

End Users Alliance Roadmap

2024 - 2027



Those who use technology tools for care – health IT end users – face a growing set of federal mandates from federal agencies over the next four years. While each rule addresses important objectives, understanding the complete regulatory landscape highlights implementation challenges, areas of overlap, and even potential conflict. The Health IT End Users Alliance created this roadmap to spark discussions about real-world impacts of requirements and identify ways to lessen administrative burden on end users by better alignment and sequencing of federal requirements.

The left side of the table is a list of the federal regulatory final rules in no specific order. The 21st Century Cures Act and the ONC HTI-1 Final Rule are divided into specific subparts to demonstrate the different regulatory requirements and various agency involvement.

The timeline represents 2024 to 2027. Each color corresponds to a different federal agency identified by the key at the bottom of the page. Areas that are highlighted indicate future requirements end users will be expected to comply with.



Requirement	2024	2025	2026	2027
HIPAA Privacy Rule Update to Support Reproductive Health Privacy	[Blue bar]			
HIPAA Administrative Transactions Update	[Light blue bar]			
ONC 21st Century Cures Act Final Rule: Information Blocking	[Grey bar]			
ONC 21st Century Cures Act Final Rule: TEFCA	[Green bar]			
CMS Interoperability Final Rule	[Light blue bar]			
No Surprises Act	[Light blue bar]			
Inpatient Prospective Payment System (IPPS) + Physician Fee Schedule (PFS)	[Light blue bar]			
Electronic Prior Auth. and Interoperability				[Light blue bar]
Health Technology and Interoperability - 1 (HTI-1): CEHRT				[Light blue bar]
Health Technology and Interoperability - 1 (HTI-1): DSI				[Grey bar]
Health Technology and Interoperability - 1 (HTI-1): Privacy				[Grey bar]

End User Concerns



As part of the roadmap process, the Alliance identified key concerns with implementing each of the regulations identified. Each concern presents opportunities for the end user to share their on-the-ground perspectives to facilitate more effective and efficient implementation of these requirements. These concerns include: regulations that require the adoption and use of technology end users rely on their technology vendors for, different final rule requirements that contradict each other, areas where multiple agencies must align requirements for end users to implement them, rules with certain requirements that come into effect ahead of other regulatory requirements, and requirements that lack a direct connection to improving patient care.

Requirement	Technology Dependent	Multi-Agency Jurisdiction	Rule Incongruency	Out of Sequence Implementation	Indirect Connection to Care
HIPAA Privacy Rule Update to Support Reproductive Health Privacy	✗				
HIPAA Administrative Transactions Update			✗		
21st Century Cures Act Final Rule: Information Blocking	✗	✗			
Interoperability and Patient Access Final Rule	✗				
No Surprises Act	✗			✗	
Medicare Payment Rules (IPPS, PFS)	✗	✗			
Electronic Prior Auth. and Interoperability	✗			✗	
Health Technology and Interoperability - 1 (HTI-1)	✗				✗
21st Century Cures Act Final Rule: TEFCA	✗				

The Health IT End Users Alliance brings together health information professionals, physicians, hospitals, and other front-line health care providers and organizations that use health IT in the provision of care. The Alliance seeks to advance end user perspectives in health IT policy and standards development and provide a collective voice to move beyond end user involvement to end user leadership.

Learn more about the Alliance at: www.hitenduser.org