptly document and implement revised Policies and Procedures whenever there is a change in law that necessitates a change to Equinox, Inc.'s Policies and Procedures.

**Purpose:** The purpose of this Policy is to ensure that Equinox, Inc. changes the HIPAA Policies and Procedures as necessary and appropriate to comply with changes in the law.

**Procedures:**

1. Changes to the HIPAA:
  - a. The Privacy Officer will document the changes made to all Policies and Procedures affected by the changes.
  - b. The Privacy Officer will implement the revised Policy or Procedure.
  - c. If the change in the law materially affects the content of Equinox, Inc.'s Notice of Privacy Practices, the Privacy Officer will promptly make the appropriate revisions to the Notice of Privacy Practices.
2. Other Changes to the Law:
  - a. The Privacy Officer will ensure that any proposed revision to a Policy or Procedure complies with HIPAA and New York State law.
  - b. Prior to the effective date of the planned change, the Privacy Officer will document the change.
  - c. The Privacy Officer will implement the revised Policy or Procedure.
  - d. If a change is made to a privacy practice stated in Equinox, Inc.'s Notice of Privacy Practices, the Privacy Officer will:
    - i. verify that the Notice of Privacy Practices states that Equinox, Inc. reserves the right to change its Privacy Practices;
    - ii. make the appropriate revision(s) to the Notice of Privacy Practices;
    - iii. make the revised Notice of Privacy Practices available;
    - iv. make the change effective for Protected Health Information created or received prior to the effective date of the revised Notice of Privacy Practices; and

- v. refrain from implementing any changes to a Policy or Procedure prior to the changes to HIPAA Policies and Procedures effective date of the revised Notice of Privacy Practices.

4823-0527-4031, v. 1