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](https://confluence.hl7.org/display/DVP/Da+Vinci+Video+Presentations))
  - **Patient Access API** – CARIN IG for Blue Button, Da Vinci P Dex IG, Da Vinci P Dex 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)
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
- Collison 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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