September 20, 2022

RCE Monthly Informational Call

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Agenda

- Remarks by Micky Tripathi, ONC, National Coordinator for Health IT
- How will Exchange Work under TEFCA?
- What are TEFCA Components?
- Timeline to Operationalize TEFCA
- Questions & Answers: Part 1
  - » Questions received during or after August monthly call
- SOP Status & Release Schedule
  - » Recently Released SOPs and Resources
- Testing Documentation & Tools
- Payment and Health Care Operations Stakeholder Input Process
- Questions & Answers: Part 2
  - » Questions received during September monthly call

ONC, National Coordinator for Health IT
Micky Tripathi

How will exchange work under TEFCA?

ONC defines overall policy and certain governance requirements.

RCE provides oversight and governing approach for QHINs.

Qualified Health Information Networks (QHINs) connect directly to each other to facilitate nationwide interoperability.

Each QHIN connects Participants, which connect Subparticipants.

TEFCA Components

Trusted Exchange Framework

Common Agreement

Standard Operating Procedures

QHIN Technical Framework

QHIN Onboarding

Metrics

Governing Approach

Timeline to Operationalize TEFCA

2021
- Public engagement
- Common Agreement Work Group sessions
- RCE and ONC use feedback to finalize TEFCA

Summer/Fall 2022*
- Finalize initial SOPs
- QHINs begin signing Common Agreement and applying for Designation

2023
- Establish Governing Council
- Follow change management process to iterate Common Agreement, SOPs, and QTF, including to support FHIR-based exchange

2021	2022 – Q1	Q2	Q3	Q4	2023

Q1 of 2022
- Publish Common Agreement Version 1
- Publish QHIN Technical Framework (QTF) Version 1 and FHIR Roadmap
- Initiate work to enable FHIR-based exchange
- Public education and engagement

Q3 and Q4 of 2022
- Onboarding of initial QHINs
- Additional QHIN applications processed
- RCE establishes Transitional Council
- RCE begins designating QHINs to share data
- Prepare for TEFCA FHIR exchange pilots

SOP Status & Release Schedule

TEFCA SOP Release Schedule

SOP Name	Expected Publication of Version 1 Final
QHIN Security Requirements for the Protection of TI (Update)	Version 1.1 released 5/16
Exchange Purposes	June 2022 (V1 released 6/21)
QHIN Fee Schedule (Schedule 1)	June 2022 (V1 released 6/21)
Types of Entities That Can Be a Participant or Subparticipant in TEFCA	July 2022 (V1 released 7/19)
QHIN Onboarding & Designation (and QHIN Application)	August 2022 (V1.1 released 9/16)
Means to Demonstrate U.S. Ownership and Control of a QHIN	August 2022 (V1 released 8/31)
Individual Access Services (IAS) Exchange Purpose Implementation	September 2022 (V1 released 9/16)
Individual Access Service (IAS) Provider Privacy and Security Notice and Practices	September 2022 (Draft released 6/21)
Participant and Subparticipant Security	October 2022
Other Security Incidents and Reportable Events	End of 2022
Payment and Health Care Operations Exchange Purpose Implementation	Early 2023
Public Health Exchange Purpose Implementation	Early 2023
Government Benefits Determination Exchange Purpose Implementation	Mid 2023
Suspensions Process	2023
Successor RCE & Transition	2023

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

Questions & Answers

For more information:
rce.sequoiaproject.org

Final SOP: Individual Access Services (IAS) Exchange Purpose Implementation

SOP: IAS Exchange Purpose Implementation

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

- **Credential Service Provider**— IAS Providers are required to have an agreement with a credential service provider (CSP) who has been approved by an RCE-selected CSP approval organization.

- **Identity Verification Requirement**— IAS Providers are required to verify the identities of Individuals via a CSP prior to the Individual's first use of Connectivity Services, and then again after credentials expire.

- **Evidence of Individual Identity Proofing** —   IAS Providers are required to demonstrate that all Individuals that elect to use their IAS offering have proven their identities consistent with achieving NIST IAL2.

- **Use of Proven Demographics.** IAS Providers are required to submit queries to the QHIN that include only the demographics as provided to the CSP and as part of the patient's identity verified to NIST IAL2.

- **Response** – QHINs, Participants, and Subparticipants that receive a QHIN Query for an IAS Exchange Purpose that provides the information specified in (3) and (4) and provides an acceptable match based on responder policy are required to Respond with the Required Information per the Common Agreement, the QHIN Technical Framework, and the Exchange Purposes SOP**.**

- **Certified Changes Only**— An IAS Provider is required to ensure that all updates to demographic information transmitted via Connectivity Services for the IAS Exchange Purpose have the demographics validated to NIST IAL2 by the CSP prior to their use.

Qualified Health Information Network (QHIN) Conformance Testing Process

QHIN Technical Framework (QTF) Version 1

- The QHIN Conformance Testing Process outlined in the QHIN Onboarding & Designation SOP leverages the Sequoia Interoperability Testing Platform ("ITP"), built around the specifications defined in the QHIN Technical Framework (QTF) Version 1, information outlined in the Common Agreement and relevant SOPs, and related test materials adopted by the RCE.
- The Sequoia ITP verifies that a QHIN's or Applicant QHIN's system both complies with all specifications and requirements of the QTF and has the ability to interoperate with other QHINs.
- QHIN implementations will be tested using a set of software tools, test data, and procedures managed by the Sequoia Project as described in the documentation found here. (Testing documented was published 09/09/22)
- *Test cases, test data, and the tooling may be updated as issues are identified over time.*

Sequoia Interoperability Testing Platform (ITP)

- The Sequoia community has developed a large body of test cases, data, and conformity assessment tools that are open source
- Designed to ensure interoperability and assure compliance and minimal implementation
- The Sequoia Project has collaborated on the development of testing tools with IHE International, IHE Catalyst, and NIST to support our Sequoia, and RSNA validation testing programs
- Battle-hardened by years of operations and productized into the new Sequoia Interoperability Testing Platform (ITP)
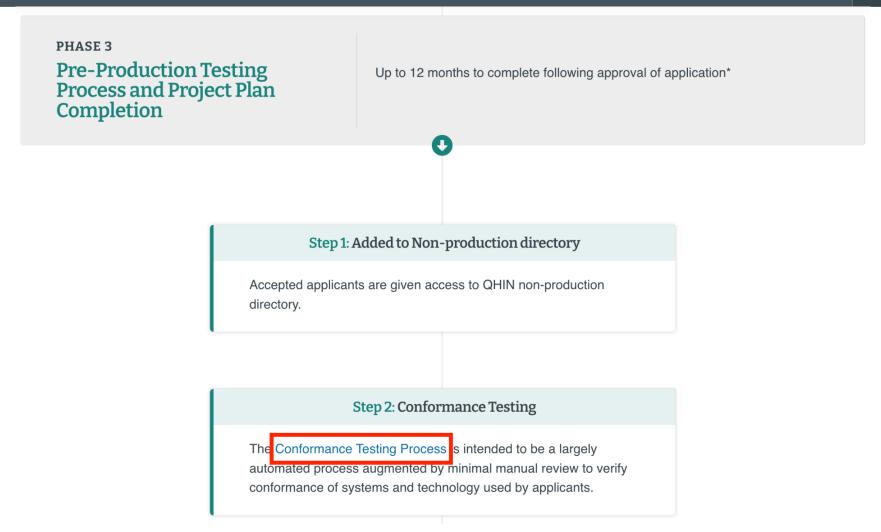
- The prospective QHIN Application, Onboarding, and Designation process has been divided into a series of five phases as follow:
  - » Phase 0 – Pre-application
  - » Phase 1 – Application Submission
  - » Phase 2 – Application Review
  - » Phase 3 – Pre-Production Testing Process and Project Plan Completion (12 months to complete)
    - – Step 1 - Added to non-production QHIN Directory
    - – Step 2 – Conformance Testing against Sequoia ITP
    - – Step 3 – Non-production Partner Testing (Peer to Peer)
  - » Phase 4 – Designation and Post-Production Testing
  - » Phase 5 – Production QHIN Exchange

https://rce.sequoiaproject.org/qhin-process/

QHIN Onboarding Testing Documentation

PHASE 3

Pre-Production Testing Process and Project Plan Completion

Up to 12 months to complete following approval of application*

Step 1: Added to Non-production directory

Accepted applicants are given access to QHIN non-production directory.

Step 2: Conformance Testing

The Conformance Testing Process is intended to be a largely automated process augmented by minimal manual review to verify conformance of systems and technology used by applicants.

https://rce.sequoiaproject.org/rce-qhin-conformance-testing-program/

1. **Testing Program Overview** - Describes the test system components and includes the configuration items that are needed for testing. This document does not describe how to use the tools or run test cases.
2. **Initialization Tests** - Describes tasks to be performed by QHINs to initialize their systems with test data and configuration information.
3. **Testing User Guide** - Describes how to use the Sequoia ITP tools and run the test cases for the QHIN Pre-Production Testing Process
4. **Transport Test Cases** - Describes tests under three broad categories, aligned with the exchange modalities defined by the QTF. These categories are:
   » QHIN Query, including;
      - Patient Discovery Query
      - Document Query and Retrieve
   » QHIN Message Delivery (Section 4.3 will have updates by 9/30/22)

5. **Security Test Cases** - Describes the negative testing and security test cases to be completed as part of the QHIN Pre-Production Testing Process

6. **Patient Data Load Files** - This zip file constitutes test patients and their records used to support the QHIN Pre-Production Testing Process

Payment & Health Care Operations Stakeholder Input Process

Payment & Health Care Operations Input Process

Charge
- Collect stakeholder input to inform the first version of the TEFCA P&HCO Exchange Purpose Implementation SOP to be published by early 2023.

Priorities for Use Case Selection
- High benefit, high burden
- Strong likelihood of voluntary adoption
- Increase patient access and interoperability
- Reduce provider/payer burden

Public Stakeholder Input Webinar
- October 11, 1-2pm ET

- Current market for payment & health care operations
  - » Commercial market for P&HCO data exchange services
  - » Challenges with identifying and collecting the "right" data
    - Minimum necessary concerns
    - Challenges with data tagging and segmentation (e.g., for self-pay or sensitive data)
    - Primary source verification requirements
  - » Trust is hard to build - Divergent interests among payers and providers
  - » Value proposition on both sides not always clear
  - » Unintended consequences (e.g., pre-mature denials)
- Current TEFCA environment
  - » TEFCA will initially operate in an IHE environment – eventually move to FHIR
  - » Exchange modalities include Query Solicitation and Message Delivery
  - » TEFCA prohibits fees between QHINs but is silent on other fees

- Improve **transparency** of why the data is being requested
- Enable **reciprocity** between participant types - shared value
- Provide the **right information** and nothing more (minimum necessary)
- Provide **consistent** information
- Be **transport agnostic**
- Support **integration into existing workflows**
- Account for both **EHR and non-EHR technologies**
- Get to **win-win-wins** (patient, provider, payer)
  - » Patient at the center
  - » Reducing payer and provider burden
- Require **no special effort**
- **Contain costs**

Payment and Health Care Operations SOP Outline

- Definition
- Permitted Actors and Workflows
- Request
  - Guidelines around specifying sub purpose of use
  - Date range
  - Identifying information
  - Other information about why the data is needed
  - Guidelines around Message Delivery
- Responses
  - What formats do payers/providers need in a response?
  - What types of information (content) do providers/payers need?
  - Whose responsibility is it to determine what data should be sent?
  - Optionality
- Directory
  - How do you ensure transparency around who the original requestor is?
  - How do you verify the relationship with the requestor?

- Disclose risk-based information supporting health plans with the cost associated with their members
- Disclose health information to appropriate parties to use to identify risk

Questions & Answers

For more information:
rce.sequoiaproject.org

Resources

- Common Agreement v. 1
- QHIN Technical Framework
- FHIR® Roadmap for TEFCA
- Standard Operating Procedures
- QHIN Application
- Communication Protocols
- User's Guide
- Benefits of TEFCA by Stakeholder Factsheets
- FAQs

https://rce.sequoiaproject.org/tefca-and-rce-resources/

Additional Resources:
https://www.healthit.gov/tefca

All Events Registration and Recordings: https://rce.sequoiaproject.org/community-engagement/

Upcoming Monthly Informational Call:
Tuesday, September 20 | 4:00 – 5:00 p.m. ET with
remarks by ONC National Coordinator
(updated time)

Upcoming Office Hours:
Friday, September 30 | 11:00a.m.-12:00p.m. ET

TEFCA P&HCO Input Webinar:
Tuesday, October 11 | 1:00-2:00 p.m. ET