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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