



Compliance with CMS Interoperability and Patient Access Rule



Technical Readiness

- 1. **API Development and Implementation:** Ensure APIs meet HL7 FHIR standards and are compliant with CMS requirements for patient access and provider directory APIs.
- 2. **Data Format and Mapping:** Verify data is standardized in FHIR format and correctly mapped to meet required use cases (e.g., claims, encounter data).
- 3. **Security and Privacy:** Implement OAuth 2.0 for secure API access and ensure compliance with HIPAA and other relevant privacy standards.
- 4. **Testing and Validation:** Conduct rigorous testing of APIs, including end-to-end validation with external partners and internal systems.



Organizational Readiness

- 1. **Stakeholder Engagement:** Identify key stakeholders (e.g., IT, clinical staff, compliance officers) and establish a governance structure for overseeing interoperability efforts.
- 2. **Training and Education:** Provide training for staff on new processes, data handling, and privacy considerations under the CMS rule.
- 3. **Resource Allocation:** Assess and allocate necessary resources, including budget, technology, and personnel, to support compliance efforts.



Policy Readiness

- 1. **Patient Consent Management:** Establish or update processes for obtaining and managing patient consent for data sharing.
- 2. **Compliance Monitoring:** Develop mechanisms to continuously monitor compliance with CMS requirements and address any identified gaps.
- 3. **Reporting and Documentation:** Ensure that policies and processes are well-documented, including data sharing agreements and API performance reports.

Strategic Alignment

- 1. **Alignment with Organizational Goals:** Integrate compliance efforts with broader organizational strategies for digital transformation and patient engagement.
- 2. **Continuous Improvement:** Create a plan for ongoing evaluation and improvement of interoperability capabilities.

Resources and Tools

CMS and ONC Guidance Documents

- **CMS Interoperability and Patient Access Fact Sheets:** Provides detailed information on requirements and timelines.
- **ONC Cures Act Final Rule:** Offers insights into interoperability, data blocking, and certification requirements.
- **Resource Links:**
 - [CMS Interoperability and Patient Access Fact Sheets](#)
 - [ONC Cures Act Final Rule Overview](#)

API Implementation and Testing Tools

- **HL7 FHIR Implementation Guides:** Specific guides for Patient Access APIs and Provider Directory APIs, detailing the necessary standards and specifications.
- **Inferno Testing Tool:** An ONC-provided tool for testing FHIR APIs against CMS interoperability requirements.
- **Resource Links:**
 - [HL7 FHIR Implementation Guides](#)
 - [Inferno Testing Tool](#)



Security and Privacy Compliance

- **HITRUST CSF:** Framework for managing data protection and compliance with various regulations, including HIPAA.
- **NIST Cybersecurity Framework:** Provides guidelines for improving critical infrastructure cybersecurity, applicable to securing healthcare APIs.
- **Resource Links:**
 - [HITRUST CSF](#)
 - [NIST Cybersecurity Framework](#)



Consent Management

- **ONC Patient Consent Toolkit:** Offers guidance on developing patient consent policies and managing consent electronically.
- **SMART on FHIR Consent Management Apps:** Explore consent management applications that integrate with existing FHIR APIs.
- **Resource Links:**
 - [ONC Patient Consent Toolkit](#)
 - [SMART on FHIR Apps](#)



Compliance Monitoring and Reporting

- **API Performance Monitoring Tools:** Use tools like Postman and Swagger to test API performance and ensure adherence to required standards.
- **FHIR Compliance Validators:** Automated tools to validate data against FHIR specifications.
- **Resource Links:**
 - [Postman API Testing](#)
 - [FHIR Validator](#)



Training and Education

- **CMS Webinars and Training Sessions:** Regularly updated webinars on compliance topics relevant to CMS interoperability rules.
- **HL7 FHIR Training:** Courses and certifications on FHIR standards to build organizational knowledge.
- **Resource Links:**
 - [CMS Webinars](#)
 - [HL7 FHIR Training](#)

Are You Ready to Start an Interoperability Assessment?

We can help.



CareNexus[®] was designed to navigate these nuances, analyze your current systems to determine any gaps in interoperability, brainstorm your dream EHR needs, choose the right EHR to achieve those dreams, and use a checklist to **ensure interoperability and compliance.**



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