

# FHIR for the HIM Professional

## Key Considerations for FHIR Related Discussions

### Executive Position Statement

Fast Healthcare Interoperability Resources (FHIR) is a federally mandated interoperability standard that directly impacts patient access, data governance, coding integrity, compliance, and audit accountability. While frequently implemented by technical teams, FHIR operationalizes structured clinical data, an established domain of the Health Information Management (HIM) profession. As interoperability requirements expand, FHIR competency is becoming essential to HIM leadership in data stewardship and regulatory compliance roles.

### What is FHIR

FHIR stands for *Fast Healthcare Interoperability Resources*. It is a next level interoperability standard created by HL7.

FHIR, developed by Health Level Seven International (HL7), is a standard for health information exchange using RESTful APIs and structured data 'Resources' (e.g., Patient, Observation, Condition, Encounter, Medication Request). Certified health IT systems are required to support FHIR-based APIs to enable standardized access to United States Core Data for Interoperability (USCDI) elements under the 21st Century Cures Act Final Rule.

### Why is This Important?

In the CMS Interoperability and Patient Access final rule, CMS required certain payers to implement an HL7 FHIR Patient Access API. CMS is requiring some payers to add information about prior authorizations (excluding those for drugs) to the data available via that Patient Access API. This will empower patients to access to more of their data and help them understand the prior authorization process. This requirement must be implemented by January 1, 2027. FHIR is also enforced in the ONC 21st Century Cures Act Final Rule\*, which requires standardized API access to defined United States Core Data for Interoperability (USCDI) data elements and prohibits information blocking practices. FHIR standardizes transport, but does not ensure data quality. Data governance remains HIM responsibility. FHIR increases accountability for terminology mapping, provenance tracking, and audit controls. HIM professionals should manage these mapping, tracking and audit processes to ensure patient privacy and regulation compliance.

### Key Considerations for the HIM Professional

HIM professionals should always have a seat at the table for discussions regarding the exchange of healthcare related data.

Key Questions to ask yourself and stakeholders in your organization include:

- Do you understand the encryption and data security mechanisms?

- What is the data security and audit policy for the exchange?
- What is the turn around on security risks?
- What are your responsibilities, under the standards in the AHIMA data governance practice brief, to ensure data quality, data governance, and best practices?
- FHIR transmits data exactly as documented; free text documentation limits interoperability and downstream usability; how can your organization be a good steward of your data and maximize data assets?
- What are all the interfaces sending PHI using FHIR? Are they cataloged and routinely validated?

\*The ONC 21st Century Cures Act Final Rule requires health IT systems to support **secure, seamless access and exchange of electronic health information**, giving patients more direct control over their data. It also **prohibits information blocking** and promotes interoperability by pushing developers and providers to adopt standardized APIs and share data more freely.

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