



# Recognized Coordinating Entity (RCE) Communications Protocols

Version 1.2 (updated as of December 2, 2022)

This document outlines the communications protocols that the RCE, entities applying for Designation as a QHIN (“Applicant QHINs”), and QHINs must follow as they proceed through the application, Onboarding, and Designation process.

By submitting the intent to apply for QHIN Designation, the Applicant QHIN agrees that it will only communicate its status at any point in the course of the application, Onboarding, and Designation process in accordance with these communications protocols. Failure to abide by these protocols may result in consequences up to and/or including immediate denial or termination of Applicant QHIN or QHIN. The RCE reserves the right to modify these communications protocols at any point and will inform Applicant QHINs or QHINs of any modifications in writing sent to the email address for the primary contact for Applicant QHIN or QHIN.

## Overarching Requirements

- Applicant QHINs and QHINs may not publish any written, public communication related to TEFCA without RCE approval.<sup>1</sup> Applicant QHINs and QHINs must provide the RCE with at least four (4) business days advance notice of any written, public communication, including a copy of such communication. The communication must be sent to [RCE@sequoiaproject.org](mailto:RCE@sequoiaproject.org).
- No Applicant QHIN may communicate that it is or will become a QHIN until it is Designated.
- Applicant QHINs and QHINs may not release any communications that contain a misrepresentation, including but not limited to misrepresentations regarding the QHIN application; Onboarding and Designation process; its own or other Applicant QHINs’ Onboarding and Designation status; the role of the RCE and ONC; or anything else related to the application, Onboarding, and Designation process, or TEFCA.
- In all communications, Applicant QHINs and QHINs must clearly and accurately describe their Onboarding and Designation status, including the phase they have reached— as described in the QHIN Onboarding & Designation SOP and QHIN Application, Onboarding, and Designation Process diagram<sup>2</sup>— to the extent permitted by this document.

---

<sup>1</sup> Written, public communication includes but is not limited to press releases, blog posts, articles, media advisories, white papers, and web pages.

<sup>2</sup> <https://rce.sequoiaproject.org/qhin-process/>

- Applicant QHINs and QHINs may not disclose details of RCE and Applicant QHIN or QHIN discussions surrounding the application, Onboarding, and Designation process, except to the extent permitted by this document or approved by the RCE.
- RCE has the discretion to publish any aggregate, non-identifiable information related to the pre-application, application, Onboarding, and Designation phases at any point.
- Notwithstanding anything in this document to the contrary, at any point, if the Applicant QHIN has communicated its participation in any phase, it must communicate any decision on the part of the Applicant QHIN or RCE that would cause it to not move forward with the process (e.g., withdrawal, denial).
- The Office of the National Coordinator for Health IT (ONC) has submitted trademark applications to the U.S. Patent and Trademark Office for the following terms:
  - Qualified Health Information Network
  - QHIN
  - Recognized Coordinating Entity
  - RCE
  - Trusted Exchange Framework and Common Agreement
  - TEFCA
 Unauthorized use of these marks is prohibited.
- Statements or communications of employees and agents of the Applicant QHIN or QHIN will be attributed to the Applicant QHIN or QHIN.

### Specific Communication Protocols by Phases<sup>3</sup>

Phase	Applicant QHINs and QHINs	RCE
Phase 0: Pre-Application Phase	<ul style="list-style-type: none"> <li>• May communicate submission of intent to apply</li> </ul>	<ul style="list-style-type: none"> <li>• May communicate that an Applicant QHIN submitted intent to apply only if the applicant has agreed to make this information public or already communicated this information publicly</li> </ul>
Phase 1: Application Submission	<ul style="list-style-type: none"> <li>• May communicate submission of the QHIN Application after receipt of notice from the RCE that the application is complete</li> </ul>	<ul style="list-style-type: none"> <li>• May communicate that an Applicant QHIN submitted QHIN Application only if the Applicant QHIN has agreed to make this information public or already communicated this information publicly</li> </ul>

<sup>3</sup> More detail on these phases is available at: <https://rce.sequoiaproject.org/qhin-process/>

Phase	Applicant QHINs and QHINs	RCE
Phase 2: Application Review	<ul style="list-style-type: none"> <li>No communication, unless approved by the RCE</li> </ul>	<ul style="list-style-type: none"> <li>No communication regarding individual QHIN Applications, unless mutually agreed to by the RCE and the QHIN Applicant</li> <li>However, RCE may communicate withdrawn or denied applications, including the name of the Applicant QHIN</li> </ul>
Phase 3: Pre-Production Testing and Project Plan Completion	<ul style="list-style-type: none"> <li>No communication, unless approved by the RCE</li> </ul>	<ul style="list-style-type: none"> <li>No communication regarding individual QHIN Applications, unless mutually agreed to by the RCE and the Applicant QHIN</li> </ul>
Phase 4: Designation and Post-Production Testing	<ul style="list-style-type: none"> <li>May communicate official Designation only after given permission by the RCE</li> <li>Must prominently and clearly disclose Provisional or Provisional Governance Status</li> <li>Must use language approved by the RCE when describing Provisional Status and Provisional Governance Status</li> </ul>	<ul style="list-style-type: none"> <li>Will communicate QHIN names</li> <li>QHIN names may be listed on the RCE and ONC websites</li> </ul>
Phase 5: Production QHIN Exchange	<ul style="list-style-type: none"> <li>May communicate ongoing production QHIN exchange</li> </ul>	<ul style="list-style-type: none"> <li>May communicate ongoing production QHIN exchange</li> </ul>
Post-Designation Termination or Suspension	<ul style="list-style-type: none"> <li>Must disclose suspension/termination to Participants and Subparticipants</li> <li>Must use language approved by the RCE when communicating reason for suspension/termination</li> <li>Any subsequent communications related to QHIN status must clearly and prominently indicate the suspension/termination until such time that an entity is re-Designated</li> </ul>	<ul style="list-style-type: none"> <li>May communicate suspension or termination of a QHIN, including the QHIN name and reason for suspension/termination</li> </ul>

This program 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 grant number 90AX0026, Trusted Exchange Framework and Common Agreement – Recognized Coordinating Entity (RCE) Cooperative Agreement Program, in the amount of \$5,101,000 with 100 percent funded by ONC/HHS. 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.