Key ONC Interoperability and Information Blocking Timelines

ONC and CMS Rules Finalized in the Federal Register

EHI Definition Limited to the USCDI

Updated: Information Blocking Compliance Deadline

New: ONC COVID-19 Info Blocking Delay Finalized

Updated: Conditions of Certification Deadline

Updated: EHI Definition Changes to ePHI

May 1  Oct./Nov.  April 5  Oct. 6  Dec. 31

2020  2021  2022

12 months  24 months  31 months

* Enforcement has only been outlined for Vendors/HINs/HIEs and will be governed by HHS/OIG.

Note: Provider compliance with ONC Information Blocking provisions is contingent on vendor readiness and additional CMS rulemaking outlining disincentive actions. The timeline for HHS information blocking disincentive enforcement is currently unknown.

Additional Resources:
- ONC Rule Text + COVID-19 Delay Rule
- ONC COVID-19 Delay Fact Sheets
- CMS Rule Text + Payer Fact Sheet
- CMS CY21 PFS Proposed Rule
- OIG Civil Monetary Penalties Proposed Rule

OIG Information Blocking Guidance for Providers:
In determining whether a health care provider has committed information blocking, OIG shall consider whether, in accordance with sec. 3022(a)(7), a developer of health information technology or another entity offering health information technology to such provider failed to ensure that the technology meets the requirements to be certified under the ONC Health IT Certification Program.
**Updated: Key CMS Interoperability and Information Blocking Timelines**

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
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<tbody>
<tr>
<td>CMS Rule Finalized in the Federal Register</td>
<td>May 1, 2020</td>
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<tr>
<td>Deadlines for CMS Patient Access &amp; Provider Directory API Requirements</td>
<td>January 1, 2021</td>
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<tr>
<td>Deadline for Payer-to-Payer Data Exchange Requirements</td>
<td>January 1, 2022</td>
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<tr>
<td>Provider Compliance Deadline for CMS ADT Requirements</td>
<td>May 1, 2021</td>
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<tr>
<td>New: Provider Implementation Deadline for 2015 Edition Cures Update</td>
<td>August 2, 2022</td>
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</tbody>
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