

## CommonWell Health Alliance Commentary on 2022 Medicare Hospital Inpatient Prospective Payment Systems (IPPS) final rule; new Health Information Exchange (HIE) Bi-Directional Exchange measure

Sept. 15, 2021 – On Aug. 13, 2021, the Centers for Medicare & Medicaid Services (CMS) [published](#) the FY 2022 Medicare hospital inpatient prospective payment systems (IPPS) final rule, which takes effect on Oct. 1, 2021. [Included in the rule](#) was a new Health Information Exchange (HIE) Bi-Directional Exchange measure for promoting interoperability in the Medicare Promoting Interoperability Program, to which eligible hospitals and critical access hospitals (CAHs) would need to attest to one of the following:

- + Participating in an HIE in order to enable secure, bi-directional exchange of information to occur for all unique patients admitted to or discharged from the eligible hospital or CAH inpatient or emergency department (POS 21 or 23), and all unique patient records stored or maintained in the EHR for these departments, during the EHR reporting period in accordance with applicable law and policy.
- ++ Participating in an HIE that is capable of exchanging information across a broad network of unaffiliated exchange partners including those using disparate EHRs, and not engaging in exclusionary behavior when determining exchange partners.
- +++ Using the functions of CEHRT to support bi-directional exchange with an HIE.

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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 Aug. 1, 2021, connects [approximately 24,000 provider organizations](#) and retrieves on average more than 35 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 CommonWell connection to the eligible hospital or CAH.