



# Session 4

## CMS Interoperability Planning Collaborative

June 29, 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 |
|----|---|----------|
|    | <ul style="list-style-type: none"><li>• CMS Interoperability primer (optional)</li></ul>  | March 29 |
| #1 | <ul style="list-style-type: none"><li>• FAQs from Primer and Compliance Updates</li><li>• Market summary and lessons</li><li>• County considerations</li></ul>                                  | April 5  |
| #2 | <ul style="list-style-type: none"><li>• Recap and Key Takeaways So Far</li><li>• Some Questions</li><li>• Data Requirements</li></ul>   | April 26 |
| #3 | <ul style="list-style-type: none"><li>• Recap about Data Requirements</li><li>• Some Questions and Survey Responses</li><li>• Consumer consent, 3<sup>rd</sup>-party App Registration</li></ul> | May 17   |
| #4 | <ul style="list-style-type: none"><li>• Recap about Consent and App Registration</li><li>• FAQs and other updates</li><li>• Lessons and feedback from implementations so far</li></ul>          | June 29  |
| #5 | <ul style="list-style-type: none"><li>• Final group discussion</li><li>• Feedback on draft work plan and next steps</li></ul>   | July 19  |

# Admin Stuff

## Program email

- [interoperability@calmhsa.org](mailto:interoperability@calmhsa.org)

## Program materials and resources

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

The screenshot shows a web browser displaying the California Mental Health Services Authority (CalMHSA) website. The page is titled "CMS Interoperability Planning" and features a navigation menu with links for "About Us", "Members", "Programs", "CaAIM", "Announcements", and "Contact". The main content area includes a description of the program's purpose, a list of webinar sessions, and a "Members Login" button.

**California Mental Health Services Authority**

**CMS Interoperability Planning**

The primary purpose of this program is to support a collaborative approach for county behavioral health agencies to begin necessary planning efforts that meet the data interoperability requirements of California Medi-Cal managed care entities serving the Medi-Cal population.

The project will consist of six webinars from the period of March through July 2022 hosted by CalMHSA and KN Consulting with participation from various subject matter experts. The webinars will establish a baseline understanding of the interoperability business requirements, a mini-gap analysis, highlight valuable lessons learned from previous implementation, and move toward helping counties create a planning roadmap to meet their target completion dates.

This project is made possible by a grant from the California Healthcare Foundation.

**CMS Interoperability Planning Webinars:  
(For County Participants Only)**

| Session   | Date                              |
|---|-----------------------------------|
| Primer (optional) <ul style="list-style-type: none"><li>• <a href="#">Primer Recording</a></li><li>• <a href="#">Slides</a></li></ul> | March 31, 2022<br>9AM-10:30AM PST |
| Session 1 <ul style="list-style-type: none"><li>• <a href="#">Session 1 Recording</a></li><li>• <a href="#">Slides</a></li></ul>      | April 5, 2022<br>11AM-12:30PM PST |

# Program Staff and Guest Speakers



**Khoa Nguyen**  
CEO, KN Consulting LLC  
Project Director



**Mark Scrimshire**  
Chief Interoperability Officer,  
Onyx Health



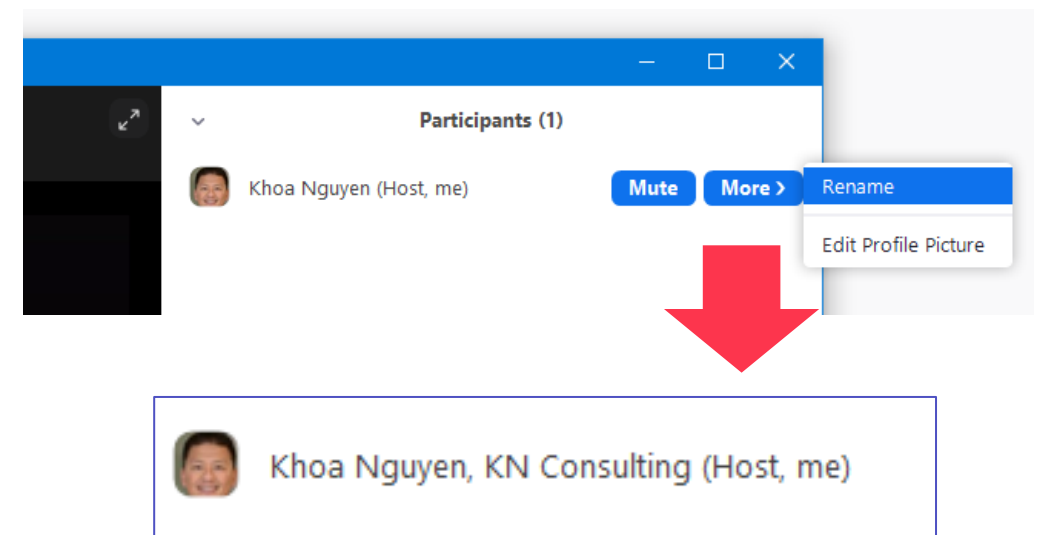
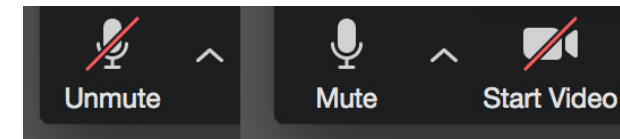
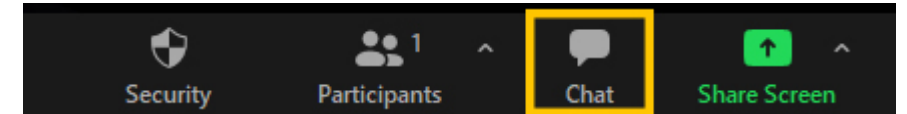
**Tom Schwanginer**  
Executive Digital Advisor  
LA Care Health Plan



**Kathryn Madrid**  
Business Systems Analyst  
Community Health Group

# 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 Takeaways about Consent and App Registration
- FAQs and other updates
- Lessons and feedback from implementations so far

# From Session 3: Consent and 3<sup>rd</sup>-Party Apps

CMS interoperability requirement is MORE than existing patient portal

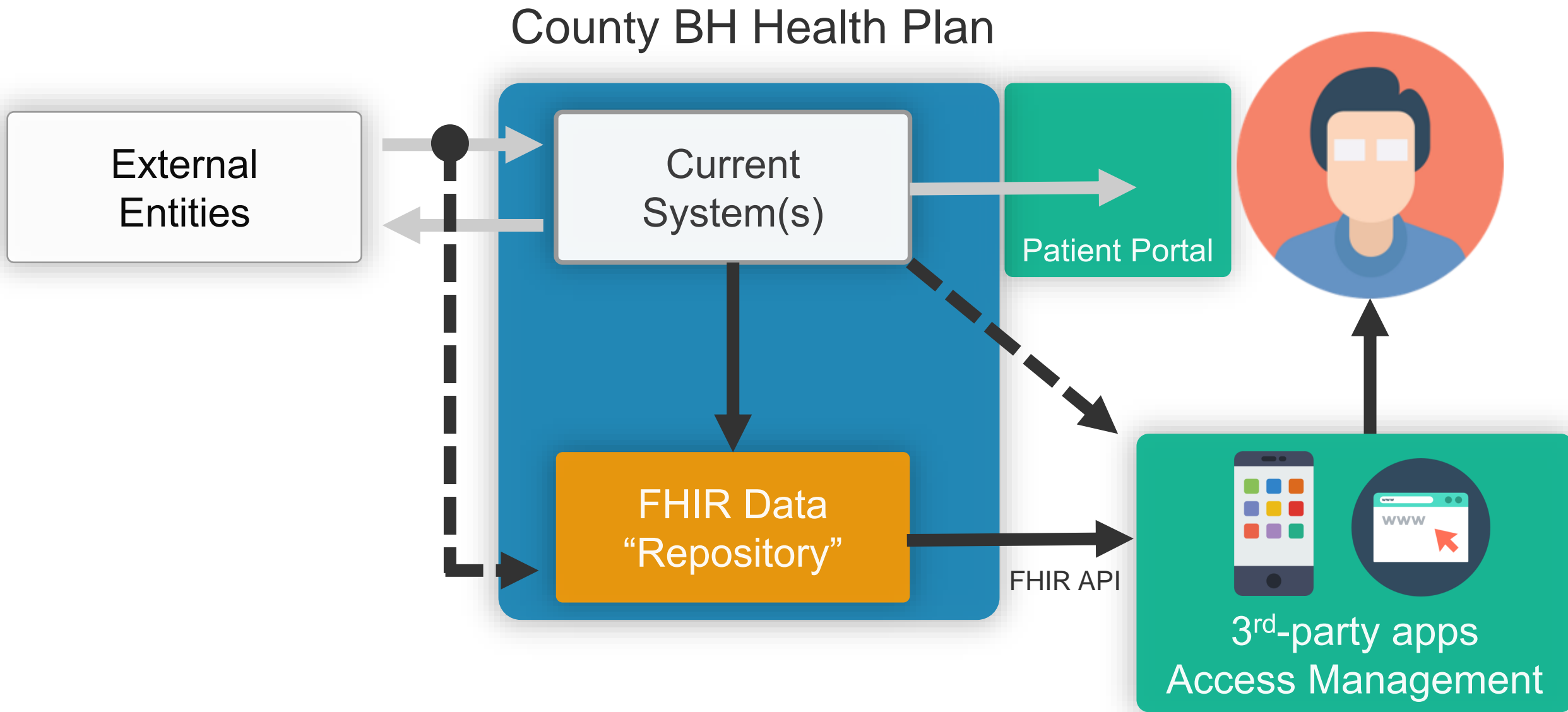
- + All claims – including contracted providers, ODS claims\*
- + FHIR data and API
- + Client access via 3<sup>rd</sup>-party apps (not county EHR portal)
- + Obtain and track client consent with each 3<sup>rd</sup>-party app
- + Provider Directory API

Privacy and security issues

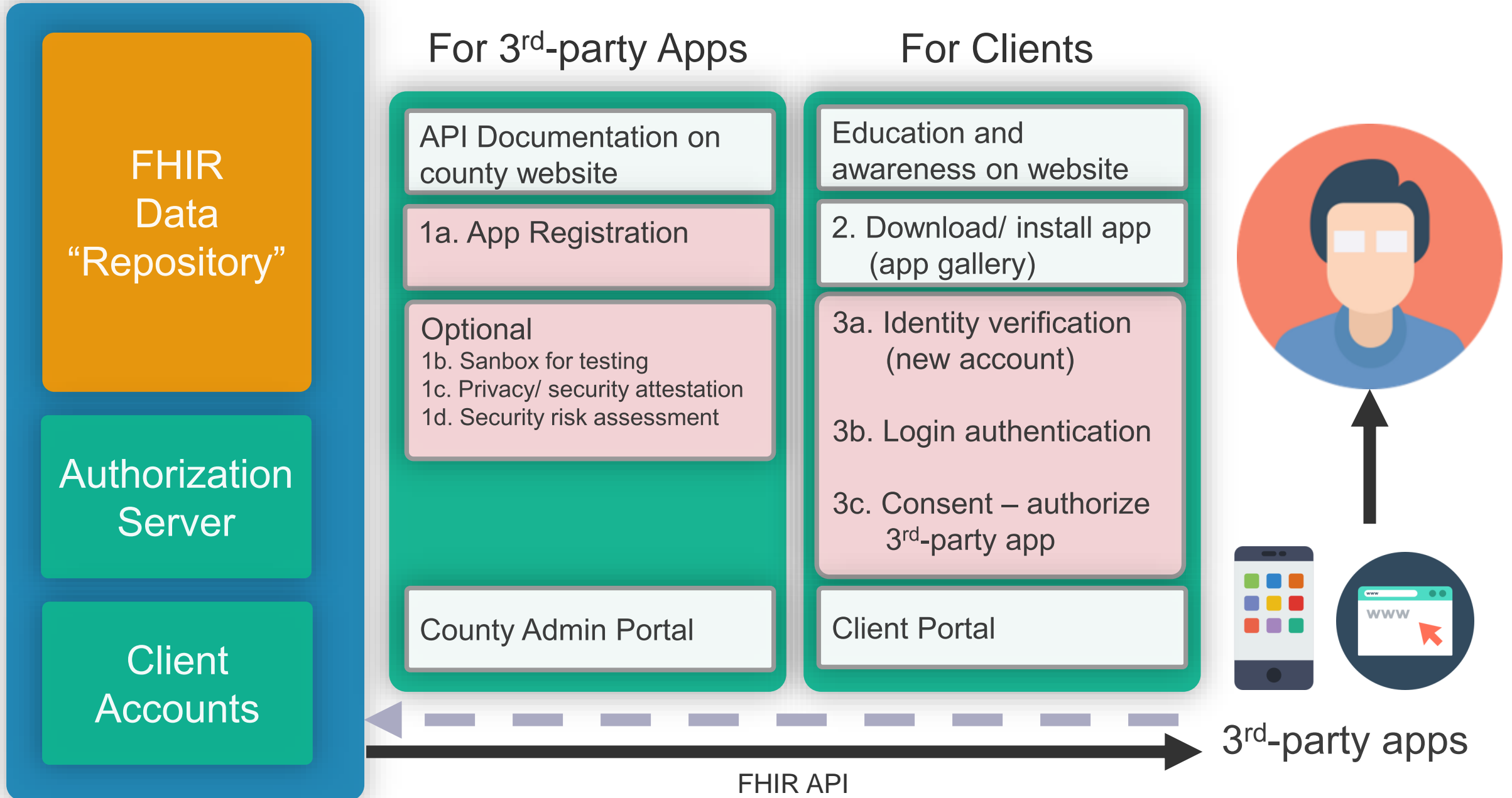
- Business requirements and implementation
- Concerns with client awareness and trustworthy apps



# Overview of Data Flow



# County BH Plan



## Same privacy and security framework

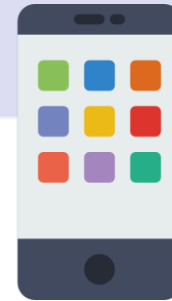
- Existing HIPAA right of access
- Existing federal, state, local laws

### 3. API for Data Exchange

#### 2. Access Management

#### 1. County Data

3<sup>rd</sup>-Party Apps regulated by FTC



# Today's Agenda and Discussion Framework

Program Goal – start the planning process

- Welcome and Admin Stuff
- Recap and Takeaways about Consent and App Registration
- FAQs and other updates
- Lessons and feedback from implementations so far

# Compliance with CMS Interoperability Requirements

## Impacted Payors

Medi-Cal Plans

Medicare Advantage Plans  
Medicaid State FFS  
Individual Marketplace Plans

---

## Who has Regulatory Oversight?



# Compliance with CMS Interoperability Requirements

## CMS Guidance

No penalty for non-compliance (yet),  
but checking each impacted payor:  
[www.cmscompliancetracker.com](http://www.cmscompliancetracker.com)

### Expectations

1. Have a work plan with specific activities and milestones
2. Make good faith effort
3. Make progress



# Core Requirements of County Behavioral Health Plans

- Patient access to eHI via application program interfaces (APIs)

|   |  | Effective Date                             | Data Exchange Partner                                  | Consumer Consent |
|---|--|--|--|------------------|
| 1 | Patient Access API<br>(similar to Blue Button 2.0) | <del>January 1, 2021</del><br>July 1, 2021 | Plan-to-Client<br>(through 3 <sup>rd</sup> -party app) | ✓                |
| 2 | Provider Directory API                             | <del>January 1, 2021</del><br>July 1, 2021 |  | X                |
| 3 | Payer-to-Payer*                                    | <del>January 1, 2022</del><br>???          |  | ✓                |

Hearing draft regulations are being reviewed – expect release by end of year

\* State Medicaid FFS is exempt from Payer-to-Payer requirements.

# Survey Question: Feedback on Potential Next Steps

18 county responses

| Options Identified 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        |
| Overlap and differences in data requirements between multiple county interoperability -- such as ONC, CMS, BH-QIP and new statewide HIE | 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        |
| More technical education about FHIR and APIs  | 12  | 2     |    | 4        |



# Initial Conversation with Epic

## Support Patient Access API

- Customer MUST be using Epic's payer platform Tapestry
- "Free" through Tapestry

Do NOT support Provider Directory API

# Today's Agenda and Discussion Framework

Program Goal – start the planning process

- Welcome and Admin Stuff
- Recap and Takeaways about Consent and App Registration
- FAQs and other updates
- Lessons and feedback from implementations so far

# Program Staff and Guest Speakers



**Khoa Nguyen**  
CEO, KN Consulting LLC  
Project Director



**Mark Scrimshire**  
Chief Interoperability Officer,  
Onyx Health



**Tom Schwanginer**  
Executive Digital Advisor  
LA Care Health Plan



**Kathryn Madrid**  
Business Systems Analyst  
Community Health Group

# For Our Guest Speakers

## Context

- Plan, county served, current enrollment
- Current status with CMS interoperability
- Approach and key considerations

## Lessons from planning and implementation

- Best decision you made
- Would do differently
- Lessons for counties

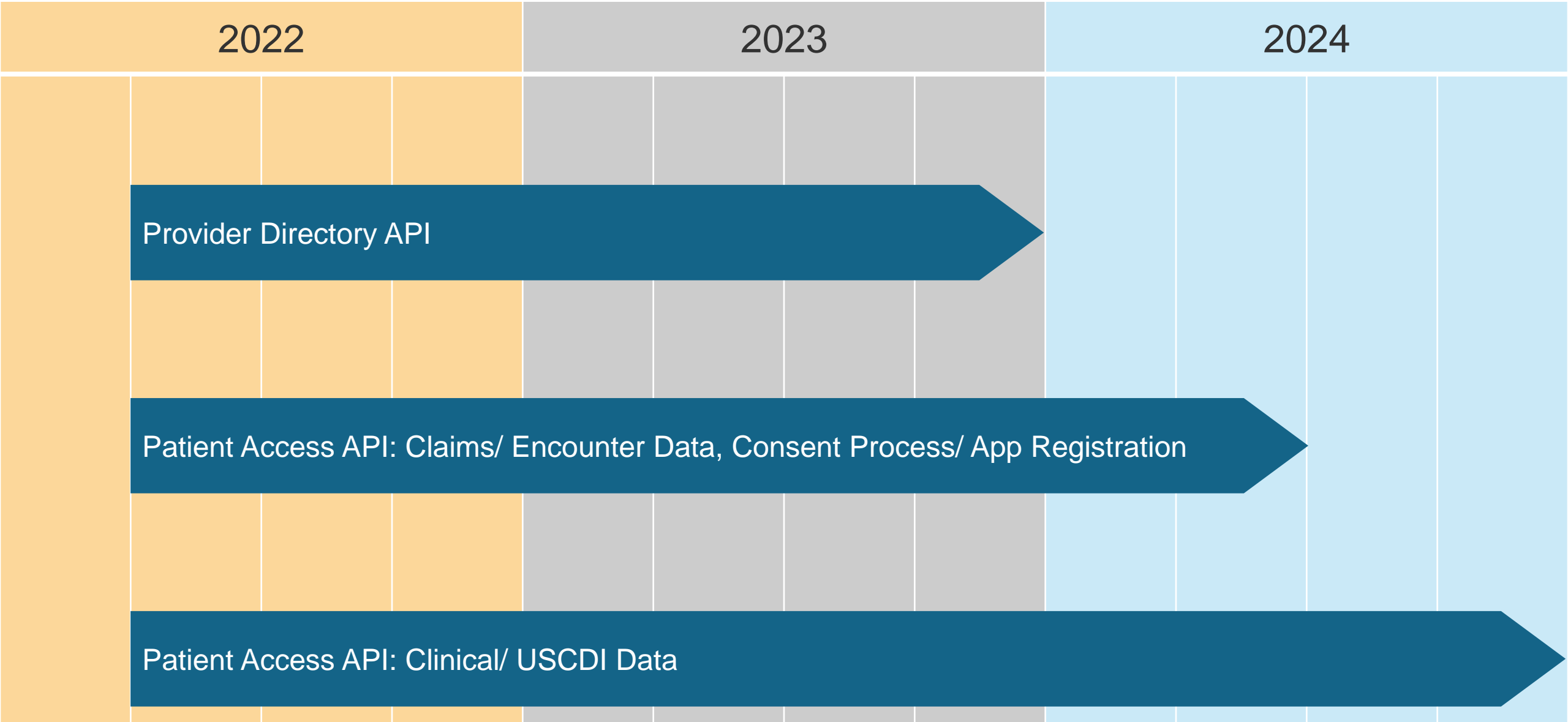
# Survey Question: Feedback on Potential Next Steps

18 county responses

| Options Identified 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        |
| Overlap and differences in data requirements between multiple county interoperability -- such as ONC, CMS, BH-QIP and new statewide HIE | 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        |
| More technical education about FHIR and APIs  | 12  | 2     |    | 4        |

# Considerations for CMS Interoperability Timelines

## Phased Approach



# Considerations for CMS Interoperability Timelines

## Phased Approach

2022

- Builds on existing PDF and 274 project
- No consumer consent, no PHI or patient-level data – no issues with privacy
- Low cost to implement

2024

Provider Directory API

Patient Access API: Claims/ Encounter Data and Access Manage

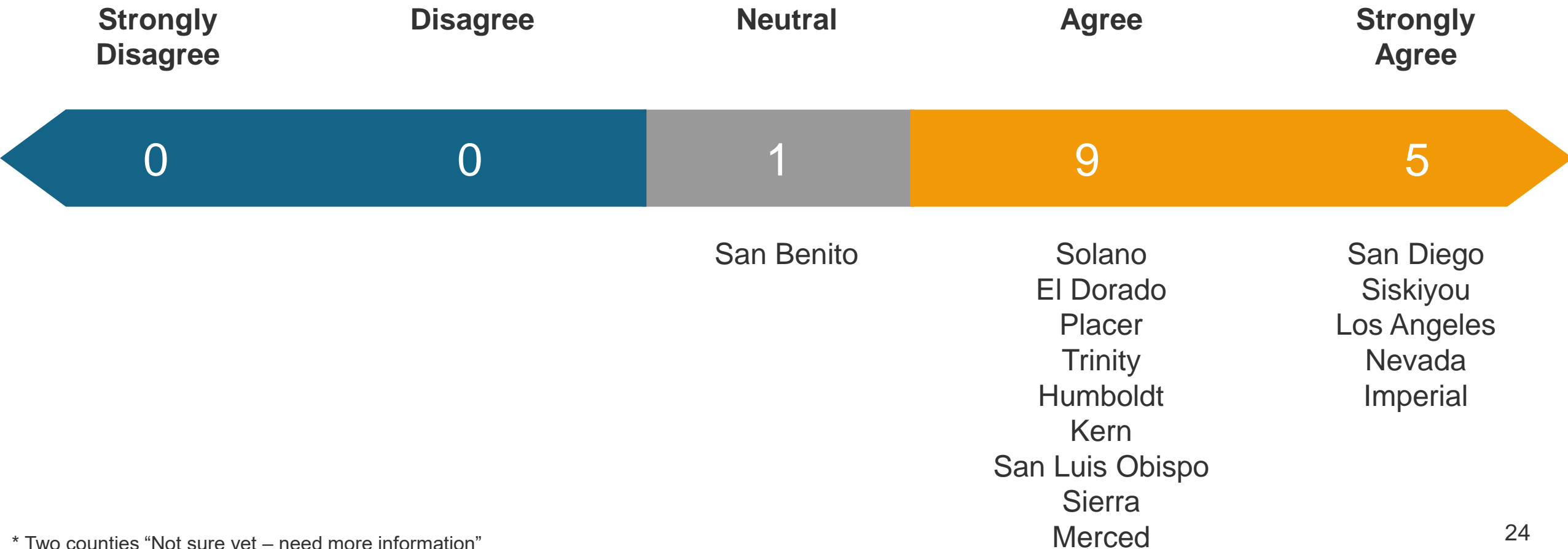
EHR source data, potential for IDP/ authentication, and new EHR implementations

Patient Access API: Clinical/ USCDI Data (new/ current EHR implementations)

# Phased Approach to Implementation of CMS Interoperability

18 county responses

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



\* Two counties "Not sure yet – need more information"

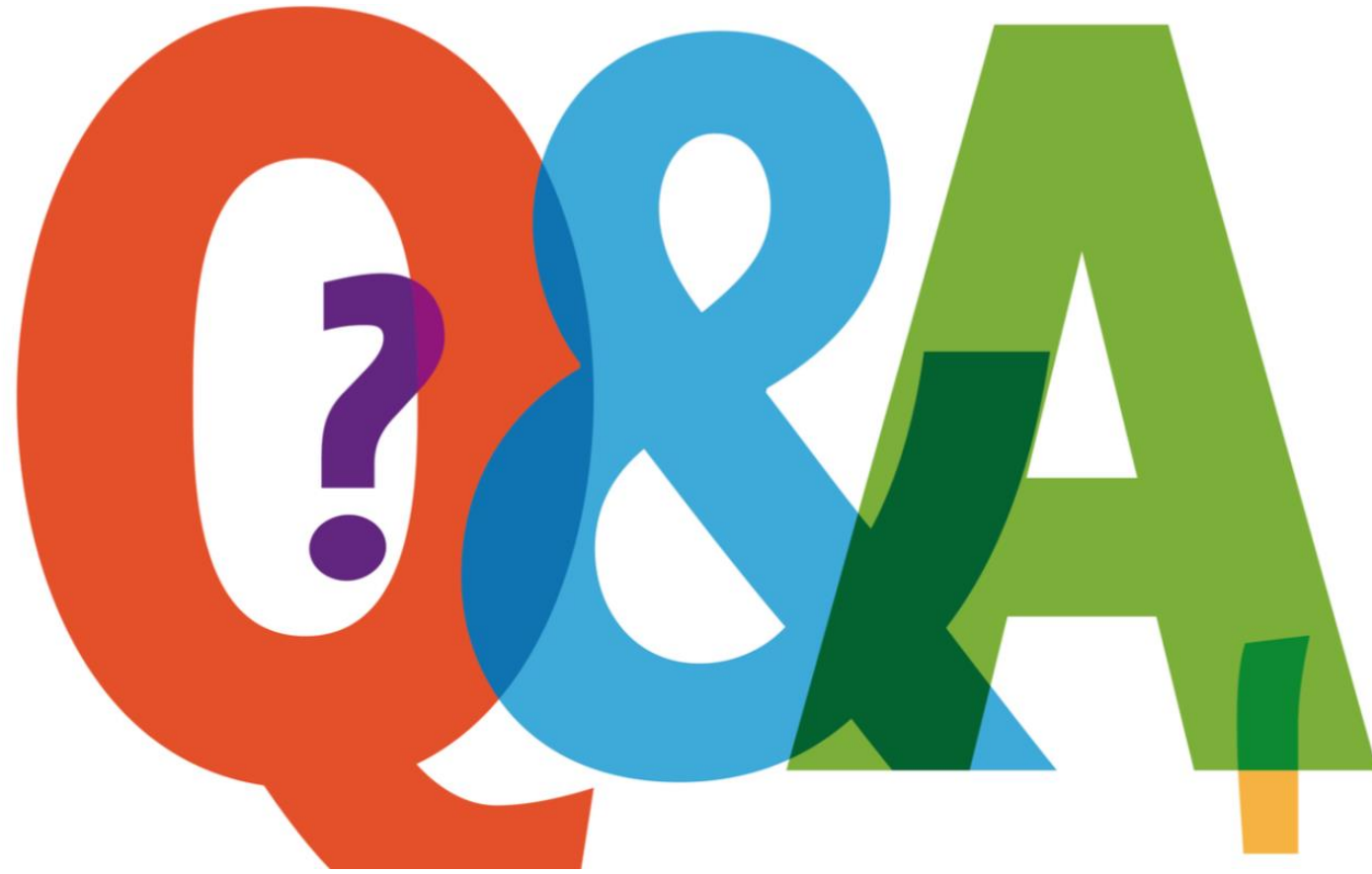


# Don't Boil the Ocean

Consider implementation in “stages”



|                               |  |  |
|-------------------------------|--|--|
| Provider Directory API        | Pt Access API – claims/<br>encounter data, Rx data | Pt Access API – clinical data/<br>USCDI  |
| Test population, 2021+ data   | All clients, 2021+ data                            | All clients, 2016+                       |
| Individual consent            | Authorized rep: parent/<br>guardian<br>and minors  | Authorized rep: power of<br>attorney     |
| Test with internal mobile app | Test with 1 3 <sup>rd</sup> -party app             | Open for all 3 <sup>rd</sup> -party apps |



# CMS Interoperability Planning Collaborative

|    | Meeting Topics and Focus  | Schedule |
|----|---|----------|
|    | <ul style="list-style-type: none"><li>• CMS Interoperability primer (optional)</li></ul>  | March 29 |
| #1 | <ul style="list-style-type: none"><li>• FAQs from Primer and Compliance Updates</li><li>• Market summary and lessons</li><li>• County considerations</li></ul>                                  | April 5  |
| #2 | <ul style="list-style-type: none"><li>• Recap and Key Takeaways So Far</li><li>• Some Questions</li><li>• Data Requirements</li></ul>   | April 26 |
| #3 | <ul style="list-style-type: none"><li>• Recap about Data Requirements</li><li>• Some Questions and Survey Responses</li><li>• Consumer consent, 3<sup>rd</sup>-party App Registration</li></ul> | May 17   |
| #4 | <ul style="list-style-type: none"><li>• Recap about Consent and App Registration</li><li>• FAQs and other updates</li><li>• Lessons and feedback from implementations so far</li></ul>          | June 29  |
| #5 | <ul style="list-style-type: none"><li>• All program resources and references</li><li>• Feedback on draft work plan</li><li>• Next steps</li></ul>   | July 19  |