PURPOSE:
To facilitate a patient’s right to request an amendment to their PHI.

POLICY STATEMENT:
Patients have a right to request an amendment of their PHI (Protected Health Information) for as long as this information is maintained at WMHC. The requests to amend will be handled as follows:

1. Patient must complete the Request Form for Amendment of Health Information.
2. The request will be reviewed by the appropriate WMHC staff member:
   - Step One: Originator of the record
   - Step Two: Originator’s supervisor
3. The Originator’s Supervisor will prepare a written response. This response must be delivered to the patient within 60 days of receipt of the request. One extension of no more than 30 days is permissible as long as patient is given written notice that includes the reason for the delay.
4. If the requested amendment is **approved**:
   a. The patient must be notified in writing that the amendment has been accepted.
   b. The designated PHI must be appropriately amended or be linked to the location of the amendment.
   c. The patient must confirm relevant persons to be notified of the amendment.
   d. The entities identified and authorized by the patient must be notified of the amendment within a reasonable period of time.
5. If the request is **denied**,
   a. The patient must be notified in writing. The document must include:
      1. The reason for the denial:
         1. Information is accurate and complete as is.
         2. Information was not created by WMHC
         3. Information is not part of the medical/payment record (DRS)
         4. Information is not accessible by law
      2. Patient’s right to submit a written disagreement with the denial and how to do so.
      3. Patient’s right to discuss the denial with WMHC and/or Campus Privacy Officer and Secretary of HHS.
      4. Patient’s right to include the request and denial in any future disclosures of the PHI that is the subject of the request.
b. If the patient submits a written disagreement:
   1. The document will be reviewed by WMHC Privacy Officer.
   2. The WMHC Privacy Officer will prepare a written rebuttal. A copy must be provided to the patient.
   3. WMHC must identify the PHI that is the subject of the disputed amendment and link it to the request, response, disagreement and rebuttal.

6. Accepting Forwarded Amendments. WMHC must accept amendments to the DRS received from another entity.

7. Effect on future Disclosures
   1. All approved amendments must be included in future disclosures of the PHI.
   2. If a request has been denied, a copy of the amendment request and denial will be included in future disclosures only if the patient has requested such action in writing.
   3. If a request has been denied and the patient has submitted a written disagreement, all documentation of the amendment request process (or an accurate summary) must be included in future disclosures of the PHI to which the disagreement relates.