INTEROPERABILITY AND PATIENT ACCESS RULE - A COMPLIANT SOLUTION FOR PAYER SYSTEMS

Consolidate, **Curate**, and **De-Silo** Healthcare Data to be Part of the Connected Healthcare

The July 1, 2021, deadline for implementing the Interoperability and Patient Access Final Rule for Payer is behind us and it is time to assess where we stand with the implemented technology and what to expect from the current and upcoming technology and regulatory changes.

The Patient Access Rule primarily requires Payers (Medicare, Medicaid, CHIP, MCOs, and Qualified health Plans) to make the patient data available to patients or plan members on demand via 3rd-party apps using FHIR APIs and USCDI data definitions – the patient data in this context includes clinical, claims, and other relevant data a payer is managing. Other data to be made available to patients through the standard APIs include Drug Formulary and Provider Directory data.

The solution for CMS Patient Access Rule compliance for a payer, in general, can be implemented by integrating a package of certified FHIR Server, FHIR APIs, and other security and audit services to the existing payer system. The solution must also be integrated with the payer data sources using Dynamic Query Response approach or implementing a Member Data Repository (MDR):

Dynamic Query Response Approach

Using this approach, each data request from external applications is serviced by running search queries against the payer data sources within the payer's databases. The result set is then transformed from the native format to the FHIR format and served through the FHIR APIs. For distributed member data sources or complex data access queries, dynamic data extraction, parsing, mapping, and transformation may not produce predictable quality and may introduce data access layer performance and response time issues.

Member Data Repository (MDR) Approach

Instead of serving the data request by running the queries against the payer's data sources, the query results are built from the MDR - a new member repository, pre-populated with the latest member data from internal and external data sources. MDR could be viewed as an authoritative source of complete member data including existing clinical, claims, and other relevant member data. In the dynamic data extraction model described above, the data is extracted and transformed to service the data request. Using the MDR approach, the data requests are serviced from the MDR where the member data is already extracted, transformed, curated, and stored.

Payers can meet the CMS Patient Access Rule compliance requirements by implementing any of these methods, but the Dynamic Query Response approach is a tactical solution and does not provide the foundation for a fully interoperable and connected health system. The standards-based healthcare data interoperability is here to stay, and the CMS Patient Access Rule compliance is the initial requirement primarily focused on patient data access. Soon, payers and providers will be expected to support several new regulations and while implementing solutions for these regulations, you may be required to revisit your current architecture and consider implementing an MDR based solution.

Implementing an MDR for the CMS Patient Access Rule compliance is more in line with the goals of improved interoperability and improved outcomes for payers' systems. The MDR approach has significant advantages over the Dynamic Query Response Approach and for minimal additional effort, provides much better ROI and strategic benefits such as:

Data Extraction

An MDR based solution comes with a wide variety of connectors that enable member data extraction using various protocols and data formats. These connectors are not tied to the dynamic external data requests, instead the connectors are designed to pre-populate the MDR on schedule or on demand. This feature is very powerful and can be leveraged to extract data from external or distributed data sources.

Interoperability & Compliance

To cost effectively support the current and upcoming interoperability regulations, your system must support a standards-based platform and high-quality computable member data. An MDR based solution provides an excellent foundation for developing compliant solutions for the upcoming regulations such as Payer to Payer Data Exchange API, Electronic Prior Authorization (ePA), Payer Coverage Decision Exchange (PCDE), Electronic Information Export, Trusted Exchange Framework and Common Agreement (TEFCA), and Advance Explanation of Benefits (AEOB).

Extensibility

With frequent expected changes in coverage, plans, members, and providers, you will need to make frequent changes to your data sources to ensure that accurate member data is available to the members on demand. It is much easier to add new data sources for an MDR as compared to the Dynamic Query Response approach. The data from the new or modified data sources is automatically populated into the MDR while your queries always point to MDR.

Payer System Performance Impacts

In the Dynamic Query Response approach, data request queries are serviced on-demand against your active system and without a smart caching system in place there is no built-in performance efficiency. In an MDR, the member data is extracted from the data sources once and on a configurable schedule which ensures minimal or no impact on the active system

Data Quality

As the data is extracted from the internal and external data sources, it is transformed, curated, linked, and de-duplicated prior to storing it in the MDR. These data quality processes, built in an MDR solution, ensures that the member data is ready for most efficient sharing on demand. Payers can use the high-quality data in the MDR for internal or external business process such as management of risk agreements with providers, management of risk adjustments, CMS MACRA/MIPS reporting requirements, and analytics to optimize revenues.

Application Development Platform

The high quality MDR with FHIR Server APIs, SMART on FHIR APIs, and Bulk FHIR APIs provides a new application development platform for payers which can be leveraged to develop innovative apps for internal business process improvement. For example, payers can develop and deploy a fully compliant Patient Portal using the platform or the platform can support any compliant 3rd-party Patient Portal.

InteropX (iX) MDR is the ultimate interoperability compliance solution for any payer system. It is architected to be implemented as a bolt-on to existing payer system either on-premises or in the cloud. iX MDR can be progressively integrated with various data sources and services of the payer system to ensure minimal integration effort required from the payer's IT team.

iX MDR fully covers the 5 ROI and strategic benefits outlined above:

MDR Key Features	iX MDR Support
Data Extraction	✓
Interoperability & Compliance	✓
Extensibility	✓
Payer System Performance Impacts	✓
Data Quality	✓
Application Development Platform	✓

Key Differentiators

InteropX MDR, a certified **CMS Patient Access Rule compliance** product, provides an innovative solution for payer systems to become fully interoperable and be ready for all upcoming regulatory requirements. Highlights of the key differentiators of InteropX solution from its competitors include:

iX Connectors enable data extraction from any data source including EHR systems to extract clinical data creating **consolidated patient charts** ready for reporting and analysis

iX MDR provides the latest and most comprehensive dataset for payers enabling Risk Adjustment workflows, Quality Reporting, and Cohort Analytics.

Dedicated team with a **Project Manager** and **solution integrators** to implement and deliver the solution to ensure seamless and successful integration with the payer's system

Ongoing support for future changes in the FHIR versions, USCDI changes, and other regulatory changes impacting the implemented solution
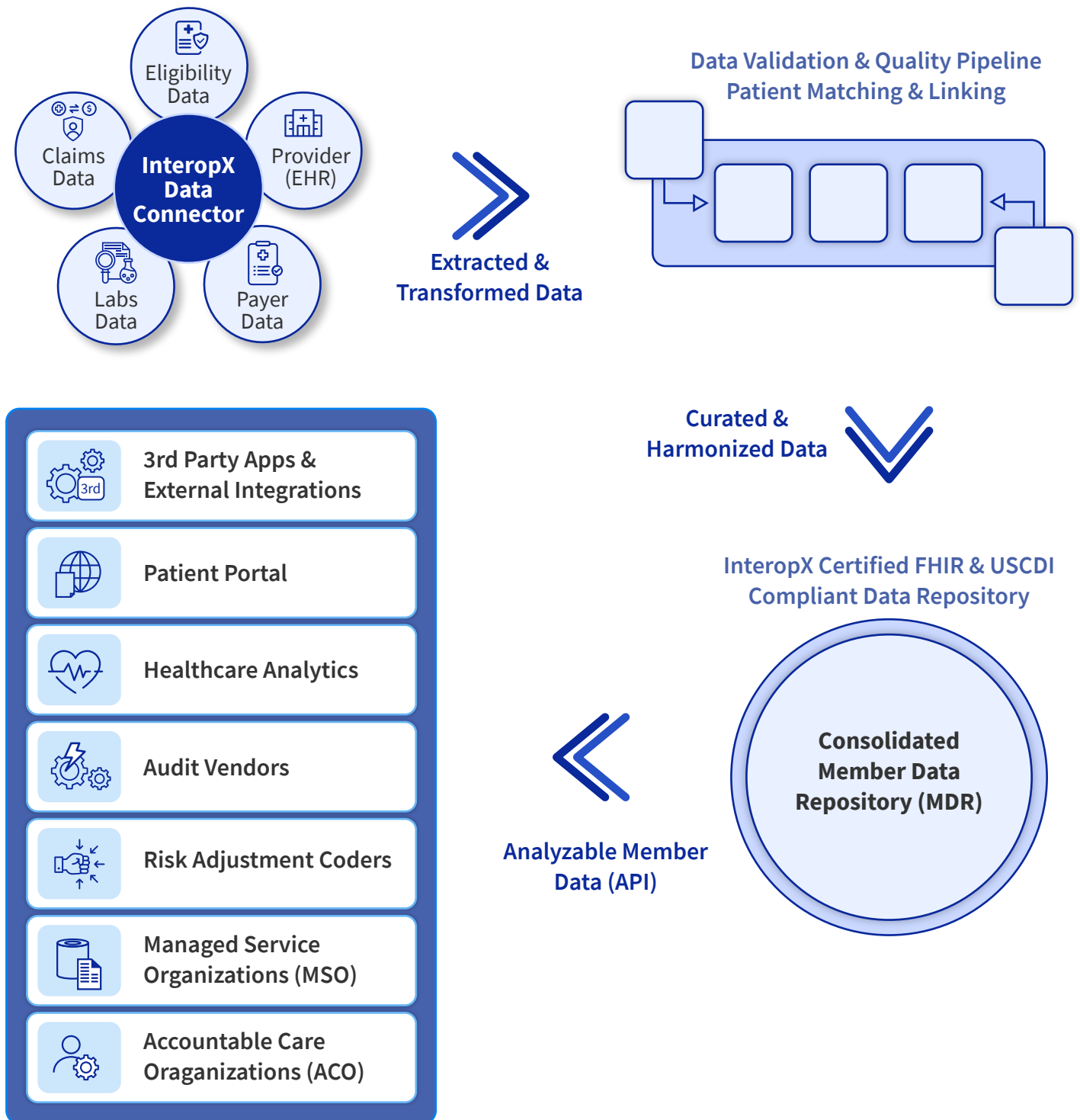
InteropX is the only solution in the market that has a complete packaged solution which includes the **iX Connectors** to extract patient data from provider systems

Highly **flexible** and **modular** InteropX architecture:

- **No impact** on existing payer system software
- All future **CMS** and **ONC** regulatory requirements can be added as new modules to the implemented solution

InteropX provides the most compelling business value in the industry – **efficient**, **cost effective**, and your best **ROI** outcome **without significantly impacting** your existing resources and business priorities.

MDR DATA FLOW

Eligibility Data

Claims Data

InteropX Data Connector

Provider (EHR)

Labs Data

Payer Data

Extracted & Transformed Data

Data Validation & Quality Pipeline
Patient Matching & Linking

Curated & Harmonized Data

InteropX Certified FHIR & USCDI Compliant Data Repository

Consolidated Member Data Repository (MDR)

Analyzable Member Data (API)

- 3rd Party Apps & External Integrations
- Patient Portal
- Healthcare Analytics
- Audit Vendors
- Risk Adjustment Coders
- Managed Service Organizations (MSO)
- Accountable Care Oraganizations (ACO)

GET IN TOUCH

Speak to us about getting started with our iX MDR solution or to request your demo

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