

	UNIFIED FIRE AUTHORITY ORGANIZATIONAL POLICY MANUAL	
	Affiliation: Compliance and Records Division Policies	
	Title: Patient Request for Amendment to PHI	
	Number: 200 – 090	
	Approved: 6/13/2023	By: Fire Chief Dominic Burchett
Last Reviewed: 4/14/2025	By: Shelli Fowlks Records Mgr.	

DEFINITIONS:

See [UFA Policy and Procedure - General Compliance and Records Definitions](#)

REFERENCES:

[Request for Amendment of Protected Health Information Form](#)

LEADERS INTENT:

The Health Insurance Portability and Accountability Act (HIPAA) grants patients the right to request an amendment to their protected health information (PHI) contained in the Designated Record Set (DRS), for as long as the PHI is maintained. To ensure Unified Fire Authority (UFA) complies with its obligation, this policy outlines procedures for handling patient requests for an amendment of their PHI and establishes the procedures by which patients or authorized representatives may request an amendment.

POLICY:

This policy applies to all UFA employees who handle requests from patients or authorized representatives requesting amendment to PHI. All requests will be directed to the Records Manager/Compliance Office for processing.

1.0 Requests for Amendment of PHI

- 1.1 A patient, or his or her authorized representative, has the right to request an amendment to the patient’s PHI contained in UFA’s DRS.
- 1.2 If a patient or authorized representative requests an amendment to PHI, the requestor will be referred to the Records Manager/Compliance Officer. The patient or authorized representative will need to complete Unified Fire Authority’s “Request for Amendment of Protected Health Information Form”.
- 1.3 The Records Manager/Compliance Officer will verify the patient’s identity, or, if the requestor is not the patient, the name and identity of the representative and whether the representative has the legal authority to act on the patient’s behalf. The use of a driver’s license, social security card, or other form of government-issued identification is acceptable for this purpose. If the requestor cannot be physically present to make the request and verify this information, the Records Manager/Compliance Officer may ask the requestor to verify the patient’s name, date of birth, SSN, address, and telephone number over the phone and ask the requestor to submit the “Request for Amendment of Protected Health

Information Form” and any supporting requested documentation via email, mail or fax.

- 1.4 UFA must act upon a request for amendment of PHI within 60 days of the request. If UFA is unable to act upon the request within 60 days, it must provide the requestor with a written statement of the reasons for the delay, and in that case may extend the time period in which to comply by an additional 30 days.

2.0 UFA may accept or deny the Amendment in whole or in part:

- 2.1 Determinations of whether to accept or deny the request for the amendment will be made after consultation with the treating crew and/or author of the entry requested to be amended.
- 2.2 The Records Manager/Compliance Officer or designee will send the Request for Amendment to the appropriate crewmember and a timeframe by which the crewmember must respond back.
- 2.3 The Records Manager/Compliance Officer or Chief Legal Officer may be consulted for direction or clarification following a review of the relevant record and DSR.

3.0 Granting the Request for Amendment of PHI

- 3.1 If the request for amendment is granted, the requestor will receive a letter indicating that the appropriate amendment to the PHI has been made.
- 3.2 The letter will contain a form for the patient to complete, sign, and return to UFA. Using this form, the patient must identify individuals who may need the amended PHI and sign the statement giving UFA permission to provide them with the updated PHI.
- 3.3 The amendment to the PHI may be in the form of an addendum, which would be attached to the record, or an actual change to the documentation in the record. The addendum should be completed by the individual making the original entry.
- 3.4 UFA must provide the amended information to individuals identified by the patient as well as persons or business associates that have the original information and who may have relied on or could be reasonably expected to rely on the amended PHI.

4.0 Denying the Request for Amendment of PHI

- 4.1 UFA may deny a request to amend PHI for the following reasons:
 - 4.1.1 If UFA did not create the PHI at issue;
 - 4.1.2 The information is not part of the DRS;

- 4.1.3 The PHI is accurate and complete;
 - 4.1.4 The information would not be available for inspection as provided by law;
or
 - 4.1.5 The information was received from someone else under a promise of confidentiality.
- 4.2 In the event of a denial, UFA must provide a written notice containing the following information:
- 4.2.1 The reason for the denial;
 - 4.2.2 The individual's right to submit a statement disagreeing with the denial and how the individual may file such a statement;
 - 4.2.3 A statement that, if the individual does not submit a statement of disagreement, the individual may request that UFA provide the request for amendment and the denial with any future disclosures of the PHI; and
 - 4.2.4 A statement that the individual may file a complaint with UFA or with the Office for Civil Rights of the Department of Health and Human Services.
- 4.3 UFA will provide a copy of our "Procedure for Filing Complaint about Privacy Practices" if the requestor indicates that he or she wants to file a complaint against UFA.
- 4.4 If the individual submits a "statement of disagreement," UFA may prepare a written rebuttal statement to the patient's statement of disagreement. The statement of disagreement will be appended to the PHI, or at UFA's option, a summary of the disagreement will be appended, along with the rebuttal statement of UFA.

5.0 Administrative Obligations

- 5.1 If UFA receives notice from another covered entity, such as a hospital, that the other covered entity has amended PHI it has generated in relation to a particular patient, UFA must amend its own affected PHI to conform to the amendments. The Records Manager/Compliance Officer or designee will be responsible for performing this task.
- 5.2 UFA will add the "Patient Request for Amendment of Protected Health Information Form" and the denial or granting of the request, as well as any statement of disagreement by the patient and any rebuttal statement by UFA, to the DRS.

Replaces policy dated: July 1, 2019