



April 20, 2021

Sagran S. Moodley
Chairman
HL7 Da Vinci Project Steering Committee

Request Number: HL7 FHIR Exception #**2021031001**

Dear Mr. Moodley:

On March 10, 2021, the Centers for Medicare & Medicaid Services (CMS) National Standards Group (NSG) on behalf of the U.S. Department of Health & Human Services (HHS) received the request from the Health Level Seven (HL7) Da Vinci project requesting approval of an exception from use of adopted standards, as provided under 45 CFR 162.940, to test Fast Healthcare Interoperability Resources (FHIR) based standards. The goal of the test is to determine whether FHIR based standards will reduce the cost, complexity, and reduce the burden of the prior authorization transaction. The following exceptions to the adopted HIPAA standard are requested:

- Exception from a requirement to use the X12 278 for a prior authorization (PA) request and response when using the FHIR standards; and
- Exception from the use of the X12 270/271 when using HL7 FHIR® Da Vinci - Coverage Requirements Discovery (CRD) Implementation Guide to determine if PA is required and performing Payer Side PA based on the FHIR standards.

Your request has been reviewed and is approved. Below are the conditions of this exception approval:


- The exception is approved until April 14, 2024.
- Within 90 days of the conclusion of your project, but not later than July 14, 2024, HL7 must submit a report on the results of the test, including a cost-benefit analysis.
- This exception is approved for the trading partners listed in your request, however, if you add additional participants, written notification, accompanied by trading partner concurrences, must be received in our office at least 30 days prior to that action.

When contacting us regarding this project, please include the request number **#2021031001**
Please direct correspondence and reports to the CMS Administrative Simplification Request mailbox at CMSAdministrativeSimplificationException@cms.hhs.gov or write to the National Standards Group (NSG) at:

Centers for Medicare & Medicaid Services (CMS)
National Standards Group (NSG)
P.O. Box 8030
Baltimore, MD 21244-8030

We appreciate this HL7 initiative to promote administrative simplification throughout the health care industry. We are looking forward to learning the results of this effort. If you have any questions or wish to discuss this further, please feel free to contact me at 410-786-0693, or christine.gerhardt@cms.hhs.gov, or you may contact Mr. Daniel Kalwa, Deputy Director, National Standards Group at 410-786-1352, or daniel.kalwa@cms.hhs.gov .

Sincerely,

Christine
Gerhardt -S  Digitally signed by
Christine Gerhardt -S
Date: 2021.04.20
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Christine Gerhardt
Director, National Standards Group (NSG)
Office of Burden Reduction and Health Informatics (OBRHI)

Cc: Daniel Kalwa
Robert Dieterle