

CommonWell Health Alliance Commentary on 2021 Physician Fee Schedule (PFS) final rule; new Health Information Exchange (HIE) Bi-Directional Exchange measure

February 1, 2021 – On Dec. 28, 2020, the Centers for Medicare & Medicaid Services (CMS) [published](#) the CY 2021 Physician Fee Schedule (PFS) final rule, which took effect on Jan. 1, 2021. Included in the rule was a new Health Information Exchange (HIE) Bi-Directional Exchange measure for promoting interoperability in the CMS Quality Payment Program (QPP), to which clinicians would need to attest to one of the following:

- + I participate in an HIE in order to enable secure, bi-directional exchange to occur for every patient encounter, transition or referral, and record stored or maintained in the EHR during the performance period in accordance with the applicable law and policy.
- ++ The HIE that I participate in is capable of exchanging information across a broad network of unaffiliated exchange partners, including those using disparate EHRs, and does not engage in exclusionary behavior when determining exchange partners.
- +++ I use the functions of CEHRT to support bidirectional exchange with an HIE.

Within the final rule, CMS requested that HIEs, which meet the second attestation statement, publicly share their availability to support this measure.

Following a review of the measure and attestation statements by the CommonWell Health Alliance leadership and member-driven Government Affairs Committee, CommonWell notes the following:

CommonWell offers bi-directional data exchange services and nationwide network that, as of January 1, 2021, connects [more than 22,000 provider organizations](#) and retrieves on average more than 24 million documents a week. CommonWell core services help enable health care providers to manage patient identity, link patients across organizations, and facilitate trusted data access and exchange beyond one's own system or community.

CommonWell has a broad and diverse group of exchange partners including:

- CommonWell [Service Adopters](#) which connect directly to the network,
- CommonWell Connectors™ which connect other EHRs, portals and providers that are not directly connected to CommonWell, and
- Other exchange frameworks and networks, such as Carequality and eHealth Exchange, which connect their group of exchange partners.

The CommonWell suite of interoperability services was developed with APIs that health IT vendors embed directly into their software, allowing clinicians access to patient records within their [CommonWell Connected™ product](#) and current workflow. Specific to this measure, the CommonWell data query and retrieval broker enables caregivers to search, potentially select and receive needed clinical data across a trusted network of exchange partners.

Based upon the above, we believe providers who are actively utilizing CommonWell services and connecting to the CommonWell network through an approved CommonWell Connected product would meet the attestation requirements of the Health Information Exchange (HIE) Bi-Directional Exchange measure. However, the ultimate determination would need to be made via the CommonWell Service Adopter providing the clinician their CommonWell connection.