Owl Health&Care Technologies | A business unit of ValueMomentum

Avoid Penalties with Our 2027 ONC Compliance Checklist

- FHIR Implementation
- Patient Access and Authorization
- Payer-to-Payer Data Exchange
- Data Quality
- Enterprise Data Standards
- Third-Party App Registration & Onboarding

FHIR IMPLEMENTATION

Version Adoption	Which FHIR version(s) (e.g., R4) are currently implemented or planned, and for which use cases (claims, clinical data, etc.)?
Resource Coverage	How many and which FHIR resources (e.g., Patient, Coverage, Claim) have you successfully implemented or mapped?
Implementation Approach	Are you building FHIR capabilities internally, or do you rely on a third-party platform or vendor solution?
Interoperability Testing	How do you test your FHIR APIs for interoperability with external partners (e.g., connectathons, sandbox environments)? (If Applicable)
Future Roadmap	What is your roadmap for expanding FHIR support to additional resources or newer versions (e.g., FHIR R5)? (If Applicable)

PATIENT ACCESS AND AUTHORIZATION

Patient-Facing Tools	Which platforms (patient portal, mobile apps) enable members to view and manage their health data?
Consent & Authorization Workflow	Describe your process for capturing and managing patient consent for data sharing with external applications.
User Experience	Have you conducted user testing or satisfaction surveys to gauge ease-of-use for patient data access?
Data Granularity	Can patients control the granularity of data they share (e.g., specific data types, date ranges)?
External Application Access	What safeguards ensure only authorized third-party apps can request and retrieve patient data?

PAYER-TO-PAYER DATA EXCHANGE

Data Sharing Framework	Which standards/protocols (e.g., FHIR-based, X12) are used for data transfers with other payers (transitions of coverage, claims history)?
Coverage & Claims History	How do you exchange member coverage details or claims histories with other payers upon coverage transitions?
Automation Level	Is data exchange largely automated, or does it rely on manual processes or batch files?
Data Governance in Exchanges	What agreements or data use policies ensure security and privacy when exchanging data with other payers?
Error Handling	How do you address discrepancies or errors in data exchanged between payers (reconciliation, dispute resolution)?

DATA QUALITY

Quality Definition	How do you define data quality (e.g., completeness, accuracy, timeliness) in the context of interoperability?
Validation Rules	What automated tools or scripts check data for compliance with internal quality rules (e.g., format, code validity)?
Exception Handling	When errors are detected (e.g., missing fields, invalid codes), how do you correct or escalate them?
Monitoring and Reporting	Do you generate regular data quality reports (error rates, completeness percentages), and who reviews them?
Contiuous Improvement	How do you incorporate feedback loops (e.g., from downstream systems) to continually improve data quality?

ENTERPRISE DATA STANDARDS

Standard Code Sets	Which standard code sets (ICD-10, SNOMED, LOINC) does your organization use, and are they consistently applied across systems?
Local-to-Standard Mappings	Do you maintain mappings from local/ proprietary codes to standard terminologies, and how often are they updated?
Compliance Monitoring	How do you monitor internal systems for consistent use of standardized code sets?
Governance Oversights	Does your data governance team oversee the adoption and updates of enterprise data standards?
Exception Management	What happens when a specific data element cannot be mapped to a recognized standard code (exception management)?

THIRD-PARTY APP REGISTRATION & ONBOARDING

Workflow Registration	What is your formal process to register and validate third-party apps seeking API access?
Security Requirements	How do you communicate security and privacy requirements to third-party developers?
Technical Documentation	Do you provide a developer portal or sandbox environment for third parties to test integrations?
Certification & Attestation	Are third-party apps required to certify or attest to compliance with industry standards (e.g., CARIN, HL7 FHIR) before going live?
Monitoring & Revocation	What triggers an app's access to be limited or revoked (suspicious activity, policy violation), and how is this enforced?

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