



County of Inyo
Health & Human Services Department
Behavioral Health
Patient Access and Provider Directory API

1. Purpose

This document outlines new guidelines and requirements for the implementation and maintenance of a secure, standards-based Patient Access Application Programming Interface (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 Inyo County Behavioral Health's website.¹

Background

In May 2020, CMS finalized the Interoperability and Patient Access final rule (CMS Interoperability Rule), which seeks to establish beneficiaries as the owners of their health information with the right to direct its transmission to third-party applications.² CMS and the Office of the National Coordinator for Health Information Technology have established a series of data exchange standards that govern such specific transactions.^{3 4}

Assembly Bill (AB) 133 (Committee on Budget, Chapter 143, Statutes of 2021) implements various components of the CalAIM initiative, including those components in Welfare and Institutions Code (W&I) section 14184.100, et seq., and Health and Safety Code section 130290 to implement the California Health and Human Services Data Exchange Framework, including the CMS Interoperability Rule. DHCS is authorized to develop and implement Article 5.51 of the W&I Code and the requirements of the California Health and Human Services Data Exchange Framework through this Behavioral Health Information Notice (BHIN).⁵

¹ [45 CFR section 170.215; 42 CFR sections 431.60, 431.70, and 438.10.](#)

² [85 Federal Register 25510-25640.](#)

³ The data exchange standards for the [Patient Access Application Programming Interface](#); [CARIN Implementation Guide](#); [Payer Data Exchange for US Drug Formulary](#); [Provider Directory Application Programming Interface](#).

⁴ Section 4003 of the Office of the National Coordinator for Health Information Technology 21st Century [Cures Act](#) defines "Interoperability" as health information technology that (1) enables the secure exchange and use of electronic health information without special effort on the part of the user; (2) allows for complete access, exchange, and use of all electronically accessible health information for authorized use under applicable state or federal law; and (3) does not constitute information blocking as defined in section 3022(a) of the Public Health Service Act.

2. Plan

In accordance with the CMS Interoperability Rule, Inyo County Behavioral Health Programs will implement and maintain a secure standards-based Patient Access Application Programming Interface (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 the Inyo County Behavioral Health website.

Further, Inyo County Behavioral Health Programs will comply with all applicable regulations including 42 Code of Federal Regulations (CFR) 438.242, 45 CFR 170.215, the provider directory information requirements specified in 42 CFR 438.10, and the public reporting and information blocking components of the CMS Interoperability Rule 45 CFR Part 171.

Patient Access API

Inyo County will implement and maintain a Patient Access API that can connect to provider electronic health records and practice management systems, in accordance with requirements specified at 42 CFR section 431.60. The Patient Access API must 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 BHIN through the use of common technologies and without special effort from the beneficiary.

Inyo County Behavioral Health will make individual-level United States Core Data for Interoperability (USCDI)⁶ data that they maintain for dates of services on, or after, January 1, 2016, available to the beneficiary or their authorized representative as follows:⁷

⁵ [Welfare and Institutions Code section 14184.102\(d\)](#); [Health and Safety Code section 130290\(j\)](#).

⁶ [45 CFR section 170.213](#). USCDI is a standardized set of health data classes and component data elements for nationwide, interoperable health information exchange. The February 2020, Version 1 is available at: <https://www.healthit.gov/isa/united-states-core-data-interoperability-uscdi>.

⁷ [42 CFR section 431.60](#).

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.

Member Educational Resources

In accordance with 42 CFR 431.60(f), BHPs must provide, in an easily accessible location on their public websites and/or through other appropriate mechanisms through which they ordinarily communicate with current and former Beneficiary seeking to access their health information, educational resources in non-technical, simple and easy-to-understand language explaining at a minimum:⁸

- 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
- An overview of which types of organizations or individuals 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.

⁸ CMS developed a resource to assist BHPs in meeting this requirement, the *Patient Privacy and Security Resources-Supporting Payers Educating their Patients* document. It includes an overview and sample content to meet these requirements. Use of this document is not required; it is to support BHPs as they produce Beneficiary resources tailored to their Beneficiary population. The document is available at: <https://www.cms.gov/files/document/patient-privacy-and-security-resources.pdf>.

Provider Directory API

Inyo County Behavioral Health will 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. Inyo County Behavioral Health will update the Provider Directory API no later than 30 calendar days after Inyo County Behavioral Health receives the provider information, or is notified of a change.⁹

The Provider Directory API will include the following information about Inyo County Behavioral Health's network providers for behavioral health providers, hospitals, and any other providers or facilities contracted for Medi-Cal covered services under the MHP's contract:

- Name of provider, medical group/foundation, independent physician/provider associations, or site as well as any group affiliation;
- National Provider Identifier number;
- Street address(es);
- All telephone numbers associated with the practice site;
- Website URL for each service location or physician provider, as appropriate
- Specialty, as applicable
- Hours and days when each service location is open, including the availability of evening and/or weekend hours;
- Services and benefits available;
- Whether the provider will accept new beneficiaries;
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;
- Whether the provider's office/facility has accommodations for people with physical disabilities, including offices, exam room(s), and equipment; and
- Telephone number to call the 24/7 access line.¹⁰

Oversight and Monitoring

Inyo County Behavioral Health will ensure that data received from its Network Providers and Subcontractors is accurate and complete by verifying the accuracy and timeliness of reported data; screening the data for completeness, logic, and consistency; and collecting service information in standardized formats to the extent feasible and appropriate. Inyo County Behavioral Health will

⁹ [42 CFR section 431.70](#) and [42 CFR section 438.10\(h\)\(3\)\(ii\)](#).

¹⁰ [42 CFR section 438.10](#). [Welfare & Institutions Code section 14197.1](#).

make all collected data available to DHCS and CMS, upon request.¹¹

Inyo County Behavioral Health or its contracted designee will 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.¹²

Inyo County Behavioral Health or its contracted designee may deny or discontinue any third-party application's 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 must 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.¹³

3. Process

How to Access Patient Access and Provider Directory API

Inyo County Behavioral Health in partnership with its contracted agencies will release when available all required elements to ensure patient access to the APIs, including:

1. 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.
2. The software components and configurations an application shall use to successfully interact with the API and process its response(s).
3. 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.

Link to the publicly accessible member educations resources will be available through the API and on the Inyo County Behavioral Health website. Educational resources will include:

1. The steps a member may consider taking to help protect the privacy and

¹¹ [42 CFR section 438.242.\(b\)\(3\),\(4\).](#)

¹² [42 CFR section 431.60\(c\)\(2\).](#)

¹³ [42 CFR section 431.60\(e\).](#)

security of their health information and the importance of understanding the security and privacy practices of any application to which they entrust their health information.

2. 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.

Patient Consent

Inyo County Behavioral Health Services (BHS) shall ensure that the Protected Health Information (PHI) and Personally Identifiable Information (PII) of members of Behavioral Health Services are protected from inappropriate disclosure. In areas where California law is more stringent than Federal law related to PII & PHI, the more stringent California confidentiality requirements apply. In areas where CFR 42 part 2 applies (substance use disorder treatment), the more stringent confidentiality requirements apply.

Members must provide consent before being included in the Patient Access and Provider Directory API and must complete a release of Information before records are released to any entity outside of the provider electronic health records and practice management systems included in the Patient Access API.

Records Requests

The information available within the API does not replace need for records request for a full record. Requests for records must follow the current Records Request Procedure in the Consumer Rights Overview Policy.

- Members have the right to request and receive a copy of their medical records within 15 working days of a written request. Members can also request that said records be amended or corrected.
- Members have the right to confidentiality with records. Information in the record shall be disclosed to only those authorized persons in accordance with federal, state and local laws.
- Members have the right to be informed about disclosures related to the medical record.
- Members have the right to inspect or review their records within 5 working days of a written request.
- Access to records can be denied if the health care provider determines that it would be harmful to the consumer to review the records. In this instance a summary shall be provided to the consumer.

4. References

DHCS BHIN 22-068

DHCS BHIN 23-032

DHCS BHIN 23-048

HHS – BH Policy and Procedures:

Confidentiality of Protected Health Information And Personally Identifiable Information

Consumer Rights Overview

Exchange of Protected Health Care Information