

# Five Strategies for Your Organization’s Information Blocking Plan

This AHIMA checklist includes five strategies designed to help HIM professionals build compliance infrastructure, spark inter-departmental collaboration, and create implementation templates customized to your organization.

## 1. Read the Rules

	Read the <a href="#">ONC</a> final rule on information blocking
	Determine whether your organization is an “ <a href="#">actor</a> ,” according to the rule
	Become familiar with the Part 171 ONC Information Blocking rules and its <a href="#">eight exceptions</a>

## 2. Establish a Governance Structure

	Identify organizational stakeholders related to information blocking
	Develop a multi-disciplinary compliance team
	Conduct an assessment and/or risk analysis to determine readiness
	Develop a project plan to address action items related to rule compliance

## 3. Assess Systems for Compliance and Operational Efficiencies

	Assess patient identification and matching accuracy to ensure appropriate access to EHI via APIs
	Review the <a href="#">United States Core Data for Interoperability (USCDI)</a> . Determine which EHI is not available to the patient and develop plans to address by <b>April 5, 2021</b>
	Conduct a systems inventory to determine whether designated record sets are included
	Define the organization’s <a href="#">designated record set</a> and develop and implement data segmentation for sensitive EHI
	Develop policies and procedures for unsigned or incomplete documents and lab/test results that require review before availability

## 4. Evaluate Compliance and System Infrastructure

	Review business associate agreements to determine any revisions necessary to contracts, agreements, and licenses related to information blocking
	Plan and/or implement appropriate <a href="#">HL7 Fast Healthcare Interoperability Resources (FHIR)</a> -based interfaces
	Collaborate with providers to ensure their digital contact information is available to the public to facilitate care coordination and data exchange

	Collaborate with payers to implement and maintain a secure, standards-based (HL7 FHIR) API to exchange claims, cost, and encounter information
	Implement a provider directory API for access to the provider
	Evaluate other privacy and security rules such as <a href="#">Federal Trade Commission (FTC) Act</a> , <a href="#">California Consumer Privacy Act (CCPA)</a> and state privacy laws for compliance in conjunction with the information blocking and interoperability rules
	Identify staff and processes for monitoring/auditing the organization's incoming and outgoing EHI requests. These include, for example, requests for API interface and linkage from third parties, requests, and questions from patients
	Evaluate and implement the costs and fees appropriate under the information blocking/interoperability and patient access rules
	Review and revise consents and authorizations for compliance with information blocking/interoperability and patient access
	Define processes to determine approval of third-party applications with API access

## 5. Update Policies and Procedures

	Develop and implement policies and procedures for public reporting of providers for information blocking
	Assess and implement policies and procedures to ensure compliance and business actions related to information blocking/interoperability
	Develop policies and procedures to ensure providers are automatically alerted upon a patient's ED services, admission, discharge, and transfer
	Develop policies and procedures to address patient requests of EHI via an app
	Review ROI policies and procedures and revise as necessary to meet the information blocking requirements
	Develop policies and procedures for the exceptions to the information blocking rules
	Develop an information blocking/interoperability and patient access incident management policy and procedure that includes data collection, reporting and forms
	Review, update, and implement patient access, interoperability, API, and information blocking related patient request workflows, policies, procedure, and forms
	Update and/or develop any applicable HR policies, procedures, documentation, and systems to provide for discipline for information blocking/interoperability compliance violations by workforce members
	Develop policies and procedures to monitor effectiveness of information blocking/interoperability compliance
	Develop education and training materials as well as competency tests on information blocking/interoperability
	Develop patient education plans regarding information blocking and the risks associated with using non-certified third-party applications