



AND PATIENT ACCESS-THE CMS FINAL RULE



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Interoperability and Patient Access

The CMS final rule: what it is, who gets impacted, and how to plan for the future

This paper contains a detailed summary of the final Interoperability and Patient Access Rule and the 21st Century Cures Act, along with technical and implementation standards. The paper explains how the ruling impacts healthcare enterprises and technology firms and provides a planning guide for implementation of the requirements.



This ebook is a snapshot of the more detailed white paper Interoperability and Patient Access: what it is, who gets impacted, and how to plan for the future.

Download the complete paper



Interoperability & Patient Access - Highlights

Implements provisions of the 21st Century Cures Act to advance interoperability; supports the access, exchange, and use of electronic health information (EHI); and addresses occurrences of information blocking

Empowers patients by improving accessibility of information to make informed healthcare decisions includina healthcare prices and outcomes

Defines technological framework and vocabulary standards to advance interoperability | and ensures that patients have access to their healthcare information

Medicare and Medicaid programs, the Children's Health Insurance Program (CHIP), and qualified **INCLUSIONS** health plan (QHP) issuers on the individual market Federally-facilitated Exchanges (FFEs) **EXCLUSIONS**

GOALS

Stand-alone dental plans (SADPs), QHP issuers only offering QHPs in the Federally-facilitated Small Business Health Options Program Exchanges (FF-SHOPs), State-Based Exchanges

Ability to move from payer to payer, provider to provider, and have both their clinical and administrative information along with them

on the Federal Platform (SBE-FPs)

MyHealthEData Initiative

- Executive Order 13813 to Promote Healthcare Choice and Competition
- Will improve access to healthcare and information related to prices and outcomes needed to make informed health care decisions.
- Will minimize reporting burdens on impacted providers, and payers subject to this rule

Standards based Interoperability and Information exchange has the potential to facilitate efficient, safe and quality care for individuals and populations.



21st Century Cures Act and Blue Button API - Overview

21st Century Cures Act

- Provisions for standardized APIs to allow individuals to securely access healthcare information
- Discourages information blocking by provider organizations and health IT developers
- Updates to the ONC health IT certification criteria
- Deregulatory actions on some certification criteria
- Adoption of USCDI as a terminology standard
- A certified health IT product to support electronic health information export

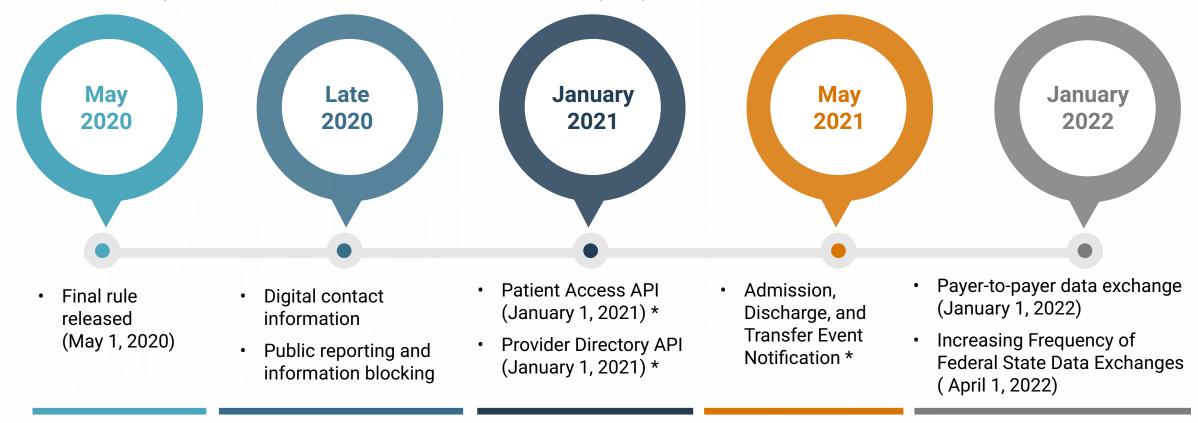
Blue Button API

- Developed by CMS
- Standards-based FHIR API that enables beneficiaries to connect their claims data to the applications they trust
- Uses the OAuth 2.0 standard for beneficiary authorization
- Contains four years of Medicare Part A, B, and D data for 53 million Medicare beneficiaries
- Allows developers to integrate with the Blue Button API



Interoperability and Patient Access - Timelines

The Interoperability and Patient Access final rule empowers patients by giving them access to their health information when they need it and, on any device or application of their choice and in a way they can best use it.



^{*} In-view of the COVID-19 crisis, CMS has extended the implementation timelines for these proposals by six months



What It Means For Patients, Providers, and Payers

Patients

- Access their own data no additional cost
- Share and decide how their data will be used
- Access health information from any device or application of their choice
- Ensure security and privacy of the data

Providers

- Digital contact information on NPPES portal
- Public reporting of information blocking
- ADT electronic patient event notifications

Payers

- Publish Patient Access API
- Publish Provider Directory API
- Exchange data set to another plan or to recipient as identified by the enrollee
- Participate in a trusted exchange network
- Increase the frequency of federal-state data exchange to submit data to CMS daily

The new ruling empowers patients. The major onus of updating technology infrastructure to publish the APIs is on the payers. Providers will have to attest to "not blocking information" and updating their digital contact information. The update to ADT electronic patient event notifications will be facilitated by the EMR vendors.



Overview of Technical Standards

third-party apps through

use of the OAuth 2.0

standard

HHS has finalized technical standards in the ONC's 21st Century Cures Act final rule for payers and developers to use:

Fast Healthcare Interoperability Resources (FHIR) Standards for APIs

Secure authorization of Secure a

the end-user



FHIR Release 4.0.1 resources

structure of core health data

define the content and

clients to verify the identity of

Implementation Standards Overview (Payers)

Should have at a minimum the following data points:

Patient Access API

Provider **Directory** API

Payer-to-Payer Data **Exchange**

Increasing Frequency of **Federal-State Data Exchanges** Adjudicated claims (including provider remittances and enrollee cost-sharing) Encounter data

- Clinical data
- Laboratory data

Accessible via a public-facing digital endpoint on the payer's website to include provider names, addresses, phone numbers, and specialties

Payers are required to exchange patient clinical data (specifically the U.S. Core Data for Interoperability (USCDI) version 1 data set) at the patient's request

States to exchange certain enrollee data for individuals dually eligible for Medicare and Medicaid, including state buy-in files and "MMA files" from monthly to daily exchange

The CARIN Blue Button® Framework and Common Payer Consumer Data Set (CPCDS), provides a set of resources that payers can display to consumers via a FHIR API.

Download the paper for complete details



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Implementation Standards Overview (Providers)

Public Reporting and Blocking Information

- CMS will publicly report eligible clinicians, hospitals, and critical access hospitals (CAHs) that may be blocking information based on how they attested to certain Promoting Interoperability Program requirements
- Will help patients choose providers who have attested to Promoting Interoperability

Digital Contact Information

- Providers to update their digital contact information as a Direct Address and /or FHIR API endpoint
- CMS will publicly report those who have not updated their information in the National Plan and Provider Enumeration System (NPPES)

Admission, Discharge, and Transfer Event Notifications

Hospitals and CAHs to send electronic patient event notifications of a patient's admission, discharge, and/or transfer to another healthcare facility or to another community provider or practitioner



Applicable for Payers

The following proposals are applicable to payers

Patient Access API

- Open APIs for claims and encounter data
- Maintaining security functionalities of APIs
- Initial design development, testing and longterm support

Provider Directory API

 Most payers have the data available but would need to provide this through a FHIR API accessible on the payer's website

Payer to Payer Coordination

- Support beneficiary information to a new plan when requested
- At a minimum,
 data elements in
 the United States
 Core Data for
 Interoperability
 (USCDI) standard be
 included

Participate In Trusted Exchange Network

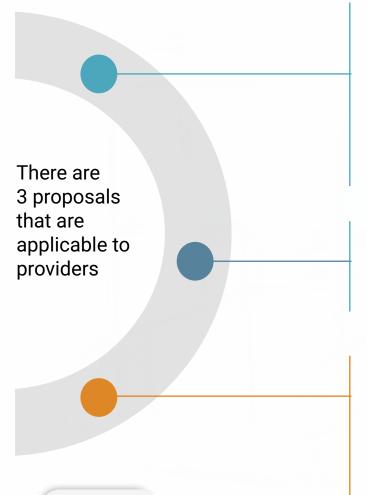
 Framework to exchange PHI connecting inpatient and ambulatory EHRs, and secure messaging between patients, providers, and payers

Federal-state Data Exchange

 Updates to systems to be able to submit data daily to CMS



Applicable for Providers



Information Blocking Public Reporting

- Three statements that require a "yes" attestation response to successfully report for the CMS programs
- CMS proposes to publicly report negative attestations for eligible clinicians and eligible hospitals

Provider Digital Contact Information

 All healthcare providers and facilities to update their NPPES record online to add digital contact information

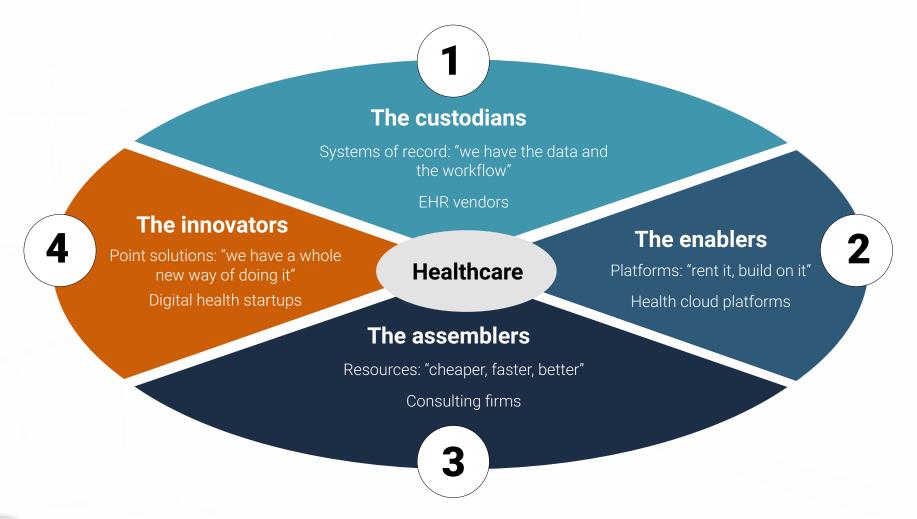
ADT Electronic Patient Event Notifications

 Creating an electronic patient event notification for the change in ADT status to trigger a message either:

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- » Directly to the provider
- » Through a Health Information exchange

The Damo ICEA™ Framework for Technology Vendors





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What the final ruling means for different healthcare IT providers

Damo ICEA™ Framework

For healthcare technology providers, the new ruling comes with increased opportunities in terms of innovations and increased technological enhancements of existing infrastructure

Innovators

Point solutions

"we have a whole new
way of doing it"

E.g. Digital health startups

 Compliance to the FHIR Integration framework and USCDI data standards

Custodians

Systems of record

"we have the data and the workflow"

E.g. EHR vendors

- Make available open access FHIR APIs with USCDI vocabulary compliance
- Patients to get
 electronic access
 to their data at no
 additional cost

Enablers

Platforms

"rent it, build on it"

E.g. Health cloud platforms

 Provide development environment with FHIR APIs, Security and Identity management, PHI/HIPAA and other tools

Assemblers

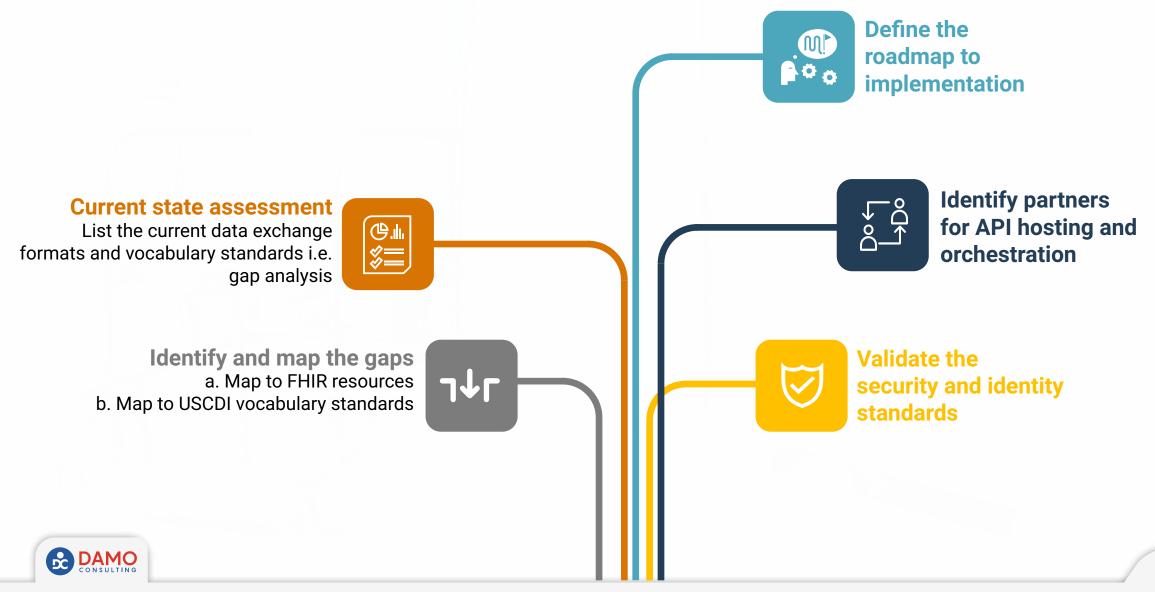
Resources
"cheaper, faster, better"

E.g. Consulting firms

 Consulting firms with good knowledge of healthcare domain and technology – EMR data standards and FHIR APIs



How Damo Consulting can help



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To learn more about how Damo Consulting can help build and implement interoperability and patient access roadmaps, write to us: info@damoconsulting.net

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Vision

We envision digitally-enabled health systems and technology partners collaborating to deliver a superior care experience and promote better health outcomes for healthcare consumers around the world.

Mission

As a preferred advisory partner and expert in digital transformation strategies, we are committed to supporting healthcare enterprises with digital health innovation while helping technology providers seize the opportunity for growth through the right market strategies.



Damo Consulting is a digital transformation and strategic growth advisory firm serving healthcare enterprises and the technology companies that support them. We specialize in delivering actionable healthcare market intelligence and branded thought leadership for our clients.

USA

1212 S Naper Blvd Suite # 119-160 Naperville, IL 60540

INDIA

No 60, Ferns Residency K.Narayanapura Kothanur Bangalore – 560077 (Regd. address)