

Information Blocking Compliance Program for Providers and Exchanges

Last reviewed October 2026 · <https://www.integralhs.com/information-blocking-compliance-program>

What to have ready

This checklist is IHS's planning view. Items that name an exception tie to its section heading in 45 CFR Part 171, and the rest support the definition in 171.103(a).

- Your current written policy for EHI requests, or a note that none exists.
- A list of the ways requests reach you, such as a patient portal, an exchange or network, or direct requests.
- Your log of requests that were denied, delayed or limited, with the reason recorded for each.
- For any request where you relied on an exception, the documentation behind it, organized by exception title.
- Your privacy and security policies, since privacy (171.202) and security (171.203) are both exceptions by title.
- A list of your health IT systems and the person who administers each.
- If you charge for access to EHI, your fee schedule, since charging fees (171.302) is an exception by title.
- Any licensing terms for interoperability elements, since 171.303 is an exception by title.
- Exchange or network participation agreements, if you take part in one.
- Staff training records on EHI requests.
- The name of the counsel who confirms legal conclusions and the path for reaching them.

Bring what you have to the free introductory call and we will tell you what is missing.