



# HTI-4 Unpacked

What You Need to Know Now and What's Ahead

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# New HTI-4 Rule Overview



- The HTI-4 final rule (“Health Data, Technology, and Interoperability: Electronic Prescribing, Real-Time Prescription Benefit and Electronic Prior Authorization”) is included in the FY 2026 CMS IPPS final rule.
- Finalizes certain proposals from HTI-2, focusing on electronic prescribing, real-time Rx benefit checks, and electronic prior authorization.

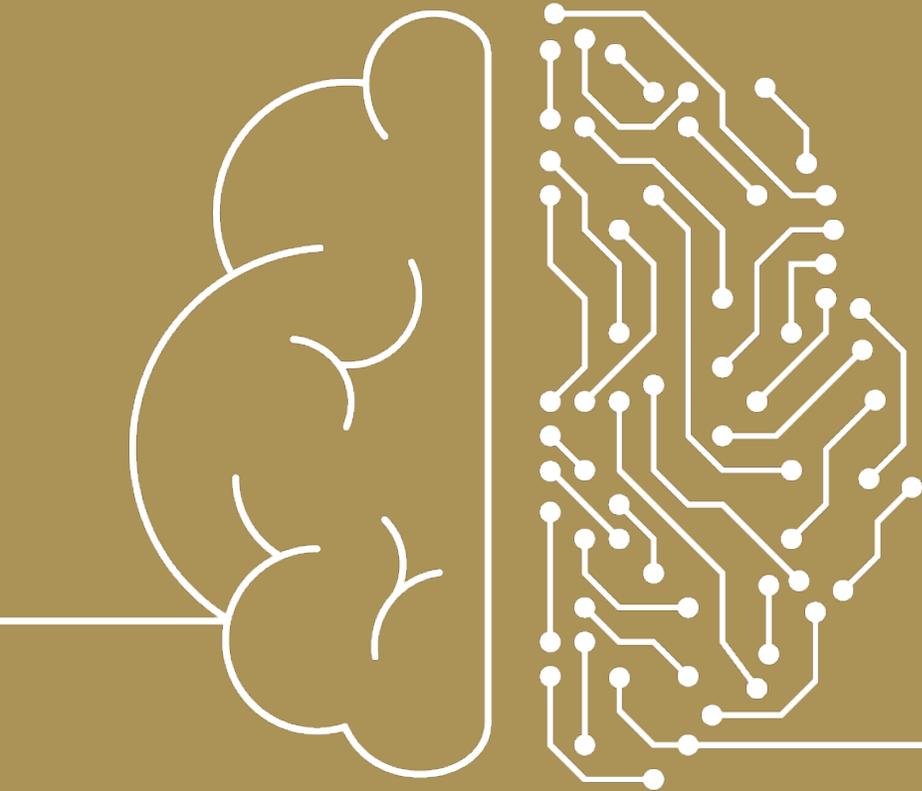
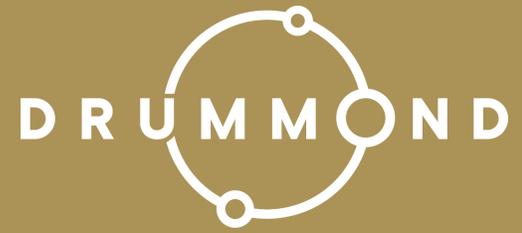
# CMS Rule and HTI-4



Advances HTI-4 within the broader CMS IPPS context (CMS-1833-F).

**Effective Date: October 1, 2025**

# Who is Impacted

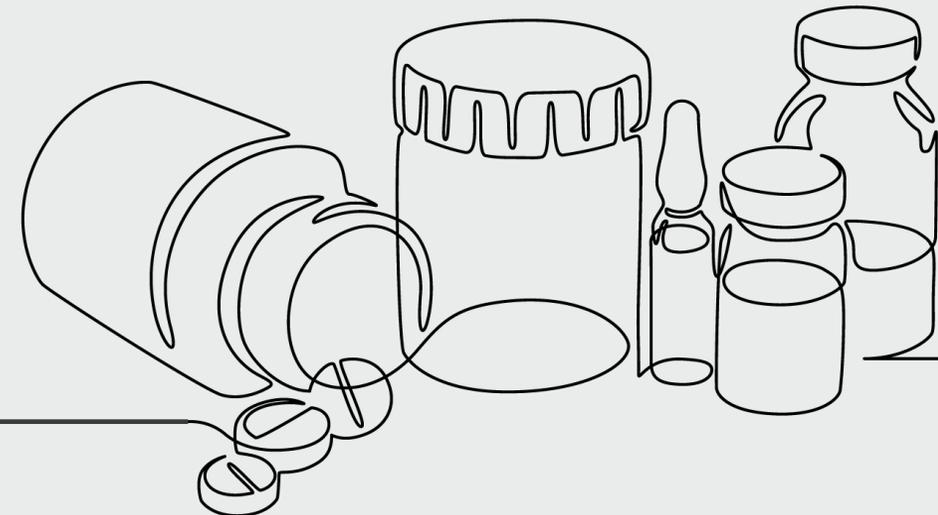


- **Health IT Developers:** Must update to conform to new certification criteria for e-Prescribing (NCPDP SCRIPT 2023011), Real-Time Prescription Benefit (RTPB), and ePA APIs.
- **Healthcare Providers:** Those using certified health IT in Medicare programs (e.g., Promoting Interoperability, MIPS) must ensure their systems meet updated standards.

# Electronic Prescribing Updates



- (b)(3): Electronic Prescribing
  - NCPDP SCRIPT 2023011 required by January 1, 2028
  - ePA Transactions Required
  - Live Testing Required
  - Beta Testing Available
- (b)(4): Real Time Prescription Benefit
  - New criterion based on NCPDP RTPB standard v13
  - Base EHR Requirement on and after January 1, 2028
  - Required for (b)(3) Electronic Prescribing



# Electronic Prior Authorization (ePA)



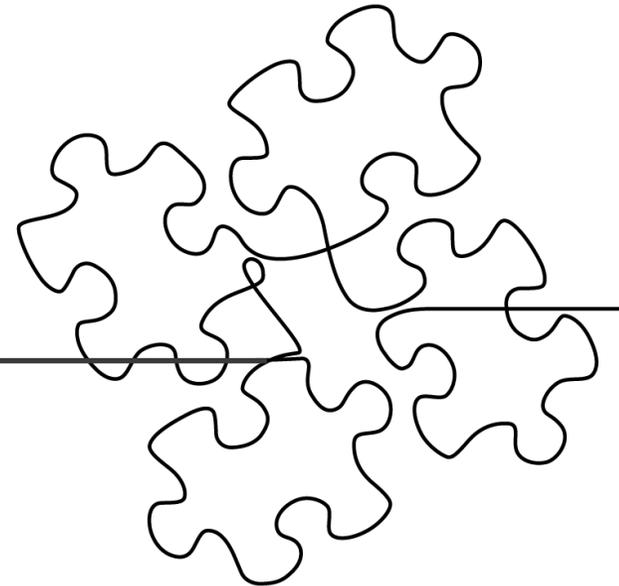
- Introduces FHIR-based certification criteria (Da Vinci IGs) allowing providers to request payer coverage info, submit authorization, and monitor status directly via certified systems
  - (g)(31) Coverage Requirements Discovery (CRD)
  - (g)(32) Documentation Templates and Rules (DTR)
  - (g)(33) Prior Authorization Support (PAS)
- Required for MIPS participating providers in 2027



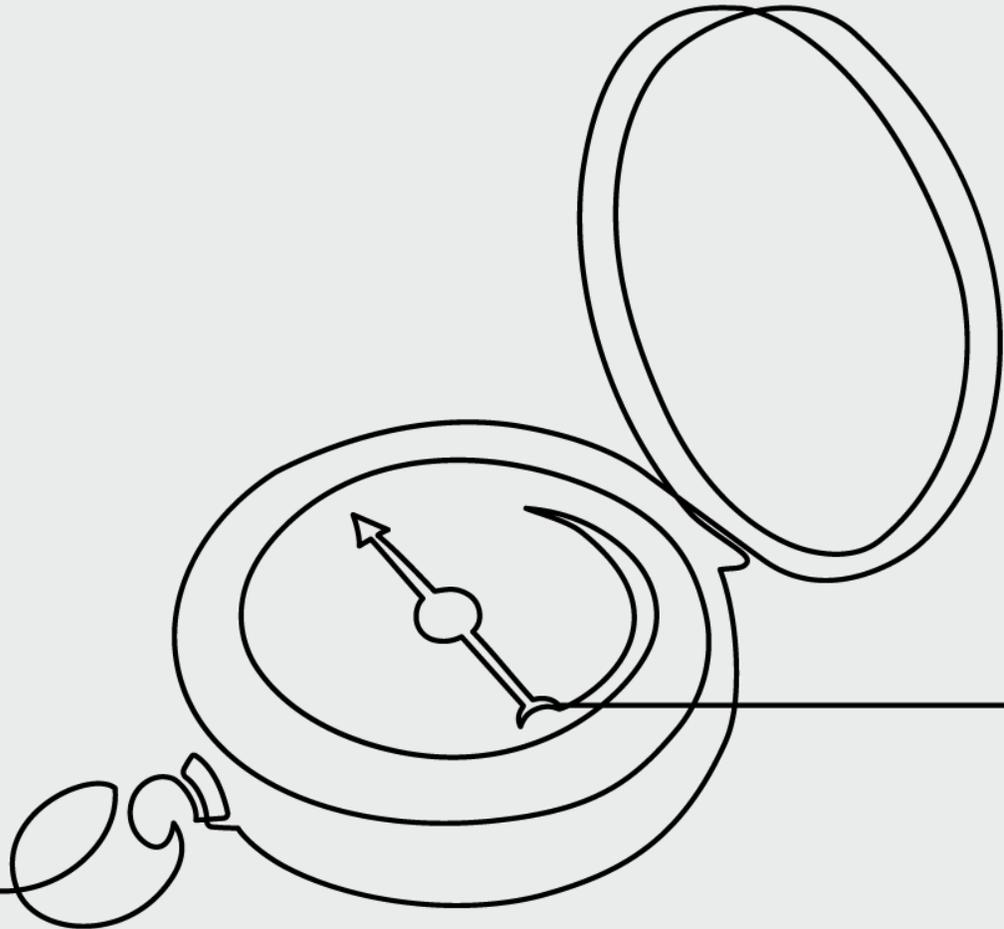
# Modular API Capabilities



- New FHIR-based certification criteria for supporting electronic prior authorization workflows and other use cases.
- (j)(20) Workflow Triggers for DSI – Clients
  - Required for (g)(31) Coverage Requirements Discovery (CRD)
- (j)(21) Subscriptions – Client
  - Required for (g)(33) Prior Authorization Support (PAS)



# New Test Procedures and Test Kits Coming Soon



- Draft Test Procedures available for comment until September 24, 2025
- Draft Inferno Test Kits for ePA and Subscriptions currently available
- Final Test Tools and Test Procedures around effective date October 1, 2025
- Developers should monitor ONC timelines for official announcements.

# HTI-4 Timeline



- **October 1, 2025:** HTI-4 effective date
- **Q1 2026:** Certification testing begins
- **January 1, 2027:** Payers must support ePA
- **Calendar year 2027:** Providers use ePA API at least once
- **January 1, 2028:** Mandatory support of SCRIPT 2023011 and RTPB for Base EHR

# Possible Future Rulemaking Revealed by HTI-4



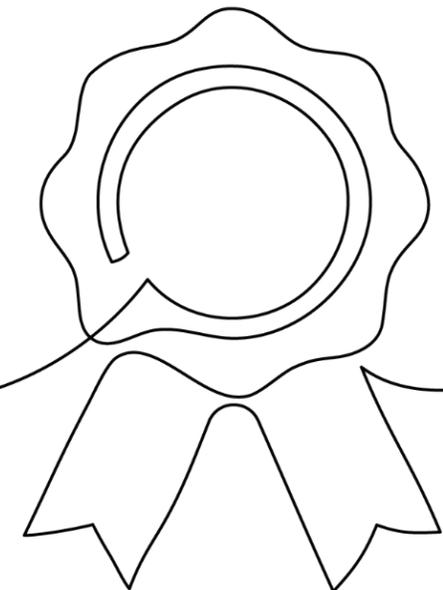
- HTI-2 NPRM resulted in 3 final rules (so far!)
- HTI-4 focused on Prior Authorization
- ONC working with CMS to advance “Health Tech Ecosystem”
- Adds 4 additional FHIR IGs to 170.215 for use by HHS



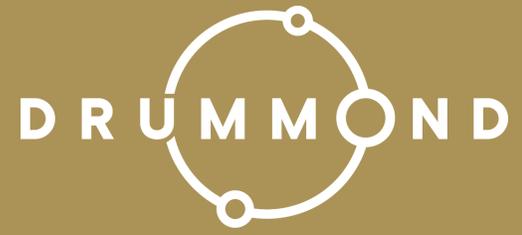
# HTI-5 Coming Soon!



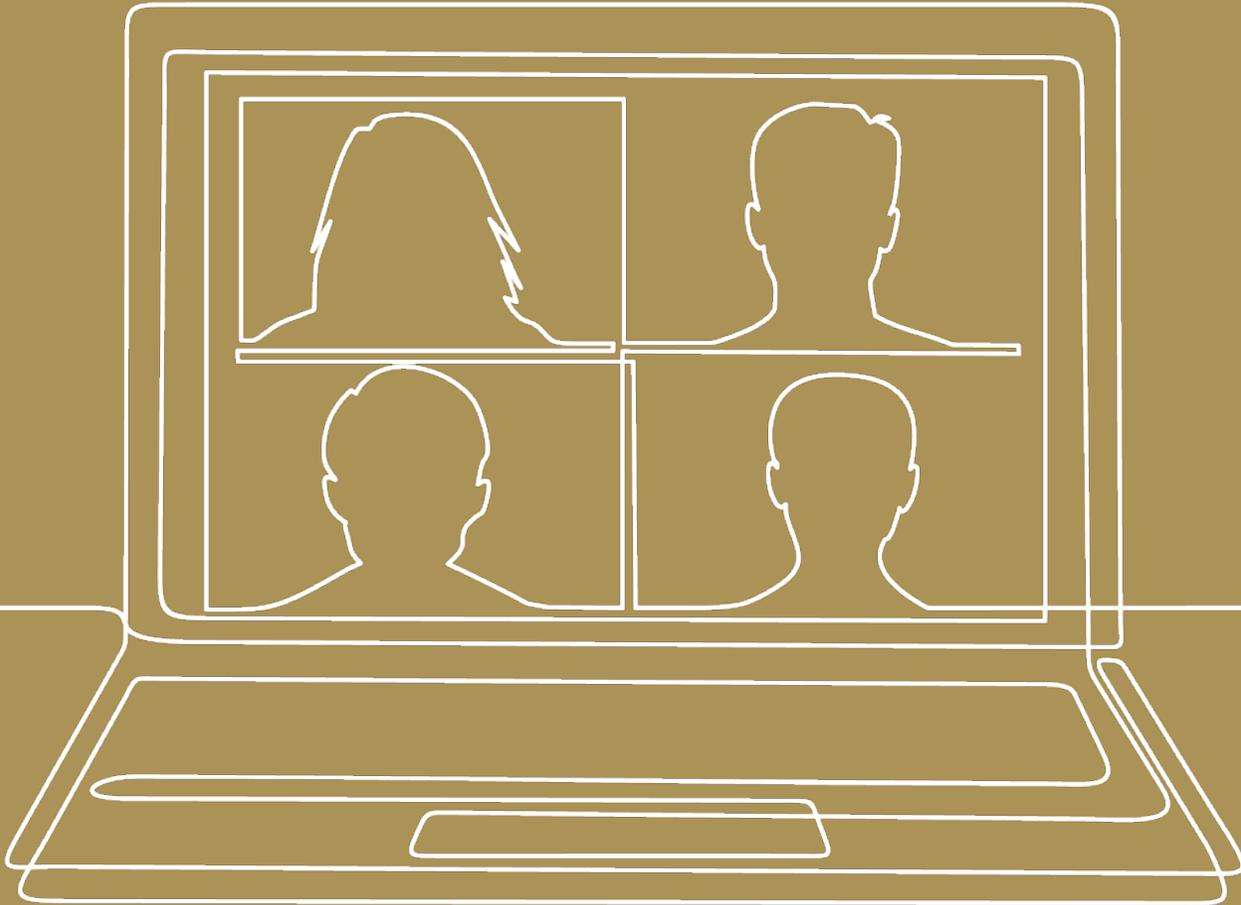
- Codify all or parts of recent enforcement discretion (RWT) guidance
- Remove certain certification criteria
- Remove Condition and Maintenance of Certification requirements
- Remove other ONC Health IT Certification Program requirements
- Potential deregulatory actions on 45 CFR part 171 (Information Blocking)
- Potential deregulatory actions on 45 CFR part 172 (TEFCA).



# Check-In Calls



- Meet with your Account Manager
- Personalize Guidance
- Share Actionable Insights
- Clarify Roles and Resources
- Identify Support Gaps





Q & A