There are specific laws around **what** needs to be communicated during the conversation between a patient and an entity when the patient has a request for a correction to their chart. (documented in July and presented at multiple meetings)

“It’s not a simple update – it’s a legal amendment.”

“This is net new work for HL7”

We presented the “what” above to FHIR-I at the Sept WGM and in several other meetings. Our question to them: How do we facilitate this conversation?

Workflows and data elements we need to consider: (The **WHAT**)

* Patient identifies:
  + Where the error is found (could be structured or not)
  + Actions requested
  + Reason they want the change
* Covered entity must respond within 60 days with: Accepted, Denied, Request more time.

Accepted:

* Entity notifies patient the amendment is accepted
* Entity obtains the list of who the amendment needs to be shared with

Denied:

* The Entity must provide the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) with a denial in plain language and contain:
* The basis for the denial
* The [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526)'s right to submit a written disagreement
* A statement that the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) may request the [covered entity](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=118c2846b72bdf7c20f71ae0e1cc95ee&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) provide the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526)'s request for amendment and the denial with any future [disclosures](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=076b99cf91351f84634847c70a060303&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) of the [protected health information](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7383a4ae647bf28b2388260d0de8b4ef&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) that is the subject of the amendment
* A description of how the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) may complain to the [covered entity](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=118c2846b72bdf7c20f71ae0e1cc95ee&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526).
* The patient may submit a statement of disagreement.
* The entity may prepare a rebuttal to the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526)'s statement of disagreement and must provide a copy to the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) who submitted the statement of disagreement.

Request more time:

* The [covered entity](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=118c2846b72bdf7c20f71ae0e1cc95ee&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) must provide the [individual](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8490b40f8ddb1b658047bf74d1757b07&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) with:
* The reasons for the delay
* The date by which the [entity](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=118c2846b72bdf7c20f71ae0e1cc95ee&term_occur=999&term_src=Title:45:Chapter:A:Subchapter:C:Part:164:Subpart:E:164.526) will complete its action on the request

Recommendation from FHIR-I and meetings with others is to see if Task can accommodate this workflow. The track proposal was created according to the recommendations.

**Today’s meeting focus is to discuss these two items which are needed for the IG.**

* Where do we place each of these elements?
* What are the minimum requirements?
  + What are the minimum requirements for a simple request (patient requests, entity accepts request)
  + What are the minimum requirements for a more complex use case (denial, disagreement, rebuttal)
* How do we link the “conversation” together when there are multiple pieces to the conversation expressed over a span of time?

<https://www.law.cornell.edu/cfr/text/45/164.526>