

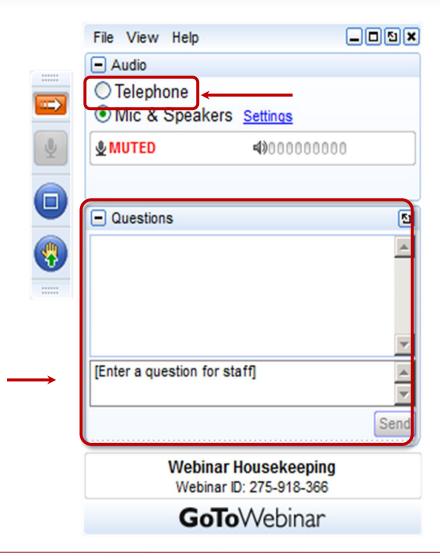


# Demystifying the CMS Interoperability Final Rule

**August 17, 2021** 

## Logistics: How to Participate in Today's Session

- Today's session is being recorded.
  - All attendees will receive a link to view the on-demand webinar.
- Your phones will be muted upon entry and during the webinar.
- Throughout the session, you may communicate a question via the web.
  - Send in your questions via the questions panel on the right side of the GoToWebinar desktop





# Today's Presenters



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# Agenda

- Understanding the CMS Interoperability and Patient Access Final Rule
- Challenges facing health plans and app vendors
- Questions and Answers



# Understanding the CMS Final Rule



Centers for Medicare and Medicaid Services released the Final Rule ("CMS Final Rule") on Interoperability and Patient Access, requiring that CMS-regulated plans:

- ✓ Implement and maintain openly-published HL7® FHIR® based APIs in order to provide patients access to their health information and provider directory information.
- ✓ Permit access to data by third-party applications
- Support electronic exchange of data for care coordination as patients move between plans
- ✓ Provide information to their members to help them protect the privacy and security of their health information

Source: https://www.healthcareitnews.com/news/hhs-publishes-final-regs-info-blocking-interoperability



# Important Dates to Know

## Major Milestones for the CMS Interoperability and Patient Access Final Rule

## May 2020

CMS issues Interoperability and Patient Access final rule

## January 2022

Payer-to-payer data exchange required

**July 2021** 

Patient access API and provider directory API enforcement begins



# App/Payer General Workflow



App



Payer



App



Payer



App

# Request Connection

#### Find a payer

- Submit information on org identity, security, privacy, data use, etc.
- Request a connection

## **Review App**

- Review connection request and evaluate submitted org identity and security information
- Approve/deny connection
- Share app information with members to make data sharing decisions
- Send URL to access credentials

## Request Credentials

- Access payer's URL to request credentials
- Test to ensure ability for effective and secure connection

#### **Grant Credentials**

- Issue credentials
- Notify app of credentials grant

#### **Get Credentials**

- Get credentials
- Update credentials in own app Identity Access system



App can now access member data at member request



# Payer to Payer General Workflow



**Current Payer** 



**Prior Payer** 



Prior Payer



**Current Payer** 



Prior Payer

**Send Member Data** 

**Request Member** Data

When looking for past member data current payers need:

- A way to gather member request/consent
- A mechanism to find where members previously had coverage
- A process to match a member between payers
- A way to find where to go to get the member data

When looking to send member

**Review Payer** 

Request

- data prior payers need a way to: Ensure that data requests are from valid current payers of their past members
- Communicate process for requesting payers to access past member data

Grant **Credentials** (via API)

When looking to exchange data payers need a way to:

- Test to ensure effective and secure connection
- Issue credentials
- Notify requesting payer of credentials grant
- Access credentials

(via API)

**Get Credentials** 

When looking to share member data payers need a way to:

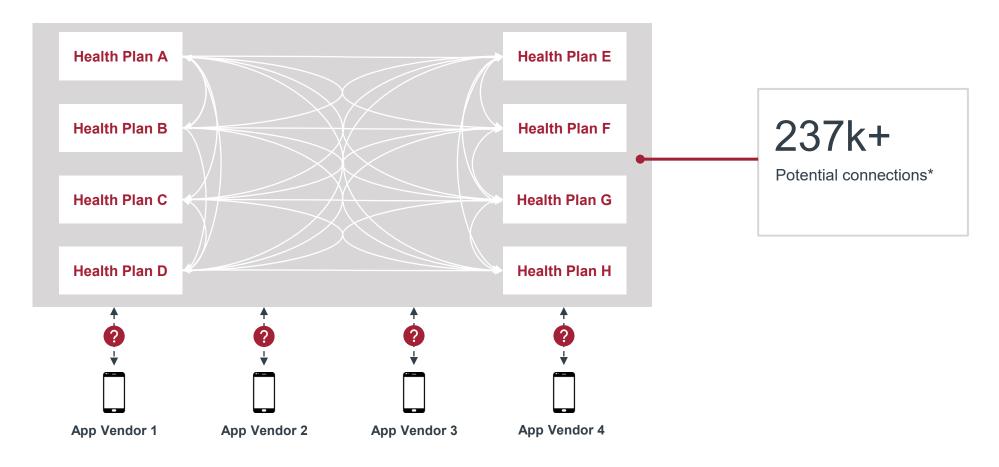
 Ensure that data is shared securely with requesting payer

#### Success

Requesting Payer can now access member's prior payer data with member consent



# **Unwieldy Volume of Potential Connections**



\*Calculated using AIS data and assumes that every health plan would need a connection to every other health plan, connections to third party apps are additive..



# Connections Can be Tedious and Time Consuming



**Connection Need Established** 



**Endpoint Search** 





**Connection Request** Made



**Member Match and** Consent



Legal, Operational and **Technical Hurdles** 



**Credentials Exchanged** 

Repeat this process 237K+



# Promoting Trust: Identity, Security, Privacy, Data Use, Testing, and Maintenance



## **Authenticating**

- Checking business credentials of payers and apps
- Gathering information to evaluate system technical and security risks
- Obtaining member consent and payer/member matching



## **Educating**

- Collecting and communicating privacy, security, and data use information to help members make informed decisions
- Ensuring that payers and apps have information needed to locate and connect with endpoints



## **Testing**

- Validating that endpoints are active and FHIR compliant
- Testing between payers and apps to ensure effective and secure connections



## Maintaining

- Ensuring that endpoints and information are up to date
- Communicating updates to payers, apps, and members



**Questions and Answers** 

## How to Submit Your Questions

<u>Via the Web</u> – Enter your question into the "Questions" pane in the lower right hand corner of your screen.

