DATA SHEET

What you need to know about the CMS Interoperability and Patient Access final rule

Infor Cloverleaf

The Centers for Medicare & Medicaid Services (CMS) Interoperability and Patient Access final rule (CMS-9115-F) is here and includes new mandates for providing patients with access to their own data. This data sheet covers the new requirements and how Infor is positioned to help payers and providers meet these regulations and be enabled for future success.

The CMS Interoperability and Patient Access final rule primarily targets Medicare Advantage (MA), Medicaid, CHIP, and Qualified Health Plan (QHP) issuers on the Federally-facilitated Exchanges (FFEs) with some additional requirements for healthcare providers.

Patient Access API

As part of the final rule, payers must make a patient's claim and encounter data (specifically the US Core Data for Interoperability (USCDI) version 1 data set) available to the patient via a Patient Access API using FHIR R4. This data would be delivered via the Patient Access API to an application of the patient's choice. CMS requires the use of the HL7 FHIR US Core Implementation Guide STU 3.1.0 and recommends the use of the HL7 FHIR Da Vinci Payer Data Exchange Implementation Guides as means to meet the requirements.

Infor Cloverleaf® helps payers and providers meet the new regulations of the CMS Interoperability and Patient Access final rule.

Part D Medicare Advantage plans must also publish formulary information via the Patient Access API. Medicaid and CHIP FFS and managed care must also publish preferred drug lists via the Patient Access API, facilitated via the Da Vinci Payer Data Exchange US Drug Formulary Implementation Guide.

Provider Directory API

All payers except QHP issuers must make provider directory information available via a Provider Directory API. This information must be publicly available and based on the Da Vinci Payer Data Exchange (PDex) Plan Network Implementation Guide, which defines a FHIR interface to a payer, their associated networks, and the providers within these networks.

Payer-to-Payer Data Exchange

CMS-regulated payers must exchange a patient's clinical data with another payer as requested by the patient, enabling patients to create and maintain a consistent health record as they change payers. Payers must share the USCDI version 1 data set they support with patients through the Patient Access API and other payers through the Payer-to-Payer Data Exchange.

Admission, discharge, and transfer event notifications

The CMS final rule has adjusted the Conditions of Participation for hospitals, including psychiatric hospitals and critical access hospitals, to send notifications of patient admission, discharge, or transfer to another hospital, care provider, or practitioner to ensure timely follow-up care.

What this means for the industry

Patients will have easy access to their clinical and claims history, and that data will be made available to their providers via standardized data sets. It will be easier for patients and their care teams to ascertain the provider network and formulary information pertaining to the patient. Patients will also be able to transmit their clinical records to another payer upon changing health plans. These changes will also improve continuity of care as long-term care and community providers are notified of patient admission, discharge, and transfer events.

How Infor can help

You may have legacy systems in place that are ill-equipped to respond to real-time query transactions or provide data in the required FHIR format. Additionally, the implementation timelines are aggressive. Leverage Infor's extensive experience in FHIR implementations and expanding clinical data into the API ecosystem to make this data available to patients, providers, and other vendors rapidly. Partner with Infor and take advantage of our forward-thinking FHIR API strategy to ensure that you are positioned for future regulations and innovation opportunities.

The Infor FHIR suite can help you address the CMS final rule and be well prepared for future interoperability requirements.

FHIR offers a wide range of advantages to care providers, payers, and patients. But adopting FHIR can require a significant investment of IT resources. Infor can streamline the process of FHIR enablement and ensure that you realize its benefits quickly and reliably.

To learn more about how Infor can smooth your transition to FHIR, visit our website.

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