

## **Designation of InnovAge Affiliated Covered Entity**

The Health Insurance Portability and Accountability Act of 1996 and the rules enacted thereunder (“HIPAA”) permits all Covered Entities under common ownership or control to designate themselves a single Affiliated Covered Entity for purposes of complying with HIPAA. “Common control” exists if an entity, such as Total Community Options, Inc., has the power, directly or indirectly, to influence or direct the actions or policies of the other entities.

### **Affiliated Covered Entities**

The following Covered Entities under the common control of Total Community Options, Inc., a Colorado corporation, are hereby designated as part of a single Affiliated Covered Entity for purposes of HIPAA:

- Total Longterm Care, Inc. (d/b/a InnovAge Colorado PACE and InnovAge California PACE)
- Total Community Care, LLC (d/b/a InnovAge New Mexico PACE)
- Seniors! Inc. (InnovAge Home Care and InnovAge Home Health)
- InnovAge Home Care North, LLC
- InnovAge Home Care – Aspen, LLC
- Innovative Care Management, Inc.
- InnovAge Virginia PACE-Roanoke, LLC (dba InnovAge Virginia PACE-Roanoke Valley)

This designation is effective September 23, 2013, and will remain effective until rescinded. This designation may be modified from time to time as needed in order to reflect the current makeup of the Affiliated Covered Entity.