ONC TEFCA
Recognized Coordinating Entity
Monthly Informational Call
April 21, 2020
This project is supported by the Office of the National Coordinator for Health Information Technology (ONC) of the U.S. Department of Health and Human Services (HHS) under 90AX0026/01-00 Trusted Exchange Framework and Common Agreement (TEFCA) Recognized Coordinating Entity (RCE) Cooperative Agreement. This information or content and conclusions are those of the author and should not be construed as the official position or policy of, nor should any endorsements be inferred by ONC, HHS or the U.S. Government.
Agenda

• Welcome
• RCE Status Update
• Common Agreement Work Group Update
• QHIN Technical Framework Update
• Stakeholder Feedback Meeting Recap
• Next Steps
• Questions and Answers
Meet the RCE Team

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CEO
The Sequoia Project

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Executive Director
Carequality Inc.

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Gravely Group

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RCE Update
## RCE Progress

### MRTCs
- ONC-RCE language review sessions
- RCE facilitated research for TEFCA Summary of Disclosures
- RCE supported analysis for certain MRTC topics

### ARTCs
- RCE drafted ARTC framework and initial ARTCs
- Public stakeholder feedback meetings
- ONC-RCE review sessions

### QHIN Technical Framework
- RCE scoping discussion with ONC
- Public stakeholder feedback meetings
- Submitted draft QTF to ONC
- ONC-RCE review sessions

### Stakeholder Input
- ONC approved stakeholder engagement strategy and plan
- Public stakeholder feedback meetings
- Monthly informational calls

### Common Agreement Work Group
- ONC approved CAWG proposal
- RCE developed participation criteria, CAWG application and MOU-Confidentiality Agreement
- Call for applications to participate in CAWG

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Common Agreement Work Group Update
Common Agreement Work Group

• **Purpose**
  – Inform RCE development of the draft Common Agreement (MRTC/ARTC components)

• **Participation**
  – 23 organizations represented, including:
    • HINs (national, state and technology-centric)
    • HIN Participants (provider organizations, health plan)
  – Operate under MOU and Confidentiality Agreement
  – Participation is not a guarantee of QHIN status

• **Process**
  – RCE facilitates discussion for defined topics in bi-weekly meetings
  – Participants share feedback and work towards consensus
  – RCE synthesizes feedback and refines contract language
  – RCE hosts public stakeholder feedback session on key ARTCs
  – RCE prepares Common Agreement Draft Version 1 for submission to ONC

• **Additional Opportunities for Input**
  – Monthly informational calls
  – ARTC public call
  – Common Agreement Draft Version 1 public comment period
CAWG Work Plan Schedule – Where We Are

<table>
<thead>
<tr>
<th>Date</th>
<th>Session #</th>
<th>Venue</th>
<th>Topic</th>
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<tbody>
<tr>
<td>4/1</td>
<td>1</td>
<td>Virtual</td>
<td>Kickoff Meeting</td>
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<tr>
<td>4/15</td>
<td>2</td>
<td>Virtual</td>
<td>Governance Structure</td>
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<tr>
<td>4/29</td>
<td>3</td>
<td>Virtual</td>
<td>Governance (cont’d as needed) + Rights of the Individual</td>
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<tr>
<td>5/13</td>
<td>4</td>
<td>Virtual</td>
<td>QHIN responsibilities (Part 1)</td>
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<tr>
<td>5/27</td>
<td>5</td>
<td>Virtual</td>
<td>QHIN responsibilities (Part 2)</td>
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<tr>
<td>6/10</td>
<td>6</td>
<td>Virtual</td>
<td>QHIN liability for non-compliance with requirements</td>
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<tr>
<td>6/24</td>
<td>7</td>
<td>Virtual</td>
<td>Misc CA terms (select topics only given time constraints)</td>
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<tr>
<td>7/8</td>
<td>8</td>
<td>Virtual</td>
<td>Review draft CA</td>
</tr>
<tr>
<td>7/22</td>
<td>9</td>
<td>Virtual</td>
<td>Continue review of draft CA</td>
</tr>
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Topics Addressed Thus Far

• Session 1: 4/1/20
  – Definitions
  – QHIN designation process

• Session 2: 4/15/20
  – Governance models
  – Role of The Sequoia Project’s Board of Directors
  – Role of QHINs, Participants, and others
What’s Next

• Session 3: 4/29/20
  – Governance discussion, if needed
  – Individual Access Services
  – Individuals’ right to use or disclose their own information without limitation
  – Meaningful choice

• Sessions 4 and 5: 5/13/20 and 5/27/20
  – Privacy, security, and patient safety (non-HIPAA entity issues)
  – Minimum necessary requirements
  – Written privacy policies and summary of privacy practices
  – Disclosures for specific purposes
  – Summary of disclosures
  – Breach notification
  – Ability of a QHIN, Participant or Participant Member to not receive Electronic Health Information (EHI)
  – Mandatory flow-downs to Participants and Participant Members
  – Access to Participant/QHIN agreements by ONC or RCE
  – Fees
QHIN Technical Framework (QTF) Update
Elements of the QHIN Technical Framework

• **Supported Information Flows:**
  – Patient Discovery
  – Document Query
  – Message Delivery

• **Functions and Technology to Support Exchange**
  – Certificate Policy
  – Secure Channel
  – Mutual QHIN Server Authentication
  – User Authentication
  – Authorization and Exchange Purpose
  – Patient Identify Resolution
  – Individual Privacy Preferences
  – Directory Services
  – Auditing
  – Error Handling
  – Onboarding and Testing

**Approach:**
- Build from current capabilities
- Deploy known standards
- Keep an eye toward future approaches
QTF Status

- Two public stakeholder feedback meetings
- Submitted draft QTF to ONC for review
- Review sessions with ONC
- QTF being revised based upon ONC feedback
Stakeholder Feedback Meeting Recap
Key Stakeholders to Engage

- Likely QHINs
- Other HINs
- National and state associations
- Consumer and patient groups
- Payers and purchasers
- Continuum of providers
- Federal, state, local govt/ public health
- Standards development organizations
- Health IT developers
- Technology companies

Targeted Outreach

- Healthcare providers across the continuum
- Technology service providers
- Payers, purchasers and consumer groups
- State, local government and public health
- Health information networks
- ONC engaging federal agencies

National and state associations included where appropriate

Continuum of healthcare providers
- Primary care
- Specialists
- Behavioral Health
- Emergency Medical Services
- Safety Net Providers
- Acute Care
- Post-acute Care
- Long-term Care

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Stakeholders Engaged to date (by Group)

The RCE engaged **665 key stakeholders in 5 groups:**

- Providers across the care continuum
- Health Information Networks (HINs)
- Technology service providers
- State government and public health
- Payers and consumers
Stakeholder Feedback Meetings to Date (by Type)

The RCE has facilitated **26 public feedback meetings** with **2,500 participants**

- Multi-stakeholder feedback meetings
- ONC Annual Meeting sessions
- The Sequoia Project Annual Meeting
- Targeted stakeholder feedback meetings
Common Themes Across Groups

- Questions on timelines
- Incorporation of FHIR-based exchange into the TEFCA ecosystem
- Clarification regarding whether HINs must support the technical specifications in the QTF for exchange within the HIN
- Capabilities necessary to be a QHIN
- Interaction with the finalized CMS and ONC interoperability rules
- Clarification regarding whether participation is mandatory
Themes Within Stakeholder Groups

• State government and public health
  – Public health use cases
  – Impact on existing public health information exchange
  – Need for public health engagement and governance representation
  – Use of push modalities for public health
  – End to end encryption

• Health information networks
  – QHIN onboarding and designation process
  – Common Agreement flow down terms to QHIN Participants
  – Timeframes for amending existing agreements
  – Implications of state laws in relation to the Common Agreement
Themes Within Stakeholder Groups (Cont’d)

• Providers across the care continuum
  – Use of TEFCA for some (or all) exchange needs
  – Content of data exchanged (e.g. parsable, USCDI, etc.)
• Payers and consumers
  – Consumer education about TEFCA and involvement in developing the Common Agreement
  – Individual access to health information
  – What types of organizations might be QHINs
• Technology service providers
  – Document-based exchange and support for FHIR
  – Potential for duplicative data
  – Record locator service implementation (e.g., by QHIN, Participant)
  – Common Agreement Work Group process
Next Steps
What’s Next?

• RCE will facilitate the CAWG process
• RCE will host monthly informational calls
• RCE will host a public call regarding the ARTCs
• RCE will submit drafts to ONC
  — Common Agreement Draft Version 1 for Public Comment – Combined contract terms (MRTCs / ARTCs)
  — QHIN Technical Framework (QTF) – Draft 2
• ONC will post the QTF Draft 2 and Common Agreement Draft Version 1 for public comment
• Public comments will inform next iteration of the Common Agreement and QTF

Get involved: https://rce.sequoiaproject.org/contact/