



## The Automation Advisory Group (TAAG) Kick-off Meeting

#### **NEHI & MHDC**

May 10, 2022 1:00-3:00 pm (EST)











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Executive Director & CEO

Massachusetts Health Data Consortium

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**Executive Director** 

New England Healthcare Exchange Network Inc

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President & CEO

Network for Excellence in Health Innovation

### Project overview



#### Goal

To make recommendations that result in the adoption of automated prior authorization among payers and providers in Massachusetts in the next two years

#### Phase 1: Formulation of Elements of End-End Automation

#### **Phase 2: Stakeholder Assessment**

- Incorporate MHDC implementation prototype findings
- Interview stakeholders (20-25 interviews)
  - Technology service providers / vendors
  - Payers & providers
  - Personnel involved in proposing legislative & regulatory processes

#### **Phase 3: Policy Recommendations**

Will cover necessary incentives, including financial & technical assistance, rewards, & mandates

#### **Phase 4: Dissemination**

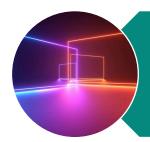
MHDC & NEHI joint public webinar

### Meeting goals





Understand your role as it relates to achieving the project goal



Arrive at a shared & basic knowledge of the components of end-end automation



Propose interviewees & topics to assess MA provider & payer capabilities



### Agenda



**Project Background & Overview** (15 min)

**TAAG Overview & Questions** (5 min)

**Keynote Speaker: John Glaser** (20 min)

**Q&A Following John's Presentation** (15 min)

Break (5 min)

**Presentation & Discussion of Automation Key Components** (45 min)

Next Steps (15 min)







### Housekeeping



- We are recording the meeting to ensure we capture the essential elements of the discussion
- We will delete the recording after our final report is completed

# PROJECT BACKGROUND & OVERVIEW



## What do we mean by the "automation" of prior authorization?



- Adoption of an end-end PA request (i.e., request → response)
  completed electronically that uses a defined set of data exchange
  standards and technologies by the entire community
  - Process exhibits little or no need for human intervention
  - Some refer to this process as "electronic PA"

- Automating the process not simply digitizing it
  - E.g., we are NOT referring to web portals or interactive voice response



### Why is automation important?



- Reduces burden
  - Approx. 16 min saved per transaction
- Saves \$\$
  - Est. 5-10% reduction in PA spending for providers & payers\*
- Impacts other functions
  - Paves the way for automation of other healthcare processes
- Improves patient care

Average Cost and Savings Opportunity per Transaction by Mode, Medical, 2021 CAQH Index							
Transaction	Mode	Plan Cost	Provider Cost	Industry Cost	Plan Cost Savings Opportunity	Provider Cost Savings Opportunity	Industry Cost Savings Opportunity
Eligibility and Benefit Verification	Manual	\$ 4.55	\$ 11.52	\$ 16.07	\$ 4.52	\$ 10.57	\$ 15.09
	Partial	\$ 0.03	\$ 3.62	\$ 3.65	\$ 0.00	\$ 2.67	\$ 2.67
	Electronic	\$ 0.03	\$ 0.95	\$ 0.98			
Prior Authorization	Manual	\$ 3.54	\$ 10.95	\$ 14.49	\$ 3.47	\$ 7.52	\$ 10.99
	Partial	\$ 0.07	\$ 9.93	\$ 10.00	\$ 0.00	\$ 6.50	\$ 6.50
	Electronic	\$ 0.07	\$ 3.43	\$ 3.50			

Source: CAQH Index (2021). "Working Together: Advances in Automation During Unprecedented Times"



### NEHI's previous project: Streamlining Prior Authorization

#### Issues

- Frequency with which PA is applied
- Variation among payers in services/pharmaceuticals subject to PA
- Variation in PA criteria
- Variation in documentation required by plans to satisfy medical necessity

#### **Identified Solutions**

 "Create incentives for full automation of PA" received full consensus











#### Huge 'Thank You!' to our project sponsors:















### TAAG OVERVIEW AND QUESTIONS



#### TAAG role



- Comment on and validate a recommended roadmap for end-to-end automation. The roadmap will specify the essential prior authorization functions, corresponding workflow, and associated technical requirements.
- Consider and discuss MHDC's pilot implementation prototype findings.
- Provide guidance to NEHI and MHDC for completing an assessment of MA providers and payers' capabilities and readiness to adopt automation pursuant to the roadmap.
- Assist NEHI and MHDC in prioritizing issues for resolution and discuss recommendations for addressing these.
- Vet final recommendations that include both requirements and incentives to achieve adoption of automation within a two-year period.
- Discuss the dissemination of the final report and strategies for influencing the adoption of the recommendations made therein.

### **TAAG** members



Organization	Representative
BCBSMA	Lee Green & Mike Katzman
Berkshire Health Systems	Bill Young & Lucas Markland
BMC HealthNet	Kim Sinclair
Boston Children's Primary Care Alliance	Dr. Jen Hyde
Change Healthcare	Andrew Johnson
CMS	Alex Mugge
Cohere	Niall O'Connor
Community Care Cooperative	Bill Fleischmann
Counterpoint Solutions	Sandy Vance
EOHHS	Lauren Peters
Epic	Heath Hanwick & Graham Pedersen
Fallon	Dr. Mark Dichter
Health New England	Casey Hossa

### TAAG members continued



Organization	Representative
Health Policy Commission	Kara Vidal & Gina Dello Russo
Hook	Lorenzo Granato
MassHealth	Dr. Jatin Dave
Meditech	Mike Cordeiro
MGB	Laurie Finigan & Tasha Hogeboom
Mt Auburn Cambridge IPA	Dr. Barbara Spivak
New England Quality Care Alliance	Dr. Alain Chaoui
ONC	Beth Myers
Point32Health	Nicole Waickman & Vijay Bhatt
Reliant Medical Group	Mike Hebert
Self	Dr. John Glaser
Steward	David Colarusso
ZeOmega	Tony Sheng

### TAAG meeting community agreements



- Turn your video on whenever you can
- Treat each meeting as a discussion, not a presentation. All parts of the meeting will contain substance so plan to participate in the full meeting
- Recognize that everyone has an important role

  - Acknowledge & appreciate experiences
    Respect stakeholder diversity in the "room"
- Meetings have tight schedules. Please try to make your points clearly and succinctly if possible.
- "Active listening" is the preferred practice to ensure we are hearing each other and getting our points across
- Do not circulate project and stakeholder information other than for purposes of the project
- The project is intended to help NEHI and MHDC as well as to help each of your organizations. You will develop insights and relationships here, but please refrain from marketing.
- Please ask open and honest questions throughout. NEHI and MHDC are extremely grateful for your participation.

### Expected outline of TAAG meetings going forward



**Phase 1**. Investigation of Elements of End-End Automation (May – July 2022)

- We are here!
  - Project Deliverable:
     Presentation Tool
     Describing End-End
     Automation

Phase 2: Stakeholder Assessment (Aug - Nov 2022)

- TAAG Meeting #2 (expected early Sept 2022; virtual)
  - Compile stakeholder assessment findings
  - Develop priority action steps
  - Reach consensus on existing capabilities
     & gaps
  - Project Deliverable: Interim Report

Phase 3: Policy Recommendations (Dec 2022 – Feb 2023)

- TAAG Meeting #3 (expected early Feb 2023)
- Develop policy & operational recommendations
- Outline matching incentives & mandates
- Possible coalition: Action steps
- Project Deliverable:
   Policy & Operational
   Recommendations

**Phase 4**: Dissemination (March – June 2023)

- TAAG Meeting #4 (expected May 2023; in-person)
- Comment on final report
- Identify commitments for further action & dissemination
- Project Deliverable:
   Disseminate findings
   via webinar, etc.



# Welcome to our keynote speaker:

John Glaser, PhD





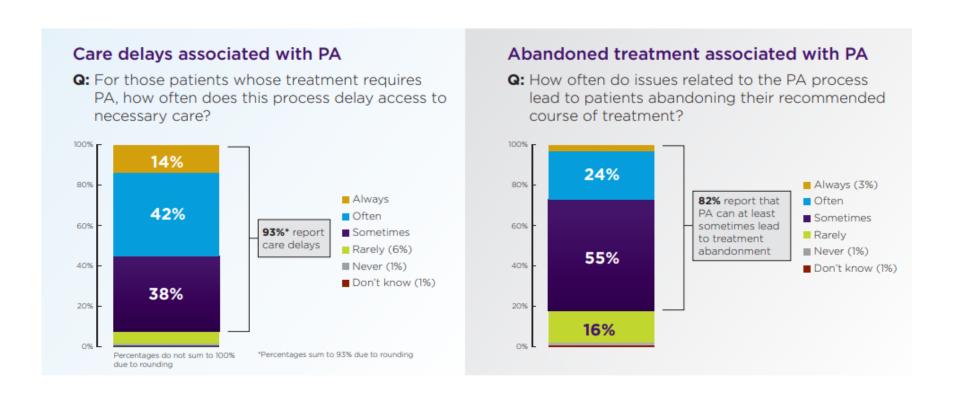


John Glaser, PhD

Executive-in-Residence, Harvard Medical School

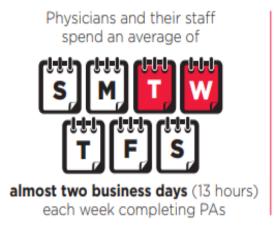
May 10, 2022

# Patient care impact of current prior authorization processes



# Physician practice impact of current prior authorization processes







88%
of physicians describe the burden associated with PA as high or extremely high

# Improving prior authorization processes is complicated

- Multiple organizations
- Multiple electronic health records
- Multiple health plan systems
- Variations in prior authorization operations across plans
- Collaborative approaches are often challenging to manage

# But there are tail winds that help address the challenge

- 21<sup>st</sup> Century Cures regulations advance interoperability
  - Discourages information blocking
  - Implements TEFCA
  - Requires FHIR-based APIs
- CMS has targeted the digital transformation of prior authorization as high priority

# But there are tail winds that help address the challenge

- The FHIR API standards are gaining significant industry support
  - The HL7 DaVinci FHIR project is focused on interactions between health care providers and health plans: prior authorization, confirming a patient's health insurance coverage, and accessing information about the price of care
  - Over 500 organizations are supporting the advancement of FHIR
  - A 2019 survey showed that 84% of hospitals and 61% of clinicians have adopted and implemented certified API technology enabled with FHIR

## But there are tail winds that help address the challenge

- Significant business value from FHIR APIs is being realized
  - One payer saw its average prior authorization approval time reduced from 20 minutes to 20 seconds
  - The Mayo Clinic has found that two orders of magnitude improvement in the efficiency of developing interfaces

# Why was NEHEN successful?

#### FOCUS: RETURN ON INVESTMENT

# THE NEW ENGLAND HEALTHCARE EDI NETWORK

#### ABSTRACT

The New England Healthcare EDI Network (NEHEN) is a collaborative of providers and payers in eastern Massachusetts that created, manages, and operates a shared insurance EDI infrastructure. NEHEN currently has 12 provider and three payer members, and supports over 1,000,000 insurance EDI transactions per month. This paper describes the philosophies that define the NEHEN business model and discusses its governance structure, technology, operational issues associated with its implementation, and its current status, along with lessons learned from the NEHEN undertaking.

JOHN P. GLASER, PHD, GREG DEBOR, AND LAURANCE STUNTZ

### NEHEN Success Factors

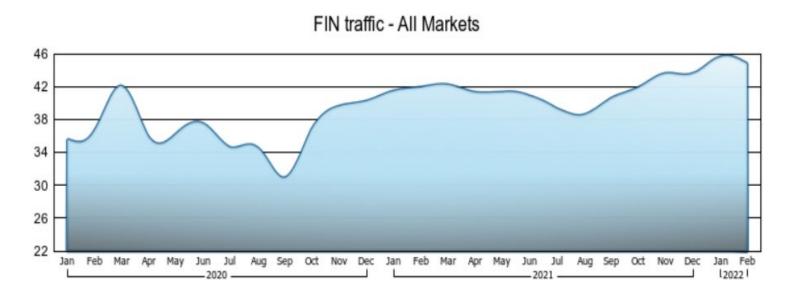
- The transaction standards had been defined and HIPAA had set a timetable for their implementation
- Key stakeholders led the effort
- The stakeholders trusted and knew each other; relationships had been formed at the MHDC CIO Forum
- It was clear what was in it for the participants; there was real business value
- For each stakeholder to get their gain, they needed the others to get their gain

### NEHEN Success Factors

- The more organizations who realized their gain, the more gain each individual organization realized
- Organizations were not going to compete on these transactions
- CSC brought significant resources and talent to the undertaking
- The initiative was thoughtfully assessed, piloted and scaled

### SWIFT — a collaboration between banks to support intra-bank funds transfers

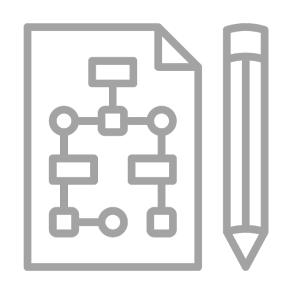




Millions of transactions between banks world-wide

### Lessons learned from banking

- Targeted interoperability can address a broad range of needs
- Interoperability will only be successful when it makes business sense for the participants
- Interoperability must be driven by collaborative efforts



## Open Travel Alliance has evolved from its initial focus on supporting electronic airline tickets



Alaska Airlines

**American Airlines** 

Delta Air Lines

**United Airlines** 

Hilton Hotels

**Hyatt Corporation** 

Marriott International

Swissotel

Alamo

Avis

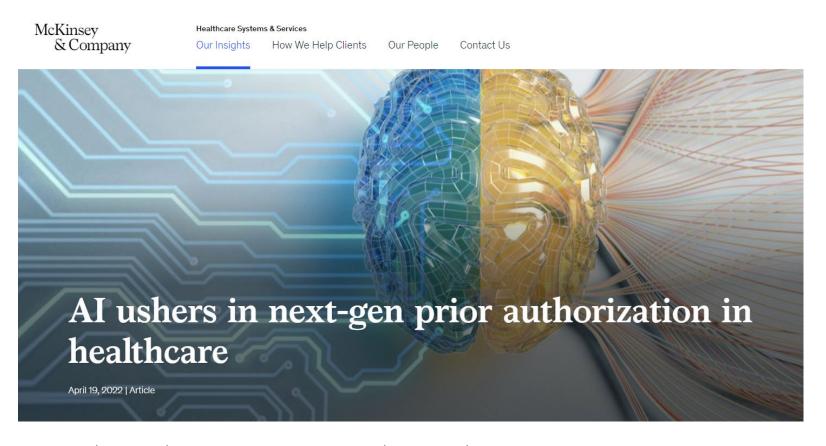
Budget

Hertz

National Car

- Flight schedule and fare search and booking
- Hotel booking including special requests
- Car rental booking
- Reviews and ratings
- Tours, attractions, and experiences
- Public transportation
- Railroad booking
- Cruise booking
- Travel insurance
- Golf course reservations

### A digital prior authorization infrastructure can provide the foundation to take further steps



# Alone we can do so little. Together we can do so much.

**HELEN KELLER** 



### BREAK



01

Provider decides on an order/ treatment/etc.

03

Payer gathers information for the prior authorization request from the Provider's EHR

05

Payer/Intermediary processes request & Payer sends decision





02

Prior authorization & coverage requirements shared between Payer & Provider



Provider verifies & submits request



06

(Possible) Payer requests additional info/documents from Provider

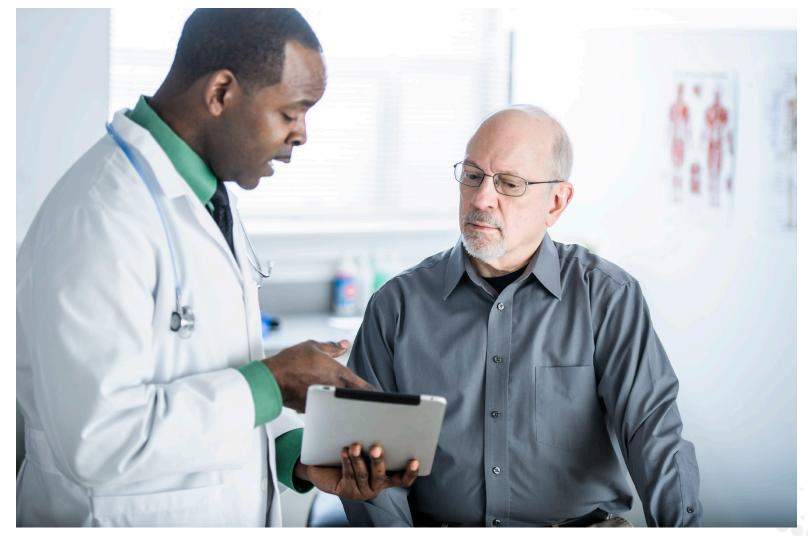


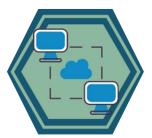
# Simplified end-end automation workflow





Step 1: Provider decides on an order/treatment/etc.





# Step 2: PA & coverage requirements shared between Provider & Payer (Coverage Requirements Discovery) - Workflow



#### **Provider Workflow**

- Provider creates order/treatment in EHR\*
- EHR uses CDS Hooks API to activate Payers' API service
  - Value: Immediate feedback to provider about benefit coverage for service and PA requirement(s)

#### **Payer Workflow**

- API service responds to CRD inquiry
  - API service provides coverage & PA requirement information specific to member & service requested

**Discuss**: Other viable workflows?



<sup>\*</sup>It is conceivable that a third-party solution could be used in the event the EHR is not ePA ready



# Step 2: PA & coverage requirements shared between Provider & Payer (Coverage Requirements Discovery) - Technology



#### **Provider Technical Requirements**

- A 'CDS Hooks' enabled EHR which can connect to payer API end-points, using Order Sign & Order Select triggers (<u>cds-hooks.org</u>)
- Ability to display and take actions with 'CDS Cards' responses from payers

#### **Payer Technical Requirements**

- Establish a CDS Hooks API Service
  - Responds to API calls with 'CDS Cards'
  - References member benefits and PA Rules
- Establish a Prior Authorization Rules Repository
  - Includes: procedure / service codes, documentation requirements, questionnaires & CDS Card content (SMART on FHIR App, URL, Information)

**Discuss**: Timeline for EHRs to be CDS Hooks enabled & Payers Readiness to establish CDS Hooks API support and PA Rules Repositories



### CDS Cards example



R Toprol XL 50 mg daily

Client triggers a CDS hook and invokes a remote service

CDS
Services

#### information card

\$45 per month (patient pays \$7)

#### suggestion card

Try HCTZ as first-line due to patient age (71)

Switch to HCTZ

#### smart app link card

Managing hypertension?

Launch JNC 8 Rx Pro

2

Returns CDS cards (rendered and displayed by Client)





# Step 3: Payer gathers info for the PA request from the Provider's EHR (Documentation Templates & Rules) - Workflow



#### **Provider Workflow**

- Provider responds to the CDS Card based on the information provided (URL, SMART App link, Information, etc.)
- SMART App initiates automated data collection which partially reduces burden to manually complete questionnaires
- SMART App stores PA info in EHR for completion
   & submission outside of provider workflow

#### **Payer Workflow**

 Payer's SMART on FHIR app retrieves associated questionnaire and content from the PA Rules Repository

**Discuss**: Who completes the PA questionnaire / response and when?





# Step 3: Payer gathers info for the PA request from the Provider's EHR (Documentation Templates & Rules) - Technology



#### **Provider Technical Requirements**

- EHR enabled to launch SMART on FHIR App or local ePA App
- EHR ability to pend/save/retrieve & later complete
   PA requests from SMART on FHIR App or local App
- Adequate FHIR Resources for CQL\* data capture

Suggested: PA Dashboard - Status

- SMART on FHIR Prior Authorization App
- Ability to retrieve specific questionnaires and associated CQL\* logic for the requested service from the payer's PA Rules Repository
- FHIR Questionnaires that use the Structured Data Capture Templates

\*Clinical Query Language

**Discuss**: Are CQL and EHR FHIR repositories required or optional?

**Payer Technical Requirements** 



# Step 4: Provider verifies & submits request (Prior Authorization Support) - Workflow



#### **Provider Workflow**

 Requestor locates, completes and submits the PA request 'Bundle' to the payer or intermediary from EHR including questionnaires / attachments

#### **Payer Workflow**

 Payer electronically processes the PA request bundle and assigns a status (pended, approved, denied, RFAI)





# Step 4: Provider verifies & submits request (Prior Authorization Support) - Technology



#### **Provider Technical Requirements**

- EHR able to create the FHIR 'Bundle' and associated FHIR questionnaire resources and transmit via FHIR API to payer / intermediary
- Alt: EHR Support for X12 278 (Referrals) & 275 (Attachments) messaging as may be chosen by the payer & provider

#### **Payer Technical Requirements**

- Prior authorization converter/Intermediary to convert the FHIR Bundle to X12 transactions facilitating automated payer processing and HIPAA compliance\*
- Automated prior authorization adjudication of submitted request including X12 278 processing, questionnaire response processing and status assignment

\*The Da Vinci Workgroup has been granted a 2-year exception to the requirement of using X12 for PA

**Discuss**: EHR's readiness to create & send the PA request bundle. Payers electronic authorization processing readiness.

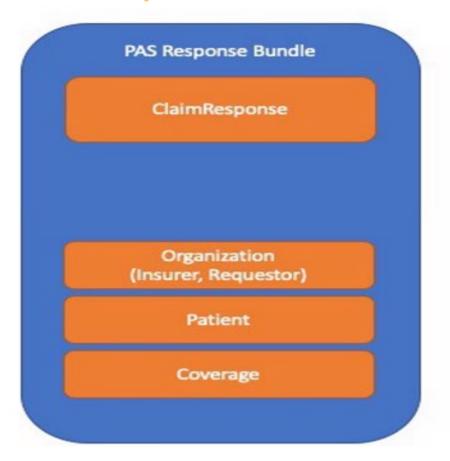
### What is included in the FHIR PA bundle?



#### **Provider Workflow**

### **PAS Request Bundle** Claim Request Items (ServiceRequest, DeviceRequest, MedicationRequest) Organization (Insurer, Requestor) **Patient** Coverage

#### **Payer Workflow**







## Step 5: Payer/Intermediary processes request & Payer sends back decision - Workflow



#### **Provider Workflow**

 Provider's EHR processes Payer's response, stores authorization number (if approved) and updates the status of the PA request in the EHR

#### **Payer Workflow**

 Payer's system sends a FHIR response bundle back to the prior authorization converter or directly to the provider's EHR for automated update



# Step 5: Payer/Intermediary processes request & Payer sends back decision - Technology



#### **Provider Technical Requirements**

 EHR enabled to accept a FHIR resource bundle response with PA status and update PA status within EHR

#### **Payer Technical Requirements**

PA response bundle with PA status and / or RFAI (Request for Additional Information)

**Discuss**: EHR's readiness to accept an automated PA response. Payer's Readiness to send a FHIR bundle response to an automated PA request.



### Discussion



- Does automation of prior authorization seem like a compelling priority?
  - What organizational initiatives complement it? Which ones are competing with it?
  - Does it appear achievable? What else do you need to know?
  - What conclusions have you formed about your role on this Advisory Group?
- There are several considerations we must tackle in thinking about how to promote automation. Do you agree with these (some overlap)?
  - State and federal government roles (standard setting; vendor certification; financial support)
  - Governance: Oversight of prior authorization. Oversight of implementation issues
  - Calculation of implementation costs; transition from (leveraging) existing technologies
  - Transaction/data standards; extent of process standardization
- What would you add?

### NEXT STEPS



### Proposed Next Step: Stakeholder interviews



 Who else do we need to speak with? Who will be most influential in making decisions about whether to pursue automation?

- What topics should we cover?
  - Cost

Other suggestions

Capacity ROI

Advisory Group participants represent several groups—those with technical, financial, and clinical expertise in different parts of the health care industry.

## Thank you

#### **Next TAAG Meeting**

- Report back on interviews: Draft assessment
- Update on MHDC/NEHEN pilot
- Update on federal guidance/ regulation
- Discussion of priority action steps



