Information Blocking Investigations and Enforcement For Entities Subject to Civil Monetary Penalties

1. OIG receives an information blocking complaint
2. OIG uses its enforcement priorities to assess complaints
3. OIG opens an information blocking case
4. OIG investigates the complaint by gathering facts, conducting interviews, document requests, etc.
   a. OIG may consult with ONC to assess facts and information blocking regulations
   b. Case closed if OIG concludes information blocking was not committed
5. OIG provides an opportunity to the entity to discuss OIG’s investigation
6. If OIG concludes the entity committed information blocking, a demand letter is sent to the entity
7. Entity has the opportunity to appeal OIG’s imposition of the penalty

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https://OIG.HHS.GOV/reports-and-publications/featured-topics/information-blocking/