

Health Information Compliance Alert

Compliance Tips: WITH AMENDMENT REQUESTS - POLICY MAKES PERFECT

Don't let amendment requests catch you off guard

Don't wait until it's too late to plan out a policy for streamlining your amendment request process, advises **Gina Cavalier**, an attorney with Sonnenschein, Nath & Rosenthal in Washington, DC. Tip: Map out how protected health information flows through your office and write a policy "that mirrors the way your PHI moves," she offers.

Because patients' amendment rights are three-fold, Cavalier suggests you develop your policy around these three main components:

- 1. How the patient will submit the request.** A simple, standardized form will work for each patient in your practice (see Don't Get Stuck In An Amendment Request Rut). Be sure to include a field for patients to write out what they think the mistake is. This way you can filter out problems that can be resolved in other ways.
- 2. How you will evaluate the request.** This step happens internally. You should start the evaluation by checking the amendment request against the standards for denial set out in the reg.
- 3. How you will implement your decision.** Create a form letter that outlines how you came to your decision and what steps the patient should take next (see How To Respond To Amendment Requests).