ALTEA MEDICAL LLC

DEPARTMENT: Compliance	**POLICY:** E-40
PAGE: 1 of 2	**REPLACES POLICY DATED:** N/A
EFFECTIVE DATE: July 15, 2026	**APPROVED BY:** Karim Salamatian

INFORMATION BLOCKING COMPLIANCE

I. PURPOSE:

The purpose of this policy is to establish guidelines relating to affiliated practices' responses to requests for access, exchange, or use of electronic health information ("EHI").

II. POLICY:

Company will comply with affiliated practices' instructions concerning access, exchange, or use of EHI and assist the practices in complying with the Information Blocking (as defined below) prohibition of the 21st Century Cures Act and related regulations.

III. PROCEDURES:

A. Responding to Requests for Access, Exchange, or Use of EHI

1. Definitions:

a. "EHI" means Electronic Protected Health Information to the extent that it would be included in a Designated Record Set, but EHI does not include: (1) Psychotherapy Notes; or (2) Information compiled in reasonable anticipation of, or for use in, a civil, criminal or administrative action or proceeding.

b. "Information Blocking" means a practice that (1) except as required by law or covered by an ONC Final Rule Exception, is likely to interfere with access, exchange, or use of EHI; and (2) if conducted by a health care provider, such provider knows that such practice is unreasonable and is likely to interfere with, prevent, or materially discourage access, exchange, or use of EHI.

c. "ONC Final Rule Exception" means one of the exceptions to the Information Blocking prohibition in the 21st Century Cures Act, as set forth in 45 C.F.R. Part 171.

2. Request Handling

a. Company will respond on behalf of, and assist affiliated practices in responding, to requests for access, exchange, or use of EHI in a manner consistent applicable laws, including the Information Blocking prohibition of the 21st Century Cures Act.

b. Should Company (on behalf of an affiliated practice) or an affiliated practice deny a request for access, exchange, or use of EHI that would otherwise meet the definition of Information Blocking, then the Company or affiliated practice, as appropriate, will document why such denial was consistent with an ONC Final Rule Exception, including completion of any documentation specifically required under such exception.

c. If the request for access, exchange, or use of EHI involves a request to license or use an Interoperability Element (as such term is defined in 45 C.F.R. Part 171), then the Patient Records Coordinator will consult with Company's Compliance Officer and legal counsel to determine an appropriate response.

3. Information Blocking Complaint Handling

a. Reports from Company or Affiliated Practice Workforce Members. Workforce members should report compliance concerns involving actual or potential Information Blocking in accordance with **[the internal reporting policy]** and other applicable policies and procedures.

b. Receipt of Compliance Concerns. Company will accept reports of compliance concerns involving Information Blocking from workforce members, patients, or other third parties for review and response in accordance with applicable policies and procedures.

IV. QUESTIONS:

Should you have any questions, comments, or concerns about this policy and associated procedures, we encourage you to raise them with your manager, the Compliance Officer, or through our Compliance Hotline (compliance@alteahc.com).