



myUnity Enterprise Interoperability Rule: Information Blocking Update

On May 1, 2020, the **Office of the National Coordinator (ONC)** published the [final rule](#) which sets the requirements for **Information Blocking** as required by Congress in the **21st Century Cures Act**.

The rule defines:

- who information blocking actors are
- what data elements should be available for interoperability
- timelines for compliance
- guidelines by which an Information blocker can be defined

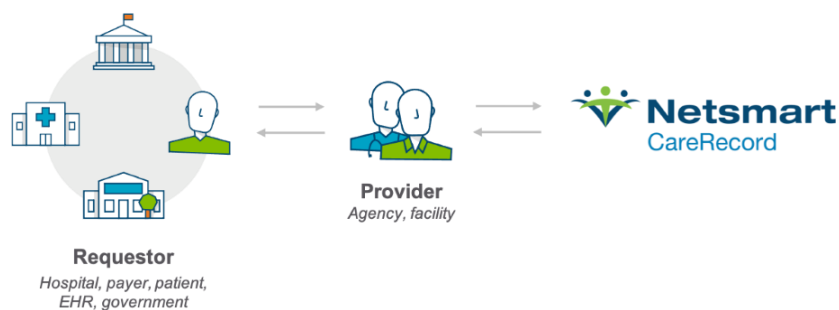
Information Blocking is defined as a practice likely to interfere with access, exchange or use of electronic protected health information (ePHI), except as covered by an exception or required by law. The ONC previously defined ePHI as data elements represented in the U.S. Core Data for Interoperability (USCDI) during the first 24 months of the rule. Starting October 6, 2022, the ONC defines ePHI as data that would be included in a designated record set. This includes individually identifiable health information maintained in electronic media or transmitted by electronic media and included in one of the following groups: medical and billing records, records maintained by or for a health plan and records used to make medical decisions about individuals and are not specifically excluded from ePHI as [defined by the ONC](#).

Each organization should outline its own individualized policy and practice as it relates to Information Blocking. Organizations, particularly those who utilize behavioral health notes, will likely want to consult with their legal counsel to ensure their policies and procedures meet the requirements and consider any applicable exceptions of psychotherapy notes under the rule.

What the Rule Does Not Do

The rule does not implement the civil money penalties (CMPs) by which an Information Blocker would be held to and provides for a potential ban on health IT developers in violation of the Conditions of Certification. A companion rulemaking will come from the Office of the Inspector General (OIG) which will define the enforcement of the Information Blocking rules, and CMPs will not begin until that rule is final. ONC has also stated that discretion will be exercised such that conduct occurring before the CMP rule is final will not be subject to information blocking CMPs.

Information Blocking Flow



A requestor can be a hospital, agency, patient, government entity, payor, etc. The requestor is responsible for bi-directionally communicating with the provider (agency). The provider is the data owner, responsible for bi-directionally communicating machine readable information from the Netsmart solution. Netsmart will not generally communicate directly with the requestor, whereas the provider (agency) is responsible for communicating & obtaining information accurately.

Netsmart Response

Below is a matrix of the data elements that would be included in a designated record set and included in the Information Blocking requirements starting October 6, 2022. The list of data elements below is a broad determination of elements Netsmart has defined for Information Blocking which was, in part, based on industry direction from the [AHIMA EHI Task Force Report](#). Not all data elements may be captured in the myUnity Enterprise solution (as noted in the Data Captured column). This document also outlines how data that is captured can be exported from the system in a machine-readable format.

The below outlines access to data based on the Netsmart standard set up and forms suite. If your organization has elected to use customized forms or setup, the location and availability of the below data elements may vary.

Organizations can use this document to access data elements and support compliance using the myUnity Enterprise solution.

Data Elements	Data Captured	Options for Export	Path
Allergies	Yes	CCD/FHIR	CCD/FHIR
Assessment & Plan of Treatment	Yes	CCD/FHIR	CCD/FHIR

Care Team Members	Yes	CCD/FHIR	CCD/FHIR
Clinical Notes	Yes	CCD/FHIR	CCD/FHIR
Goals	Yes	CCD/FHIR	CCD/FHIR
Health Concerns	Yes	CCD/FHIR	CCD/FHIR
Immunizations	Yes	CCD/FHIR	CCD/FHIR
Lab Tests & Results	Yes when Order Connect is in use	CCD/FHIR	Data stored in Order Connect; otherwise, data is not stored
Demographics	Yes	CCD/FHIR	CCD/FHIR
Problems	Yes	CCD/FHIR	CCD/FHIR
Procedures	Yes	CCD/FHIR	CCD/FHIR
Provenance	Yes	CCD/FHIR	CCD/FHIR
Smoking Status	Yes	CCD/FHIR	CCD/FHIR
Implanted Device Identifiers	Yes	CCD/FHIR	CCD/FHIR
Vitals	Yes	CCD/FHIR	CCD/FHIR
Encounters	Yes	CCD/FHIR	CCD/FHIR
Diagnostic Imaging	Yes when Order Connect is in use	CCD/FHIR	Data stored in Order Connect; otherwise, data is not stored
Advance Directives	Yes	PDF, CSV (custom report)	Clinical > Reports > General > Advance Directive Report
Biologically derived product	No	Data Not Captured	Data Not Captured

Ophthalmic data	No	Data Not Captured	Data Not Captured
Substance use	No	Data Not Captured	Data Not Captured
Patient Work information	Yes	PDF, CSV (custom report)	Census > Reports > Face Sheets > Face Sheet Report
Functional assessments (Risk Assessments)	Yes	PDF, CSV (custom report)	CSV custom report
Reason for Referral/Type	Yes	PDF, CSV (custom report)	Census > Reports > General > Referral Source Report
Research Data (study name)	No	Data Not Captured	Data Not Captured
Family Health History	Yes	PDF, CSV (custom report)	CSV custom report
Health Insurance Information	Yes	PDF, CSV (custom report)	Facesheet
Orders (request for procedure, diagnostic, intervention, lab test, follow-up care, or other planned service)	Yes	PDF, CSV (custom report)	Clinical > Reports > Orders > Treatment Administration Records Clinical > Reports > Orders > Medication Administration Records
Observations	Yes	PDF, CSV (custom report)	Clinical>Reports>General> Patient Vital Sign Report
Social Determinants of health	Yes	PDF, CSV (custom report)	Clinical Provider Note or custom CSV report
Social history	Yes	PDF, CSV (custom report)	Clinical Provider Note or custom CSV report

Specimen	Yes if Order Connect is in Use	CCD/FHIR	Data stored in Order Connect; otherwise, data is not stored
Travel Information (travel history/future plans)	No	Data Not Captured	Data Not Captured
Provider-patient messages with patient identifiable info	No	Data Not Captured	Data Not Captured
Provider-provider chat messages with patient identifiable info	No	Data Not Captured	Data stored in CC Inbox
Patient-provider messages	No	Data Not Captured	Data Not Captured
Consents (patient consent, HIE, medication)	Yes	PDF, CSV (custom report)	CSV custom report
Events (Admission, Discharge, Transfer)	Yes	PDF, CSV (custom report)	Setup > General > Interop Log Viewer
Prior Authorization Forms	Yes	PDF, CSV (custom report)	Scheduling > Reports > Reports > Authorization Utilization Report
Claims	Yes	PDF, CSV (custom report)	Financial > Organization > Claims > Manage Claims
Billing codes assigned	Yes	PDF, CSV (custom report)	Custom report
Hospital account & coverage (facility codes)	No	Data Not Captured	Data Not Captured
Price estimates given to patient	No	Data Not Captured	Data Not Captured

Financials assistance applications	No	Data Not Captured	Data Not Captured
Financial assistance decisions	No	Data Not Captured	Data Not Captured
Insurance Eligibility information	Yes	PDF, CSV (custom report)	Custom report
Charges, refunds, deductibles	Yes	PDF, CSV (custom report)	Financial > Reports > General > Transaction Report
Payments	Yes	PDF, CSV (custom report)	Financial > Reports > General > Transaction Report Financial > Reports > General > Payment Log Report
Denials	No	Data Not Captured	Data Not Captured
Billing statements & summaries	Yes	PDF, CSV (custom report)	Financial > Organization > Claims > Manage Claims
Collection information	Yes	PDF, CSV (custom report)	Financial > Organization > Payments > Related Links > Payment Log Report Financial > Reports > Notes > Collection Notes Report
Pregnancy history	No	Data Not Captured	Data Not Captured
Patient relationships (i.e. mother, father, siblings, significant other, etc)	Yes	PDF, CSV (custom report)	Facesheet
Patient education materials provided to patient	No	Data Not Captured	Data Not Captured
Saved Documents	Yes	PDF, CSV (custom report)	Custom report

Patient-Filled Forms	No	Data Not Captured	Data Not Captured
Medication Administrations (current and historic)	Yes	PDF, CSV (custom report)	Clinical > Reports > Orders > Medication Administration Records
Incident Records	Yes	PDF, CSV (custom report)	Custom report
Appointments	Yes	PDF, CSV (custom report)	Backoffice Patient Schedule
PHI Disclosure Records	No	Data Not Captured	Data Not Captured
Patient Assessments	Yes	PDF, CSV (custom report)	Clinical > Reports > Assessments > Print Assessments