

Policy #10
Data Correction and Amendment Policy

Purpose

The purpose of the Data Correction and Amendment Policy is to articulate the Data Sharing Partner's responsibilities with regard to notifying the state designated Regional Health Information Organization, the Rhode Island Quality Institute (RIQI), of any correction or amendment to a record that had been previously submitted to CurrentCare by the Data Sharing Partner, and provider notification of such correction or amendment as applicable.

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 Data Sharing Partners.

Policy Statement

The CurrentCare Data Correction and Amendment Policy describes how RIQI will handle the circumstance when data in an enrollee's record maintained by CurrentCare changes after it is first reported. 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 (DSP) 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.


For corrections to records originating from DSP sources, DSPs will notify RIQI of any correction or amendment to a patient's protected health information that was previously provided to CurrentCare. The DSP will send a revised copy of the results to RIQI with a notation of the corrected result according to the DSP's data correction policy and procedures and any applicable regulatory requirements. RIQI will include the correction or amendment in the patient's CurrentCare record. In cases where the DSP is not able to send a revised copy of the results to RIQI, then RIQI will delete the incorrect data from its system.

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 correction according to its internal error resolution procedures.

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
03	November 29, 2012	Format change; Added Revision Control
04	March 20, 2014	Removed Responsibility and Procedure Section
05	See signature date below	Per Audit & Compliance/Policy & Legal Committee Review: Minor language changes to Policy Statement section

Ver 5.	 _____ Alok Gupta, COO & CIO	_____ 7/29/14 Date
--------	---	--------------------------