



CMS Interoperability Framework: A Call to Action for the Health Technology Ecosystem

Breaking news on Wednesday July 30 was the [pledge](#) made by more than 60 major health care and information technology organizations to voluntarily commit to implement the Centers for Medicare & Medicaid Services (CMS) Interoperability Framework and become a CMS-Aligned Network. This announcement of widespread collaboration among technology leaders is groundbreaking and puts the health care industry on track to make significant and critical advancements over the next 12 months.

The [CMS Interoperability Framework](#) is a call to action for organizations to meet the voluntary criteria and become a CMS-Aligned Network. The [CMS-Aligned Network](#) specifically allows different types of health data sources to align with CMS goals for interoperability. The CMS Interoperability Framework envisions a health data exchange ecosystem based on an open, standards-based infrastructure that puts patients and providers first.

The first part of the CMS Interoperability Framework is the criteria that define data sharing principles. The categories of the criteria are:

1. Patient Access and Empowerment

The criteria for this category include: (i) Use applications (apps) of the patient's choice to access electronic health information; (ii) Allow access by patients to claims, explanation of benefits, prior authorizations, and clinical data from current or past payers; (iii) Allow access to health portals without additional logins when using a digital identity credential; (iv) Support audit log transparency of access to patient information. In addition, the patient's consent preferences must be shared with all parties involved, when included in a transaction.

2. Provider Access and Delegation

The criteria for this category include: (i) Allow full access for providers to patient information when using an identity verified credential, are active in the CMS National Provider Directory, and attest that the request is for treatment purposes; (ii) Use any app or delegated technology by providers for data exchange in the network; (iii) Use queries for payers and value-based care organizations to access specific quality data elements; (iv) Use queries for payers to access relevant data tied to a claim.

3. Data Availability and Standards Compliance

The criteria in this category include: (i) Use machine and human-readable formats to return clinical documents; (ii) Respond timely, and real time, when possible, to queries for patients; (iii) Share patient appointment and encounter details, with a commitment to support and implement Fast Healthcare Interoperability Resources (FHIR®)-based application program interfaces (APIs). Organizations committing to the criteria in this category must also meet the following by July 4, 2026: (i) Provide access to data using FHIR APIs that adhere to the US Core FHIR implementation guide; (ii) Return human-readable formats as FHIR attachments; (iii) Provide appointment and encounter notifications using FHIR subscriptions; and (iv) Implement record locator functionality.

4. Network Connectivity and Transparency

The criteria in this category include: (i) Display of CMS-Aligned Network by data networks; (ii) Update the CMS National Provider Directory as information is added; (iii) Provide metrics on network queries; (iv) Support standards-based inter-network connectivity; and (v) Support network-wide searching for all records of a patient or only a subset using a targeted query.

5. Identity, Security, and Trust

The criteria in this category include: (i) Require all queries to include the purpose for the request; (ii) Accept digital credentials for both patients and providers; (iii) Enforce data access controls; (iv) Allow access to logs or audit records for independent review; and (v) Maintain HITRUST certification or equivalent security validation as approved by CMS.

The second part of the CMS Interoperability Framework is the different categories of participants, such as data networks, electronic health record (EHR) vendors, providers, payers, and digital health product vendors. CMS is encouraging early adopters from the various categories of participants to pledge to collaboratively meet the stated objectives in the first quarter of 2026. These objectives include becoming CMS-Aligned Networks; providers, payers, and EHR vendors connecting to CMS-Aligned Networks; and patient-facing apps leveraging CMS-Aligned Networks in Kill the Clipboard, Conversational AI, Diabetes and Obesity Prevention and Management projects.

Highlighted at the July 30 event was the commitment to CMS Interoperability Framework. The [early adopters](#) making the pledge included well-known data networks, health systems and providers, payers, and patient-facing app vendors. While the pledges agreed to by the early adopters varied based on the organization's group, there were common actions and requirements. Working collaboratively, becoming or participating with the CMS-Aligned Network, empowering patients and meeting

personalized needs, using digital tools and apps, and accessing and sharing patient health information securely were cornerstones in each pledge. In total, 21 data networks, 11 health systems and providers, 38 patient-facing app vendors, and 5 payers committed to the pledge.

CMS also announced during the event progress on its work in building foundational tools that support an improved digital ecosystem, including an enhanced Plan Finder for Medicare beneficiaries, development of a FHIR-based API National Provider Directory, improved digital identity processes, and trusted exchange and CMS-Aligned Networks. These topics were the subject of the June 3 meeting hosted by CMS and Assistant Secretary for Technology Policy/Office of the National Coordinator for Health IT (ASTP/ONC) where they engaged with attendees on advancing data interoperability, patient access, and patient-friendly digital health products.

Organizations interested taking the pledge and committing to the CMS Interoperability Framework can email HealthTechRFI@cms.hhs.gov.