

# CMS Interoperability Rule Compliance Tracker

CMS-9115-F | Prior Auth API 2026 | Da Vinci | TechFitFlow.com

Track compliance status for CMS Interoperability and Patient Access Rule requirements (CMS-9115-F). Prior Authorization API became effective January 2026 for most regulated payers. Track each payer separately - readiness varies significantly.

## SECTION 1 - ORGANIZATIONAL COMPLIANCE STATUS

| CMS Requirement                        | Effective Date | Who Implements                                | Org Status  | Evidence / Notes  | Owner      |
|--|----------------|---|-------------|---|------------|
| Patient Access API                     | Jan 2021       | CMS-regulated payers                          | N/A         | Not applicable to health system as provider. Monitor payer compliance for care record requests. | N/A        |
| Provider Directory API                 | Jan 2021       | CMS-regulated payers                          | IN PROGRESS | Action: Confirm provider directory data accurate with all contracted payers.                    | J.Smith    |
| Information Blocking Prohibition       | Apr 2021       | All covered entities including health systems | COMPLIANT   | Compliance review complete. Exceptions documented. Legal sign-off obtained.                     | Compliance |
| Prior Auth API (FHIR)                  | Jan 2026       | Regulated payers + providers                  | IN PROGRESS | Epic configured for FHIR PA submission to MA and commercial payers. See Section 2.              | M.Jones    |
| Da Vinci CRD (Coverage Req. Discovery) | 2026           | Providers + payers                            | IN PROGRESS | CRD hooks configured for BCBS and UHC. Other payers pending their implementation.               | M.Jones    |
| Da Vinci DTR (Documentation Templates) | 2026           | Providers + payers                            | NOT STARTED | DTR not yet configured - payer endpoints not available for most payers Q2 2026.                 | M.Jones    |
| Da Vinci PDex (Payer Data Exchange)    | 2021           | CMS-regulated payers                          | NOT STARTED | Payer PDex access for incoming care records - process to be defined Q3 2026.                    | J.Smith    |

## SECTION 2 - PAYER-BY-PAYER PRIOR AUTH FHIR STATUS

| Payer Name             | Payer Type    | FHIR PA API Avail? | Epic Config Done? | Sandbox Tested? | Prod Tested? | ID Format Match? | Status      | Go-Live |
|------------------------|---------------|--------------------|-------------------|-----------------|--------------|------------------|-------------|---------|
| Blue Cross Blue Shield | Commercial MA | Yes                | Yes               | Yes             | Yes          | Yes              | LIVE        | 01/2026 |
| UnitedHealthcare MA    | Medicare Adv. | Yes                | Yes               | Yes             | Yes          | Yes              | LIVE        | 01/2026 |
| Aetna Medicare Adv.    | Medicare Adv. | Yes                | Yes               | Yes             | In Progress  | Pending          | IN PROGRESS | TBD     |
| Humana Medicare Adv.   | Medicare Adv. | Yes                | Yes               | Yes             | Not Started  | Pending          | IN PROGRESS | TBD     |

|                      |            |             |             |     |     |         |                    |     |
|----------------------|------------|-------------|-------------|-----|-----|---------|--------------------|-----|
| Medicaid (State)     | Medicaid   | In Progress | In Progress | No  | No  | N/A     | <b>NOT STARTED</b> | TBD |
| Cigna Commercial     | Commercial | Yes         | In Progress | No  | No  | Pending | <b>NOT STARTED</b> | TBD |
| Self-Pay / Uninsured | Self Pay   | N/A         | N/A         | N/A | N/A | N/A     | N/A                | N/A |
|                      |            |             |             |     |     |         |                    |     |
|                      |            |             |             |     |     |         |                    |     |
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