CMS Final Rule 0057F Interoperability & Prior Authorization

Challenges and Opportunities

Kendra Obrist
Point-Of-Care Partners

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CMS-0057-F
Interoperability and Prior Authorization Rule Discussion Topics

- Core Elements of the Rule
- Challenges and Opportunities
- Related Industry Activity

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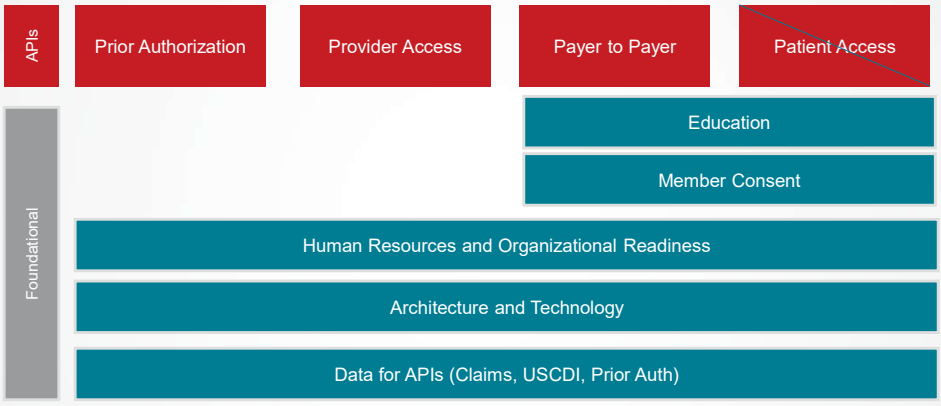
Core Elements of CMS-0057-F



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Foundational: Data for APIs

Challenges	Opportunities
• Understanding the current inventory of data assets • Developing a policy regarding what data must be shared – Access to the data – Control over the data – Authority to make the data available • Managing member health data – Metadata management, de-duplication, normalization, master data management • Timeliness of prior authorization transactional data	• Create a member health data asset for broad use throughout the enterprise

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Slide 3

KO1 [@Amy Johnson] help! Looking to tag Amy Moncelsi to help me with this slide and cannot seem to find her?
Kendra Obrist, 2025-08-13T18:50:09.147

1 0 [@Kathy Moncelsi] - hee hee. please see Kendra's note. [@Kendra Obrist]
Amy Johnson, 2025-08-13T19:13:34.636

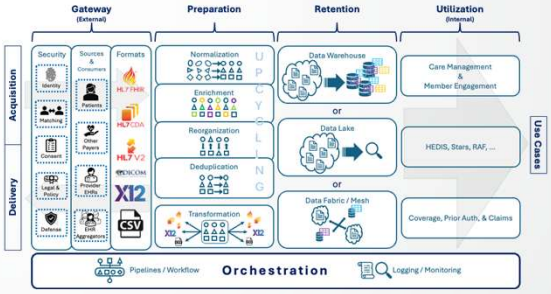
Foundational: Architecture and Technology

Challenges

- Establishing a flexible architectural platform for interoperability
- Making key architectural decisions
  - Centralized vs. distributed
  - Core data model – materialized FHIR vs FHIR façade
- Making build vs buy decisions
- Choosing and managing vendor(s)
- Managing connectivity at scale

Opportunities

- Develop an architectural platform that will support interoperability needs into the future
- Create growth opportunities for technical staff



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Foundational: Human Resources and Organizational Readiness

Challenges

- Lack of skilled and available resources to manage program complexity
- Ownership and governance of member health data assets
- Scarcity of clinical data resources
- Funding for strategic value above base compliance
- Establishing and managing contractual agreements with providers and payers

Opportunities

- Begin to consider member health data a valuable enterprise asset

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Foundational: Member Consent

Challenges	Opportunities
• Establishing consent and preference management policy, governance and accountability amongst privacy, legal, clinical and IT • Integration of member opt in and opt out with enterprise consent architecture • Establishing level of granularity for consent • Managing the intersection with state and federal privacy regulation • Integration with action triggers as consent is granted/revoked	• Create an enterprise level consent and preference management platform

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Prior Authorization

Challenges	Opportunities
• Codifying medical policy and clinical guidelines for use in DTR • Working with delegated entities – Obtain prior authorization transactional data in a timely manner to share with APIs – Routing and orchestration for CRD, DTR and PAS • Developing a strategy for managing and sharing related structured and unstructured clinical information • Implementation unknowns such as – Using clinical vs billing codes – Place of service • Approach and availability of workflow apps for provider use by EHR and other vendors	• Simplify prior authorization policies • Capitalize on a real return on investment with automation

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Provider Access API

Challenges	Opportunities
• Defining and maintaining treatment relationships • Unknowns around provider acceptance and workflows • Establishing and managing provider authentication and connectivity	• Improve patient care by providing expanded information about care received from other providers

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Payer to Payer API

Challenges	Opportunities
• Obtaining and managing member consent and previous payer identification • Establishing and managing payer connectivity • Developing and managing triggered and automated actions based on consent and/or concurrent payers • Member matching	• Making use of historical member health data for care planning, quality programs and risk adjustment

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Related Industry Activity

Government and Regulatory

- HTI-4 – certification criteria
  - Alignment with Da Vinci Burden Reduction IGs
  - Workflow triggers and subscriptions
- CMS Interoperability Framework and Aligned Networks

Industry

- Massachusetts Health Data Consortium
- Washington State Prior Authorization Workgroups
- Payer Prior Authorization Pledge
- Sequoia Group Interoperability Matters Workgroups

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Thank You

Kendra Obrist
kendra.obrist@pocp.com
954-882-5261

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www.pocp.com

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