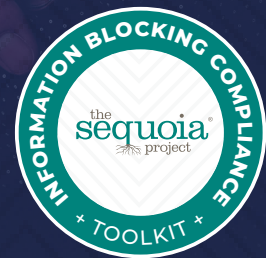


Information Blocking Implementation Checklist



For Actors and organizations affected by the Information Blocking regulations

STEP 1 CREATE PROJECT: BUSINESS AND COMPLIANCE PLANS

- Select an executive champion
- Project management process
- Identify Subject Matter Experts (SMEs) and external resources

STEP 2 REVIEW ONC (AND CMS) RULES AND RESOURCES

- Timelines
- Information Blocking
- Certification
- CMS rule as applicable

STEP 3 BUSINESS RISKS AND SCOPE

- Risks for actor type
- Interoperability elements and information blocking practices
- Electronic Health Information (EHI) products and/or services
- EHI access, exchange, use
- Enforcement agencies

STEP 4 IDENTIFY RISK MITIGATORS

- Health Information Exchanges (HIEs) and interoperability frameworks
- Standard interfaces, documents, APIs
- Organizational stance on data access and release
- Pricing and licensing
- Stakeholder satisfaction

STEP 5 CREATE RISK MANAGEMENT MODEL

- Minimize risk of blocking allegations by private parties and regulators

STEP 6 EVALUATE APPLICABLE EXCEPTIONS AND NEEDED TEAM ACTIONS

- Identify affected teams and leaders
- Establish documentation processes

STEP 7 IDENTIFY BUSINESS OPPORTUNITIES

- Enhanced “access,” “exchange,” “use” with other actors
- Pricing and licensing
- New product opportunities

STEP 8 ACTIONS AND CHANGES

- Compliance and business actions
- Identify needed changes to contracts, agreements, and licenses

STEP 9 DATA ACCESS AND COMPLIANCE

- Review interoperability and data access strategies
- Review/update information governance and Release Of Information policies
- Integrate with compliance plan and process

STEP 10 PERSONNEL AND POLICIES

- Identify affected teams and personnel/contractors
- Develop policies and procedures for business/compliance plans

STEP 11 TRAINING AND COMMUNICATIONS

- Develop internal training and communications
- Establish internal reporting processes/hot lines
- Develop external communications and messaging

