Session 3
CMS Interoperability Planning Collaborative

May 17, 2022

CalMHSA

California Mental Health Services Authority

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.

California Health Care Foundation

CMS Interoperability Planning Collaborative

	Meeting Topics and Focus	Schedule
	• CMS Interoperability primer (optional)	March 29
#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 • Some Questions and Survey Responses • Lessons and feedback from Medi-Cal health plans	Mid June
#5	• Final group discussion • Feedback on draft work plan and next steps	Mid/ late July

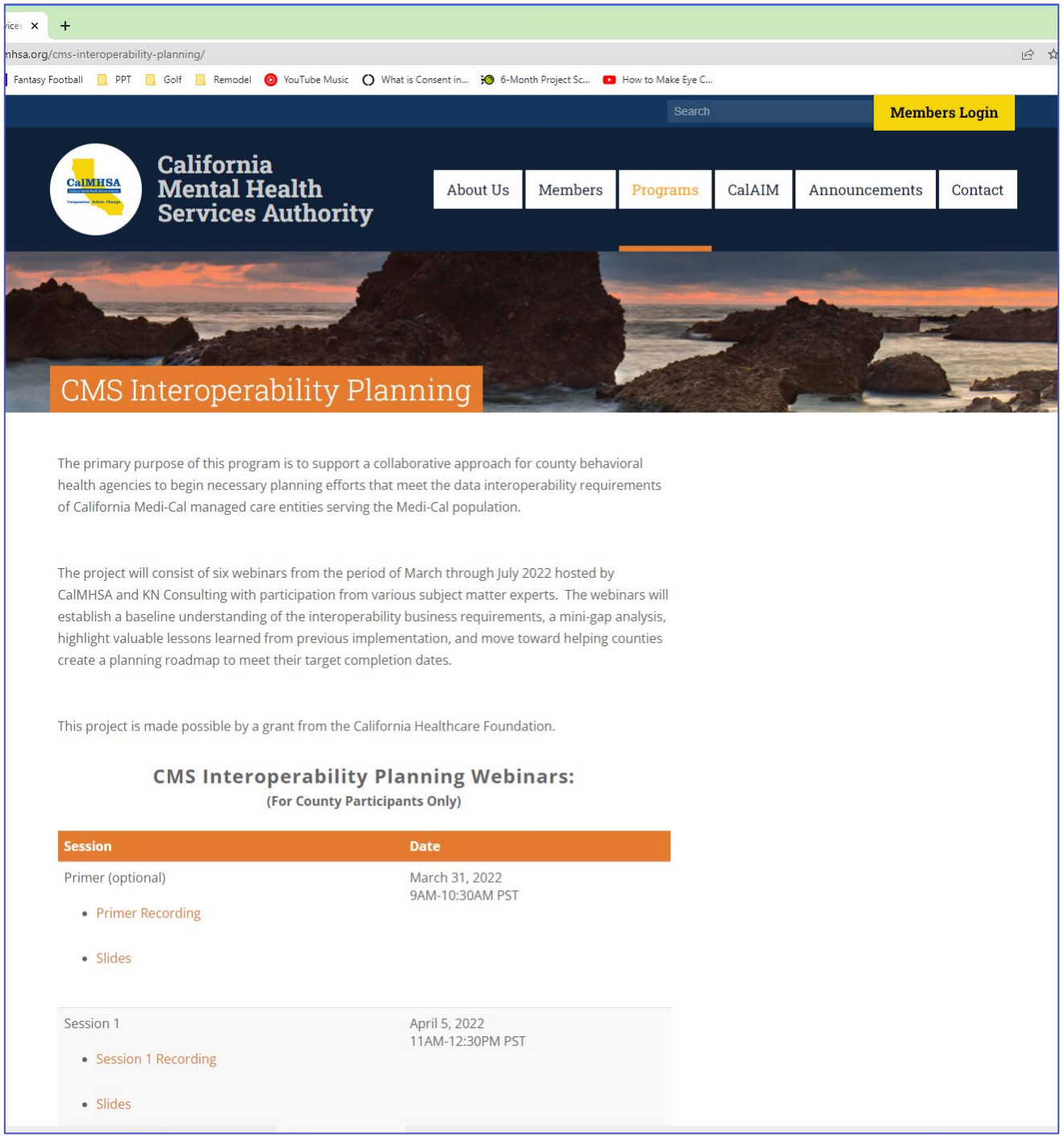
Admin Stuff

Program email

- interoperability@calmhsa.org

Program materials and resources

- https://www.calmhsa.org/cms-interoperability-planning



Program Staff and Guest Speakers

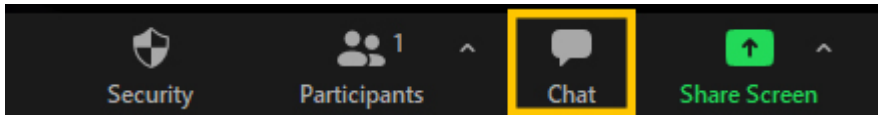
Khoa Nguyen
CEO, KN Consulting LLC
Project Director

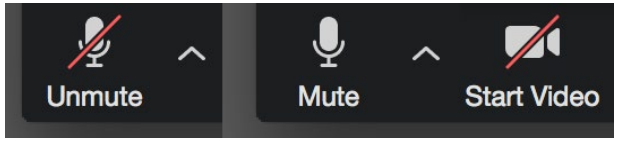
Dr. Chris Esguerra
Chief Medical Officer
Health Plan of San Mateo

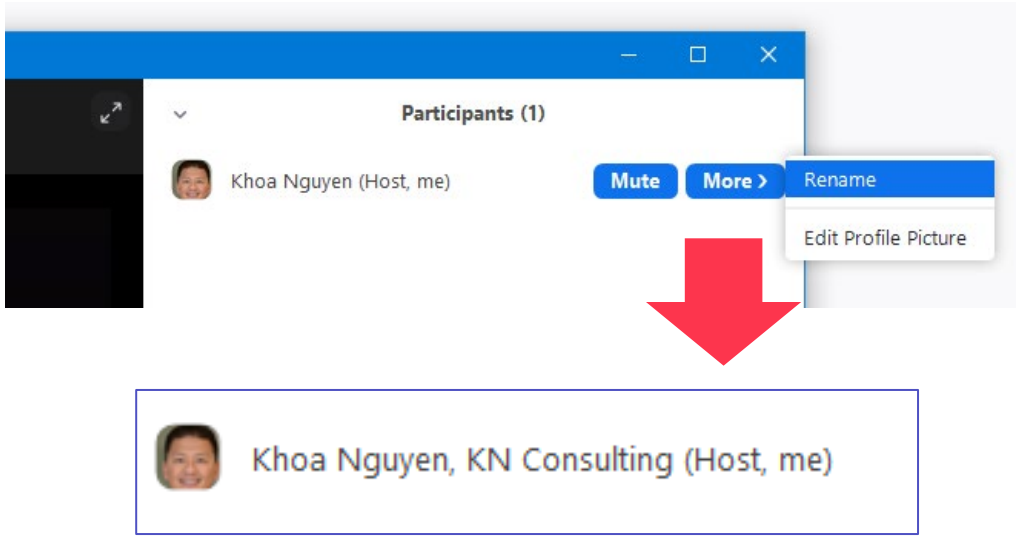
Mark Scrimshire
Chief Interoperability Officer,
Onyx Health

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





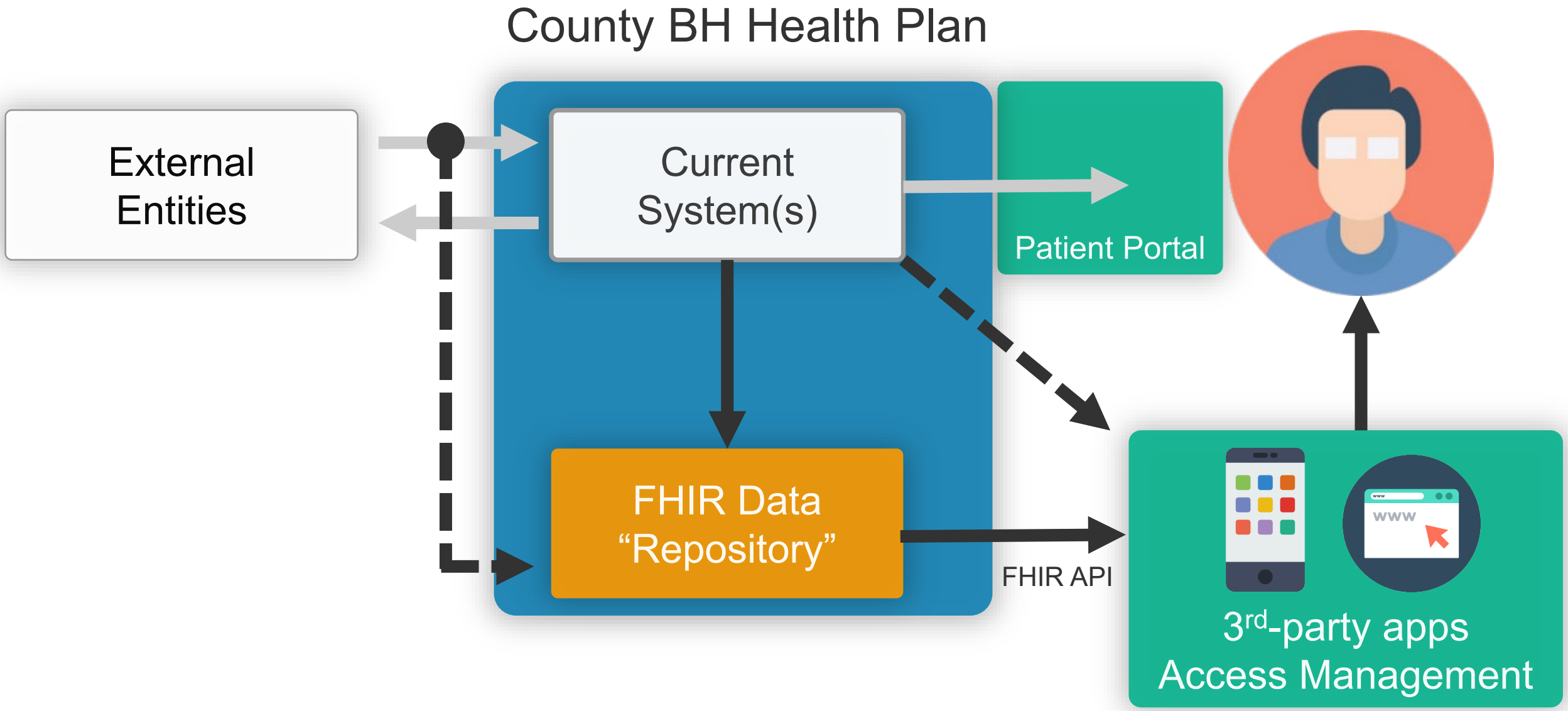


Today's Agenda and Discussion Framework

Program Goal – start the planning process

- Welcome and Admin Stuff
- Recap and Responses to Data Requirements
- 3rd-party App Registration and Client Consent
- Some Questions and Implications for Planning

Overview of Data Flow



County BH Plan

Current System(s)

Provider Directory API

Patient Access API

Claims and Encounters, with cost data

Clinical/ USCDI

*For all county and contracted BH providers

FHIR Data "Repository"

FHIR API

FHIR API

3rd-party apps Access Management

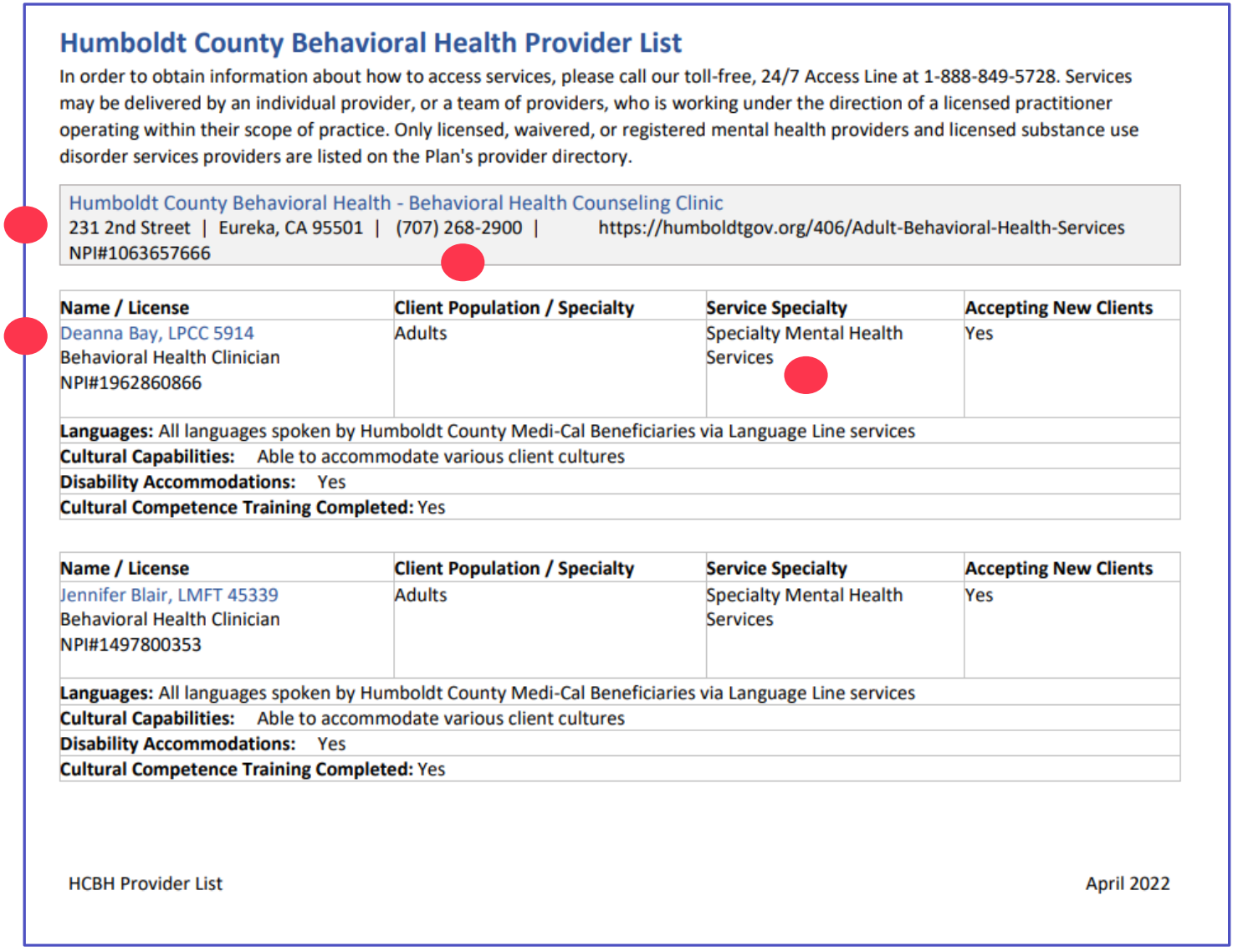
Survey Question: Provider Network Data Requirements

18 county responses

Extremely Easy	Somewhat Easy	Neutral	Somewhat Challenging	Extremely Challenging
Los Angeles	Trinity	San Benito Solano El Dorado Siskiyou San Luis Obispo Imperial Merced	San Diego Placer Tehama Humboldt Kern Orange Nevada Sierra	Sonoma

Humboldt County Provider Directory (online PDF)

https://humboldtgov.org/DocumentCenter/View/51672/Provider-Directory-PDF?bidId=



Humboldt County Behavioral Health Provider List

In order to obtain information about how to access services, please call our toll-free, 24/7 Access Line at 1-888-849-5728. Services may be delivered by an individual provider, or a team of providers, who is working under the direction of a licensed practitioner operating within their scope of practice. Only licensed, waivered, or registered mental health providers and licensed substance use disorder services providers are listed on the Plan's provider directory.

Humboldt County Behavioral Health - Behavioral Health Counseling Clinic
231 2nd Street | Eureka, CA 95501 | (707) 268-2900 | https://humboldtgov.org/406/Adult-Behavioral-Health-Services
NPI#1063657666

Name / License	Client Population / Specialty	Service Specialty	Accepting New Clients
Deanna Bay, LPCC 5914 Behavioral Health Clinician NPI#1962860866	Adults	Specialty Mental Health Services	Yes
Languages: All languages spoken by Humboldt County Medi-Cal Beneficiaries via Language Line services			
Cultural Capabilities: Able to accommodate various client cultures			
Disability Accommodations: Yes			
Cultural Competence Training Completed: Yes			

Name / License	Client Population / Specialty	Service Specialty	Accepting New Clients
Jennifer Blair, LMFT 45339 Behavioral Health Clinician NPI#1497800353	Adults	Specialty Mental Health Services	Yes
Languages: All languages spoken by Humboldt County Medi-Cal Beneficiaries via Language Line services			
Cultural Capabilities: Able to accommodate various client cultures			
Disability Accommodations: Yes			
Cultural Competence Training Completed: Yes			

HCBH Provider List April 2022

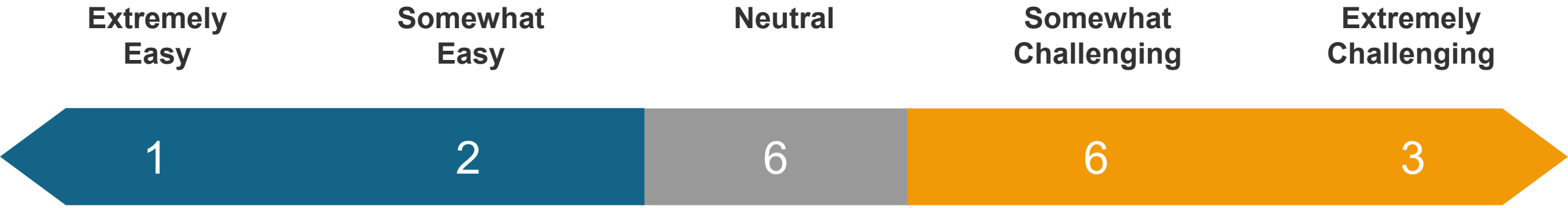
Provider Directory API Data Requirements

1. Name
2. Address
3. Phone #
4. Provider Specialty

- Updated within 30 days of receiving changes (i.e., update every month)
- Publicly available to any 3rd-party app – no client consent

Survey Question: Claims/ Encounter Data Requirements

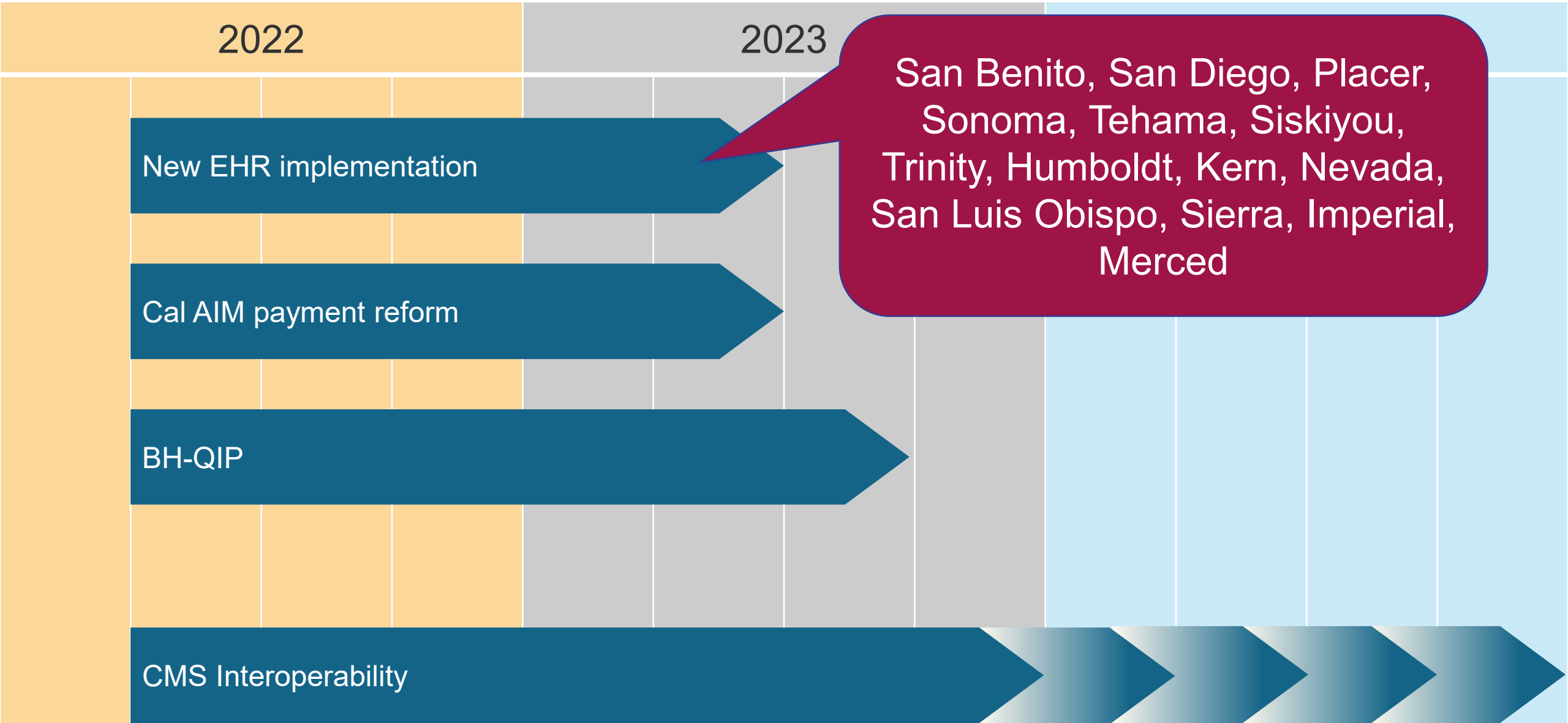
18 county responses



Extremely Easy	Somewhat Easy	Neutral	Somewhat Challenging	Extremely Challenging
Los Angeles*	Placer Trinity	Solano* El Dorado Siskiyou Humboldt Imperial Merced	San Benito San Diego Tehama Kern Orange Nevada	Sonoma* San Luis Obispo Sierra

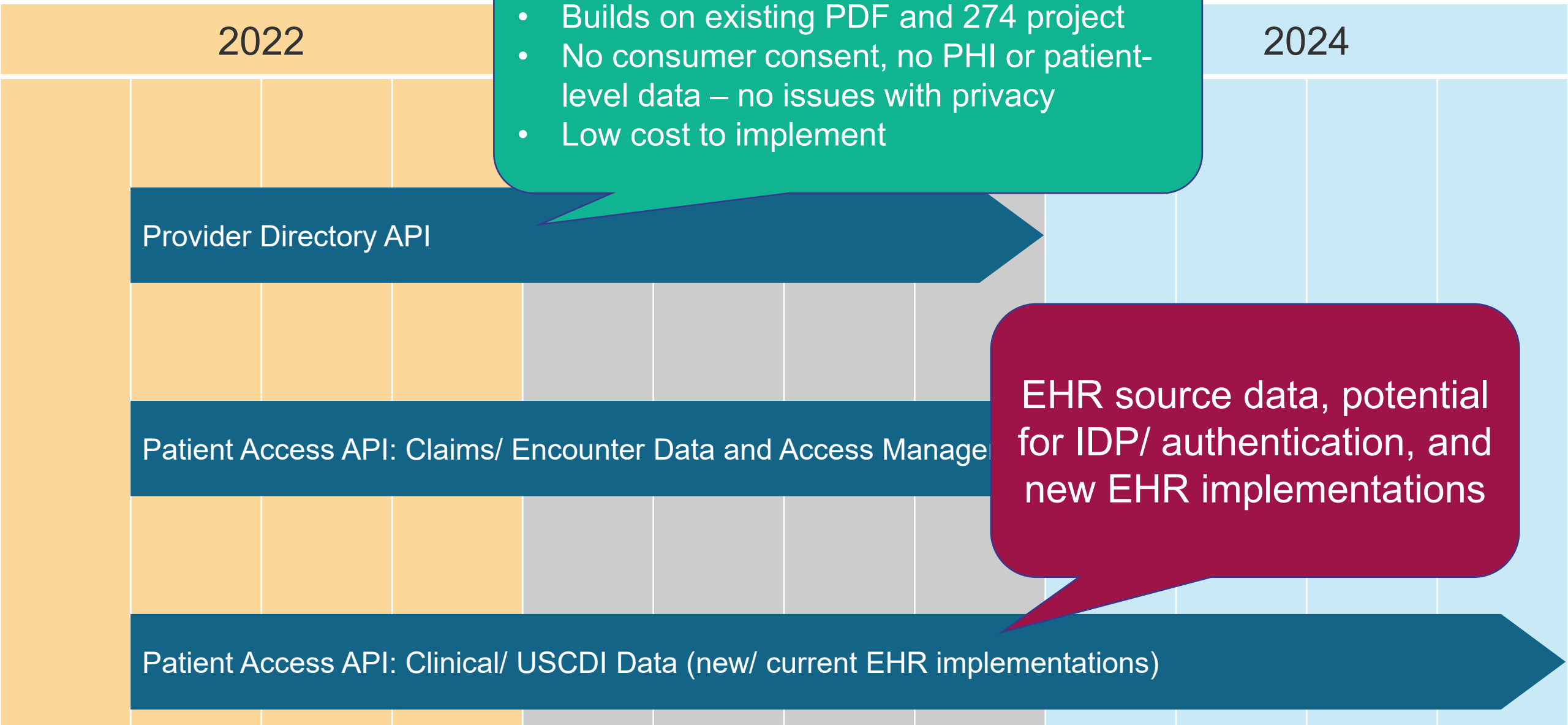
* County does not have DMC-ODS.

No Earlier than 2024 for CMS Interoperability



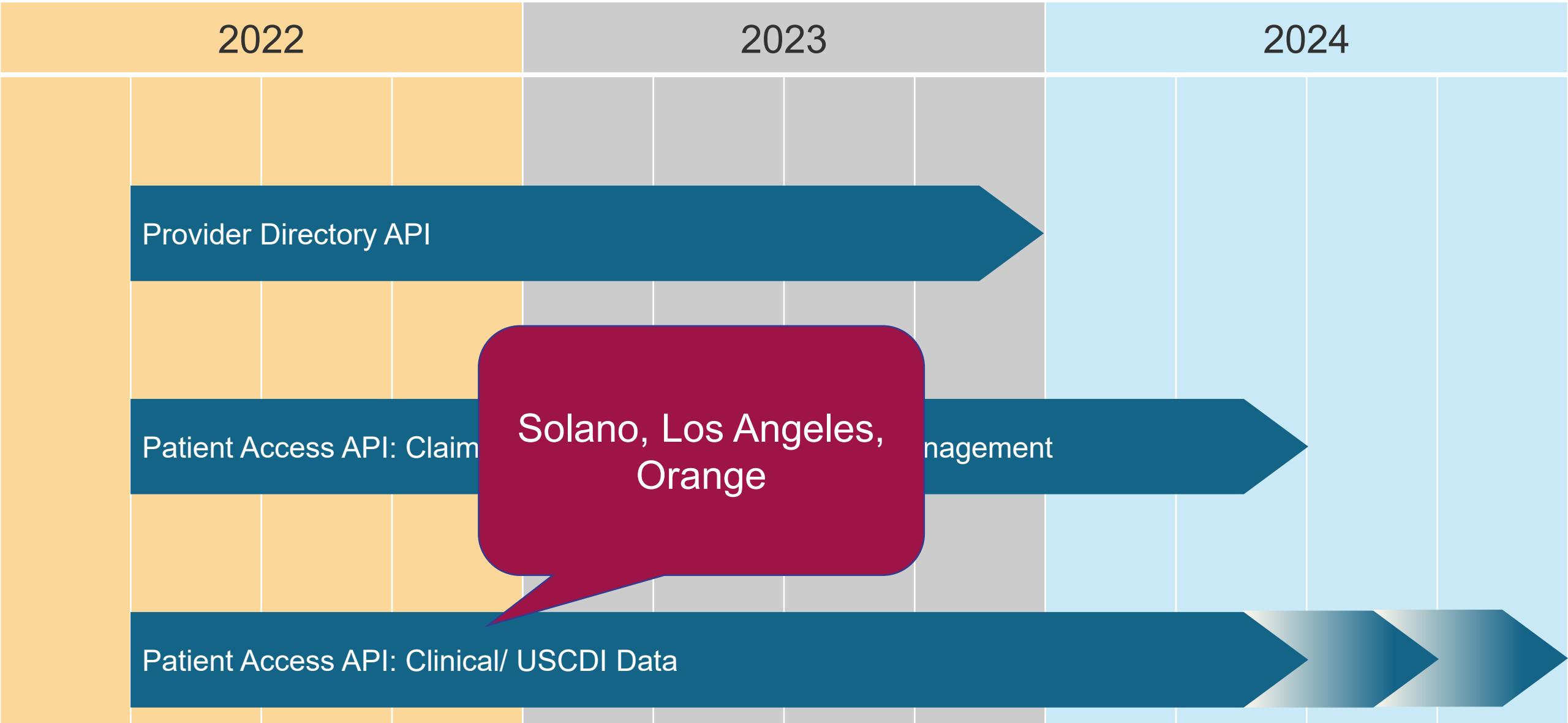
Considerations for CMS Interoperability Timelines

Phased Approach



Considerations for CMS Interoperability Timelines

Phased Approach



Phased Approach to Implementation of CMS Interoperability

18 county responses

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

Neutral	Agree	Strongly Agree
San Benito	Solano	San Diego
	El Dorado	Siskiyou
	Placer	Los Angeles
	Trinity	Nevada
	Humboldt	Imperial
	Kern	
	San Luis Obispo	
	Sierra	
	Merced	

* Two counties “Not sure yet – need more information”

Q&A

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FHIR API

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3rd-party apps Access Management

County BH Plan

FHIR Data "Repository"

Authorization Server

Client Accounts

For 3rd-party Apps

API Documentation on county website

1a. App Registration

Optional
1b. Sanbox 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

Consumer Apps and Developer Registration

Mark Scrimshire

@ekivemark| Mark.Scrimshire@onyxhealth.io

Chair, HL7 Da Vinci Payer Data Exchange Workgroup

Chief Interoperability Officer, Onyx Technology, LLC

What Do Developers need?

- Discoverability
- Endpoint Information
- Credentials
- API Documentation

How do I find your API?

Where Do I connect?

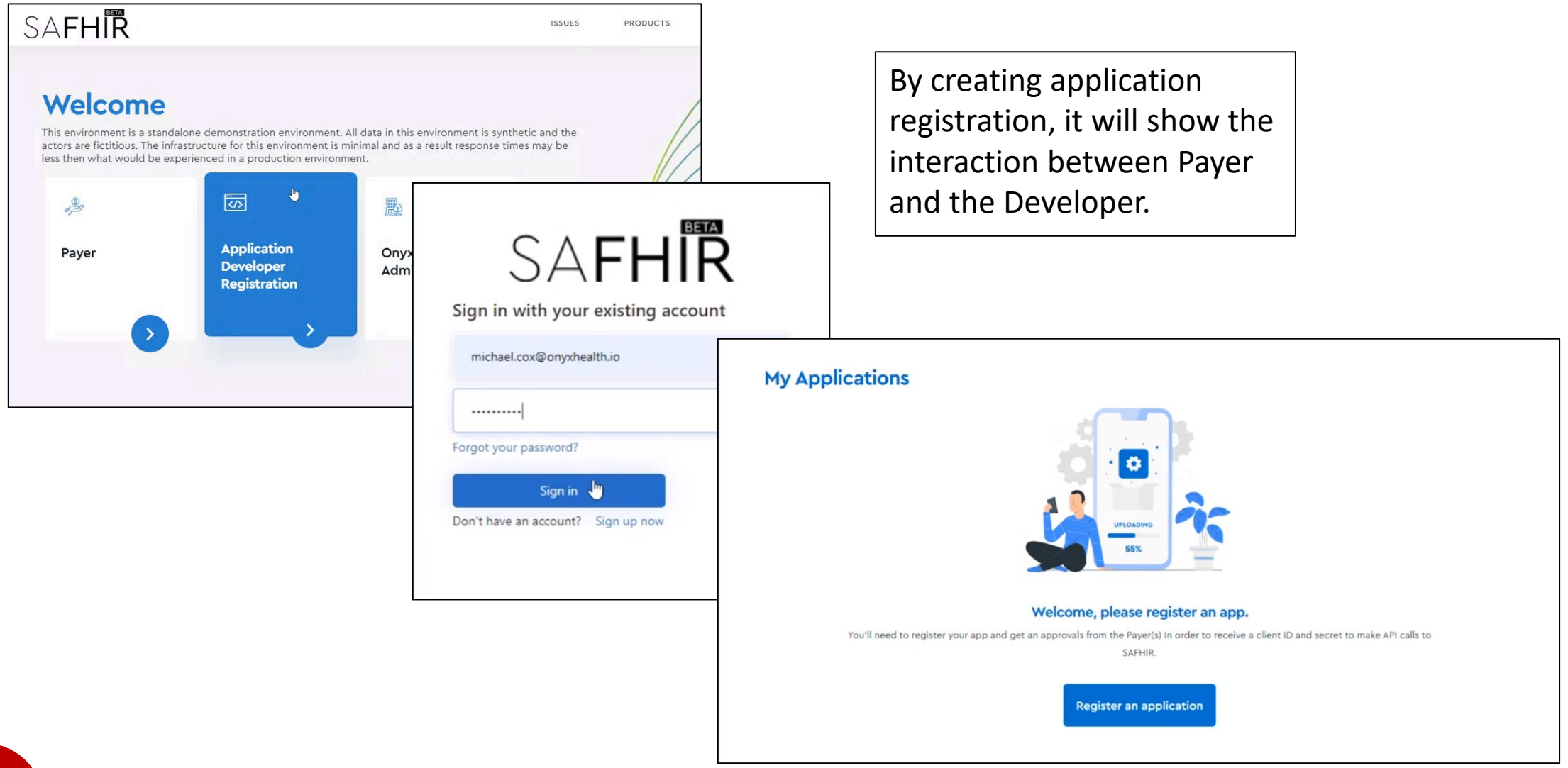
How do I get authorized?

How does the API work?

What do Members Need

- What Apps Can I use?
- How do I know an app has been approved?
- Where do I get an App from?

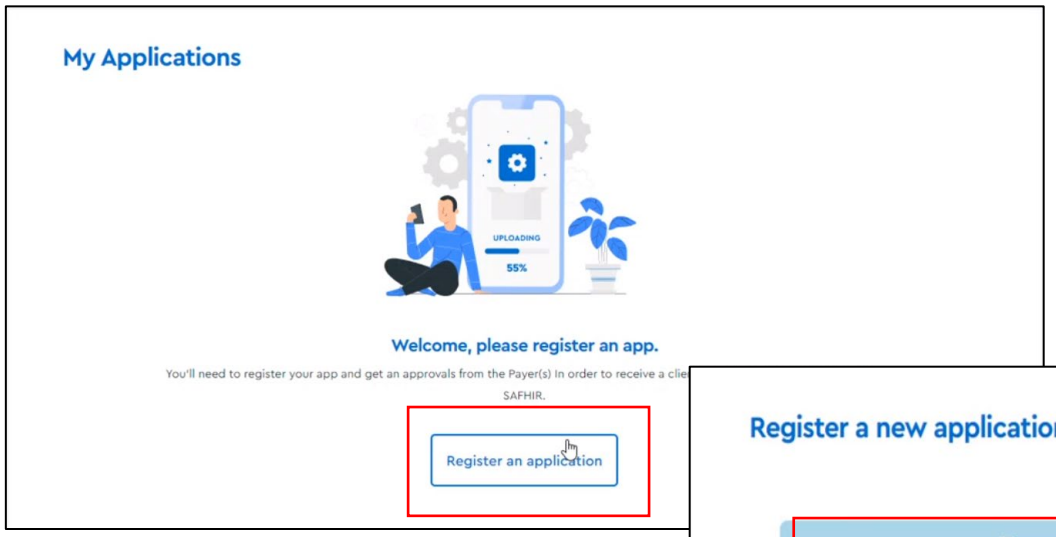
3rd Party App Management – Application Developer Sign In



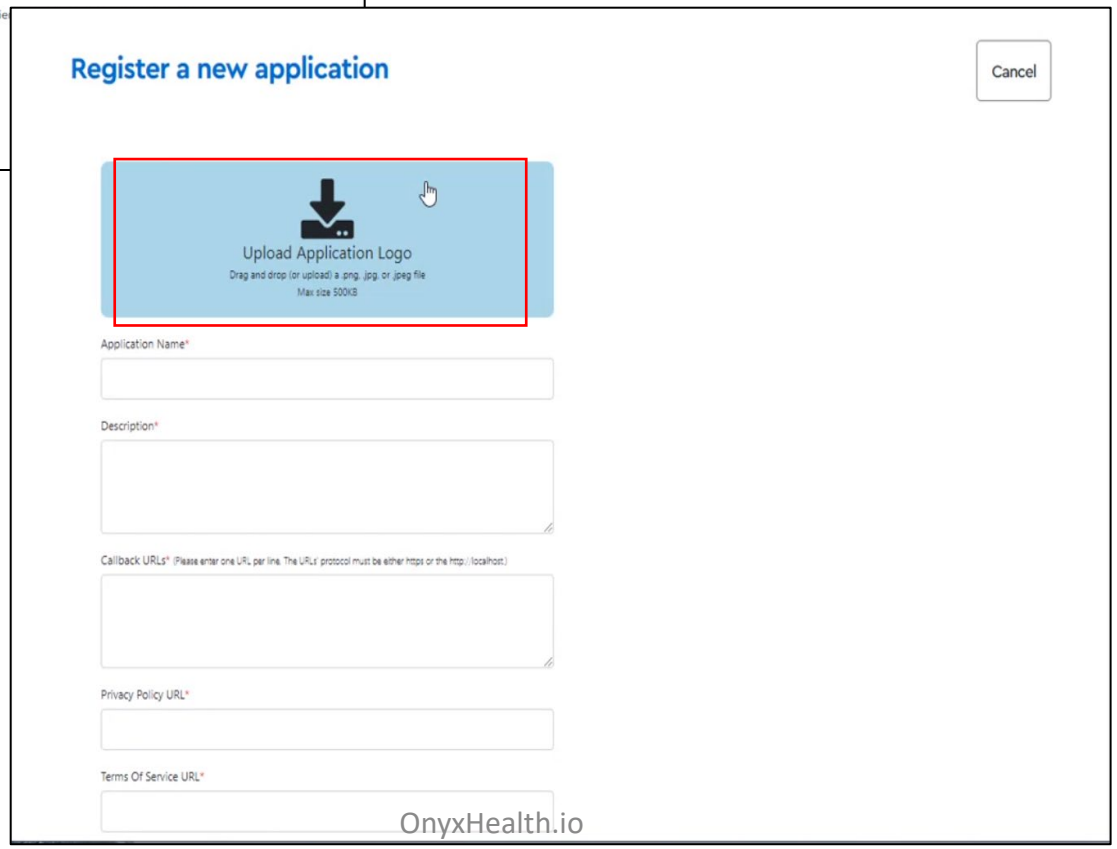
By creating application registration, it will show the interaction between Payer and the Developer.

App Dev

3rd Party App Management – Application Registration



The application will connect to the health plan where the beneficiary will use the application to connect to their health plan.



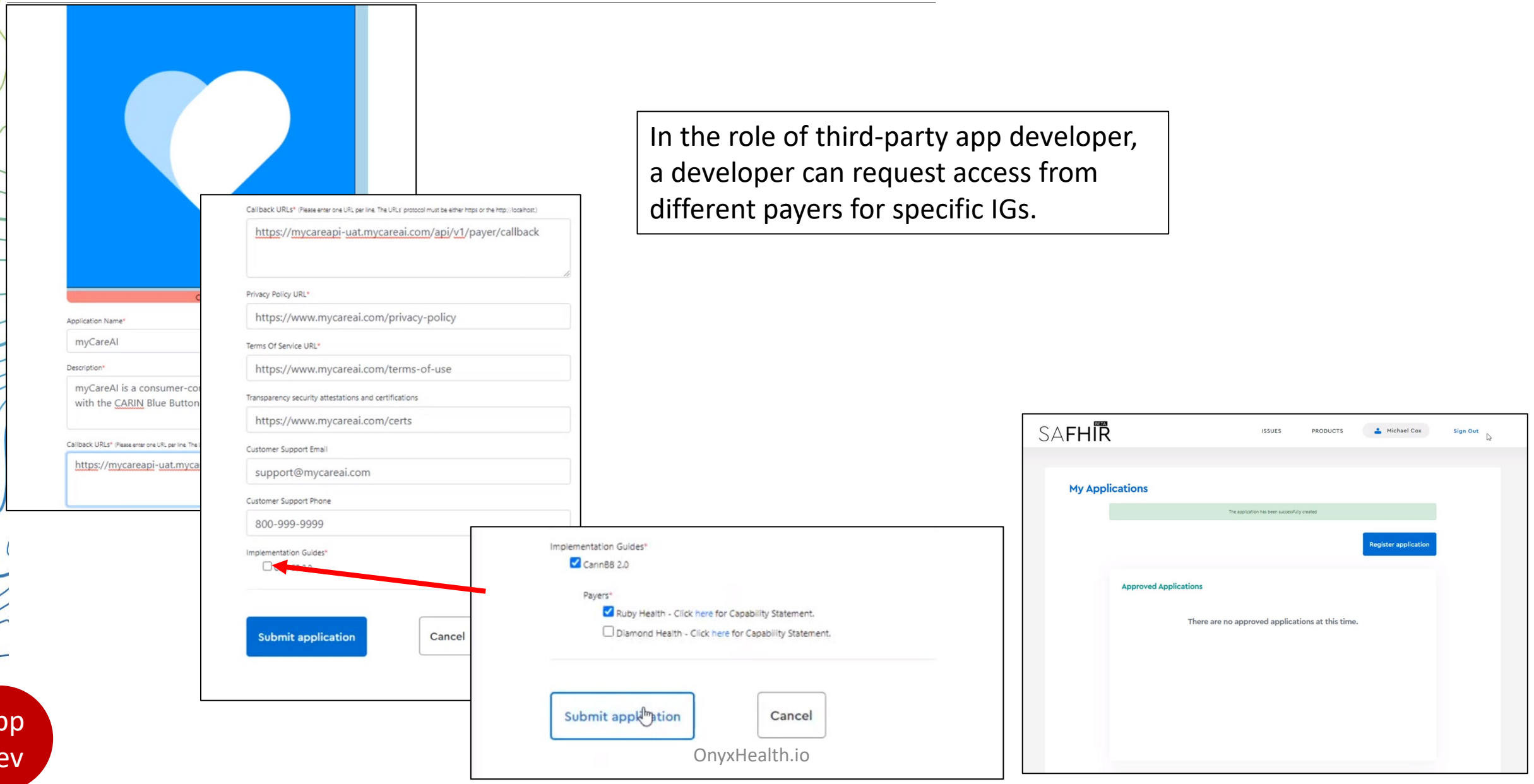
Below are the data elements that are required for a new application: Application Name

- Description
- Callback URLs
- Privacy Policy URL
- Terms of Service URL
- Transparency security attestations and certifications
- Customer Support Email
- Customer Support Phone
- Implementation Guides

App Dev

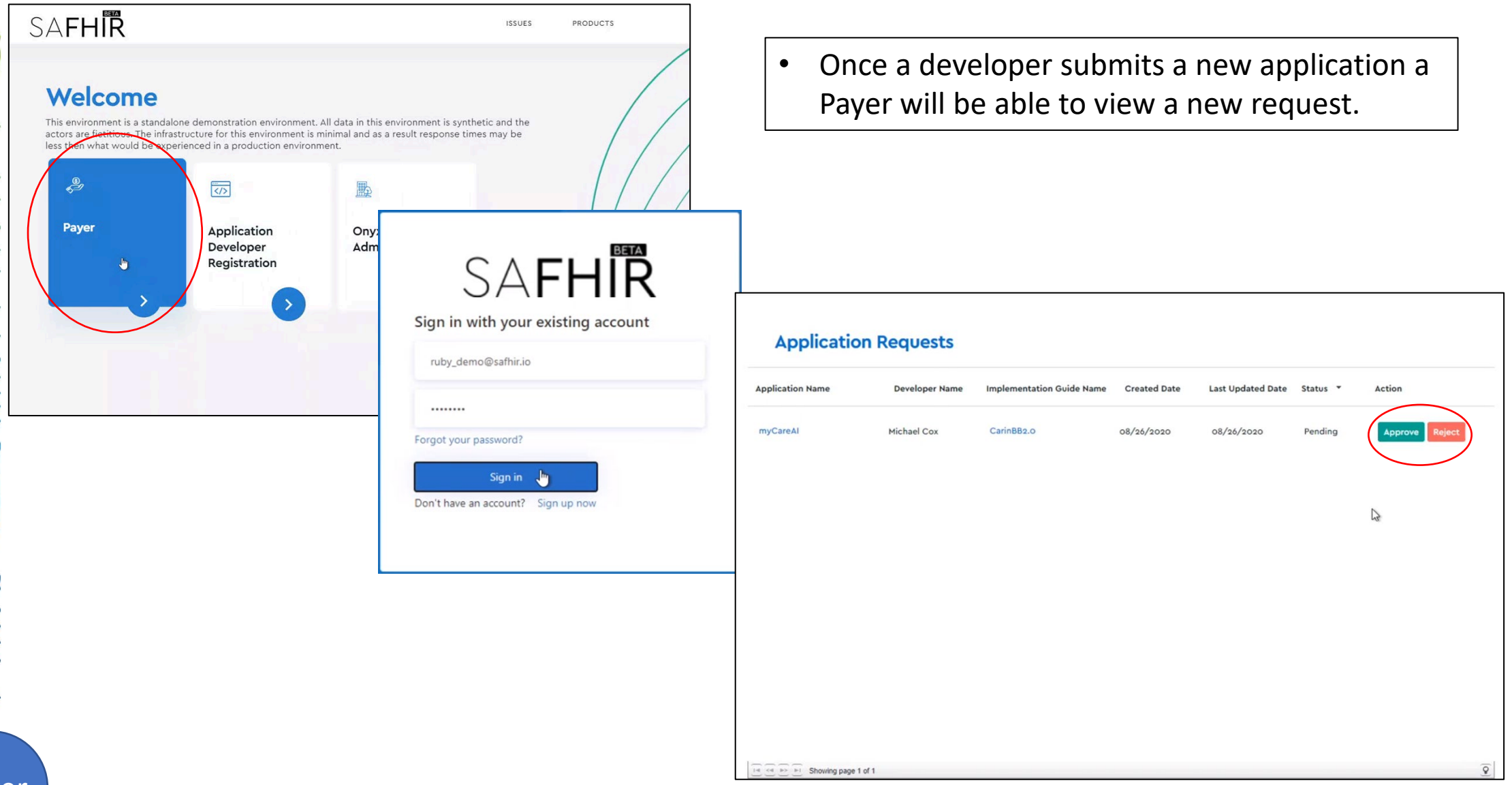
3rd Party App Management– Application Registration and Dashboard

In the role of third-party app developer, a developer can request access from different payers for specific IGs.



App Dev

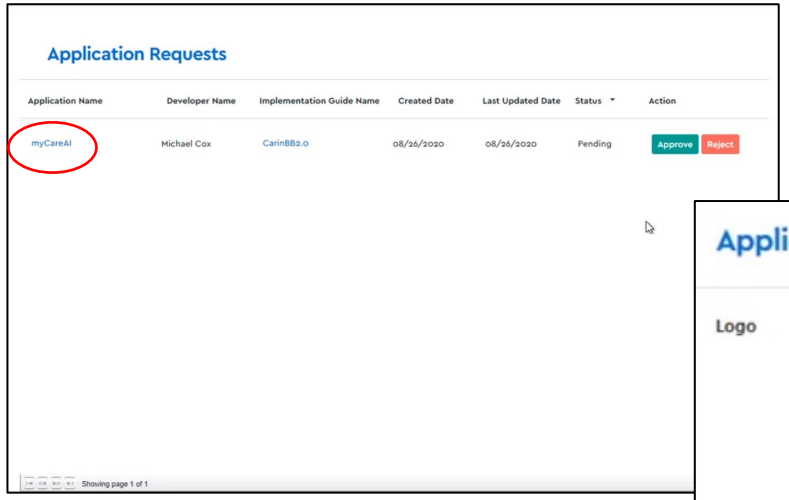
3rd Party App Management– New Application Request and Dashboard



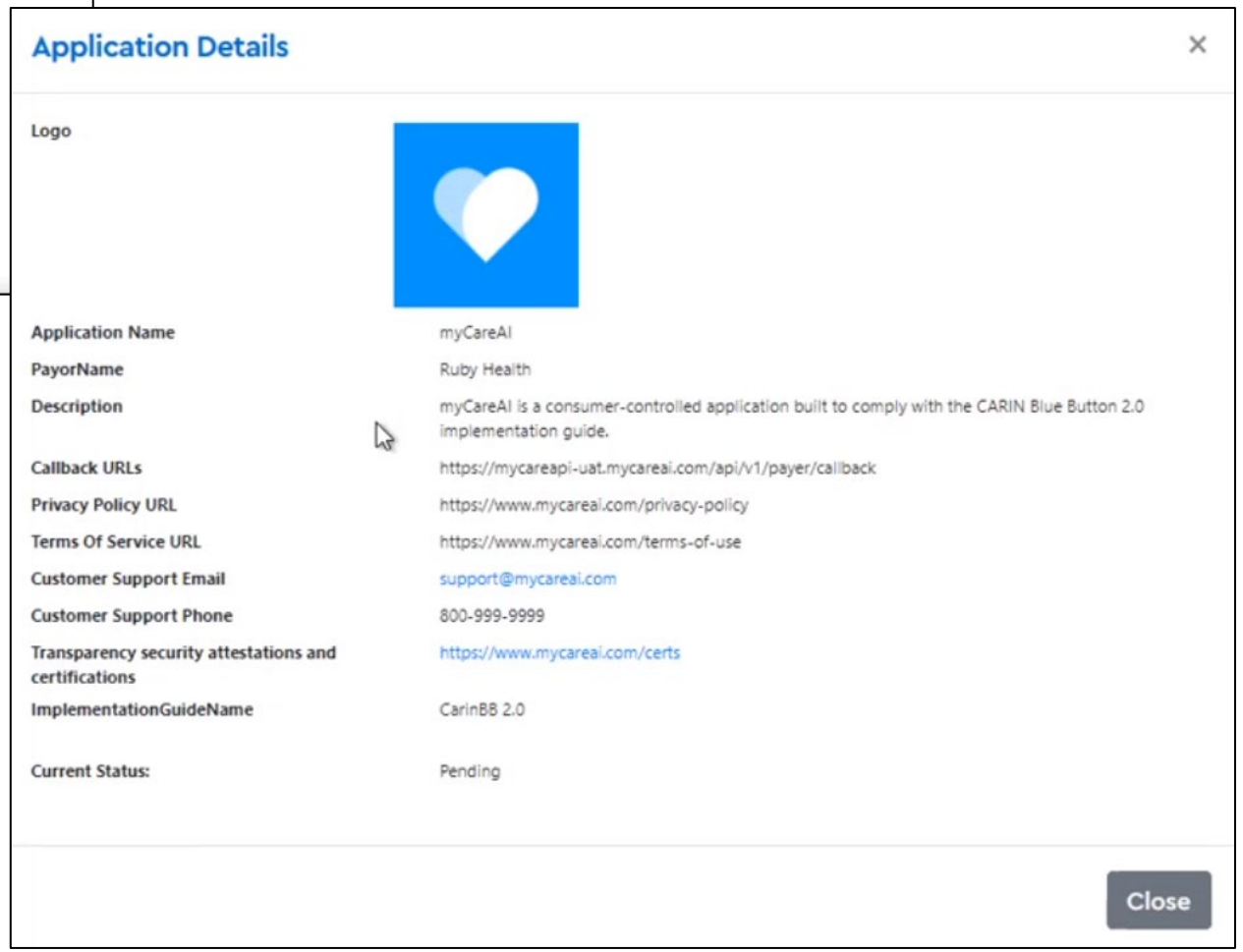
- Once a developer submits a new application a Payer will be able to view a new request.

Payer

3rd Party App Management – New Application Request and Dashboard

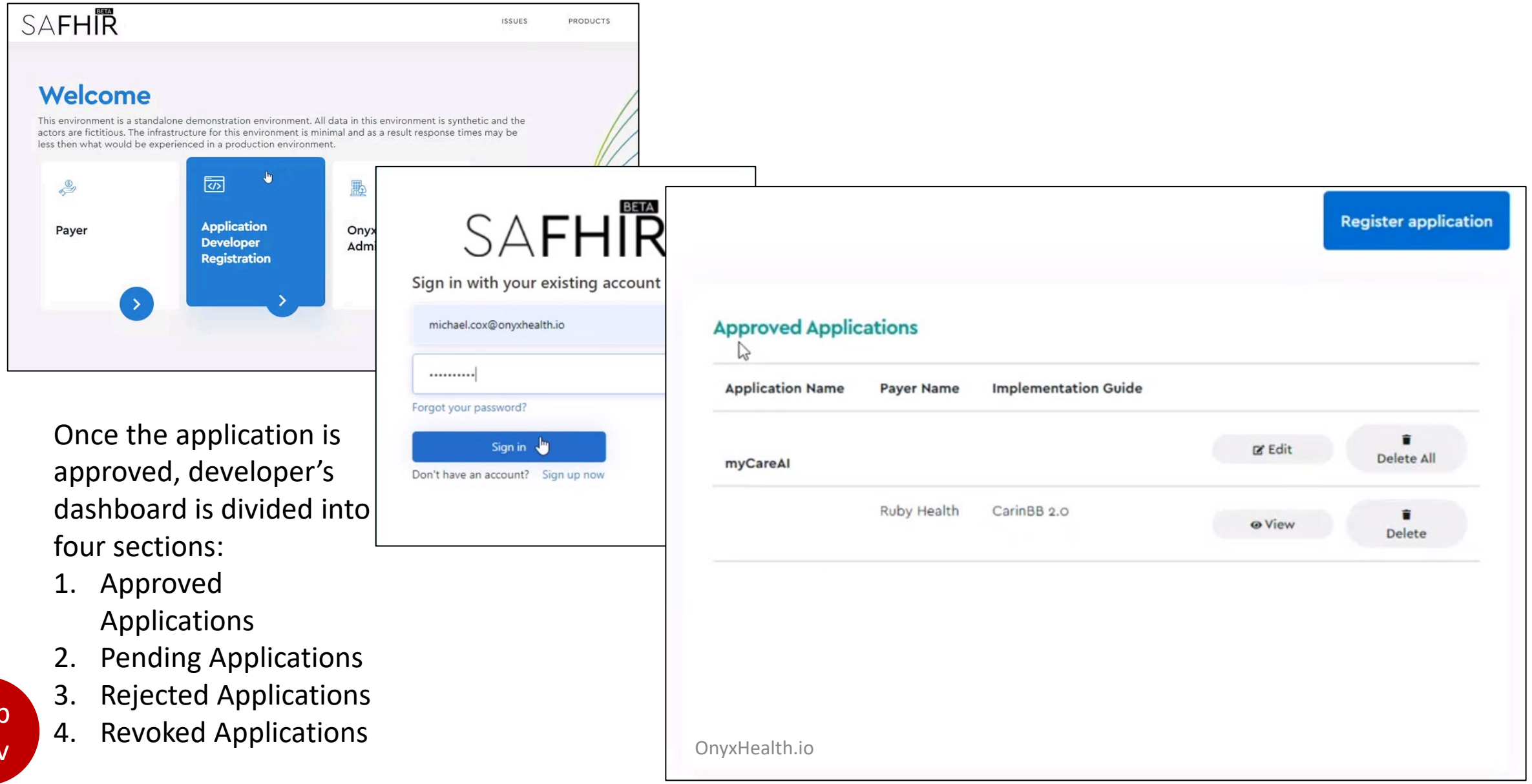


Payer have the capability to view Application Details for each new requests.



Payer

3rd Party App Management - Approved Application Dashboard



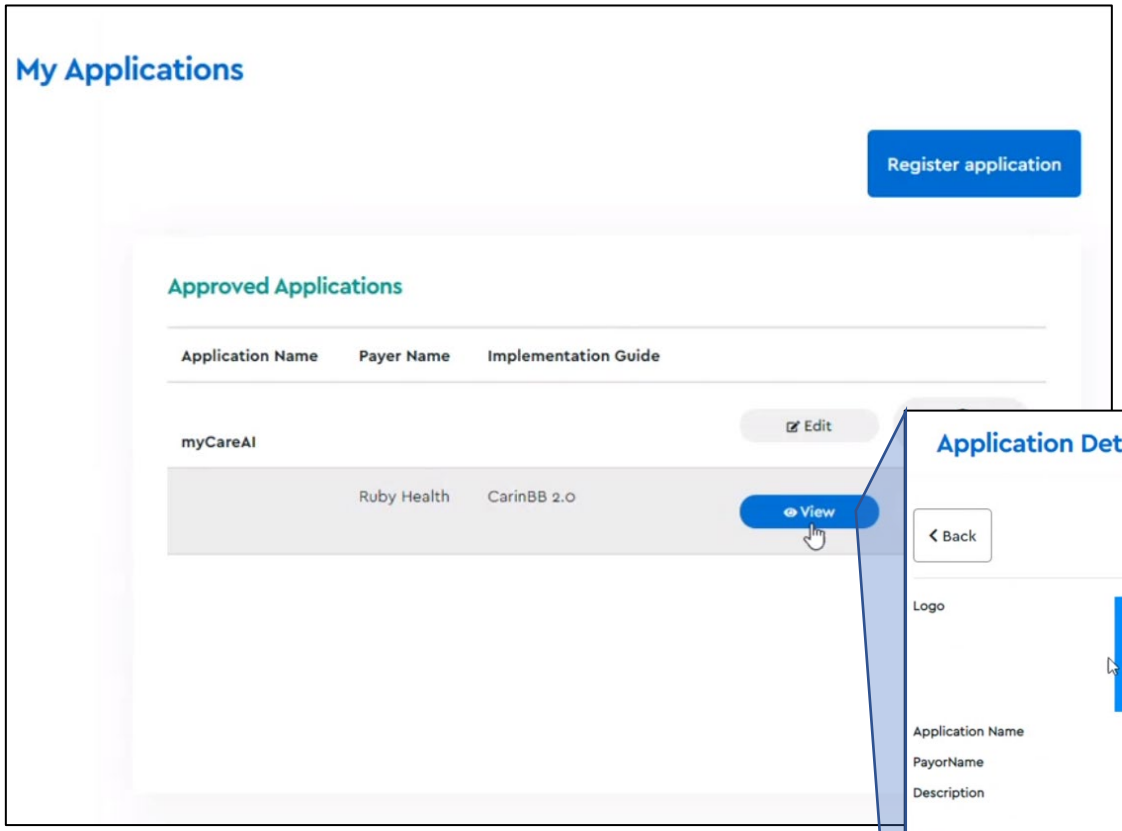
Once the application is approved, developer's dashboard is divided into four sections:

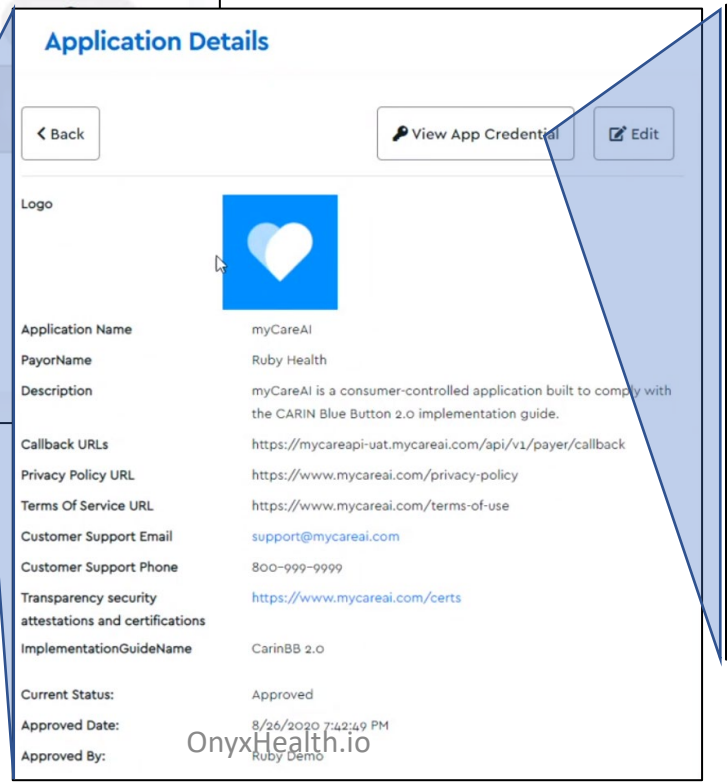
1. Approved Applications
2. Pending Applications
3. Rejected Applications
4. Revoked Applications

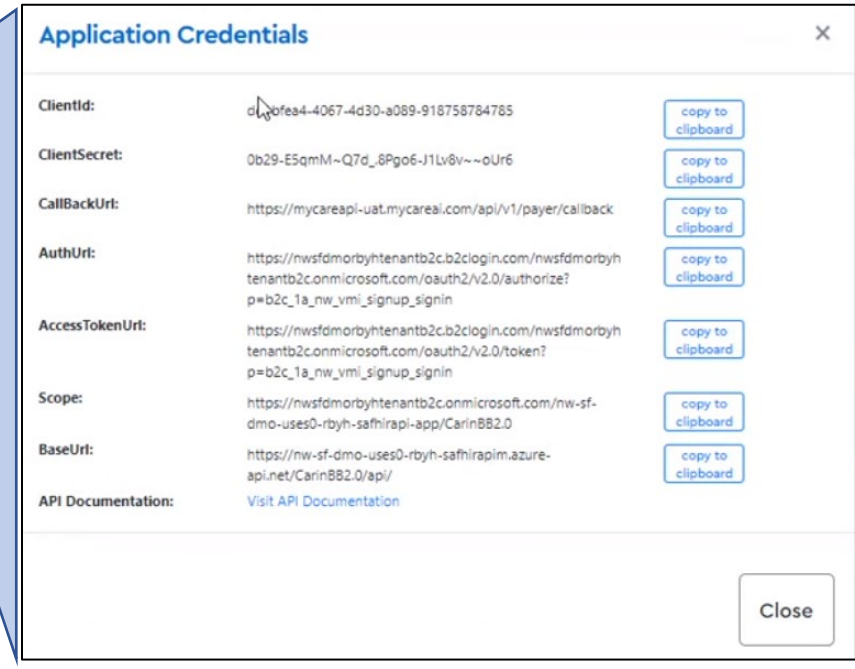
App Dev

3rd Party App Management – Application Details

After the approval, developers have the capability to view Application Details by clicking on the “View” button.

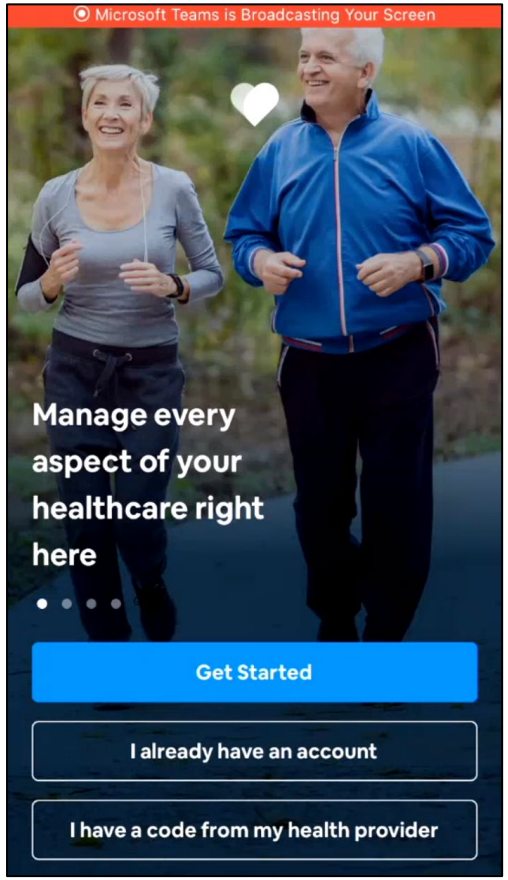


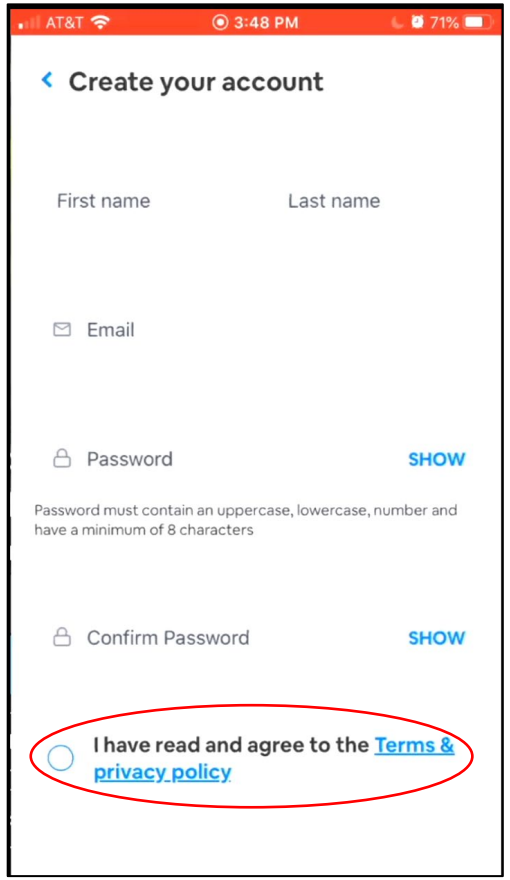


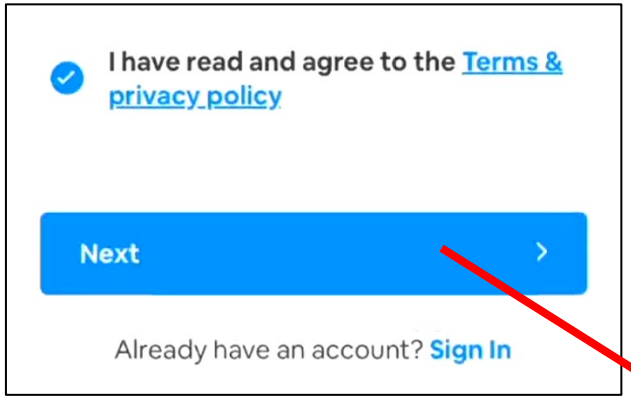


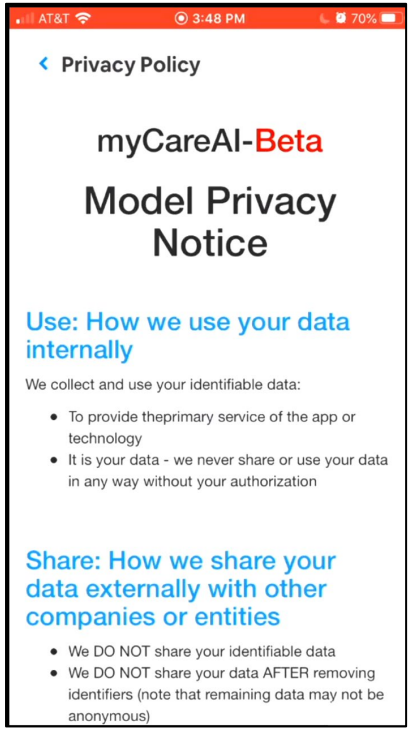
App Dev

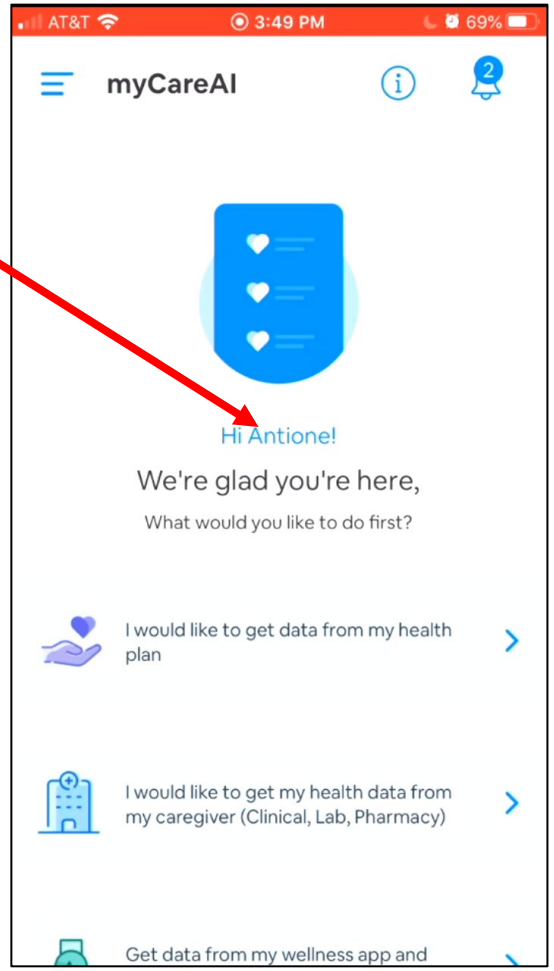
Consumer Apps (myCareAI) Consent & Policy



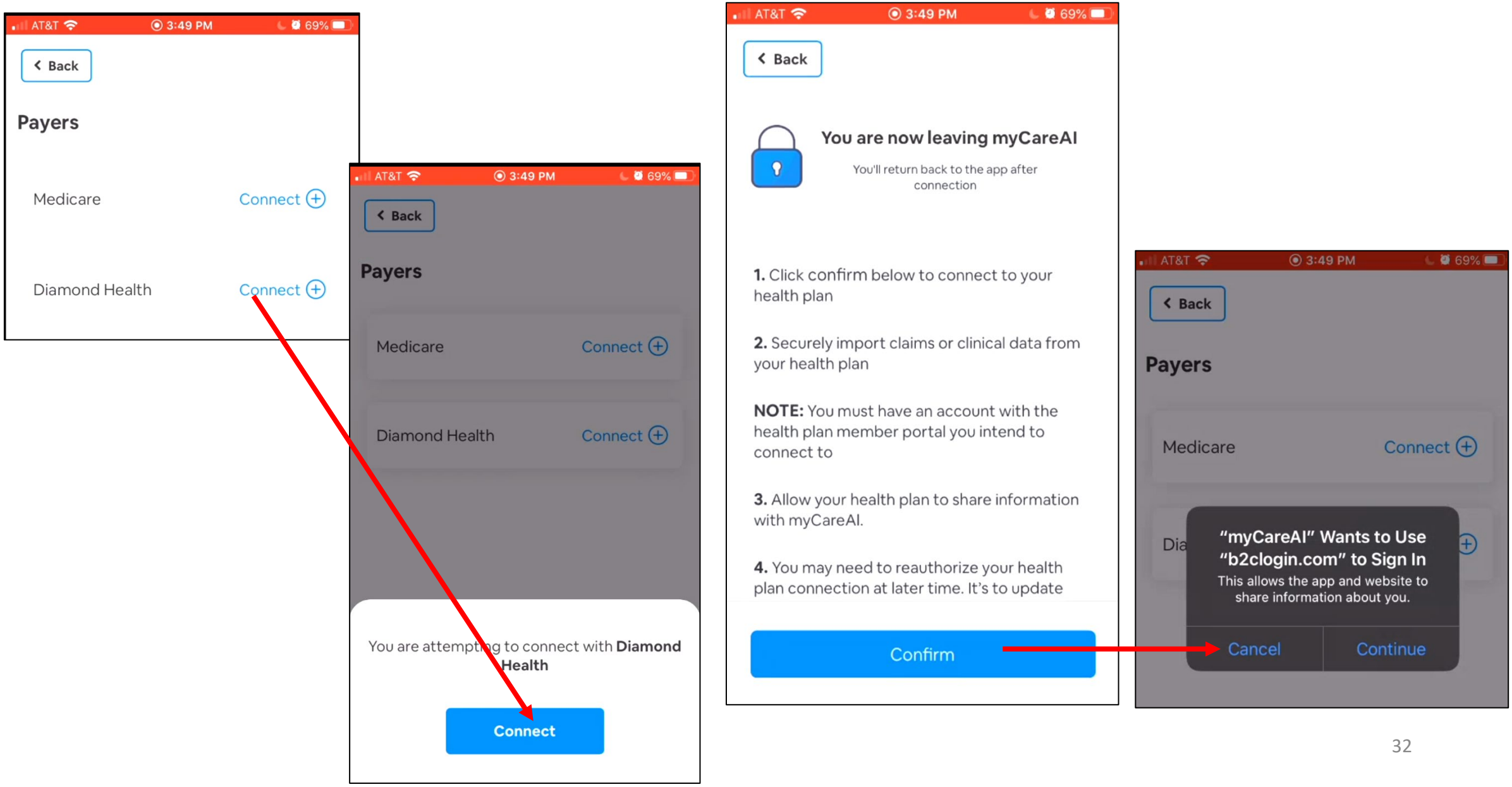




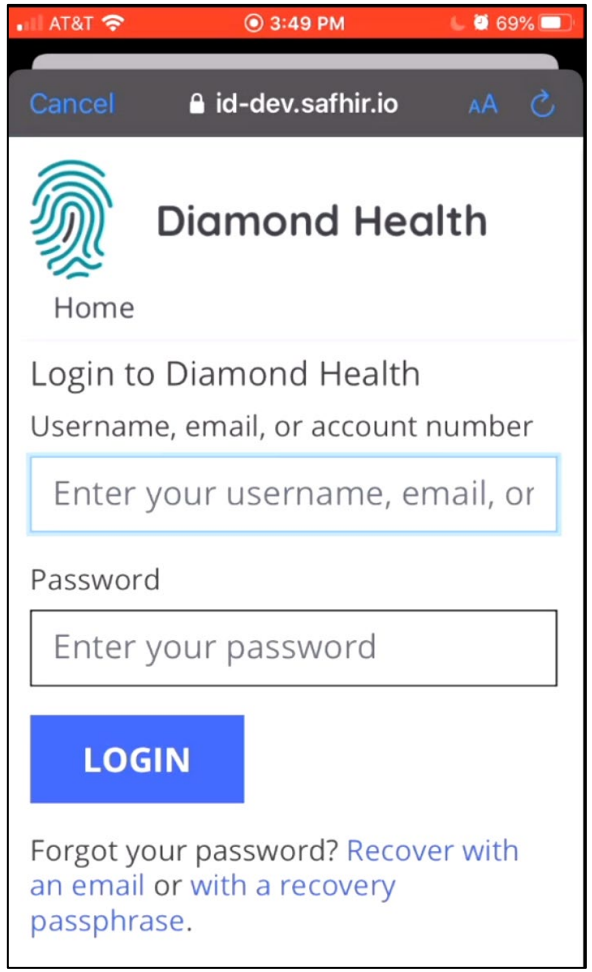




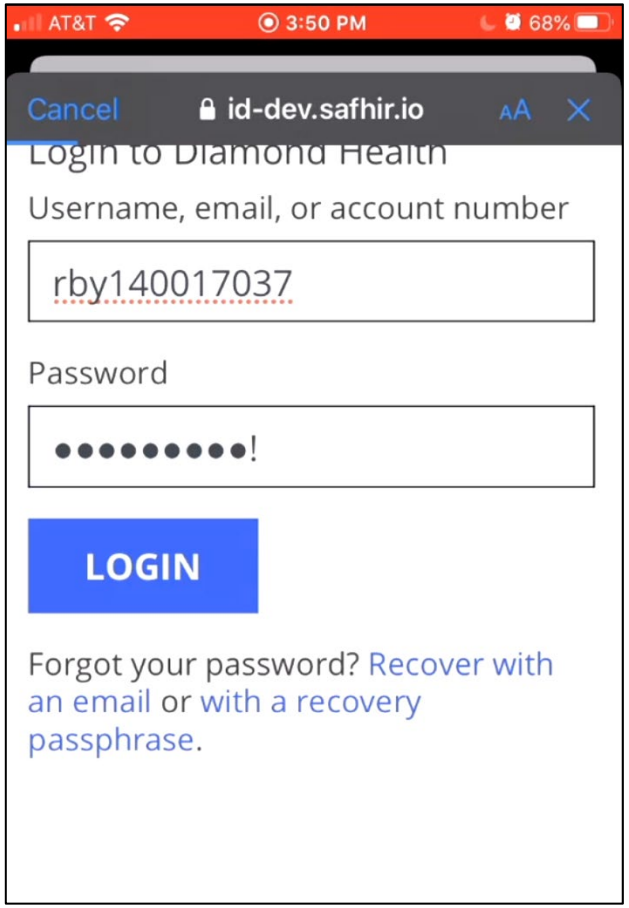
Consumer App (myCareAI) Connecting to Your API



First the Consumer Authenticates



Login is typically handled by the same Identity Provider that authenticates access to a member portal.

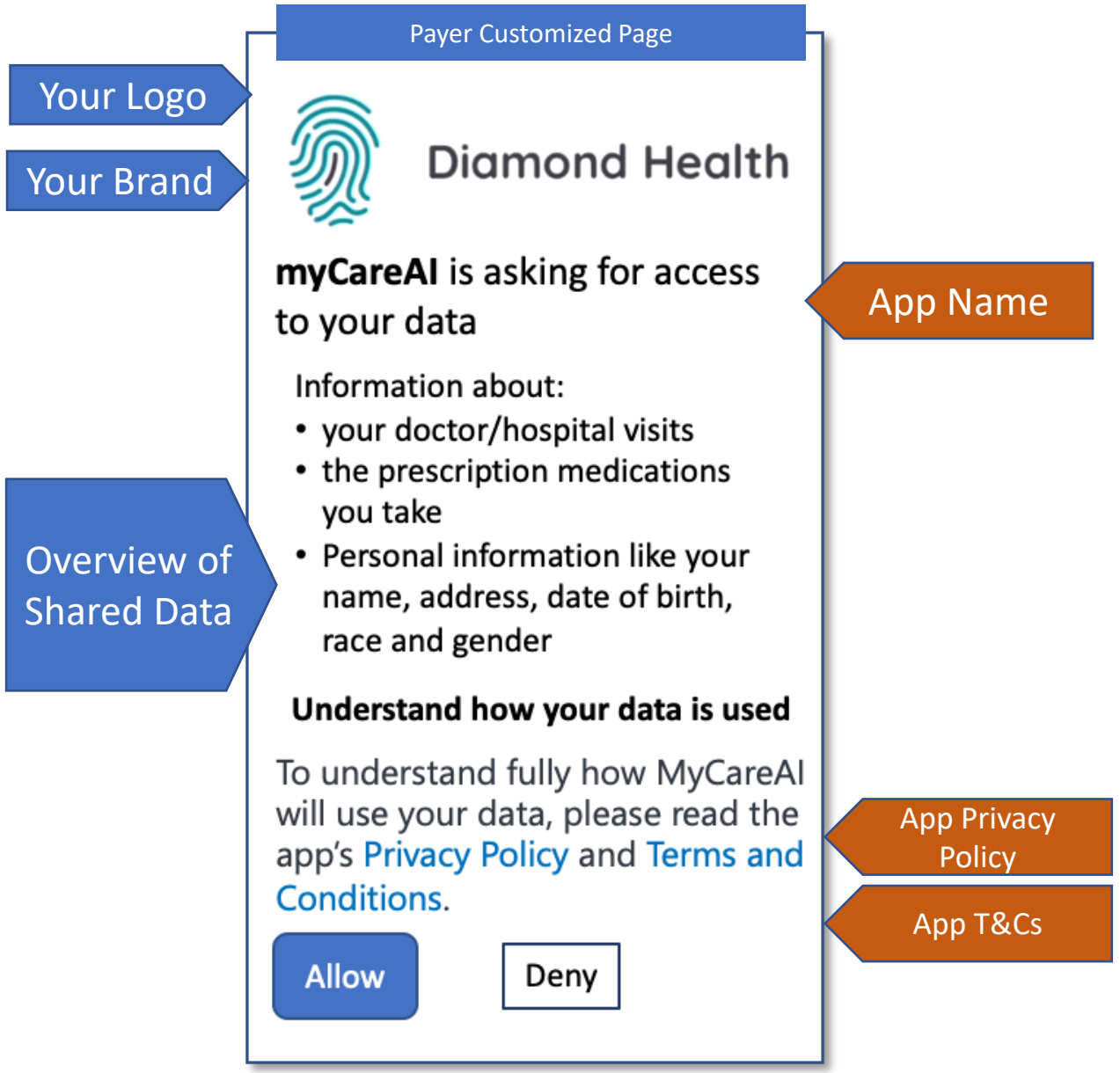


OpenID Connect

After successful login, an authentication token is created.

This includes an Identifier to do the hand off: SubjectID, MemberID or FHIRID

An Identified Member Then Chooses to Authorize Sharing



Many members will access via apps on Smartphones.

Think about complexity of the Authorization language and the visibility and clarity within the display context.

Authorization is granted for longer than the current session. CMS shares for multiple users. Many payers are setting the time limit at 1 year.

An Access Token is passed to the App

Diamond Health

myCareAI is asking for access to your data

Information about:
- your doctor/hospital visits
- the prescription medications you take
- Personal information like your name, address, date of birth, race and gender

Understand how your data is used

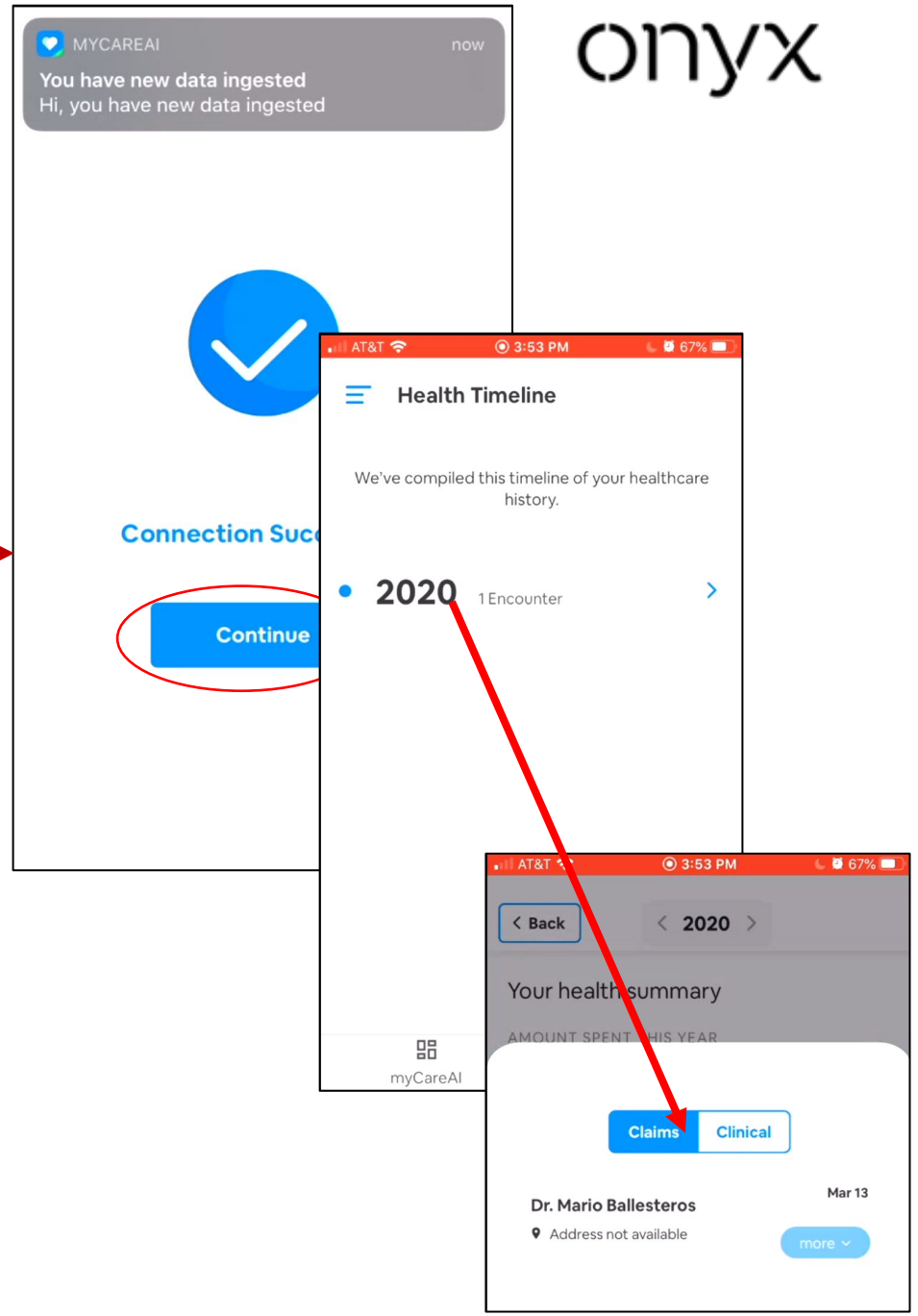
To understand fully how MyCareAI will use your data, please read the app's Privacy Policy and Terms and Conditions.

Allow

Deny

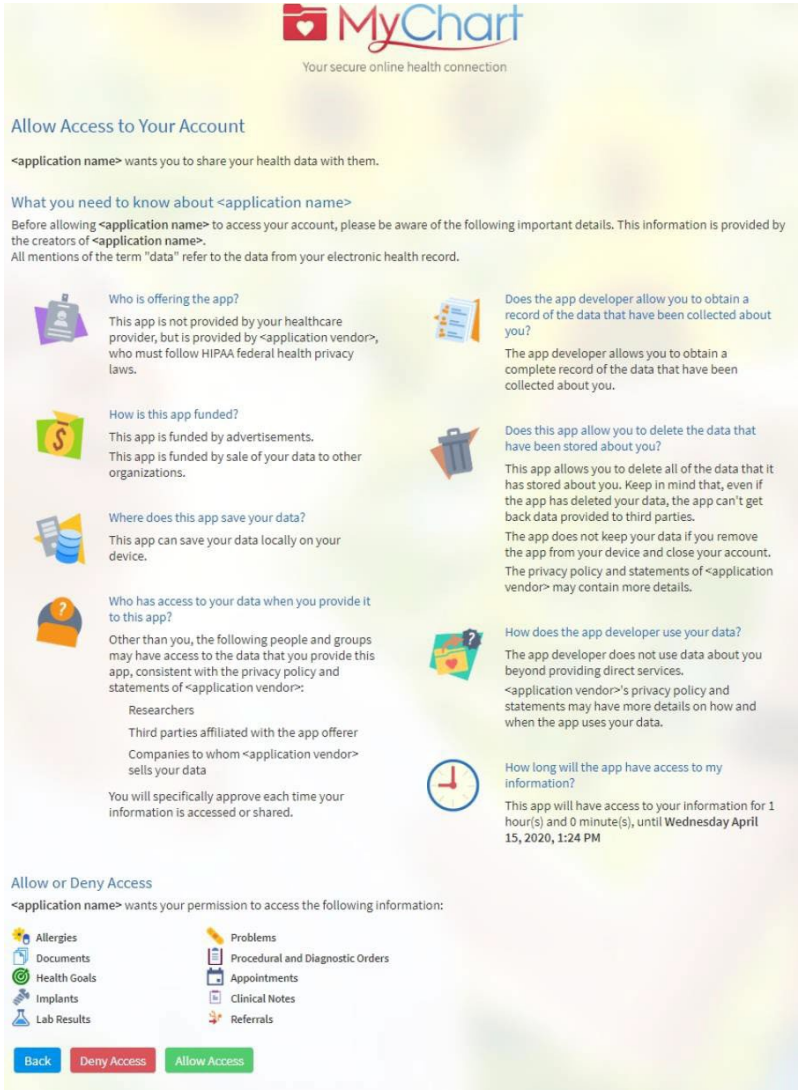
Authorization hands an Access Token and Refresh Token back to the App

These Tokens are used on every call to the API and limit access to the information elements the Member authorized the App to access.

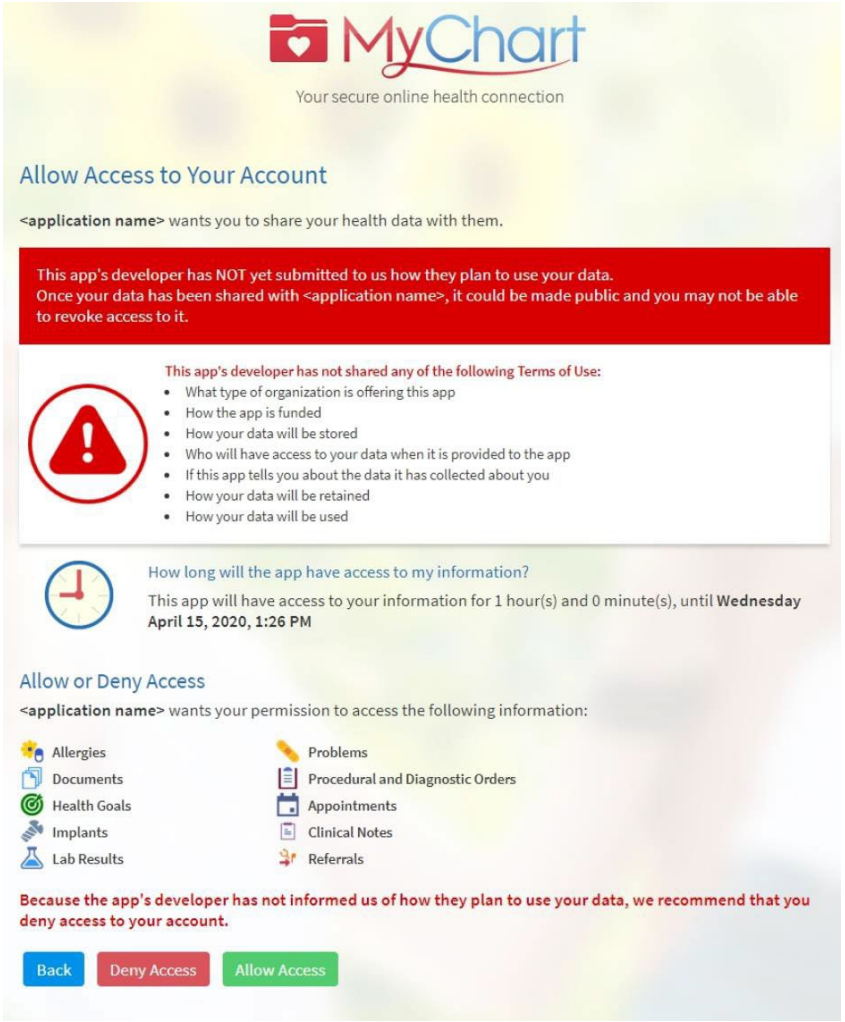


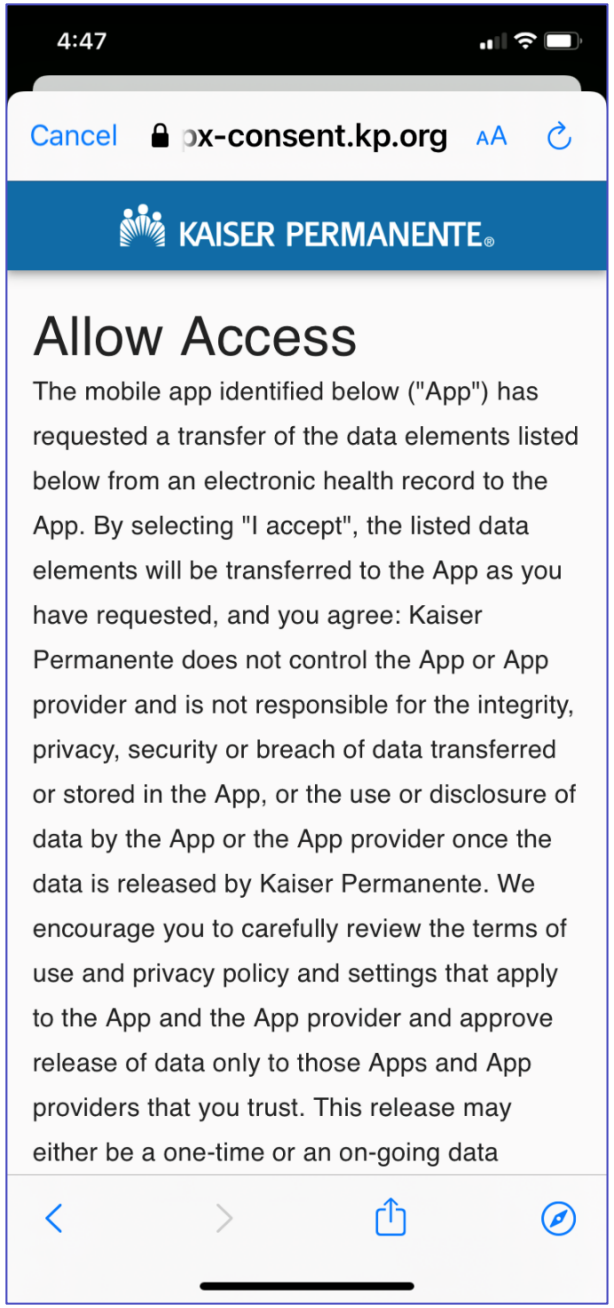
Consent-based Data Sharing Framework – Known and Unknown apps

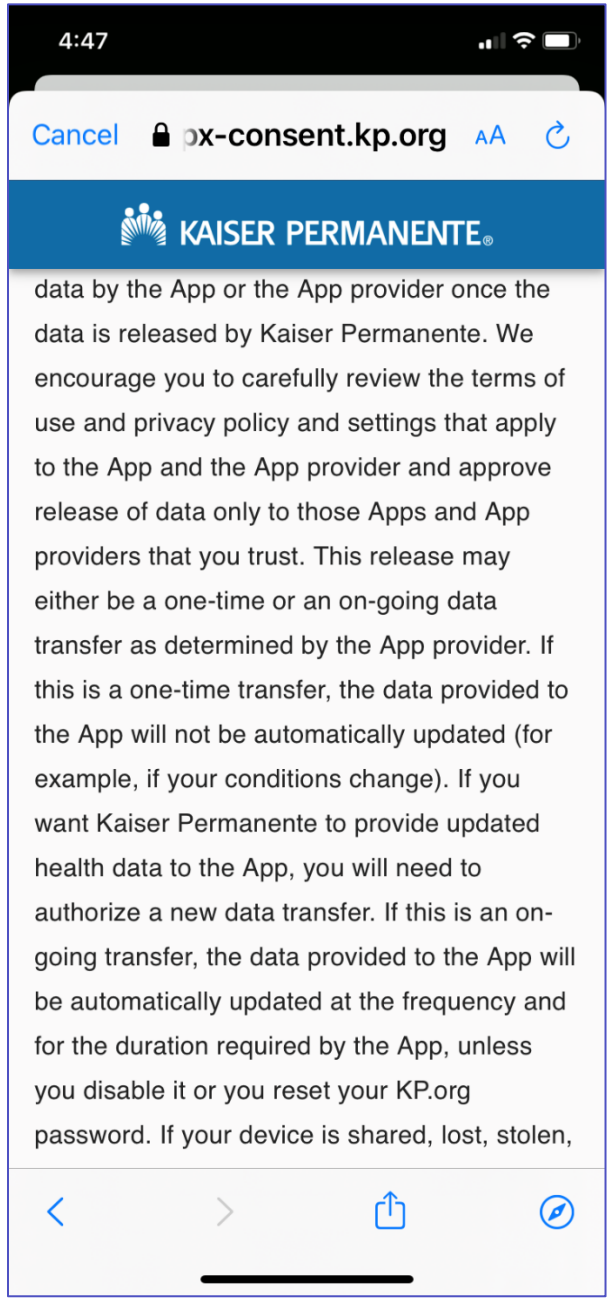
"Known" applications who have followed the CARIN Trust Framework

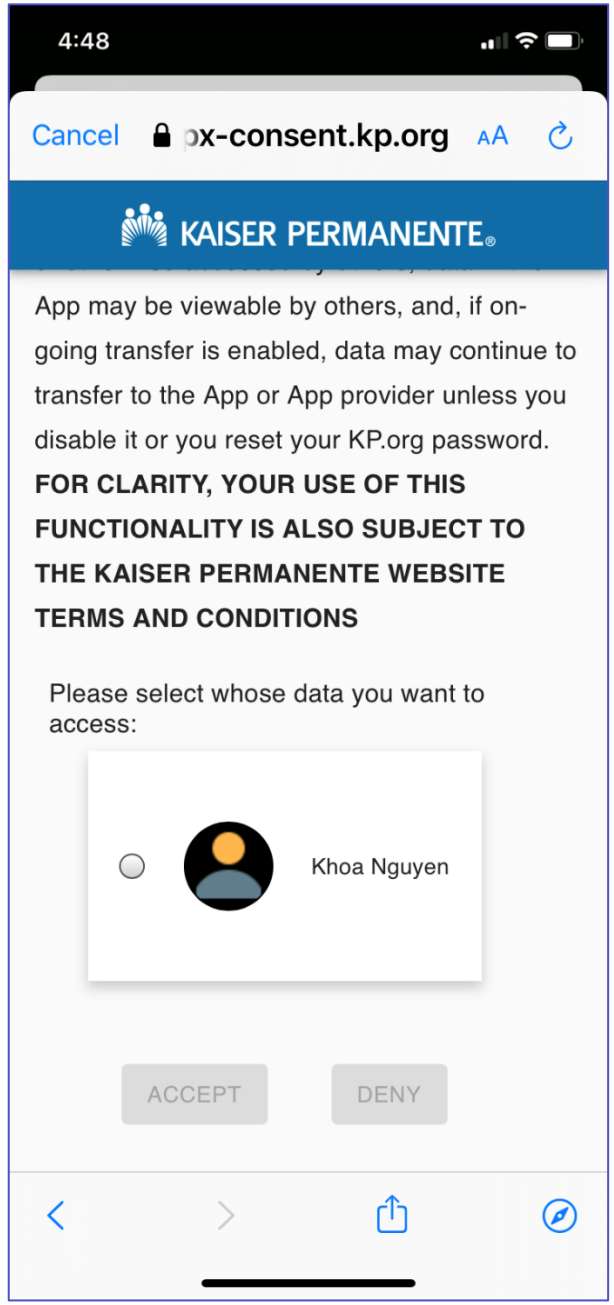


"Unknown" applications who have not followed the CARIN Trust Framework




4:47
Cancel
x-consent.kp.org
AA
KAISER PERMANENTE
Allow Access
The mobile app identified below ("App") has requested a transfer of the data elements listed below from an electronic health record to the App. By selecting "I accept", the listed data elements will be transferred to the App as you have requested, and you agree: Kaiser Permanente does not control the App or App provider and is not responsible for the integrity, privacy, security or breach of data transferred or stored in the App, or the use or disclosure of data by the App or the App provider once the data is released by Kaiser Permanente. We encourage you to carefully review the terms of use and privacy policy and settings that apply to the App and the App provider and approve release of data only to those Apps and App providers that you trust. This release may either be a one-time or an on-going data


4:47
Cancel
x-consent.kp.org
AA
KAISER PERMANENTE
data by the App or the App provider once the data is released by Kaiser Permanente. We encourage you to carefully review the terms of use and privacy policy and settings that apply to the App and the App provider and approve release of data only to those Apps and App providers that you trust. This release may either be a one-time or an on-going data transfer as determined by the App provider. If this is a one-time transfer, the data provided to the App will not be automatically updated (for example, if your conditions change). If you want Kaiser Permanente to provide updated health data to the App, you will need to authorize a new data transfer. If this is an on-going transfer, the data provided to the App will be automatically updated at the frequency and for the duration required by the App, unless you disable it or you reset your KP.org password. If your device is shared, lost, stolen,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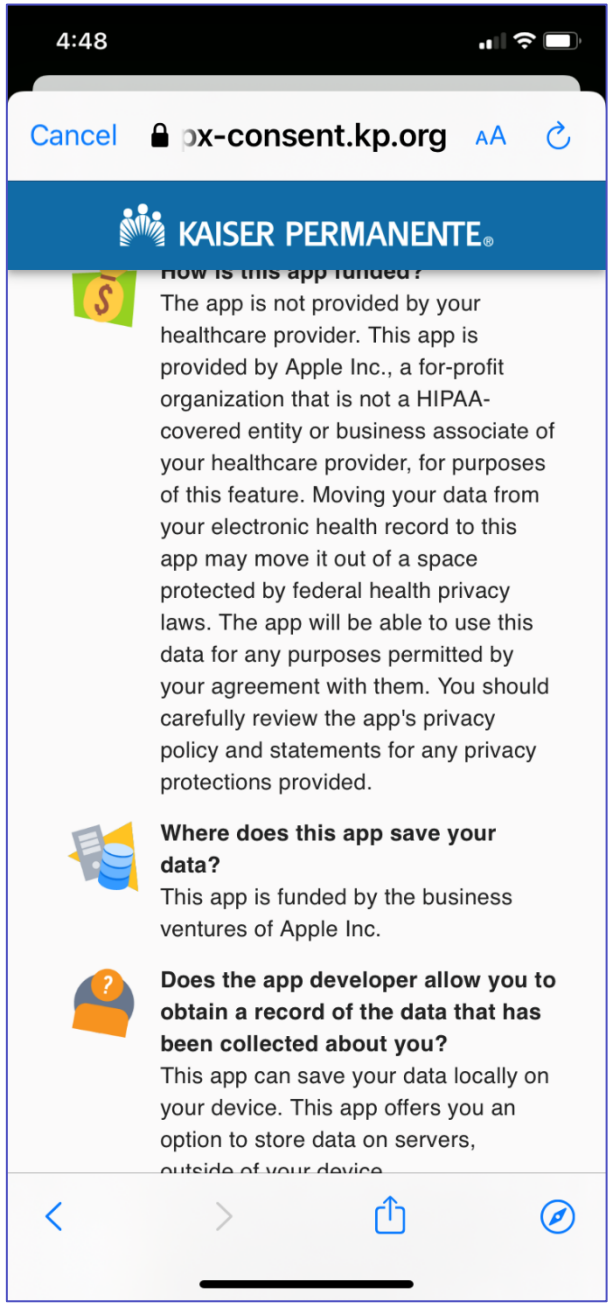
App may be viewable by others, and, if on-going transfer is enabled, data may continue to transfer to the App or App provider unless you disable it or you reset your KP.org password.
FOR CLARITY, YOUR USE OF THIS FUNCTIONALITY IS ALSO SUBJECT TO THE KAISER PERMANENTE WEBSITE TERMS AND CONDITIONS
Please select whose data you want to access:
Khoa Nguyen
ACCEPT
DENY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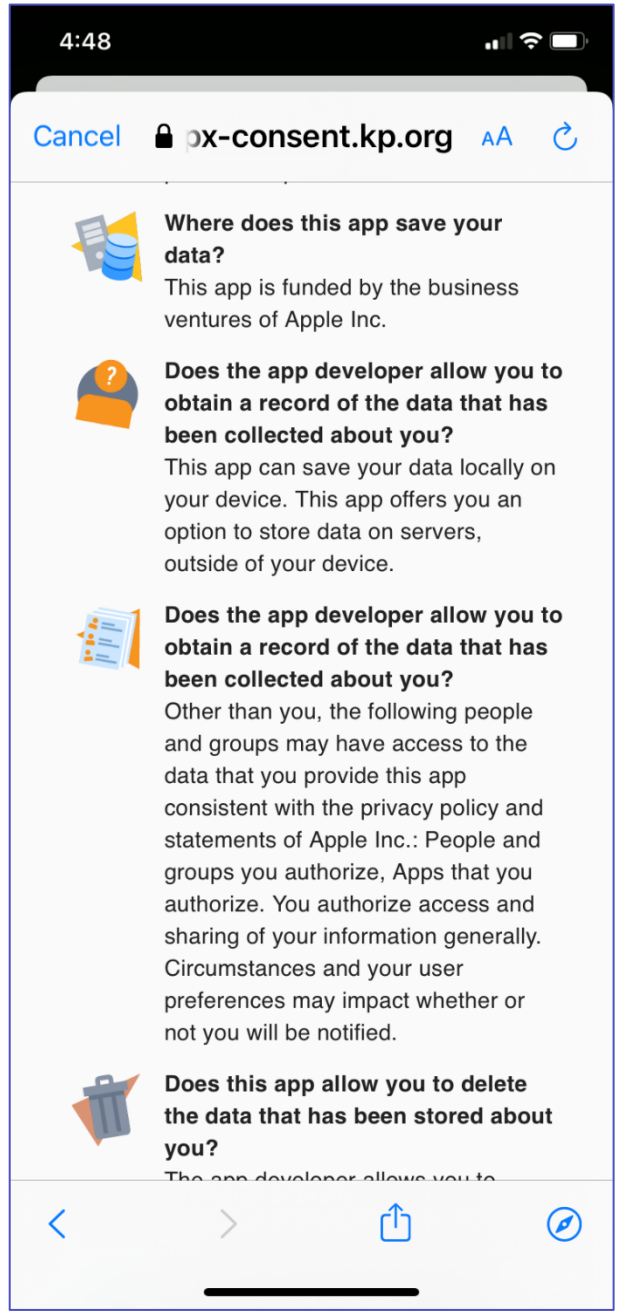
How is this app funded?
The app is not provided by your healthcare provider. This app is provided by Apple Inc., a for-profit organization that is not a HIPAA-covered entity or business associate of your healthcare provider, for purposes of this feature. Moving your data from your electronic health record to this app may move it out of a space protected by federal health privacy laws. The app will be able to use this data for any purposes permitted by your agreement with them. You should carefully review the app's privacy policy and statements for any privacy protections provided.
Where does this app save your data?
This app is funded by the business ventures of Apple Inc.
Does the app developer allow you to obtain a record of the data that has been collected about you?
This app can save your data locally on your device. This app offers you an option to store data on servers,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Where does this app save your data?
This app is funded by the business ventures of Apple Inc.
Does the app developer allow you to obtain a record of the data that has been collected about you?
This app can save your data locally on your device. This app offers you an option to store data on servers, outside of your device.
Does the app developer allow you to obtain a record of the data that has been collected about you?
Other than you, the following people and groups may have access to the data that you provide this app consistent with the privacy policy and statements of Apple Inc.: People and groups you authorize, Apps that you authorize. You authorize access and sharing of your information generally. Circumstances and your user preferences may impact whether or not you will be notified.
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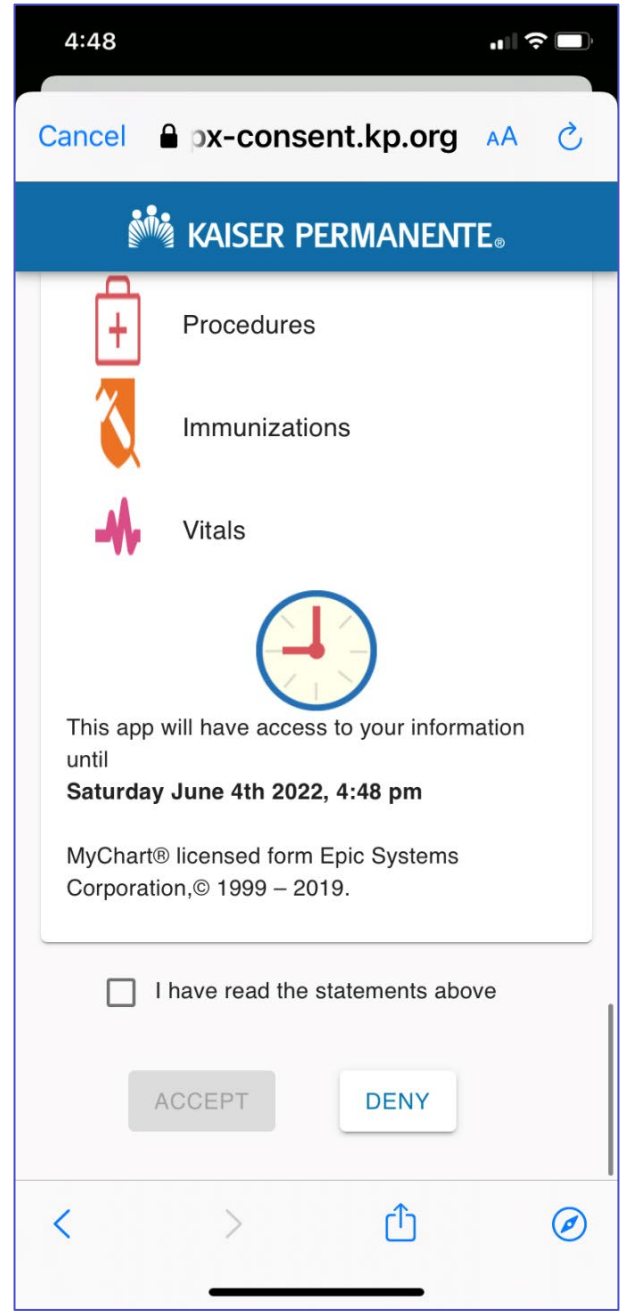
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This app will have access to your information until
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Q&A

Today's Agenda and Discussion Framework

Program Goal – start the planning process

- Welcome and Admin Stuff
- Recap and Responses to Data Requirements
- 3rd-party App Registration and Client Consent
- Some Questions and Implications for Planning

Survey Question: Feedback on Potential Next Steps

18 county responses

Options So Far	Yes	Maybe	No	Not Sure
Detailed review of potential role of/ for EHR system in meeting the CMS interoperability requirements	12	3		3
Common framework for understanding and applying privacy and security	11	4		3
Create common definitions and workflows (e.g., claim, client, consent, app registration)	12	2	1	3
Overlap and differences in data requirements between multiple county interoperability -- such as ONC, CMS, BH-QIP and new statewide HIE	12	3		3
More technical education about FHIR and APIs	12	2		4

We assume that many of the requirements will be met through the EHR as an API at some point in the future. However, its difficult for us at this point to see where the end line of support is from the EHR and whether an interoperability solution/partner may be required.

Additionally, as we anticipate many counties will participate within the EHR project, there might be an interest in pooling resources/efforts to create a single solution across all participating counties.

The challenge for Kern is Cerner has no capabilities to exchange data the way it is. We have joined the CalMHSA EHR project -- so the question I have is should we focus on trying to meet some CMS interoperability requirements with our current EHR system via a separate data warehouse or should we just focus on setting up an HIE once we have our new EHR online.

Survey Question: Feedback on Potential Next Steps

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CMS Interoperability Planning Collaborative

	Meeting Topics and Focus	Schedule
	• CMS Interoperability primer (optional)	March 29
#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 • Some Questions and Survey Responses • Lessons and feedback from Medi-Cal health plans	Mid June
#5	• Final group discussion • Feedback on draft work plan and next steps	Mid/ late July