



7.1.7 CMS INTEROPERABILITY PROVIDER DIRECTORY APPLICATION PROGRAMMING INTERFACE (API)

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Revision History: Not Applicable

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Policy Owner: Behavioral Health Clinical Informatics Analyst

Director Signature: Signature on File

I. Policy Statement

The purpose of this policy and procedure document is to outline the guidelines and steps for ensuring compliance with the Centers for Medicare & Medicaid Services (CMS) Interoperability Provider Directory Application Programming Interface (API). This policy and procedure underscores Sonoma County Department of Health Services, Behavioral Health Division's commitment to maintaining accurate and up-to-date provider information, fostering interoperability, and enhancing transparency in healthcare delivery.

In response to the transformative landscape of healthcare and the imperative to enhance interoperability, Sonoma County Department of Health Services, Behavioral Health Division is committed to implementing the Centers for Medicare & Medicaid Services (CMS) Interoperability Provider Directory Application Programming Interface (API). This background statement within our Policy and Procedure document emphasizes our dedication to fostering seamless data exchange and accessibility of accurate provider information. The CMS Interoperability Provider Directory API serves as a pivotal tool in advancing healthcare transparency and patient-centered care, enabling our organization to contribute to an interconnected healthcare ecosystem. This policy and procedure framework underscores our commitment to aligning with CMS guidelines, ensuring the accuracy and timeliness of provider information, and promoting a culture of transparency and efficiency within our healthcare delivery systems.

To assist Sonoma County Department of Health Services, Behavioral Health Division with meeting the requirements for CMS Provider Directory, Sonoma County Department of Health Services, Behavioral Health Division has partnered with the California Mental Health Services Authority (CalMHSA) to implement CalMHSA Connex. CalMHSA Connex is a specialized platform designed to facilitate the seamless and secure sharing of behavioral health information among diverse healthcare entities as well as facilitate patient access to their data. This exchange is tailored to the unique needs of mental health and substance use disorder treatment providers, enabling the confidential transmission of patient records, treatment plans, and outcomes across the behavioral health spectrum. Emphasizing privacy and consent management, CalMHSA Connex ensures that sensitive information is shared only with authorized individuals, fostering collaborative and comprehensive care. CalMHSA Connex aims to play a pivotal role in breaking down silos, enhancing care coordination, and promoting a holistic approach to patient well-being by providing clinicians with timely and comprehensive insights into a patient's health history, ultimately contributing to more informed decision-making and improved outcomes in the realm of mental health and substance use treatment.

II. Scope

This policy applies to all Department of Health Services Behavioral Health Division network providers, including county employed staff, independent contract providers and contracted organizational providers who provide Mental Health Plan (MHP), Drug Medi-Cal (DMC), and Drug Medi-Cal Organized Delivery System (DMC-ODS).

III. Definitions

- A. CalMHSA Connex: A health information exchange operated by CalMHSA catering to the interoperability needs of county behavioral health. CalMHSA Connex acts as an intermediary to facilitate data exchange between disparate parties utilizing industry accepted protocols and standards.
- B. Client/Patient: For the purposes of this document, the term “client/patient” is used interchangeably with “patient” and refers to an individual receiving medical or professional services as outlined herein.
- C. CMS Interoperability Provider Directory API: Refers to the application programming interface developed by the Centers for Medicare & Medicaid Services (CMS) to enable standardized access to accurate and timely provider information.
- D. Provider Directory: A centralized repository containing essential details about healthcare providers, including contact information, specialties, and practice locations.

- E. Interoperability: The ability of different health IT systems to exchange and use client/patient information seamlessly, ensuring data consistency and accuracy across various platforms.

IV. Policy

A. Compliance with CMS Interoperability Provider Directory API:

1. Provider Directory API shall be facilitated through the county's subscription to CalMHSA Connex. The CalMHSA Connex provided Provider Directory API is designed and implemented to comply with the [CMS Interoperability Provider Directory specifications](#).
2. CalMHSA Connex provides technology that the Sonoma County Department of Health Services, Behavioral Health Division's provider data is made available through the API in a standardized and secure format, adhering to the [CMS Interoperability Provider Directory specifications](#).
3. Ensure the provider directory data is accurate, up-to-date, and accessible through the API.
4. The Provider directory API shall be updated no later than 30 calendar days after the BHP receives new information or is notified of any information that affects the content or accuracy of the provider directory.
5. Counties requesting utilization metrics and/or related reports must reach out to CalMHSA at connex@calmhsa.org. Please allow for five to seven business days for processing.

B. Provider Information Accuracy:

1. CalMHSA Connex will use provider data sourced from Sonoma County Department of Health Services, Behavioral Health Division's SmartCare instance.
2. Data will conform to [HL7 FHIR US Core Implementation Guide](#) specifications.

V. Procedures

A. API Accessibility:

1. CalMHSA Connex will make available an API specific to Sonoma County Department of Health Services, Behavioral Health Division for the purposes of connecting through qualified third-party applications.

- a. Sonoma County Department of Health Services, Behavioral Health Division will post the following CalMHSA provided API URL on their publicly accessible website: [Swagger UI \(ehn-prod.net\)](https://ehn-prod.net/swagger-ui)
 - b. API will be accessible openly without restriction.
2. Clients/patients are free to select a qualified application of their choosing to facilitate the retrieval of their data.
3. Said third party applications must adhere to specifications and guidelines of [CMS Interoperability Provider Directory specifications](#).
4. Third party application providers may reach out to CalMHSA Connex system administrators at FHIRAPI@calmhsa.org to establish authorized access to Sonoma County Department of Health Services, Behavioral Health Division's Provider Directory API.

B. Provider Directory Updates and Accuracy:

1. Sonoma County Department of Health Services, Behavioral Health Division will have two options for ensuring that Provider Directory information is update no less than every 30 days:
 - a. Bulk upload - Sonoma County Department of Health Services, Behavioral Health Division will complete the CalMHSA Connex Provider Directory template document with updated information regarding their providers to be updated on the FHIR server.
 - i. Counting opting to go with the bulk upload process are required to provide the CalMHSA Connex team with their bulk update file by no later than the third Thursday of the month.
 - ii. The CalMHSA Connex team will upload the bulk update to the FHIR server to make available by no later than the last business day of the month.
 - b. Ad hoc updates – With Sonoma County Department of Health Services, Behavioral Health Division's authorization, the CalMHSA Connex team will provide "Power User" access to approved Sonoma County Department of Health Services, Behavioral Health Division users to be able to manually update Provider Directory information via the CalMHSA Connex portal. This function can be done at any time and requires that Sonoma County Department of Health Services, Behavioral Health Division authorized users update the Sonoma County Department of Health Services, Behavioral Health Division's information as new information (no less than every 30 days) becomes available.

- c. Sonoma County Department of Health Services, Behavioral Health Division is not required to choose one option over another. Sonoma County Department of Health Services, Behavioral Health Division can utilize both options at their discretion.

C. Security:

1. CalMHSA Connex will implement encryption protocols in alignment with the [CMS Interoperability Provider Directory specifications](#) to secure provider data transmitted through the API.
2. CalMHSA Connex will establish access controls and monitor API usage to detect and respond to any suspicious activities promptly.

D. Client/Patient Support:

1. Clients/patients of Sonoma County Department of Health Services, Behavioral Health Division shall be referred to the respective support of their chosen third-party application for assistance. Third party application vendors can then reach out to CalMHSA Connex system administrators at FHIRAPI@calmhsa.org to troubleshoot any potential issues with the patient access API.

E. Sonoma County Department of Health Services, Behavioral Health Division Support:

1. Sonoma County Department of Health Services, Behavioral Health Division end-users may reach out to CalMHSA with any questions or issues at connex@calmhsa.org. In relation to the CMS Provider Directory API, clients/patients should NOT be referred to CalMHSA under any circumstance. Please see section “III. Client/Patient Support” above for additional information.

F. Routine Audits and Monitoring:

1. CalMHSA Connex system administrators conduct routine audits of the CMS Interoperability Provider Directory API to assess compliance and identify areas for improvement.
 - a. At a minimum, CalMHSA Connex uses automated tools such as AWS Shield, AWS WAF, and Cloud Watch that ensure proper security, connectivity, and infrastructure integrity will run continuously.
 - b. System Administrator facilitated audits will occur daily to ensure proper functionality and compliance with relevant API standards and regulatory requirements.

- i. The audits include a review of the audit logs and any potential risks that were flagged by the monitoring system.
 - ii. Ensuring all software related to security and integrity are up to date to prevent misuse of the APIs.
 - iii. Ensure monitoring tools are properly configured to ensure any potential risk is immediately flagged.
 - iv. Ensure internal penetration testing has been completed and up to date.
- 2. CalMHSA Connex system administrators will monitor API usage and performance to ensure seamless access for clients/patients and troubleshoot any issues promptly.
- 3. Sonoma County Department of Health Services, Behavioral Health Division will ensure that data received from its Network Providers and Subcontractors is accurate and complete by verifying the accuracy and timeliness of reported data.
 - a. At a minimum, Sonoma County Department of Health Services, Behavioral Health Division will screen the data for completeness, accurate logic, and consistency; and collect service information in standardized formats to the extent feasible and appropriate (42 CFR § 438.242(3)).
- 4. County requests for utilization data will be provided with within 7 business days of request. Requests should be submitted to connex@calmhsa.org.

VI. Forms

None

VII. Attachments

- A. Sonoma County Department of Health Services, Behavioral Health Division Beneficiary Handbooks
 - [Mental Health Beneficiary Handbook \(ca.gov\)](#)
 - [MHP Beneficiary-Handbook-Spanish \(12.27.23\).pdf \(ca.gov\)](#)