Survey Results: Readiness for the ONC and CMS Interoperability Rules
Agenda

I. Welcome & Introductions 1:00 – 1:05 pm
   Jennifer Covich Bordenick, Chief Executive Officer, eHealth Initiative & Foundation

II. Survey Overview 1:05 – 1:15 pm
   Jennifer Covich Bordenick, Chief Executive Officer, eHealth Initiative & Foundation

III. Panel Discussion 1:15 – 1:45 pm
   Henry Archibong, Associate Vice President, Innovation Solutions, Inovalon
   Fred Bentley, Managing Director, Policy, Avalere
   Andrew E. Van Ostrand, Principal, Avalere

IV. Audience Q&A 1:45 – 2:00 pm
Housekeeping

- All participants are muted
  - Use the Q&A box to ask a question related to the presentation
  - Use the chat box is for technical difficulties and other questions / comments

Presentation slides are in the eHI Resource Center
https://www.ehidc.org/resources
Our Work

eHI conducts research, education and advocacy around critical issues to support executives transforming healthcare.
Current Focus Areas

- Consumer Privacy
- Telehealth, Reimbursement & Information Sharing
- Analytics, Social Determinants of Health (SDOH) & Artificial Intelligence
- Use of Data & Innovation to Address COVID-19
Recent Forums & Webinars

COVID-19
- Rapidly Deployed Remote Monitoring for COVID-19
- COVI19 and Beyond: Telepsychiatry Best Practices and Regulatory Priorities
- Fitbit Talks About Population Health Initiative During COVID-19 Pandemic
- How the Pandemic Influences Consumer Health Behavior
- After the Curve Flattens: What’s Next for Healthcare and COVID-19

Telehealth & Policy
- Addressing Capacity and Cashflow with Virtual Care
- How to Grow Your Practice with Reimbursement Considerations
- Telehealth during COVID-19: New strategies on how physicians are addressing the outbreak

Privacy
- What's Ahead in 2020 for Consumer Privacy?
- HIPAA: What's Covered and What's Not Covered?
- Changes to Privacy Policies and Regulations in the Face of the Coronavirus Pandemic - eHI Privacy and Security Webinar Series
- Key Survey Findings from the State of Patient Matching in America
Reports

Recent Reports:
- Building a Modern Healthcare System: Recommendations from the COVID-19 Federal Policy Workgroup
- Supporting American Indian and Alaskan Native Communities During COVID-19

Upcoming Reports:
- Consumer Framework for Health Policy
- Applying eHI’s Guiding Principles for Ethical Use of SDOH Data During COVID-19: Examples from the Field
Thank you to our sponsor!
Survey Results: Readiness for CMS Interoperability & Patient Access and ONC Cures Act Final Rules
Agenda

- Highlights from methodology and demographics
- Breakdown Analysis – Payer/Provider/Vendor where appropriate
- Trends
- Questions about analysis
# IFC Delays in Compliance Deadlines

<table>
<thead>
<tr>
<th>Provision</th>
<th>Final Rule</th>
<th>Enforcement Discretion Announcement</th>
<th>Interim Final Rule w/ Comment Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information Blocking Overall Applicability Date</td>
<td>November 2, 2020</td>
<td>N/A - No Change</td>
<td>April 5, 2021</td>
</tr>
<tr>
<td>Condition of Certification (CoC) - Information Blocking</td>
<td>November 2, 2020</td>
<td>3 months after the compliance timeframe</td>
<td>April 5, 2021</td>
</tr>
<tr>
<td>CoC - API - Compliance for current API criteria</td>
<td>November 2, 2020</td>
<td>3 months after the compliance timeframe</td>
<td>April 5, 2021</td>
</tr>
<tr>
<td>CoC - API - Rollout of new standardized API functionality</td>
<td>May 2, 2022</td>
<td>3 months after the compliance timeframe</td>
<td>December 31, 2022</td>
</tr>
</tbody>
</table>
Highlights from Methodology

- Survey Period was from August 4, 2020 – September 3, 2020
- 189 respondents
  - 25% Providers
  - 9% Payers
  - 22% Vendors
- 45% were in Executive Management/Senior Leadership
Familiarity with CMS Interoperability and Patient Access Final Rule

**Overall – Industry Wide**
- 26% were at least somewhat familiar
- 53% were very or extremely familiar

**Payers**
- 21% were at least somewhat familiar
- 79% were very or extremely familiar

**Providers**
- 39% were at least somewhat familiar
- 28% very or extremely familiar

**Vendors**
- 17% were at least somewhat familiar
- 75% were very or extremely familiar
Readiness Impacted by COVID-19

Overall – Industry Wide
- 32% moderately impacted
- 46% a lot or a great deal impacted

Payers
- 36% moderately impacted
- 42% a lot or a great deal impacted

Providers
- 24% moderately impacted
- 57% a lot or a great deal impacted

Vendors
- 37% moderately impacted
- 37% a lot or a great deal impacted
Preparedness to Meet Requirement Deadlines

Overall – Industry Wide
- 47% somewhat prepared
- 29% very or extremely prepared

Payers
- 71% somewhat prepared
- 7% very prepared

Providers
- 57% somewhat prepared
- 8% very or extremely prepared

Vendors
- 31% somewhat prepared
- 51% very or extremely prepared
Desire for Compliance Deadline to be Extended

Overall – Industry Wide
- 72% probably would or definitely would

Payers
- 86% probably would or definitely would

Providers
- 89% probably would or definitely would

Vendors
- 58% probably would or definitely would
## Areas Most Concerned About

<table>
<thead>
<tr>
<th>Area</th>
<th>Industry Wide</th>
<th>Providers</th>
<th>Payers</th>
<th>Vendors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementing and Maintaining Patient APIs</td>
<td>43%</td>
<td>41%</td>
<td>64%</td>
<td>43%</td>
</tr>
<tr>
<td>Complying with Information Blocking and Public Reporting</td>
<td>16%</td>
<td>11%</td>
<td>7%</td>
<td>11%</td>
</tr>
<tr>
<td>ADT Event Notifications Part of Conditions of Participation (CoP)</td>
<td>15%</td>
<td>24%</td>
<td>0%</td>
<td>17%</td>
</tr>
<tr>
<td>Payer to Payer Data Exchange</td>
<td>11%</td>
<td>17%</td>
<td>14%</td>
<td>9%</td>
</tr>
<tr>
<td>Provider Directory API</td>
<td>6%</td>
<td>2%</td>
<td>7%</td>
<td>6%</td>
</tr>
</tbody>
</table>
Areas Most Concerned About: Industry Wide

- Implementing and Maintaining Patient Access API: 43%
- Complying with Information Blocking and Public Reporting: 16%
- Admission, Discharge and Transfer: 15%
- Payer to Payer Data Exchange: 11%
- Other: 7%
- Provider Directory API: 6%
Areas Most Concerned About: Payers

- Implementing and Maintaining Patient Access API: 64%
- Complying with Information Blocking and Public Reporting: 14%
- Provider Directory API: 7%
- ADTs: 7%
- Payer to Payer Data Exchange: 7%
- Other (please specify)
Areas Most Concerned About: Providers

- Implementing and Maintaining Public Access API: 41%
- Admission, Discharge and Transfer: 24%
- Payer to Payer Data Exchange: 17%
- Complying with Information Blocking and Public Reporting: 11%
- Other: 4%
- Provider Directory API: 2%
Areas Most Concerned About: Vendors

- Implementing and Maintaining Patient Access API: 43%
- Admission, Discharge and Transfer: 17%
- Other: 14%
- Complying with Information Blocking and Public Reporting: 11%
- Payer to Payer Data Exchange: 9%
- Provider Directory API: 6%
## Issues Most Impactful on Readiness

<table>
<thead>
<tr>
<th>Issue</th>
<th>Industry Wide</th>
<th>Providers</th>
<th>Payers</th>
<th>Vendors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of prioritization (too many competing priorities)</td>
<td>44%</td>
<td>46%</td>
<td>43%</td>
<td>34%</td>
</tr>
<tr>
<td>Not enough time for implementation</td>
<td>41%</td>
<td>43%</td>
<td>64%</td>
<td>26%</td>
</tr>
<tr>
<td>Focus on COVID-19</td>
<td>40%</td>
<td>43%</td>
<td>29%</td>
<td>31%</td>
</tr>
<tr>
<td>Lack of staff</td>
<td>36%</td>
<td>48%</td>
<td>21%</td>
<td>26%</td>
</tr>
<tr>
<td>Knowledge of the requirements</td>
<td>33%</td>
<td>46%</td>
<td>29%</td>
<td>26%</td>
</tr>
<tr>
<td>Lack of funding</td>
<td>33%</td>
<td>37%</td>
<td>29%</td>
<td>11%</td>
</tr>
<tr>
<td>Lack of specific technical guidelines from ONC</td>
<td>28%</td>
<td>35%</td>
<td>43%</td>
<td>26%</td>
</tr>
<tr>
<td>Lack of expertise</td>
<td>25%</td>
<td>30%</td>
<td>36%</td>
<td>14%</td>
</tr>
<tr>
<td>Lack of data governance protocols/procedures</td>
<td>23%</td>
<td>20%</td>
<td>29%</td>
<td>29%</td>
</tr>
<tr>
<td>Regulations are unclear</td>
<td>21%</td>
<td>24%</td>
<td>50%</td>
<td>17%</td>
</tr>
<tr>
<td>Lack of technology</td>
<td>15%</td>
<td>24%</td>
<td>21%</td>
<td>6%</td>
</tr>
<tr>
<td>Lack of training</td>
<td>18%</td>
<td>28%</td>
<td>21%</td>
<td>9%</td>
</tr>
</tbody>
</table>
Biggest Data Sharing Challenges Between Payers & Providers

- Lack of Data Standardization: 47%
- Lack of Technical Interoperability: 44%
- Quality of Data that is Shared: 44%
- Lack of Trust Between Payers and Providers: 33%
- Timeliness of Data that is Shared: 30%
- Key information such as prior authorization, requirements, benefits, eligibility not available: 29%
- Proprietary Information Issues about Sharing Data: 28%
- Measure Standardization: 23%
- Other: 9%
Biggest Data Sharing Challenges Between Payers & Providers

**Payers**
- Key Information: 7%
- Lack of Data Standardization: 14%
- Lack of Technical Interoperability: 14%
- Lack of Trust Between Payers and Providers: 29%
- Measure Standardization: 50%
- Proprietary Issues About Sharing Data: 43%
- Quality of Data that is Shared: 50%
- Timeliness of Data that is Shared: 50%
- Other: 7%

**Providers**
- Key Information: 35%
- Lack of Data Standardization: 43%
- Lack of Technical Interoperability: 54%
- Lack of Trust Between Payers and Providers: 28%
- Measure Standardization: 33%
- Proprietary Issues About Sharing Data: 37%
- Quality of Data that is Shared: 52%
- Timeliness of Data that is Shared: 52%
- Other: 7%
Expertise in FHIR®-based healthcare data exchange models

Overall – Industry Wide
- 44% have a moderate, a lot, or a great deal of expertise

Payers
- 36% a lot or a great deal of expertise. No moderate response

Providers
- 18% moderate, a lot, or a great deal of expertise

Vendors
- 74% moderate, a lot, or a great deal of expertise
Top 3 Interoperability Initiatives Underway

Industry Wide:
1. HL7 FHIR (45%)
2. Secure Messaging (42%)
3. CCDA (42%)

Payers:
1. CCDA (64%)
2. HL7 FHIR (43%)
3. Secure Messaging (36%)

Providers
1. Secure Messaging (59%)
2. Direct Messaging (46%)
3. HL7 FHIR (33%)

Vendors
1. HL7 FHIR (75%)
2. Secure Messaging (67%)
3. Direct Messaging (63%)
Would you consider using vendor solutions and staff to help meet the requirement deadlines?

Payers
- 79% probably would or definitely would

Providers
- 69% probably would or definitely would
Top 3 Qualities in Selecting a Vendor

Payers
- Cost
- HL7 FHIR knowledge
- Security

Providers
- Cost
- Knowledge vendor has about my systems
- Ability of vendor to get up to speed quickly
Major Challenges Associated with Patient Access APIs

Overall – Industry Wide
- Managing multiple APIs connected to different systems

Payers
- Tie: Lack of data standards in the industry AND Transforming data into a readable & digestible format

Providers
- Managing multiple APIs connected to different systems

Vendors
- Managing multiple APIs connected to different systems
Would you consider utilizing a vendor company to assist in making adjustments within your organization?

Overall – Industry Wide
- 60% yes

Payers
- 57% yes

Providers
- 65% yes
Industry-wide Trends

1. Across the board, lack of prioritization was a key concern about readiness
2. Cost was concern for all
Payer & Provider Trends

1. **Patient Access API:** Both payers and providers are most concerned with implementing and maintaining Patient Access APIs.

2. **Cost related to vendors:** Both payers and providers are most concerned with cost in choosing a vendor.

3. **Plan to use vendors:** Both payers and providers plan to use vendors to assist with adjustments.

4. **Deadlines:** Payers are more willing to utilize vendor solutions and staff to help them meet requirement deadlines than providers.
Vendor Trends

1. **Ready to go!** No need for extension

2. **Most familiar** with Final Rules in comparison to other groups
Our Panelists

Henry Archibong
Associate Vice President, Innovation Solutions, Inovalon

Fred Bentley
Managing Director, Policy, Avalere

Andrew E. Van Ostrand
Principal, Avalere
Inovalon is a leading provider of cloud-based platforms empowering data-driven healthcare.

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Questions?