The sharing of secured patient health data has become increasingly important. People want fast access to their records and they want to know it’s protected. The CMS and ONC finalized the rules aimed to eliminate barriers in data interoperability and put patients in control. The timeline for implementation will require rapid mobilization and execution. Interoperability rules will require health plans and providers to exchange their data through standard based fast healthcare interoperability resources (FHIR) application programming interfaces (APIs).

Finalized Interoperability rules promote standard based data exchange, patient access, and other requirements. Non-compliant Payers and Providers face information blocking penalties.

Our perspective

Interoperability is the piece of the puzzle that brings all the others together to reveal a new vision for healthcare. It provides large opportunities for payers, providers, members, incumbent vendors and disruptors to create new value while tearing down old barriers.

Compliance with the CMS Interoperability and Patient Access rules and ONC 21st Century Cures Act is just the beginning of the interoperability journey for healthcare.

Strategic focus areas

1. Do you want to influence regulations and lead in adoption?
   - Late Adoption: Respond when regulation stabilizes or industry accepted solution is developed
   - Track and Monitor: Proactively track, monitor, and meet regulatory standard and compliance risks
   - First Adopter: Address, adopt, and comply to working standards from CMS/ONC
   - Lead the Industry: Influence industry rules and standards via working groups

2. How do you create enterprise value through greater IO?
   - Internal Efficiency: Create value through increased scale and governance
   - Enhanced Processes: Leverage exchange of expanded dataset across stakeholders for operations
   - Scale Operations: Extend and scale current services into other areas to drive value
   - Product and Services Innovation: Develop new products and services leveraging IO framework and data access

3. How do you want to drive market disruption?
   - Commercial Utility: Provide Interoperability services to meet market need
   - Partnerships/JVs: Launch partnerships to develop differentiated systems
   - Thought Leadership: Focus on innovation via industry working groups
   - Set the Standard: Require a ‘seat at the table’ for strategy and governance
## PwC approach – Supporting your unique interoperability journey from strategy through execution

### How PwC can help

<table>
<thead>
<tr>
<th>Strategy/Program</th>
<th>Technology/Data</th>
<th>Risk &amp; Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy &amp; Program Standup</strong></td>
<td><strong>Technology/Vendor Assessment</strong></td>
<td><strong>Program Risk Analysis and Management</strong></td>
</tr>
<tr>
<td>Identify organizational strategy, design governance, and stand up program to help drive adoption and compliance for interoperability requirements</td>
<td>Identify and assess technology capabilities and vendor support required to enable interoperability (e.g., API mgmt., consent/identity mgmt., clinical data mgmt., etc.)</td>
<td>Assess risks and controls to help drive toward intended business outcomes. Perform targeted reviews of key project risk areas such as testing, data conversion, security, etc.</td>
</tr>
<tr>
<td><strong>Program Management &amp; Change Management</strong></td>
<td><strong>Clinical Data Exchange Design, Implementation, and PoC</strong></td>
<td><strong>Regulatory Compliance Assessment</strong></td>
</tr>
<tr>
<td>Support and execute interoperability program and implement change management (in coordination with use case delivery) to help drive awareness and organization alignment</td>
<td>Design and develop Clinical Data Exchange to support interoperability and access of member data, including data management services such as ingestion, normalization, and standardization to enable longitudinal health record</td>
<td>Comprehensive review compliance risks to support organizations to help further build confidence and trust in the business at scale</td>
</tr>
<tr>
<td><strong>Value Management &amp; Business Adoption</strong></td>
<td><strong>Data Governance Management</strong></td>
<td><strong>Cybersecurity &amp; Privacy</strong></td>
</tr>
<tr>
<td>Identify business value drivers to support Interoperability Business Case; Develop KPIs and dashboard to help track and monitor program value delivered and business adoption</td>
<td>Assess and deploy Data Governance program framework, capabilities, and effectiveness prior to exposing data quality issues and ingesting external data via APIs</td>
<td>Assess Interoperability to help identify potential cybersecurity and privacy risks and develop active safeguards/mitigations actions to minimize exposure</td>
</tr>
</tbody>
</table>

### Why PwC?

- Our teams have significant experience supporting payers and providers on their interoperability journey (from strategy through execution)
- We have experience and relationships with leading technology companies supporting interoperability enablement and creating new value
- PwC brings a cross industry perspective that can provide insights into what others are doing, what’s working, and what’s not

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