

Policy #9
CurrentCare Enrollee Request to Amend Record Policy

Purpose

Under HIPAA, an individual has a right to request an amendment to PHI. The purpose of the Enrollee Request to Amend Record Policy is to outline the applicable circumstances under which the state designated Regional health Information Organization (RHIO), the Rhode Island Quality Institute (RIQI), will facilitate an enrollee's request to amend information accessed through CurrentCare.

Scope

This policy applies to all departments and positions at all levels, including full-time, part-time, and temporary positions. This policy also applies to all CurrentCare users.

Policy Statement

The Enrollee Request to Amend Record Policy describes the steps an enrollee can take to request an amendment to a health record accessed through CurrentCare. A record includes Protected Health Information ("PHI", as defined in the Health Insurance Portability and Accountability Act "HIPAA") that has been: (1) provided to CurrentCare by a Data Sharing Partner on behalf of the enrollee according to the terms of a Data Sharing Agreement; and/or (2) matched and merged by CurrentCare with the enrollee's cumulative records for presentation to authorized CurrentCare users.

RIQI staff will facilitate actions to support a person's right to request an amendment to records held in CurrentCare by: (1) providing the enrollee with a form to make the request to the originating source; and (2) updating the enrollee's record in CurrentCare according to any action taken by the originating source to amend the record as a result of the enrollee's request.

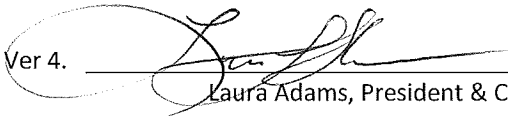
If the record in question is determined to be in error as the result of matching and merging (electronic filing) by RIQI, thereby rendering CurrentCare as the originating source of the record, RIQI will address the request for amendment according to its Data Correction/Amendment Policy.

For all requested amendments originating from sources other than CurrentCare, RIQI management will make reasonable efforts to facilitate an enrollee's request to the originating source to amend records and will accept and include amended records from the originating source in the enrollee's cumulative health record held by CurrentCare. Beyond this obligation, RIQI is not responsible for any decision made or action taken by an originating source entity relative to any individual enrollee's request to amend records.

Compliance

Any violation of this policy will subject the employee to disciplinary action or immediate discharge. Any RIQI employee having knowledge of any violation of the policy shall promptly report such violation to Human Resources.

Version	Effective Date	Statement of Change
01	April 23, 2009	Original document
02	May 10, 2012	Format change; Added revision control
03	November 29, 2012	Format change; Changes to procedure
04	See signature date below	Removed Procedure and Responsibility sections

Ver 4.  8/20/14
 Laura Adams, President & CEO Date