FEATURE

Going beyond compliance to achieve radical interoperability
Pulse survey on CMS and ONC proposed rules

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THE DELOITTE CENTER FOR HEALTH SOLUTIONS
Are health plans and health systems making interoperability a strategic objective—or just ticking off the boxes before moving on to other priorities? Recent survey findings suggest many organizations are using the rules as a first step toward broader strategies on interoperability.

Background

Proposed rules from the US Centers for Medicare & Medicaid Services (CMS) and Office of the National Coordinator for Health Information Technology (ONC), published earlier this year, are likely to drive the US health care system toward greater interoperability. We expect the administration to finalize the rules in fall 2019, and many of the provisions would go into effect on January 1, 2020 (see the February 11, 2019 Reg Pulse Blog). Through other levers such as new payment models, the Trusted Exchange Framework and Common Agreement (TEFCA), and a recent executive order on transparency, the administration is laying out a plan to drive the industry toward widespread interoperability. Taken together, these initiatives showcase the administration’s continued push to make health care information more accessible by encouraging plans and providers to share data with each other to improve the quality and efficiency of health care and with patients to help them make informed decisions.

As described in Forces of change: The future of health, today, the US health care system is a collection of disconnected components (health plans, hospital systems, pharmaceutical companies, medical device manufacturers, etc.). By 2040, we expect the system to be dramatically different than it is today. Health will likely be driven by digital transformation enabled by radically interoperable data and open, secure platforms. Moreover, consumers will own their health data and play a central role in making decisions about their health and well-being. Health care organizations that fail to see beyond compliance deadlines and realize the greater strategic value of interoperability and data could risk falling behind.

From early May to mid-June 2019, the Deloitte Center for Health Solutions polled technology leaders at large health plans (n=35) and health systems (n=35) to gauge their attitudes and priorities around the CMS and ONC proposed rules (see sidebar, “Methodology”).
Findings

Overall, many respondents said they are using the proposed rules as a foundation for their broader strategic interoperability initiatives. Moreover, many believe they will have to go beyond what their vendors provide to achieve that strategic aspiration.

Most (63 percent) health plan and nearly half (43 percent) of health system leaders say they plan to use the compliance requirements as part of their broader strategy around interoperability (see figure 1).

METHODOLOGY

The Deloitte Center for Health Solutions fielded a quantitative survey from early May through mid-June 2019.

Most respondents were chief technology officers, chief information officers, or EVPs/SVPs/VPs of technology for large (greater than US$750 million in revenue) health plans (n=35) and health systems (n=35).

Questions focused on leaders’ priorities, awareness, and preparedness in reaction to the proposed rules.

FIGURE 1

Forty-three percent of health system and sixty-three percent of health plan leaders say they plan to use compliance requirements as part of their broader interoperability strategy

- Compliance requirements will be the foundation for broader strategic interoperability initiatives
- No plans to go beyond compliance requirements
- Uncertain (either have not read or are still determining implications of the proposals)

Note: Respondents were asked to select which statement most accurately describes their organization’s approach to compliance with CMS- and ONC-proposed rules on interoperability. Total responses = 70 (health systems, 35 and health plans, 35). Percentages may not total 100% due to rounding.

Source: Deloitte Center for Health Solutions 2019 Interoperability Survey.
Moreover, many organizations reported that they plan to go beyond compliance. More than half of health system (55 percent) and health plan (60 percent) respondents say they are either building their own application programming interface (API) solutions or are doing so even while they work with a vendor to build solutions (see figure 2).

Seizing the opportunity to go beyond compliance

The administration is using multiple regulatory levers to advance interoperability. The draft rules call for organizations to meet many of the requirements starting on January 1, 2020. Organizations that develop and implement a strategic approach to interoperability are likely to have a competitive advantage with insights, affordability, and consumer engagement in the future of health. Some of the next steps to consider in establishing a strategic approach to interoperability are discussed below.

Many organizations are planning to go beyond compliance, building their own APIs even while they work with a vendor to build solutions.

Note: Respondents were asked to select which statement most accurately describes how their organization currently manages and implements technical changes to become more interoperable, or how they intend to do so. Total responses = 70 (health systems, 35 and health plans, 35). Percentages may not total 100% due to rounding.

Source: Deloitte Center for Health Solutions 2019 Interoperability Survey.
DEFINE THE ORGANIZATION’S BROADER STRATEGY
Organizations should leverage the regulatory requirements on interoperability as a jumping off point for their broader strategy for sharing data with industry stakeholders and with patients.

- Define the interoperability vision for the organization
- Establish an initial interoperability governance structure
- Perform a market scan
- Develop a business case and key business/technology benefits
- Develop high-value use cases such as enhanced care management and/or improved consumer and patient engagement

DEFINE DESIRED FUTURE STATE AND MATURITY AND COMPARE AGAINST CURRENT CAPABILITIES

- Assess current interoperability capabilities and define desired future state
- Conduct a gap analysis between current and future state
- Develop an external engagement plan (for example, partnerships and collaboration with external entities to better enable interoperability vision)
- Evaluate your overall consent and risk management strategies for use of data

DEVELOP AN EXECUTION ROAD MAP

- Prioritize a set of initiatives and road map to achieve compliance by the proposed January 1, 2020 deadline
- Identify longer-term goals beyond the January 1, 2020 compliance date around data exchange, digital tool adoption, and enhanced consumer engagement
- Assign “high priority” to the must-do/critical capabilities

Implementing a strategic interoperability plan can position health plans and health systems to gain insights and opportunities to provide more effective care, reduce inefficiencies, meet consumers’ demands, and better enable the organization to compete effectively in the future.
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