



21ST CENTURY CURES ACT
PEDIATRIC PRACTICE
CHECKLIST

Ensure your practice is prepared.



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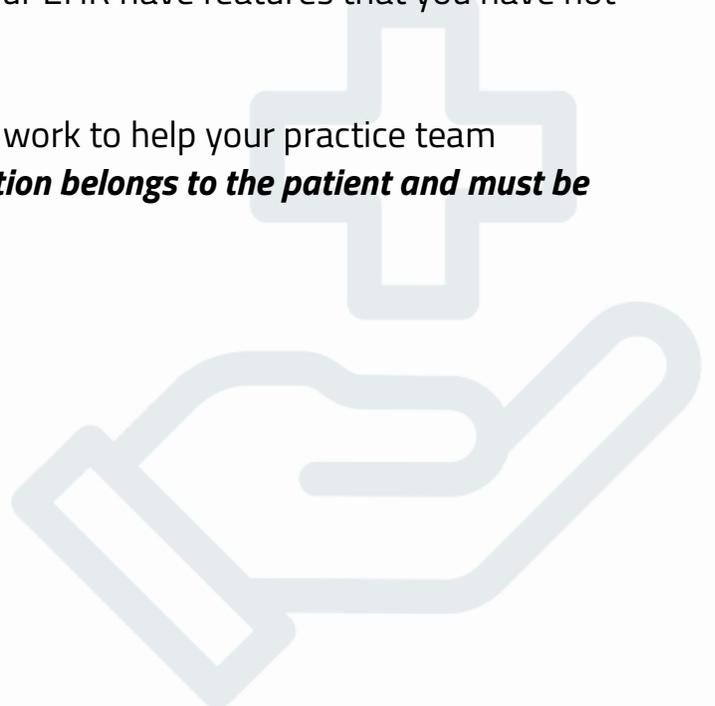


January/February 2021

- ❑ Designate an Information Blocking Compliance Officer (or team lead) for your practice.
- ❑ Make time for the Information Blocking Compliance Officer to become informed and educated about the [21st Century Cures Act](#).
- ❑ Start with the ONC's Cures Act Final Rule and [what it means for clinicians](#).
- ❑ Educate yourself on "[the why](#)" behind this movement: To empower patients to have access to their own information.
- ❑ Make sure your practice team [understands the definition of EHI \(electronic health information\)](#) and how it applies to the information you have about your patients.
- ❑ Have the Blocking Compliance Officer make a presentation to your entire practice team so all team members are aware of this mandatory federal regulation.
- ❑ Consider [joining a community conversation](#) about the 21st Century Cures Act such as those on the Section on Administration and Practice Management for the AAP (SOAPM) and the Council on Clinical Information Technology (COCIT).
- ❑ Mark **April 5, 2021**, on your calendar: the **applicability date** when this regulation applies to all stakeholders - patients, clinicians and Health IT vendors.

February 2021

- ❑ Assess your practice's current processes for releasing information to patients/caregivers.
- ❑ Identify your practice's current method(s) of providing information to patients/caregivers (such as paper copies, fax, encrypted email, PDFs, etc.).
- ❑ The 21st Century Cures Act states that if patients/representatives ask for their information in an electronic format, you have to provide it electronically. Identify the ways in which your practice can provide information to families in an electronic format ([CCDA](#), portal access to their records, through an API, etc.).
- ❑ Create a gap analysis of [what practices are required to do](#) and what you currently provide (both in the process in which you get and respond to requests, and in the form that information is provided).
- ❑ After those gaps are identified, investigate what options are available to you to close those gaps. Does your EHR have features that you have not enabled or implemented?
- ❑ Begin the serious and important work to help your practice team understand that ***patient information belongs to the patient and must be shared with them freely.***



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March 2021

- ❑ Do an in-depth review of what sensitive EHI you store in your practice that you may not want to release broadly, in order to comply with jurisdictional legal requirements (such as adolescent confidentiality related to seeking care for sexual activity).
- ❑ Understand how your current technology does or does not enable you to separate/segregate/redact sensitive data from being released to patients/caregivers.
- ❑ Familiarize yourself with adolescent and other privacy jurisdictional laws that apply to where you practice and where your patients live.
- ❑ Do an in-depth review of the [8 categories of Information Blocking Exceptions](#) and determine which scenarios might apply to your practice.
- ❑ Create a draft Information Blocking Policy for your Practice which:
 - Outlines how you share information with patients/caregivers both on-demand/self-serve and by request
 - Delineates what (if any) information you protect, how, and why - including jurisdictional mandates
 - Lists any identified gaps in your ability to meet the requirements of the 21st Century Cures Act and your plans to close them
 - Outlines your practice policy for monitoring your compliance with the 21st Century Cures Act
 - Delineates your practice policy and procedures for handling any complaints about information blocking
- ❑ Hold a provider meeting to ensure alignment and then review with the entire practice team.

April 2021

- ❑ Schedule monthly touchpoints with both the providers and broader practice team, for the remainder of the year.
- ❑ Commit to understanding the enforcement regulations/penalties from the Office of the Inspector General. (As of 1/15/21, they are not finalized but you can follow updates on the [OIG website](#).)
- ❑ Finalize your Information Blocking Practice Policy and review it with your entire practice team.
- ❑ Hold a “mock” drill for a complaint about information blocking so that your practice understands roles and responsibilities.
- ❑ Create a project plan for closing identified gaps and assign ownership and deliverables with dates.
- ❑ Promote to your patients/families how you are empowering them with their own information.
- ❑ Identify external entities that may be blocking your ability to receive EHI on your patients in order to provide safe/effective care (Labs/HIEs that - up until this point - have refused to send you electronic information or charged onerous fees) and create a plan to address.
- ❑ Commit to making sharing of information a Continuous Improvement Project for your practice.

About the Sponsor

Office Practicum provides innovative pediatric-specific health IT solutions for independent pediatric practices. Our EHR, PM system, billing services, and business analytic tools help pediatric practices improve clinical and financial outcomes and adapt to the ever-changing healthcare environment. Office Practicum is also reviewing and updating all of our policies and procedures to ensure compliance with the 21st Century Cures Act.

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