



Whitepaper

Fulfilling Interoperability and Patient Access – Final Rules with FHIR®-enabled Data Activation Platform for Payers

Table of Contents

Executive Summary

Implications of the final interoperability rules for payers	3
Providing health data access to patients through APIs	3
Making provider directory information publicly available through standards-based API	3
Data Exchange between Payers	4
Compliance timelines	4
Lack of preparation for implementing the final interoperability rules	5
What do payers need to do to incorporate the mandate and improve data exchange?	5
How can payers achieve true data interoperability in their organizations?	6
How does the FHIR-Enabled Healthcare Data Platform function?	7
Features of the FHIR-enabled Healthcare Data Platform for Payers	8
FHIR-enabled Healthcare Data Platform supports all healthcare stakeholders	9
About Innovaccer	10

Executive Summary

The Office of the National Coordinator for Health Information Technology (ONC) and the Centers for Medicare and Medicaid Services (CMS) each issued rules to empower patients and improve data exchange arrangements under the 21st Century Cures Act on March 9, 2020. The rules support increased interoperability and facilitate patient access to electronic health information. The amendment will also strengthen the MyHealthEData initiative, allowing patients to manage and make their own healthcare decisions.

The rule has some major implications for health insurers who offer Medicare Advantage and Managed Medicaid plans. This whitepaper outlines the mandates for payers and challenges that stand in the way of implementation. It further sheds light on what payers should do to achieve true interoperability and how leveraging a Healthcare Data Platform can meet the compliance requirements and improve data exchange processes.

Implications of the final interoperability rules for payers

Providing health data access to patients through APIs

The ONC rule has made it mandatory for healthcare insurers to share electronic health data with patients, which will enable them to participate more in their healthcare decisions. Members should be able to link any third-party application with their integrated health plan information and EHR data through a standards-based API. These APIs will have to use FHIR R4 for data access. Having access to their health data, patients can change providers if they aren't satisfied with the care they receive. Patients can even change plans if the care experience does not meet their expectations.

However, transmitting information across third-party platforms, especially sensitive healthcare data, needs to be approached with the utmost caution. The rule compels API developers to leverage the highly secure protocol, OAuth 2.0, putting privacy and security concerns to rest. ID Connect, an overlay developed for the OAuth 2.0 protocol, allows authentication of health plan member information utilizing an authorization server.

Making provider directory information publicly available through standards-based API

Payers regulated by CMS have to make provider directory information accessible publicly through standards-based API. The directory would contain information such as the names, addresses, phone numbers and specialty of the providers. The rule does not apply to Qualified Health Plan (QHP) issuers in the Federally Facilitated Exchanges (FfEs) since they are already required to provide this information.

Data Exchange between Payers

Patients can access and take some of their health information with them as they move from one payer to another. It helps create a comprehensive health record that they can share with their current payer. For that, CMS regulated payers should execute a payer-to-payer data exchange process through data classes and elements in the United States Core Data for Interoperability (USCDI) standard. The current payer (the data recipient) must include the data from the previous payer in the member's health record. Upon receiving a request from the member, the current payer may need to send the data to another payer, which also has to include the data from the previous payer. However, the payer will have to forward the data received from the previous in the exact electronic format in which it was received. The data that payers are required to share should have the date of service on or after January 1, 2016.

Compliance timelines



January 1, 2021

(July 1, 2021 start of enforcement)

Payers must provide members with access to their claims and clinical data using new application programming interface (API) standards.

Payers must provide public-facing directory services for provider networks and drug formularies.



January 1, 2022

Payers must take data available to other payers as members change plans through APIs



Early-to-mid 2022

Additional data sharing requirement will enable better coordination for dual-eligible members (Medicare & Medicaid members)

Lack of preparation for implementing the final interoperability rules

According to a survey, many healthcare executives are not prepared to implement the final interoperability rules. Healthcare organizations could face considerable repercussions unless they move quickly to implement the mandates.

Despite the fact that the rules were proposed in February 2019, healthcare IT executives and payers have been slow to process and prepare for implementation. Thirty percent see little impact on their organization's ability to meet the needs of their patients and customers. However, ONC and CMS have still provided sufficient time to incorporate the new changes.

Forty percent of the survey respondents think that the new regulations will have minimal impact on their IT operations. The remainder would need to create a plan to adhere to the mandate while ensuring that it doesn't disrupt their existing operations.

The fact that some organizations were delaying the implementation of interoperability proposals before it became a mandate indicates that they might have found it challenging. Pausing and altering existing workflows to ease data accessibility for other healthcare stakeholders across the value chain did not rank high on the list of priorities until now. However, since the rule has already been passed, healthcare providers, health IT developers of certified IT, health information exchanges and networks need to speed up the pace up to engage patients and reap the early adopter advantage.

What do payers need to do to incorporate the mandate and improve data exchange?

The foundational step for payers is to adhere to the issued mandates. Payers must leverage a secure, FHIR-based patient access API to provide members access to their health records. They will also need to create a plan for implementation and figure out the changes in microservices architecture necessary to support the implementation. Most payers have a provider directory in place already. However, some payers have not made this directory available through APIs. They will need to establish an FHIR-based provider directory API that can help adhere to the rule as well as enable members to choose the provider and boost engagement further. To facilitate data exchange with other payers on member requests, processes, and technologies that support USCDI a standard clinical data set will also have to be implemented.

Payers can leverage the momentum from the move towards interoperability to drive additional improvement in the data exchange process. They can leverage a data platform to access integrated, standardized, and high-quality clinical data. This data would be easy to exchange over multiple exchange protocols and data formats. By creating Unified Patient Records based on numerous data sources, cross-system connectivity can also be established. Furthermore, using the data to build customized workflows and interfaces can ultimately drive incremental performance on cost, quality, and satisfaction objectives.

How can payers achieve true data interoperability in their organizations?

Innovaccer can help payer organizations achieve true interoperability and have greater access to healthcare data with its one-of-a-kind FHIR® Enabled Healthcare Data Platform. The platform can help payers accomplish the following:

Interoperability beyond compliance needs

Beyond support for Patient Access and Provider Directory APIs, and payer-to-payer data exchange CMS requirements, the platform supports customized workflows and cross-system connectivity.

Fully managed, developer ready deployment

Its managed services model ensures outcomes are achieved, with an interactive developer sandbox and a marketplace hosting environment to support the true platform ecosystem.

Two-way interoperability

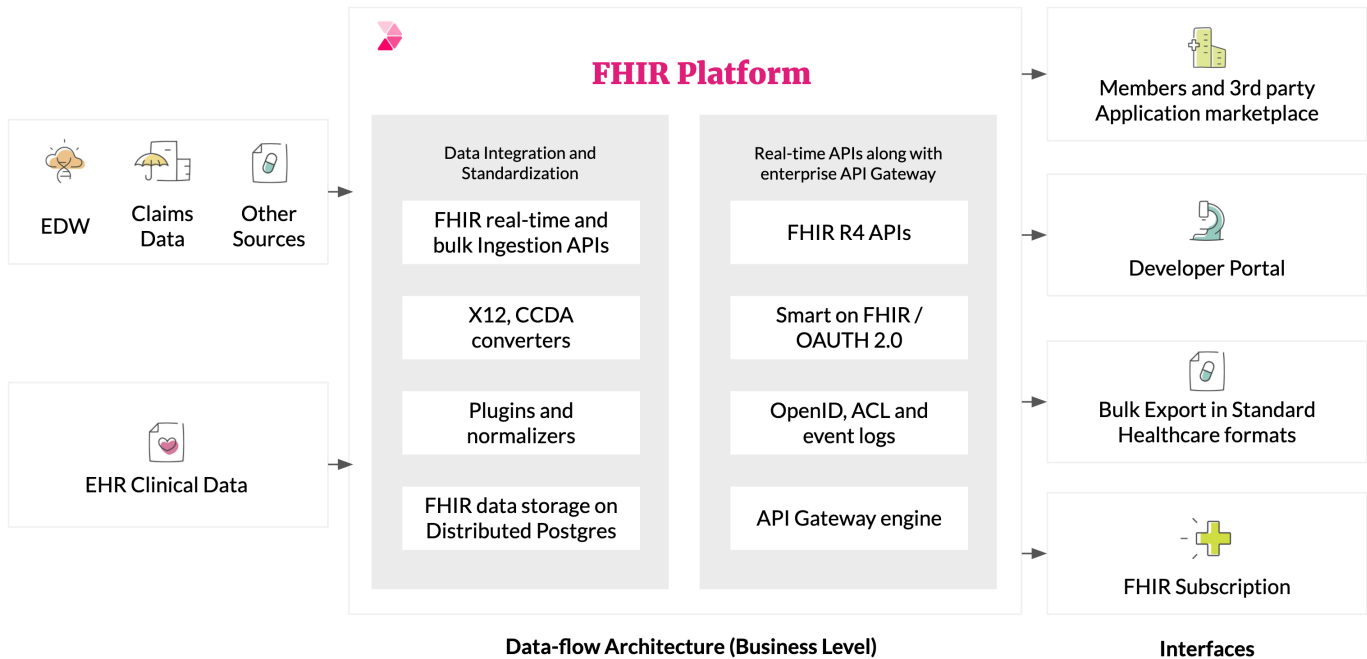
Payers can directly integrate data from EMRs, and export it through FHIR or any standard format at their convenience for true bidirectional exchange of high-quality data.

Enterprise security

Payers can leverage PHI/PII security beyond OAuth and Open ID authentication, including ACL and security-specific attribution for access control, as well as HIPAA, ISO compliance with regular compliance vendor validation.

How does the FHIR-Enabled Healthcare Data Platform function?

Innovaccer can help payer organizations achieve true interoperability and have greater access to healthcare data with its one-of-a-kind FHIR® Enabled Healthcare Data Platform. The platform can help payers accomplish the following:



Features of the FHIR-enabled Healthcare Data Platform for Payers



FHIR server

HL7 FHIR 4.0-compliant RESTful APIs with parsers for HL7, CDA, X12, XML, fixed-width (CCLF) to leverage clinical, financial and administrative data



FHIR applications

The most advanced FHIR applications to engage all stakeholders — provider network, members, employers, and payer team members



FHIR resources and Smart on FHIR

Extensive support for R4 FHIR resources to address all of your interoperability challenges, as well as support for OAuth 2.0, OpenID Connect, and Smart Launch



Enterprise-grade security

Fulfills network security, authentication and authorization, ACL, HIPAA, and other compliance requirements with years of maturity



Full-feature analytics suite

Activated data leveraging highly customizable and extensible analytics and interactive dashboards, including pre-built views and measures engine



Pre-built, rich integrations

One-click integrations with Stripe, Twilio, Patient Ping, Aunt Bertha, and more than 65 pre-built EMR connectors, enabling rapid speed to value



De-identification engine

PHI/PII data is de-identified for a secure, interactive developer environment



API gateways

Complete control of your platform through an intuitive administration interface including usage monitoring, traffic management, and IPs prevention

FHIR-enabled Healthcare Data Platform supports all healthcare stakeholders

The FHIR Healthcare Data Platform supports critical FHIR API resources and enables the most efficient implementation to solve multiple data-exchange challenges for providers and payers. With more than 65 pre-built connectors to electronic health records and more than 200 connectors to information technology vendors, the data platform ensures real-time integration without additional engineering requirements.

The platform is HIPAA-compliant and provides enterprise-grade security for data exchange by enabling secure connections through OAuth 2.0 and Smart on FHIR authorization protocol. Additionally, the platform supports a real-time interactive developer environment and sandbox environments with de-identified data to build FHIR applications rapidly.

The open framework of the FHIR-enabled Healthcare Data Platform enables a plug-and-play integration with other components and services with little to no coding required. The platform provides a rich set of capabilities from scalable FHIR APIs, optimized FHIR data lake, a best-in-class API gateway, and cloud infrastructure, among other features. This comprehensive FHIR Healthcare Data Platform supports a large network of FHIR connections enabling healthcare to care as one.

The platform complies with the latest version, FHIR v4.0.1, and includes more than 400 search parameters and more than 800 analytical enrichments to clinical and claims data. The breadth of data that the platform provides allows it to serve as a foundation upon which custom applications can be designed and built by any healthcare organization.

About Innovaccer

Innovaccer, Inc. is a leading San Francisco-based healthcare technology company committed to making a powerful and enduring difference in the way care is delivered. The company leverages artificial intelligence and analytics to automate routine workflows and reduce manual overhead to facilitate more patient-centered care. Its KLAS-recognized products have been deployed all over the U.S. across more than 1,000 locations, enabling more than 25,000 providers to transform care delivery and work collaboratively. Innovaccer's Data Activation Platform has been successfully implemented in healthcare institutions, government organizations, and corporate enterprises, including Catholic Health Initiatives, MercyOne, Orlando Health, Hartford Healthcare, and Stratifi Health. By using the connected care framework, Innovaccer has unified 3.8 million patient records and generated more than \$400M in savings.

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