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# Connecting Communities Workgroup

Interoperability RFI Discussion

March 26, 2013

2:00 – 3:00 pm ET

# Reminder

*Please mute your line when not speaking*

*(* 6 to mute, *7 to unmute)*

# Reminder

*This call is being recorded*

# Agenda

- Welcome and introduction
- Roll call
- Overview of objectives
- Overview of Interoperability RFI
- Discussion
- Next Steps

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# PSC/Comment Letter Process

- eHI's Policy Steering Committee (PSC) responds to relevant federal policy changes

- In 2012, PSC & Connecting Communities collaborated to develop a response to the NwHIN RFI

- Comment letter due April 22

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# Overview of RFI

- ONC & CMS seek input on potential programmatic/policy changes to accelerate the adoption of HIE
  - Focus on underrepresented providers (long-term care, post-acute care, behavioral health, labs) and patients
- RFI presents a series of policy options and 9 questions for comment

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**Policy Options – Low rates of EHR adoption and HIE among post-acute and long-term care providers**

- Innovative healthcare delivery/payment models
- Pilot/demonstration projects
- Home/community-based services
- Cost allocations for developing HIE infrastructure
- Conditions of participation or coverage

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## Policy Options – Low rates of HIE across settings of care and providers

- Development of e-specified measures of care coordination

- Require/encourage Medicare Shared Savings Program ACOs to exchange info

- Test innovative payment/delivery models

- Test models for integrating care delivery for dual eligibles

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# Policy Options – Low rates of consumer/patient engagement

- New questions on the Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey
- Promote use of the Blue Button
- Test innovative payment/delivery models
- Modifications to CLIA/HIPAA to allow patients access to their lab results

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# Key Points from Preliminary PSC Discussion

- PSC met 3/20/13 to begin discussing RFI
  - Incentives for LT/PAC providers who have been left out of MU and other programs would be welcome
  - Policy should focus on achieving the goals of interoperability, care coordination, etc. w/o prescribing how to do so
  - More clarity is needed on exactly which mechanisms CMS will use to facilitate HIE

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# Discussion

- Questions to consider:
  - Are any of these policy options particularly well-suited to encouraging HIE/interoperability?
  - Are there other policy options CMS/ONC should consider?

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# Discussion – ONC Questions

- Question 1: What changes in payment policy would have the most impact on the electronic exchange of health information, particularly among those organizations that are market competitors?

- Question 2: Which of the following programs are having the greatest impact on encouraging electronic health information exchange: Hospital readmission payment adjustments, value-based purchasing, bundled payments, ACOs, Medicare Advantage, Medicare and Medicaid EHR Incentive Programs (Meaningful Use), or medical/health homes? Are there any aspects of the design or implementation of these programs that are limiting their potential impact on encouraging care coordination and quality improvement across settings of care and among organizations that are market competitors?

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# Discussion – ONC Questions

- Question 3: To what extent do current CMS payment policies encourage or impede electronic information exchange across health care provider organizations, particularly those that may be market competitors? Furthermore, what CMS and ONC programs and policies would specifically address the cultural and economic disincentives for HIE that result in "data lock-in" or restricting consumer and provider choice in services and providers? Are there specific ways in which providers and vendors could be encouraged to send, receive, and integrate health information from other treating providers outside of their practice or system?

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# Discussion – ONC Questions

- Question 4: What CMS and ONC policies and programs would most impact post-acute, long term care providers (institutional and HCBS) and behavioral health providers' (for example, mental health and substance use disorders) exchange of health information, including electronic HIE, with other treating providers? How should these programs and policies be developed and/or implemented to maximize the impact on care coordination and quality improvement?

- Question 5: How could CMS and states use existing authorities to better support electronic and interoperable HIE among Medicare and Medicaid providers, including post-acute, long-term care, and behavioral health providers?

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# Discussion – ONC Questions

- Question 6: How can CMS leverage regulatory requirements for acceptable quality in the operation of health care entities, such as conditions of participation for hospitals or requirements for SNFs, NFs, and home health to support and accelerate electronic, interoperable health information exchange? How could requirements for acceptable quality that involve health information exchange be phased in overtime? How might compliance with any such regulatory requirements be best assessed and enforced, especially since specialized HIT knowledge may be required to make such assessments?

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# Discussion – ONC Questions

- Question 7: How could the EHR Incentives Program advance provider directories that would support exchange of health information between Eligible Professionals participating in the program. For example, could the attestation process capture provider identifiers that could be accessed to enable exchange among participating EPs?

- Question 8: How can the new authorities under the Affordable Care Act for CMS test, evaluate, and scale innovative payment and service delivery models best accelerate standards- based electronic HIE across treating providers?

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# Discussion – ONC Questions

- Question 9: What CMS and ONC policies and programs would most impact patient access and use of their electronic health information in the management of their care and health? How should CMS and ONC develop, refine and/or implement policies and program to maximize beneficiary access to their health information and engagement in their care?

- What specific HHS policy changes would significantly increase standards based electronic exchange of laboratory results?

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# Next Steps

- PSC is holding weekly meetings to continue development of comments
  - If interested in participating, please contact [alex.kontur@ehealthinitiative.org](mailto:alex.kontur@ehealthinitiative.org)
  - Next meeting - TBD
- Next meeting of the Connecting Communities workgroup is April 23

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# Save the Date!

- Policy briefing on the hill – April 10 – Introduction to interoperability

- eHI Forum on Data & Analytics in Healthcare – August 1 & 2 – Gaylord National Resort Hotel and Convention Center
  - Register here

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# Thank you!