1. VALIDATE LEGITIMACY OF REQUESTER

a. Verify that the Requester is a valid individual
- Ensure the requester is entitled to receive the requested information
- Requester MUST specify person(s) to receive the information

b. Request document must have:
- Original signature of the patient/legal rep
- Specified info/date(s) of service required
- Purpose of the ROI request
- Identifying information about the patient (i.e. Name, DOB, etc.)
- Dated after the date(s) of service being requested
- An expiration date; if no expiration date is provided, it will expire 90 days from the date of the original signature
- An HIPAA-required statement that it is revocable to the extent that action has already been taken
- A designated Power of Attorney in cases where there is a legal rep signing for the release of information. We must receive a copy of the legal paperwork that shows the rep does indeed have a right to sign for the release of the PHI information. We must receive a copy of the legal paperwork that shows the rep does indeed have a right to sign for the release of the PHI

2. CAPTURE/COLLECT/ SORT CONTENT

Onsite, offsite, paper charts, digital images, EMR/EHR; aggregate content (paper, digital images, data from EMR/EHR)

a. Logistics of locating requested patient content
- Physical/Paper Files
  - Onsite or in offsite storage
- Digital Images
  - Onsite or offsite digital images
- Lab Reports
  - Onsite or offsite lab reports
- Microfilm
- EHR/EMR Content
  1. Electronic/Digital
  2. Printed
  3. PDF Output
  4. Must have authorized content
  5. Sensitive information content may be redacted
     - Can all content from all locations be stored in common format?
       - i. Physical/Paper
       - ii. Digital
     - Can all content be formatted for eDelivery?

3. CREATE INVOICE (ACCORDING TO ESTABLISHED STATE STATUTES FEE STRUCTURE)

a. ROI fulfillment must be paid for PRIOR to delivery
- Are the correct ROI fee structures used and understood?
- Workflow A—Pre-paid credit card
- Workflow B—Invoiced (to Attorney, Insurance Company, etc.)
- Where is ROI invoicing generated?
  - i. Online from an accounting system
  - ii. ROI software package
  - iii. Other

b. Is there an ROI cost center reporting and management tool capability in place?
- Number of ROI requests by category (i.e. insurance, legal)
- Revenue breakout by:
  - i. Requester
  - ii. Fee structure type
  - iii. Date
    - a. ROI Cost center reporting:
      - i. FTE direct overhead
      - ii. Fulfillment timeframe
      - iii. Trapped AR billable analytics

4. PACKAGE AND VALIDATE PATIENT INFORMATION WITH QUALITY CONTROL

a. Packaging
- Physical/Paper
- Digital
  I. Tiff Output
  II. PDF Output
- CD
  i. Imaging Content
- Hybrid combination of the above

5. COLLECT ROI FEES PRIOR TO SENDING CONTENT

a. Inform the requester of the payment amount due
b. Results of keeping a detailed AR open ROI invoice system:
- Invoicing without a strong collection system (check, etc.)
- Provide flexible payment options
  i. Credit Card
  ii. ACH
  iii. Check
  iv. Pay on monthly statement (Insurance companies, Attorneys)

6. DELIVER CONTENT AND CONFIRM DELIVERY FULFILLMENT (MUST INCLUDE ACTIVITY TRACKING TO BE COMPLIANT)

a. Mail
- Must have a signed receipt for proof of delivery
b. eFax
- Requires digital fax on requester's side for receipt acknowledgement; supported by the GRM Online Record Center
c. eArchive (Option after mail or eFax)
d. eDelivery (includes email notification)
- Must meet exacting rules to ensure correct delivery acknowledgement; supported by the GRM Online Record Center
e. Secure Web Portal
- The most HIPAA-compliant option; supported by the GRM Online Record Center

7. SEND FULFILLMENT NOTIFICATION

a. Definition of fulfillment notification
- Confirms the request has been processed
- Includes the amount paid by requester
- Provides instructions for logging into the ROI Web Portal
  i. ROI + Logon URL Address
  ii. Requester account # and PIN combo
- Establishes legal protection for the provider

8. AUTHENTICATE RECEIPT OF CONTENT

a. Receipt authentication is vital to meeting compliance standards
- Receipt authentication details:
  i. Who received the ROI fulfillment content
  ii. Time and Date of when the content was received
b. Tied to ROI content delivery formats
- Mail/Fax/CD—DO NOT meet authentication requirements
- EMRs/EHRs do not have a receipt authentication feature
- ROI + the GRM Online Record Center Web Portal registration (provides the only authentication capability)

9. TRACK ROI CONTENT ACTIVITY

a. Only way to meet full HIPAA compliance
- ROI + the GRM Online Record Center Web Portal
  i. Full ROI activity logging
  ii. Transfers proof of delivery to the requester side
    - Indefinitely keeps a log of all access and viewing activity on the requester side
    - Enables the requester to monitor all activity of its staff to enforce compliance
  iii. Verifies, sets and controls all access and content rights
  iv. Establishes proof of fulfillment and payment timeframes