CMS Interoperability Planning Collaborative

- Collaboration among counties to meet new CMS data sharing requirements
- Create strategic planning roadmap

52 COUNTIES participating

Key Program Activities
- Group discussion and sharing
- Subject matter experts, health plan and industry references
- Resources and templates

Special Thank You and Acknowledgement

This program is supported by a grant from the California Health Care Foundation.
## CMS Interoperability Planning Collaborative

<table>
<thead>
<tr>
<th>Meeting Topics and Focus</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>• CMS Interoperability primer (optional)</td>
<td>March 29</td>
</tr>
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</table>
| #1 • FAQs from Primer and Compliance Updates  
  • Market summary and lessons  
  • County considerations | April 5 |
| #2 • Recap and Key Takeaways So Far  
  • Some Questions  
  • Data Requirements | April 26 |
| #3 • Recap about Data Requirements  
  • Some Questions and Survey Responses  
  • Consumer consent, 3rd-party App Registration | May 17 |
| #4 • Recap about Consent and App Registration  
  • FAQs and other updates  
  • Lessons and feedback from implementations so far | June 29 |
| #5 • Final group discussion  
  • Feedback on draft work plan and next steps | July 19 |
Admin Stuff

Program email
• interoperability@calmhsa.org

Program materials and resources
• https://www.calmhsa.org/cms-interoperability-planning
Program Staff and Guest Speakers

Khoa Nguyen  
CEO, KN Consulting LLC  
Project Director

Mark Scrimshire  
Chief Interoperability Officer,  
Onyx Health

Tom Schwanginer  
Executive Digital Advisor  
LA Care Health Plan

Kathryn Madrid  
Business Systems Analyst  
Community Health Group
Zoom Logistics

- Everyone will be muted to start
- Submit questions/comments in chat
- Unmute – through Zoom or phone (*6)
- Video is encouraged

- **Zoom name display**
  - Participants menu
  - Name, county/organization
Today’s Agenda and Discussion Framework

Program Goal – start the planning process

• Welcome and Admin Stuff

• Recap and Takeaways about Consent and App Registration

• FAQs and other updates

• Lessons and feedback from implementations so far
CMS interoperability requirement is MORE than existing patient portal

+ All claims – including contracted providers, ODS claims*
+ FHIR data and API
+ Client access via 3rd-party apps (not county EHR portal)
+ Obtain and track client consent with each 3rd-party app
+ Provider Directory API

Privacy and security issues

• Business requirements and implementation
• Concerns with client awareness and trustworthy apps
Overview of Data Flow

County BH Health Plan

External Entities → Current System(s) → FHIR Data "Repository" → FHIR API

Patient Portal → 3rd-party apps Access Management
County BH Plan

For 3rd-party Apps
- API Documentation on county website
- 1a. App Registration
- Optional
  - 1b. Sandbox for testing
  - 1c. Privacy/security attestation
  - 1d. Security risk assessment
- County Admin Portal

For Clients
- Education and awareness on website
- 2. Download/install app (app gallery)
- 3a. Identity verification (new account)
- 3b. Login authentication
- 3c. Consent – authorize 3rd-party app
- Client Portal

3rd-party apps

FHIR API

Authorization Server

Client Accounts

FHIR Data “Repository”
Same privacy and security framework

- Existing HIPAA right of access
- Existing federal, state, local laws

3rd-Party Apps regulated by FTC

3. API for Data Exchange

2. Access Management

1. County Data
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Compliance with CMS Interoperability Requirements

**Impacted Payors**
- Medi-Cal Plans

**Who has Regulatory Oversight?**
- DHCS
- CMS

**Medicare Advantage Plans**
- Medicaid State FFS
- Individual Marketplace Plans
Compliance with CMS Interoperability Requirements

CMS Guidance

No penalty for non-compliance (yet), but checking each impacted payor:
www.cmscompliancetracker.com

Expectations
1. Have a work plan with specific activities and milestones
2. Make good faith effort
3. Make progress
### Core Requirements of County Behavioral Health Plans

- Patient access to eHI via application program interfaces (APIs)

<table>
<thead>
<tr>
<th></th>
<th>Effective Date</th>
<th>Data Exchange Partner</th>
<th>Consumer Consent</th>
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<tr>
<td><strong>1</strong></td>
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<td></td>
<td>July 1, 2021</td>
<td></td>
<td></td>
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<td><strong>3</strong></td>
<td><strong>Payer-to-Payer</strong>*</td>
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<td>January 1, 2022</td>
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<tr>
<td></td>
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* State Medicaid FFS is exempt from Payer-to-Payer requirements.

- Hearing draft regulations are being reviewed – expect release by end of year.
Survey Question: Feedback on Potential Next Steps  
18 county responses

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Initial Conversation with Epic

Support Patient Access API

- Customer MUST be using Epic’s payer platform Tapestry
- “Free” through Tapestry

Do NOT support Provider Directory API
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Context

- Plan, county served, current enrollment
- Current status with CMS interoperability
- Approach and key considerations

Lessons from planning and implementation

- Best decision you made
- Would do differently
- Lessons for counties
## Survey Question: Feedback on Potential Next Steps

### 18 county responses

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Considerations for CMS Interoperability Timelines
Phased Approach

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Considerations for CMS Interoperability Timelines

Phased Approach

2022

- Provider Directory API

- Patient Access API: Claims/ Encounter Data and Access Management

- Patient Access API: Clinical/ USCDI Data (new/ current EHR implementations)

2024

- EHR source data, potential for IDP/ authentication, and new EHR implementations

- Builds on existing PDF and 274 project
- No consumer consent, no PHI or patient-level data – no issues with privacy
- Low cost to implement
Phased Approach to Implementation of CMS Interoperability

18 county responses

Provider Directory >> Claims/ Encounter Data & Consent/ 3rd-part Apps >> Clinical Data

<table>
<thead>
<tr>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neutral</th>
<th>Agree</th>
<th>Strongly Agree</th>
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<tbody>
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<td>0</td>
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<td>9</td>
<td>5</td>
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- San Benito
- Solano
- El Dorado
- Placer
- Trinity
- Humboldt
- Kern
- San Luis Obispo
- Sierra
- Merced
- San Diego
- Siskiyou
- Los Angeles
- Nevada
- Imperial

* Two counties “Not sure yet – need more information”
Don’t Boil the Ocean
Consider implementation in “stages”
# Meeting Topics and Focus

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