

September 17, 2021

The Sequoia Project
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Vienna, Virginia 22182

Submitted electronically via email to rce@sequoiaproject.org

RE: Trusted Exchange Framework and Common Agreement (TEFCA) Qualified Health Information Network (QHIN) Technical Framework (QTF) Feedback

Dear TEFCA Recognized Coordinating Entity (RCE) colleagues,

The Strategic Health Information Exchange Collaborative (SHIEC), now known as Civitas Networks for Health, is happy to provide initial feedback to the QTF draft posted on your website. We appreciate the opportunity to provide feedback via multiple methods—previously, in public and targeted meetings, and here in written form. We are also happy to continue to work directly with you to provide more detailed feedback as the QTF is further developed.

On behalf of Civitas Networks for Health, we appreciate every opportunity to provide feedback on national interoperability frameworks and approaches. Civitas Networks for Health is a newly launched organization. The Strategic Health Information Exchange Collaborative (SHIEC), representing 89 health information exchanges (HIEs) and Associate Members recently joined forces with the Network for Regional Healthcare Improvement (NRHI), representing 29 Regional Health Improvement Collaboratives (RHICs) and Affiliate Members, to form Civitas Networks for Health. Civitas is a nonprofit national collaborative comprised of member organizations working to use health information exchange, health data, and multi-stakeholder, cross-sector approaches to improve health. Collectively we represent more than 95% of the United States. We educate, promote, and influence both the private sector and policy makers on matters of interoperability, quality, coordination, health equity and cost-effectiveness of healthcare. We support local health innovators by amplifying their voices at the national level and increasing the exchange of valuable resources, tools, and ideas.

Civitas appreciates the collaborative, public approach taken by the RCE in presenting multiple drafts of the QTF and inviting public engagement and comment. After reviewing the QTF in detail with SHIEC's member-run Standards and Technology Committee (the Committee's activities will be carried over to Civitas), we have the following high-level questions and points of feedback to share:

1. We would like to better understand how QHINs will receive funding and/or charge fees for their services, in light of the 21st Century Cures Act provisions governing information blocking. In particular, the Fees Exception to information blocking provisions requires that fees are reasonable, based on objective and verifiable criteria, and are fairly applied to all parties. Will the RCE provide guidance on acceptable fee structures?

Additionally, we would like to understand if the RCE or HHS will be providing startup grant funding to QHINs, in addition to any transactional fees that the QHINs will be able to charge for their activities. Without startup grant funding, possible QHINs may be limited to a small number of organizations who must pull on outside activities to fund their operations.

2. We would like to understand the RCE's plans for the future directory of QHINs and their participants, including technical specifications, updates, and public access to any such directory, because it is our understanding that participants may only participate in one QHIN at any point in time.
3. Civitas and its members understand that the RCE only anticipates that a small number of organizations will meet the requirements to become QHINs. With this in mind, we would appreciate more information about the specific application, evaluation, and selection process for QHINs. Additionally, we are interested in learning more about the minimum standard services for QHINs, and how the RCE proposes to help participants navigate different service offerings of QHINs.
4. Regarding the document/broadcast query scenario presented in the QTF, we would like to better understand how the RCE anticipates that QHINs will implement this use case, given the extraordinarily high volume of queries this scenario would represent. Additionally, we would like to understand how the RCE anticipates QHINs will address different approaches to patient matching. Civitas member HIEs have special expertise in approaches to patient matching, honed over time and across different technical environments. We would appreciate the opportunity to collaborate with the RCE to define the minimum standards necessary to operationalize this use case.
5. We would like to further understand how the RCE anticipates QHINs will engage with the CDC and other public health agencies in the future, in light of the ongoing Public Health Emergency and renewed focus on public health and emergency response activities.
6. In response to the specific question posed: Should the QTF include QHIN Message Delivery? Civitas believes that QHIN Message Delivery is an important use case for QHINs crossing jurisdictional boundaries, especially in light of the CMS Admission, Discharge, and Transfer (ADT) notification requirements. It was not fully clarified, but we assume that Message Delivery could include multiple types of payloads, including ADT notifications.

Furthermore, we recommend Option 3, to include QHIN Message Delivery using XCDR as optional in the QTF until a FHIR-based solution is readily available. We are supportive of accelerating FHIR-based solutions for TEFCA broadly.

Thank you for the opportunity to provide feedback and for your continued commitment to improving interoperability and health information exchange. If you have questions, please do not hesitate to reach out to Civitas's interim CEO, Lisa Bari at lbari@civitasforhealth.org.

Sincerely,



Lisa Bari
CEO (Interim)
Civitas Networks for Health and Civitas Networks for Health Association.