

Effective Date: March 1, 2024	Policy Title: CMS Interoperability Patient Access Application Programming Interface (API)
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<input type="checkbox"/> MHP <input type="checkbox"/> DMC-ODS <input type="checkbox"/> DMC State Plan	Reference to BHIN No.: 23-032

PURPOSE

The purpose of this policy is to establish guidelines and procedures to ensure compliance with the Centers for Medicare and Medicaid Services (CMS) Interoperability Patient Access Application Programming Interface (API). This policy and procedure aims to facilitate seamless data exchange, enhance patient access to health information, and promote interoperability among healthcare systems.

BACKGROUND

In response to the evolving healthcare landscape and the imperative to enhance patient engagement and data accessibility, Ventura County Behavioral Health is committed to adopting the Centers for Medicare & Medicaid Services (CMS) Interoperability Patient Access Application Programming Interface (API). This policy and procedure framework underscores our dedication to upholding the highest standards of data privacy, security, and interoperability as we integrate the CMS Interoperability Patient Access API into our health information technology (IT) infrastructure. By empowering individuals with secure and standardized access to their health information across disparate systems, our organization seeks to contribute to improved patient outcomes, streamlined care coordination, and a more connected and efficient healthcare environment. This comprehensive approach reflects our commitment to quality, patient-centered care and positions us at the forefront of technological advancements in healthcare delivery.

To assist Ventura County Behavioral Health with meeting the requirements for CMS patient access, Ventura County Behavioral Health has partnered with the California Mental Health Services Authority (CalMHSA) to implement CalMHSA Connex. CalMHSA Connex is a specialized platform designed to facilitate the seamless and secure sharing of behavioral health information among diverse healthcare entities as well as facilitate patient access to their data. This exchange is tailored to the unique needs of mental health and substance use disorder treatment providers, enabling the confidential transmission of patient records, treatment plans, and outcomes across the behavioral health spectrum. Emphasizing privacy and consent management, CalMHSA Connex ensures that sensitive information is shared only with authorized individuals, fostering collaborative and comprehensive care. CalMHSA Connex aims to play a pivotal role in breaking down silos, enhancing care coordination, and promoting a holistic approach to patient well-being by providing clinicians with timely and comprehensive

insights into a patient's health history, ultimately contributing to more informed decision-making and improved outcomes in the realm of mental health and substance use treatment.

POLICY

I. Compliance with CMS Interoperability Patient Access API:

- a. Patient Access API shall be facilitated through the county's subscription to CalMHSA Connex. The CalMHSA Connex provided Patient Access API is designed and implemented to comply with the [CMS Interoperability Patient Access API specifications](#).
- b. CalMHSA Connex provides technology that client/patient data is made available through the API in a standardized and secure format, adhering to [CMS Interoperability Patient Access API specifications](#).
- c. CalMHSA Connex implements a robust authentication and authorization mechanism in alignment with [OpenID Connect Core 1.0](#) to verify the identity of individuals accessing client/patient information through the API.
- d. Information provided through the Patient Access API via CalMHSA Connex will, at a minimum, adhere to the [United States Core Data for Interoperability \(USCDI\) version 1.0.0 and Version 3.0.0](#).
- e. The data Ventura County Behavioral Health maintains is available within 1 business day of receipt or within 1 business day after a claim is adjudicated or encounter data is received for dates of service on or after January 1, 2016. Legacy data from January 1, 2016 persists within the county's data storage mechanism and is readily available via the Patient Access API. Additionally, the county's role as a health care provider also makes data accessible in near real-time via their EHR system and not dependent on claims status.

II. Privacy and Security:

- a. CalMHSA Connex will safeguard client/patient data exchanged through the API by ensuring compliance with [CMS Interoperability Patient Access API specifications](#).
- b. CalMHSA Connex will adhere to HIPAA regulations and other relevant privacy laws when handling and transmitting protected health information (PHI).
- c. Clients/patients are responsible for proper vetting and selection of third-party applications. Ventura County Behavioral Health nor CalMHSA is responsible, nor makes any claims towards the appropriate and authorized use of data of client's/patient's selected 3rd party application once API is active.
- d. Steps that clients/patients may consider taking to help protect the privacy and security of their health information and the importance of understanding the security and privacy practices of any application to which they entrust their

health information can be found in the Ventura County Behavioral Health Beneficiary Handbooks.

- e. An overview of which types of organizations or individuals are not likely to be HIPAA-covered entities, the oversight responsibilities of the Office for Civil Rights (OCR) and the Federal Trade Commission (FTC), and how to submit a complaint to OCR and FTC can also be found in the Ventura County Behavioral Health Beneficiary Handbooks.

PROCEDURE

I. API Accessibility:

- a. CalMHSA Connex will make available a Ventura County Behavioral Health-specific API for the purposes of connecting through qualified third-party applications.
- b. Clients/patients are free to select a qualified application of their choosing to facilitate the retrieval of their data.
- c. Said third party applications must adhere to specifications and guidelines of the [CMS Interoperability Patient Access API specifications](#).
- d. Third party application providers may reach out to CalMHSA Connex system administrators at FHIRAPI@calmhsa.org to establish client/patient authorized access to the given client's/patient's data for the exclusive purpose of client/patient access.
- e. API and general information for CalMHSA Connex can be found on CalMHSA's website, www.calmhsa.org, under Health IT\Interoperability.

II. Authentication, Authorization, and Security:

- a. Align with required authentication and authorization mechanisms as indicated by the [CMS Interoperability Patient Access API specifications](#).
- b. CalMHSA Connex will implement encryption protocols to secure client/patient data transmitted through the API.
- c. CalMHSA Connex will establish access controls and monitor API usage to detect and respond to any suspicious activities promptly.

III. Client/Patient Support:

- a. Clients/patients of Ventura County Behavioral Health shall be referred to the respective support of their chosen third-party application for assistance. Third party application vendors can then reach out to CalMHSA Connex system administrators at FHIRAPI@calmhsa.org to troubleshoot any potential issues with the patient access API.

IV. Ventura County Behavioral Health Support:

- a. Ventura County Behavioral Health end-users may reach out to CalMHSA with any questions or issues at connex@calmhsa.org. In relation to the CMS Patient Access API, clients/patients should NOT be referred to CalMHSA under any circumstance. Please see section “III. Client/Patient Support” above for additional information.

V. Regular Audits and Monitoring:

- a. CalMHSA Connex system administrators conduct regular audits of the CMS Interoperability Patient Access API to assess compliance and identify areas for improvement.
- b. CalMHSA Connex system administrators will monitor API usage and performance to ensure seamless access for clients/patients and troubleshoot any issues promptly.
- c. County requests for utilization data will be provided with within 7 business days of request.

DEFINITIONS

Authentication: The process of verifying the identity of an individual or system to ensure that access to client/patient information is granted only to authorized entities.

Authorization: Permission granted to individuals or systems to access specific client/patient information based on defined roles and responsibilities.

CalMHSA Connex: A health information exchange operated by CalMHSA catering to the interoperability needs of county behavioral health. CalMHSA Connex acts as an intermediary to facilitate data exchange between disparate parties utilizing industry accepted protocols and standards.

Client/Patient: For the purposes of this document, the term “client/patient” is used interchangeably with “patient” and refers to an individual receiving medical or professional services as outlined herein.

CMS Interoperability Patient Access API: Refers to the application programming interface developed by the Centers for Medicare & Medicaid Services (CMS) to enable secure and standardized access to client/patient health information, as per CMS guidelines.

Health Information Exchange (HIE): The electronic sharing of health-related information among healthcare organizations, ensuring that patient data is accessible across different systems while maintaining privacy and security.

Interoperability: The ability of different health IT systems to exchange and use client/patient information seamlessly, ensuring data consistency and accuracy across various platforms.

Protected Health Information (PHI): Identifiable health information that is subject to privacy regulations, as defined by the Health Insurance Portability and Accountability Act (HIPAA).

FORMS/ATTACHMENTS

Ventura County Behavioral Health Beneficiary Handbooks (SMHS & DMC-ODS) - <https://www.vcbh.org/resources/client>

REVISION HISTORY

Date	Revision	Page Number(s)