

HIMSS23

April 18, 2023

# HL7 Da Vinci Project: FHIR Solutions for Interoperability Needs Named in Proposed Federal Regulations

## Advancing Interoperability and Improving Prior Authorization Processes (**CMS-0057-P**):

- Impacted Payers
  - Medicare Advantage, Medicaid and CHIP FFS, Medicaid and CHIP Managed Care, QHPs on the FFEs
- Proposed APIs and Recommended IGs (**more information**)
  - **Patient Access API** – CARIN IG for Blue Button, Da Vinci PDex IG, Da Vinci PDex US Drug Formulary IG, HL7 US Core IG
  - **Provider Access API** – same set as Patient Access API (+ HL7 FHIR Bulk Data Access IG)
  - **Payer-to-Payer API** – same set as Patient Access API (+ HL7 FHIR Bulk Data Access IG)
  - **Prior Authorization Requirements, Documentation, and Decision (PARDD) API** -- Da Vinci Coverage Requirements Discovery (CRD) IG, Documentation Templates and Rules (DTR) IG, and Prior Authorization Support (PAS) IG
- Proposed Required Standards
  - HL7 FHIR Release 4.0.1, US Core 3.1.1/USCDI v1, SMART IG/OAuth 2.0, OpenID Connect 1.0, FHIR Bulk Data Access 1.0.0
- Proposed Compliance Date:
  - January 1, 2026 (or relevant rating period or plan year beginning on or after January 1, 2026)

Overview of proposed rule presented by CMS’s Office of Burden Reduction at January Community Roundtable:

<https://confluence.hl7.org/display/DVP/Da+Vinci+Video+Presentations>

## Advancing Interoperability and Improving Prior Authorization Processes ([CMS-0057-P](#)):

- Da Vinci Community Response
  - Da Vinci IGs provide the tools to support the functional requirements as finalized
  - Da Vinci IGs will be updated to ensure full compliance
- Opportunities to Advance Da Vinci IGs
  - PDex full support of documentation exchange for prior authorization information sharing
  - Bulk member match / Bulk asynchronous exchange for multiple members
  - Attribution
- Technical Considerations
  - Limitations of SMART/OAuth 2.0 and Open ID Connect for Payer-to-Payer API
  - Advancing IG versions
- Policy Considerations
  - Prior authorization decision reason codes and a standard set of denial reason codes
  - Endpoint discovery
  - API-driven versus non-API-driven prior authorization metrics
  - Support incentive via MIPS to include PARDD API in CEHRT

### **Administrative Simplification: Adoption of Standards for Health Care Attachments Transactions and Electronic Signatures, and Modification to Referral Certification and Authorization Transaction Standard Proposed Rule Components:**

- a set of HIPAA “Attachment” standards and related definitions for the electronic exchange of clinical and administrative data to support prior authorizations and claims adjudication.
  - The proposed Attachment definition changes the original HIPAA scope for Attachments by proposing to include prior authorization related requests in addition to claims.
  - The proposed Attachment HIPAA standards would name implementation guides using X12 EDI for transport and HL7 CDA for payload.
- proposed modification to existing HIPAA standards for Referral Certification and Authorization transaction (“278”).
- electronic signature policy.

Overview of proposed rule presented by CMS’s National Standards Group at January Community Roundtable:

<https://confluence.hl7.org/display/DVP/Da+Vinci+Video+Presentations>



### Da Vinci Project Core Themes for Attachments NPRM Comment Response Submission:

- ✓ Alignment with Da Vinci Project purpose and objectives
- ✓ Collision with “Interop 3” NPRM PARDD requirements
- ✓ Da Vinci’s and Industry’s real-time **Clinical Data Exchange and Prior Authorization** standards work, advancements in-flight, and testing/project efforts
- ✓ Risks and realities, if finalized, as written:
  - Disconnect with 21st Century Cures capabilities and related investments to support interoperability, reduced burden, and better patient outcomes
  - Investment leads to hardwiring and redirecting industry focus
  - Boots on the ground choices (previous, current and future)
  - Challenges with speed of technology vs. policy advancements
  - Improve clarity of Attachment definition (“kitchen sink” vs. “specific transactions”)
  - Update Implementation Guide Standards (§ 162.2002) that are outdated versions or missing

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