Draft QHIN Onboarding and Designation SOP
https://rce.sequoiaproject.org/qhin-onboarding-designation-sop-feedback/URL
Standard Operating Procedure QHIN Onboarding & Designation
Comments due - June 15, 2022

Item 3. Communication of Onboarding & Designation Status by Applicant

By submitting an application for QHIN Designation, the applicant agrees that it will only communicate its status at any point in the course of this Onboarding & Designation process in accordance with the RCE's written communications protocols.

Comment: Can the QHIN applicant communicate the status to its governing body and to its business partners who are engaged in the applicants achieving QHIN designation?

Item 4. Procedure

Section 1. Eligibility Requirements

2. Common Agreement Criterion:

a. Signatory must meet the following:

(i) Be capable of the exchange of Required Information for all Exchange Purposes.

Comment: Should the initial required exchange purposes be listed in the document?

c. Signatory must submit copies of its data sharing agreements, operating policies and procedures, and other legal agreements and related documents that govern the operation of its health information network.

Comment: For the application, is the RCE asking for the Boiler Plates of the following, specific to the QHIN, below, or do they require each and every agreement to be shared?

- Data sharing agreement
- Operating policies
- Operating procedures
- Legal agreements
- Related documents that govern the operation of its health information network

Section III: Pre-Production Testing Process (pg. 15) Please see comment at bottom of next page

6. Non-Production Partner Testing

Prior to implementing production connectivity, each prospective QHIN will complete a series of non-production tests against the test instances of other QHIN gateways ("Test Ecosystem"). The Test Ecosystem will include an RCE Directory instance with which QHINs and prospective QHINs can interact to obtain and update test gateway information. Test Ecosystem gateways and transactions will be secured using valid, non-production RCE certificates.

Prospective QHINs are responsible for conducting partner tests with all other QHINs.

The non-production partner tests will consist of successfully completing each of the required transactions.

Test partners must NOT report success until each transaction has been completed and data returned to the other party in that transaction. Specifically, for QHIN Query transactions, matching patients must be found, at least one document must be available, and one or more documents must be retrieved. Data should be coordinated among the test partners such that patient matching is successful. For QHIN Message Delivery, a successful acknowledgement must be received from the responding QHIN.

Prospective QHINs are required to achieve 100% transaction success with all in-production QHINs participating in the Test Ecosystem. The RCE recognizes that for the initial group of QHIN applicants, there will not be any in-production QHINs against which an applicant can test. **For this initial group of applicants only,** each applicant is required to achieve 100% transaction success with **at least** one other QHIN applicant. After the initial group of QHINs are Designated by the RCE, these QHINs will be the in-production QHINs for purposes of the testing requirement of achieving 100% transaction success. Once an applicant is Designated, it must assist future QHIN applicants with their testing by maintaining a suitable test environment as further described below.

QHINs that have received an RCE Directory Read/Write API key are required to add an entry into the Non-Production Test Ecosystem Directory that is available for testing at any time. QHINs are required to maintain entries in this directory that reasonably represent their production environment. QHINs MAY add additional entries to the Test Ecosystem Directory beyond the minimal list if they so choose.

Entries in the Test Ecosystem Directory, and the gateway(s) behind them, should behave substantially similarly to the production environment without access to Production data. Specifically, test partners should expect that the same query that yielded a successful test with entries in the Test Ecosystem Directory would yield a

non-errored query response in production. These test entries must ONLY return information consisting of synthetic patient data, including demographics and retrievable files. **No production clinical data should be available via gateways published in the Test Ecosystem Directory.** QHINs MUST ensure that their test gateway is active and ready to reply to test queries. Failure to repair these test entries in a timely manner may result in punitive actions from the RCE which may include, but are not limited to, a denial of access to the RCE Directory read/write privileges.

Comment submitted following the meeting via email: In discussing the Test Ecosystem, it notes that prospective QHINs are required to achieve 100% transaction success during the Non-Production Partner Testing and talks through the fact that the tests should include synthetic patient data. However, the way it reads makes it seem as though each prospective QHIN will maintain their own test/synthetic patient dataset, with just the Test Ecosystem gateway (rather than the patient data set itself) published for other prospective QHINs within the Test Ecosystem. This seems like it could make evaluating successful queries across QHINs difficult, as QHINs would be querying each other using completely different sets of synthetic patient data.

Is this how others interpreted this section? If so, it could be worth clarifying whether there will be any coordination or standardization of the synthetic patient data so as to ensure queries yield a successful response, rather than "No Matching Patient Found" (unless that response is enough to validate the connection, although the indication that "test entries must ONLY return information consisting of synthetic patient data" implies otherwise).