



COUNTY OF YOLO
HEALTH AND HUMAN SERVICES AGENCY

POLICIES AND PROCEDURES

SECTION 5, CHAPTER 6, POLICY 002

**INTEROPERABILITY AND PATIENT ACCESS/ PATIENT ACCESS AND PROVIDER DIRECTORY
APPLICATION PROGRAMMING INTERFACE**

POLICY NUMBER:	5-6-002
SYSTEM OF CARE:	BEHAVIORAL HEALTH
FINALIZED DATE:	02/27/2024
EFFECTIVE:	03/01/2024
SUPERSEDES # :	N/A

A. PURPOSE: To provide information regarding Yolo County HHSA Behavioral Health Plan’s (BHP) implementation and maintenance of a secure, standards-based Patient Access Application Programming Interface (API) and a publicly accessible, standards-based Provider Directory API.

B. DEFINITIONS:

1. **Application Programming Interface (API):** Application Programming Interface (API) is used to pass data between applications.
2. **Interoperability:** Interoperability is health information that:
 - a. Enables the secure exchange and use of electronic health information without specific effort on the part of the user.
 - b. Allows for complete access, exchange, and use of all electronically accessible health information for authorized use under applicable state or federal law.
3. **United States Core Data for Interoperability (USCDI):** United States Core Data for Interoperability (USCDI) is a standardized set of health data classes and constituent data elements for nationwide, interoperable health information

exchange. A USCDI “Data Class” is an aggregation of various Data Elements by a common theme or use case. A USCDI “Data Element” is the most granular level at which a piece of data is represented in the USCDI for exchange.

4. **Fast Healthcare Interoperability Resources (FHIR):** Fast Healthcare Interoperability Resources (FHIR) is a standard for exchanging health care information electronically.

C. RELATED DOCUMENTS:

1. N/A

D. POLICY:

Yolo County HHSA BHP shall comply with the California Department of Health Care Services (DHCS) guidance, Federal, and State Laws to provide a secure, standards-based Patient Access (API) and a publicly accessible, standards-based Provider Directory API that can connect to mobile applications and be available through a public-facing digital endpoint on Yolo County HHSA BHP’s website.

1. Patient Access API

Yolo County HHSA BHP shall implement and maintain a Patient Access API that can connect to provider electronic health records and practice management system, in accordance with requirements specified at 42 CFR section 431.60. The Patient Access API shall permit third-party applications to retrieve, with the approval and at the direction of a beneficiary or beneficiary’s authorized representative, data specified in this policy and procedure through the use of common technologies and without special effort from the beneficiary.

Yolo County HHSA BHP shall make individual-level United States Core Data for Interoperability (USCDI) data that the BHP maintains for date of services on, or after, January 1, 2016, available to the beneficiary or their authorized representative as follows:

Type of Information	Time by Which Information Must be Accessible
Adjudicated claims data, including claim data for payment decisions that may be appealed, were appealed, or in the process of appeal, provider remittances, and beneficiary cost-sharing pertaining to such claims.	Within one (1) business day after a claim is processed.
Clinical data, including diagnoses and related codes, and laboratory test results	Within one (1) business day after receiving data from providers.

Information about covered outpatient drugs and updates to such information, including formulary of prescription drugs, costs to the beneficiary, and preferred drug list information, if applicable.	Within one (1) business day after the effective date of any such information or updates to such information.
Encounter data from providers compensated on the basis of risk-based capitation payments, as defined in 42 CFR 438.2	Within one (1) business day after receiving data from providers.

a. Member Education Resources

In accordance with 42 CFR 431.60(f), Yolo County HHSA BHP shall provide, in an easily accessible location on its public websites and/or through other appropriate mechanisms through which they ordinarily communicate with current and former Beneficiaries seeking to access their health information, educational resources in non-technical, simple, and easy-to-understand language explaining at a minimum:

- i. General information on steps the Beneficiary may consider taking to help protect the privacy and security of their health information, including factors to consider in selecting an application including secondary uses of data and the importance of understanding the security and privacy practices of any application to which they entrust their health information; and
- ii. An overview of which types of organization or individual are and are not likely to be Health Insurance Portability and Accountability Act of 1996 (HIPAA) covered entities, the oversight responsibilities of the Health and Human Services Office for Civil Rights (OCR) and the Federal Trade Commission (FTC), and how to submit a complaint to the OCR and FTC. Educational resources must be provided to beneficiaries according to the information requirements of CFR 438.10.

2. **Provider Directory API**

Yolo County HHSA BHP shall implement and maintain a publicly accessible standards-based Provider Directory API as described in 42 CFR section 431.70 and meet the same technical standards of the Patient Access API, excluding the security protocols related to user authentication and authorization. Yolo County HHSA BHP shall update the Provider Directory API no later than 30 calendar days after it receives the provider information or is notified of a change.

The Provider Directory API shall include the following information about its network providers for behavioral health providers, hospitals, and any other providers or facilities contracted for Medi-Cal covered services under the Mental Health Plan’s (MHP) contract or the DMC-ODS Intergovernmental Agreement (IA):

- a. Name of the provider, medical group/foundation, independent physician/provider associations, or site, as well as any group affiliation;
- b. National Provider Identifier number;
- c. Street address(es);
- d. All telephone numbers associated with the practice site;
- e. Website URL for each service location or physician provider, as appropriate;
- f. Specialty, as applicable;
- g. Hours and days when each service location is open, including the availability of evening and/or weekend hours;
- h. Services and benefits available;
- i. Whether the provider will accept new beneficiaries;
- j. Cultural and linguistic capabilities, including whether non-English languages and American Sign Language are offered by the provider or a skilled medical interpreter at the provider's office, and if the provider has completed cultural competence training;
- k. Whether the provider's office/facility has accommodations for people with physical disabilities, including offices, exam room(s), and equipment; and
- l. Telephone number to call the 24/7 access line.

3. Oversight and Monitoring

Yolo County HHSA BHP shall ensure that data received from its Network Providers and Subcontractors is accurate and complete by verifying the accuracy and timelines of reported data; screening the data for completeness, logic, and consistency; and collecting service information in standardized formats to the extent feasible and appropriate. Yolo County HHSA BHP shall make all collected data available to DHCS and CMS, upon request.

Yolo County HHSA BHP and Yolo County Innovation and Technology Services Department (ITSD) shall conduct routine testing and monitoring, and update their systems as appropriate, to ensure the APIs function properly, including conducting assessments to verify that the APIs are fully and successfully implementing privacy and security features such as those required to comply with the HIPAA Security Rule requirements in 45 CFR parts 160 and 164, 42 CFR parts 2 and 3, and other applicable laws protecting the privacy and security of individually identifiable data.

Yolo County HHSA BHP shall deny or discontinue any third-party applications connection to an API if it reasonably determines, consistent with its security risk analysis under the HIPAA Security Rule, that continued access presents an unacceptable level of risk to the security of protected health information on its systems. The determination shall be made using objective, verifiable criteria that

are applied fairly and consistently across all applications and developers, including but not limited to criteria that may rely on automated monitoring and risk mitigation tools.

Yolo County HHSA BHP shall comply with the requirements for the Patient Access API and Provider Directory API and shall demonstrate compliance by submitting deliverables as directed by DHCS. Yolo County HHSA BHP shall update its policies and procedures to ensure compliance with these requirements and shall communicate the requirements listed above to all of its Subcontractors and Network Providers.

E. PROCEDURE:

1. Patient Access API

Yolo County HHSA BHP shall make available data it maintains within one business day of receipt or within one business day after a claim is adjudicated or encounter data is received for dates of service on or after January 1, 2016.

- a. With Yolo County HHSA's electronic health record (Avatar), claims information will be populated using 835 data

Documentation shall be located on the Mental Health Services & Substance Use Services pages of the Yolo County website, This information is further accessible via the myHealthPointe member portal's Documents folder. The documentation is accessible without any preconditions for access and shall include the minimum Information:

- a. API syntax,
- b. function names,
- c. required and optional parameters supported and their data types,
- d. return variables and their types/structures,
- e. exceptions and exception handling methods, and their returns.
- f. The software components and configurations to successfully interact with the API and process its response(s).
- g. All applicable technical requirements and attributes that are necessary for an application to be registered with any authorization server(s) deployed in conjunction with the API.

Publicly accessible member education resources shall be available through the Mental Health Services & Substance Use Services pages of the Yolo County Website. This information is further accessible via the myHealthPointe member portal in the Education folder. Member education resources shall:

- a. Demonstrate the steps a member may consider taking to help protect the privacy and security of their health information and the importance of the understanding the security and privacy practices of any application to which they entrust their health information.

- b. Provide an overview of which types of organizations or individuals are and 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.

2. Process to Approve, Deny, or Discontinue Third Party Connection

To gain access to the API, third-party entities must submit a request to Yolo County HHS BHP. Once a request for API connection is received, Yolo County HHS BHP will conduct a risk analysis to address any deficiencies related to third-party applications connected to the API and potential impacts on the security of PHI.

Following the risk analysis, Yolo County HHS BHP will either approve or deny the connection request. In case of denial, Yolo County HHS BHP will inform the third-party application provider of the decision, along with the reasons for denial, and document this information in accordance with local, state, or federal guidelines.

For existing connections, if it is reasonably determined that continued access by a specific third-party application poses an unacceptable risk to PHI security, Yolo County HHS BHP will take the following steps:

- a. Notify the third-party application provider of the determination, specifying identified security risks.
- b. Provide a reasonable timeframe for the third-party application provider to address and mitigate the identified risks.
- c. Expect the third-party application provider to promptly address and mitigate the identified security risks within the specified timeframe.
- d. Collaborate with the third-party application provider to implement necessary security measures or request evidence of remediation.

After the specified timeframe, Yolo County HHS BHP will reassess the security posture of the third-party application. If risks are satisfactorily mitigated, access may be reinstated. If not, Yolo County HHS BHP will:

- a. Notify Yolo County ITSD, which will coordinate with the EHR vendor to revoke access.
- b. Inform the third-party application provider of the decision, including reasons for denial, and document this information in accordance with any applicable guidelines.

For new requests and upon Yolo County HHS BHP's approval for third-party applications, Yolo County BHP shall:

- a. Inform the third-party application provider of approval and request contact information.

- b. Notify Yolo County ITSD, providing third-party application provider contact information and approved USCDIV1 Resources from the API documentation (posted on the county website), where upon, Yolo County ITSD will create the application and submit a ticket to the EHR Vendor to activate authorized access endpoints. Coordination with the third-party application provider for successful data exchange testing will be ensured. All authentication and access to FHIR resources will be managed utilizing the Open Authorization (OAuth) framework.

3. Provider Directory API

- a. Shall be populated and maintained through the 274 provider directory data content from Yolo County HHSA BHP's EHR.
- b. Shall have a publicly accessible Provider Directory Endpoint accessible from Yolo County HHSA BHP's primary website and shall not have a requirement for authentication or blocking.
- c. Documentation shall be located on the Mental Health Services & Substance Use Services pages of the Yolo County Website. The documentation is accessible without any preconditions for access and shall include the minimum Information:
 - i. API syntax, function names, required and optional parameters supported and their data types, return variables and their types/structures, exceptions and exception handling methods, and their returns.
 - ii. The software components and configurations an application shall use to successfully interact with the API and process its response(s).
 - iii. All applicable technical requirements and attributes that are necessary for an application to be registered with any authorization server(s) deployed in conjunction with the API.
- d. The Provider Directory API shall be updated no later than 30 calendar days after Yolo County HHSA BHP receives new information or is notified of any information that affects the content or accuracy of the provider directory.
 - i. The Yolo County BHP shall update and maintain the Provider Director API
 - ii. Provider directory update reports are received at least monthly, and a tracking log is maintained to ensure updates are processed timely

4. Testing and Monitoring

To ensure that APIs are compliant with the technical, privacy, and security functions outlined in the interoperability and Patient Access Final Rule, Yolo

county HHS runs regularly scheduled testing and monitoring of test results, and coordinates with Yolo County ITSD to resolve any identified issues

B. REFERENCES:

- 1. Behavioral Health Information Notice 22-068
- 2. Behavioral Health Information Notice 23-032
- 3. 42 Code of Federal Regulations (CFR) 438.242, 45 CFR 170.215,
- 4. 42 CFR 438.10
- 5. 45 CFR Part 171.

Approved by:

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2/27/2024
Date