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TEFCA
RECOGNIZED
COORDINATING
ENTITY

Standard Operating Procedure (SOP): Exchange Purposes (XPs)

Version 2.0

DRAFT for Stakeholder Feedback

January 19, 2024

Applicability: QHINs, Participants, Subparticipants

1 COMMON AGREEMENT REFERENCES

The requirements set forth in this Standard Operating Procedure (SOP) are required for implementation in addition to the terms and conditions found in the applicable Framework Agreement, the Qualified Health Information Network™ (QHIN™) Technical Framework (QTF), and applicable SOPs. The Trusted Exchange Framework and Common AgreementSM (TEFCASM) Cross Reference Resource identifies which SOPs provide additional detail on specific references from the Common Agreement.

All documents cited in this SOP can be found on the Recognized Coordinating Entity® (RCE™) [website](#).

2 SOP DEFINITIONS

Terms defined in this Section 2 are introduced herein and can be found in the TEFCA Glossary. Capitalized terms used in this SOP without definition shall have the respective meanings assigned to such term in the TEFCA Glossary. The definitions of Government Benefits Determination and Individual Access Services are introduced in Section 1 of the Common Agreement.

Health Care Operations: has the meaning assigned to such term at 45 CFR § 164.501, except that this term shall apply to the applicable activities of a Health Care Provider regardless of whether the Health Care Provider is a Covered Entity.

Payment: has the meaning assigned to such term at 45 CFR § 164.501.

Public Health: with respect to the definition of Exchange Purposes (XPs), a Request, Use, Disclosure, or Response permitted under the HIPAA Rules and other Applicable Law for public health activities and purposes involving a Public Health Authority, where such public health activities and purposes are permitted by Applicable Law, including a Use or Disclosure permitted under 45 CFR § 164.512(b) and 45 CFR § 164.514. For the avoidance of doubt, a Public Health Authority may Request, Use, and Disclose TEFCA Information (TI) hereunder for Public Health to the extent permitted by Applicable Law and the Framework Agreements.

Treatment: has the meaning assigned to such term at 45 CFR § 164.501.

3 PURPOSE

The Common Agreement permits QHINs, Participants, and Subparticipants to utilize TEFCA Exchange only for XPs. To the extent there are limitations on what types of Participants or Subparticipants may transact TEFCA Information for a specific XP, such limitations are set forth in the applicable SOP(s). This Exchange Purposes (XPs) SOP defines the XPs and sets forth any limitations on the types of Participants or Subparticipants can utilize such XP. It also identifies any XPs for which a Response is required pursuant to the Common Agreement.

4 PROCEDURE

4.1 Authorized Exchange Purposes (XPs)

The authorized XPs are:

- a. Treatment
- b. Payment
- c. Health Care Operations (including HCO SubXP-1)
- d. Public Health (including PH SubXP-1)
- e. Government Benefits Determination
- f. Individual Access Services

4.2 Exchange Purpose Codes (XP Codes)

Each transaction MUST be accompanied by the appropriate TEFCA XP Code in the table below.

Table 1 TEFCA XP Codes OID: 2.16.840.1.113883.3.7204.1.5.2.1

Code	Code Level	Display Value
T-TRTMNT	1	Treatment
T-PYMNT	1	Payment
T-HCO	1	Health Care Operations
T-HCO1	2	Health Care Operations SubXP-1
T-PH	1	Public Health
T-PH-ECR	2	Electronic Case Reporting
T-PH-ELR	2	Electronic Lab Reporting
T-PH-EDR	2	Other Electronic Disease/Condition Reporting
T-PH-ECI	2	Electronic Case Investigation
T-IAS	1	Individual Access Services
T-GOVDTRM	1	Government Benefits Determination

4.3 Limitations on Types of Participants/Subparticipants

- a. Initiating Nodes may only Request information for a specific XP if the Initiating Node is controlled by a QHIN, Participant, or Subparticipant that is the type of entity or person that is authorized by Applicable Law to assert Requests for the applicable XP. For example:
 - i. Only Health Care Providers may assert Treatment for a Request.
 - ii. Only a federal, state, local, or tribal agency, instrumentality, or other unit of government may assert Government Benefits Determination for a Request.
- b. Notwithstanding the foregoing, a Principal may use a Delegate to make such Request or transact for the applicable XP, provided that the Principal has in place a written agreement with the Delegate that authorizes the Delegate to make such Request or transact for the applicable XP.

4.4 Required Support

- a. For purposes of this SOP, “support” means the technical capability to:
 - i. Receive and respond to transactions from QHINs, Participants, and Subparticipants via TEFCAs Exchange, including transmitting all information that a QHIN, Participant, or Subparticipant may send via TEFCAs Exchange related to any XP (e.g., the content of the packet itself, if any).
- b. QHIN MUST support all the XPs.
- c. Responding Nodes MUST support any XP that they are required to Respond to per Section 4.5 of this SOP, and they may support any that are authorized per Section 4.1 of this SOP.

4.5 Required Responses

- a. Responding Nodes of Principals MUST Respond to Requests for the XPs listed in Section 4.5c of this SOP, except to the extent that one or more of the exceptions applies as set forth in Section 4.6 of this SOP.
- b. Responding Nodes of Delegates MUST Respond to Requests for the XPs listed in Section 4.5(c) below, if authorized by the written agreement authorizing the Delegate to conduct TEFCAs Exchange for the Principal, except to the extent that one or more of the exceptions applies as set forth in Section 4.6 of this SOP.
- c. The XPs that require a Response to a Request are as follows:
 - i. Treatment
 - ii. Individual Access Services
 - iii. Healthcare Operations SubXP-1 if the Request is received via FHIR Query

- d. Responding Nodes are permitted to Respond to all authorized XPs in Section 4.1 and not listed in 4.5(c).

4.6 Exceptions to Required Responses

- a. The below are exceptions to the Response requirements set forth in Section 4.5 of this SOP.
 - i. The Response is prohibited by Applicable Law; is inconsistent with Signatory's Privacy and Security Notice, if applicable; or is not in accordance with the Common Agreement;
 - ii. If the Responding Node is controlled by a Public Health Authority;
 - iii. If the Responding Node is controlled by a federal, state, local, or tribal agency, instrumentality, or other unit of government, including such government agency's agent(s) and contractor(s), using TEFCA Exchange solely for purposes of Requesting information for Government Benefits Determination;
 - iv. If the reason asserted for the Request is Individual Access Services and the information would not be required to be provided to an Individual pursuant to 45 CFR § 164.524(a)(2), regardless of whether the Responding Node is controlled by a Non-HIPAA Entity or a Covered Entity or a Business Associate;
 - v. If the Requested information is not Required Information, provided such Response would not otherwise violate the terms of this Common Agreement;
 - vi. If the Responding Node is controlled by a federal agency, to the extent that the Requested Disclosure of Required Information is not permitted under Applicable Law (e.g., it is Controlled Unclassified Information as defined at 32 CFR Part 2002, and the party requesting it does not comply with the applicable policies and controls that the federal agency adopted to satisfy its requirements);
 - vii. If the XP is authorized but not required at the time of the Request, either under this SOP or the Common Agreement; or
 - viii. An applicable SOP exempts the Response.

VERSION HISTORY

Version	Revision Date	Section #(s) of Update
Version 1.0	Released June 2022	N/A
Draft Version 2.0	January 19, 2024	All sections