January 30, 2024

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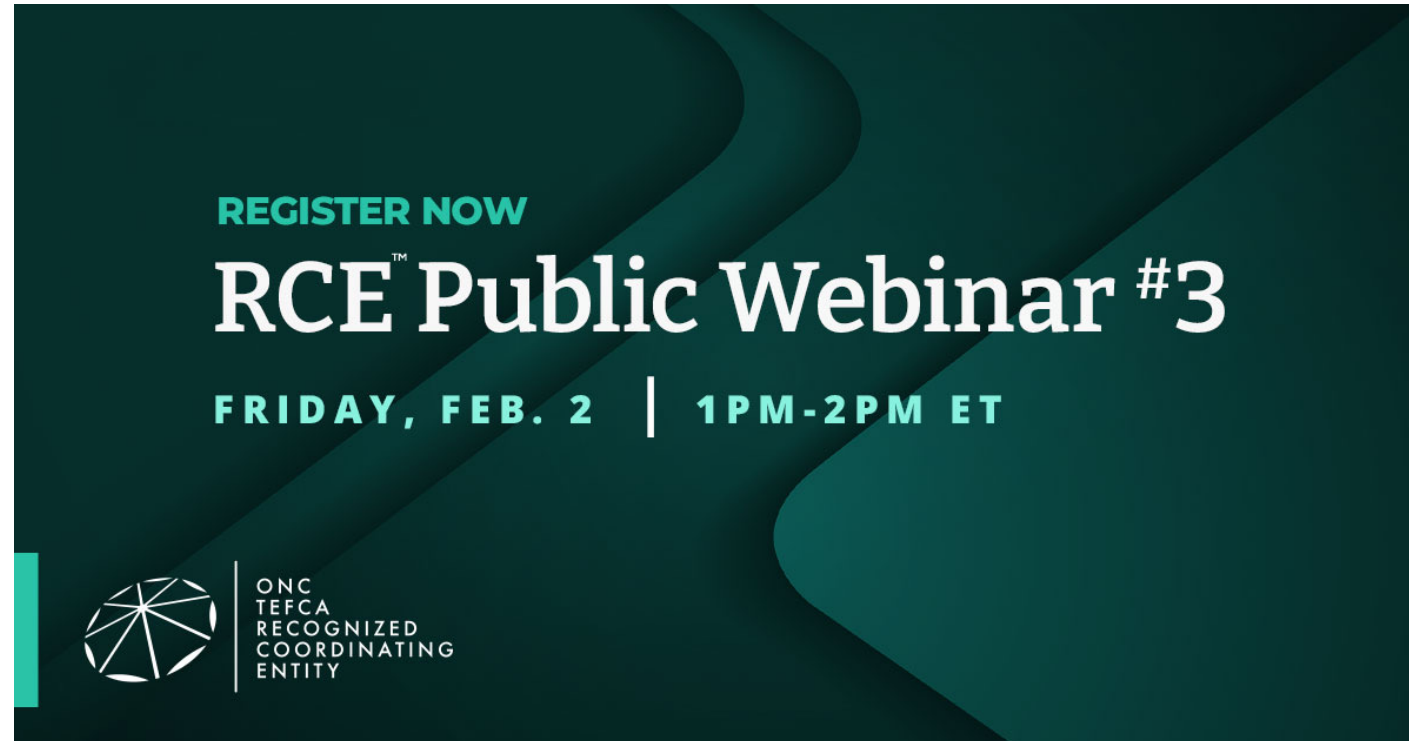
TEFCA Webinar 2:
Common Agreement Version 2.0, Terms of Participation, and Standard Operating Procedures Deep Dive

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Chantal Worzala, RCE Stakeholder Engagement
Mariann Yeager, RCE Lead

TEFCA Webinar 2: Agenda

- Welcome

- Review TEFCA Exchange and Evolution

- Feedback Period and Process

- **Common Agreement Version 2.0 and Terms of Participation**

- **Delegation of Authority Standard Operating Procedure (SOP)**

- **RCE Directory Service Requirements Policy SOP**

- Educational Resources and Upcoming Events

TEFCA^{SM} is Live and Looking to the Future with FHIR®!

Coming Up Next:

» **Friday's Webinar will provide a deep dive on Exchange Purposes (XPs) SOP, XP Implementation SOPs, and Individual Access Services (IAS) Provider Requirements SOP**
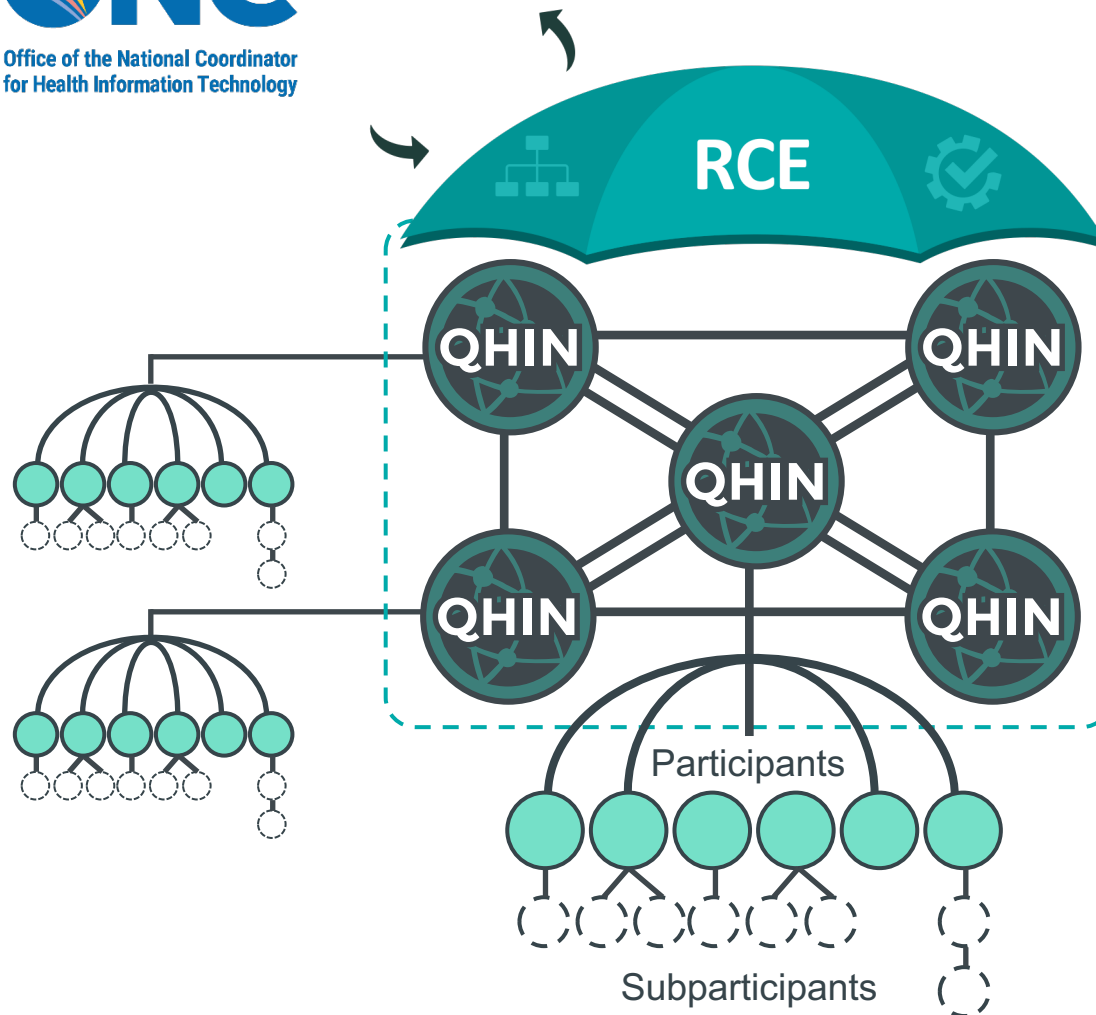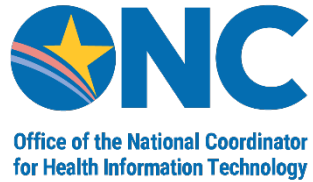
Register: https://rce.sequoiaproject.org/community-engagement/

TEFCA Exchange

How Does Exchange Work Under TEFCA?

ONC defines overall policy and certain governance requirements.

RCE^{TM} provides oversight and governing approach for QHINs.

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

Each QHIN connects Participants, which connect Subparticipants.

TEFCA Components

Trusted Exchange Framework

Framework Agreements

Standard Operating Procedures

QHIN Technical Framework

QHIN Onboarding

Metrics

Governing Approach

TEFCA is Looking to the Future

- Updates to technical and policy documents to support greater use of FHIR

- Better support for use cases beyond Treatment

- Stand-alone and static Terms of Participation to ease onboarding

- Ability to participate with multiple QHINs

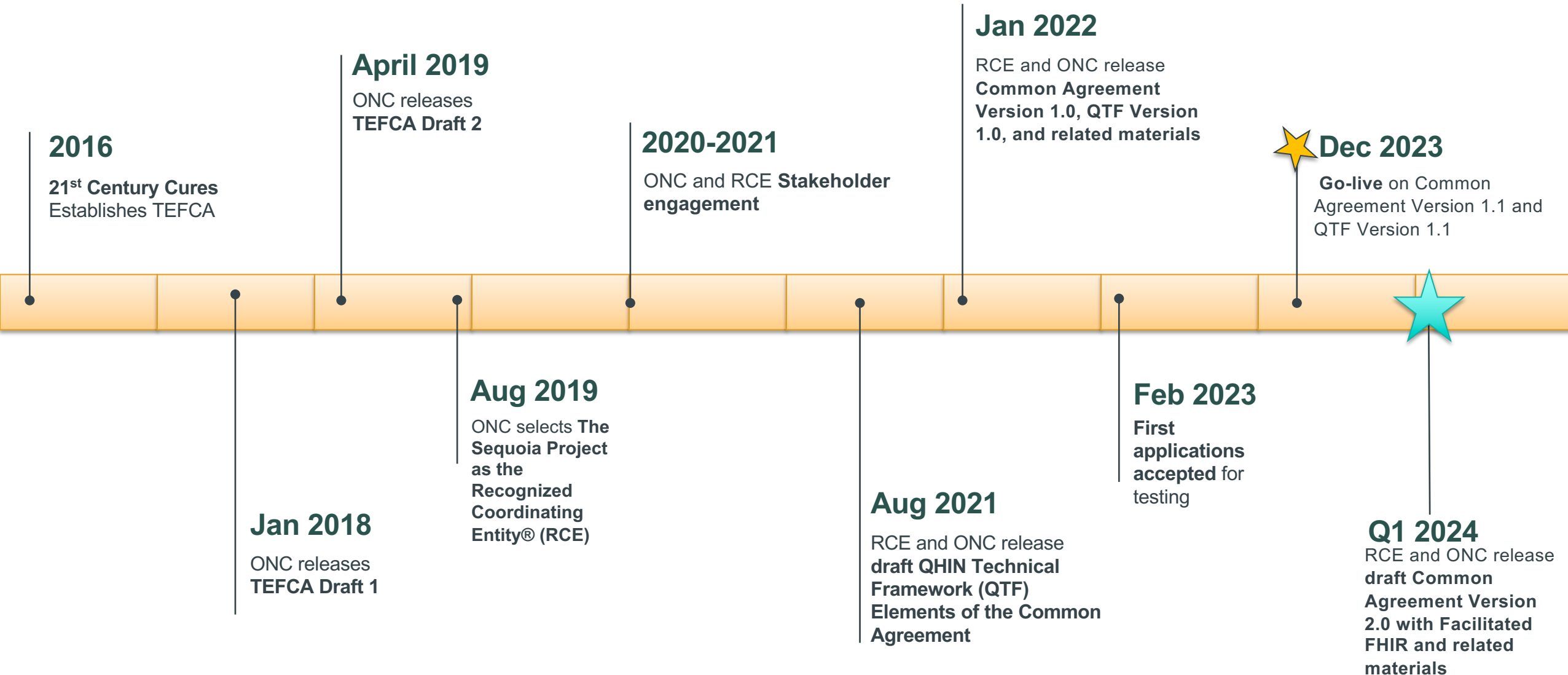- Restructuring to create flexibility for future change management

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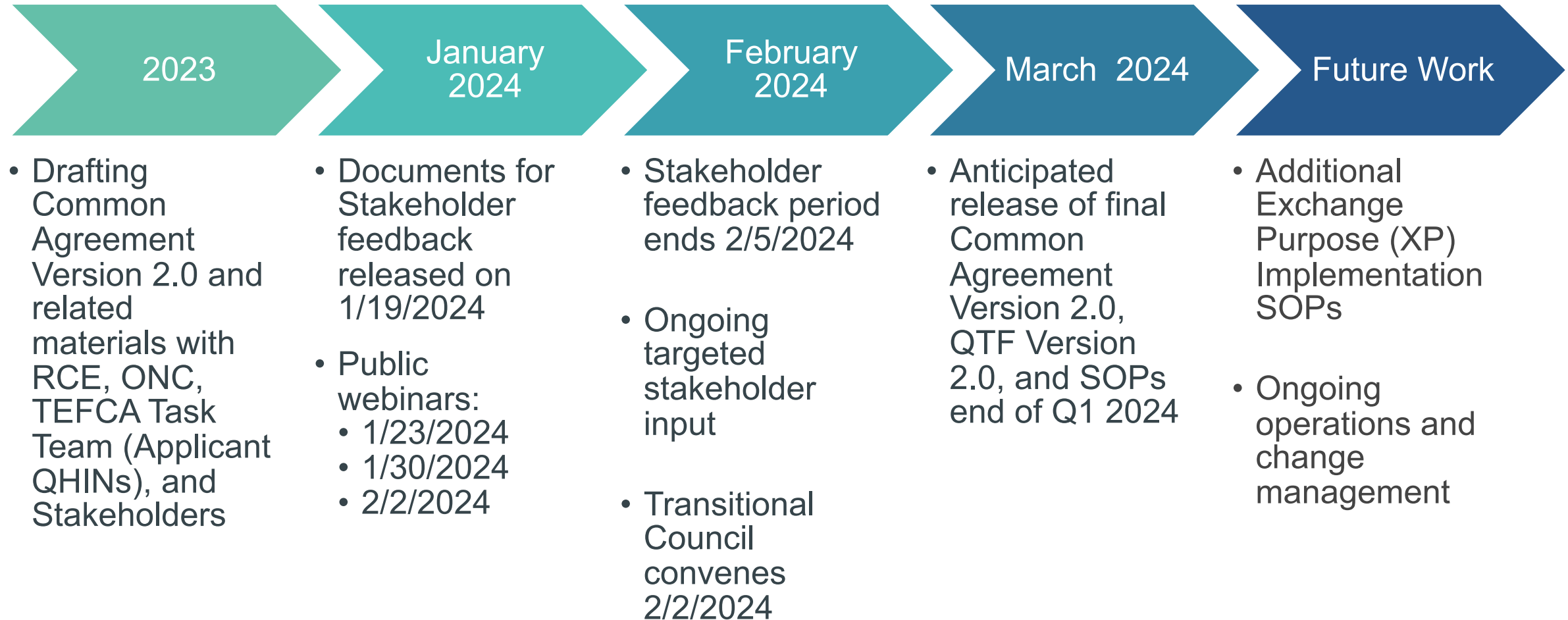COORDINATING
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TEFCA Evolution

TEFCA Evolution

2016

21st Century Cures Establishes TEFCA

April 2019

ONC releases **TEFCA Draft 2**

Jan 2018

ONC releases **TEFCA Draft 1**

Aug 2019

ONC selects **The Sequoia Project as the Recognized Coordinating Entity® (RCE)**

2020-2021

ONC and RCE **Stakeholder engagement**

Aug 2021

RCE and ONC release **draft QHIN Technical Framework (QTF) Elements of the Common Agreement**

Jan 2022

RCE and ONC release **Common Agreement Version 1.0, QTF Version 1.0, and related materials**

Feb 2023

First applications accepted for testing

Dec 2023

Go-live on Common Agreement Version 1.1 and QTF Version 1.1

Q1 2024

RCE and ONC release **draft Common Agreement Version 2.0 with Facilitated FHIR and related materials**

Common Agreement and QTF Version 2.0 Evolution

2023
- Drafting Common Agreement Version 2.0 and related materials with RCE, ONC, TEFCA Task Team (Applicant QHINs), and Stakeholders

January 2024
- Documents for Stakeholder feedback released on 1/19/2024
- Public webinars:
  - 1/23/2024
  - 1/30/2024
  - 2/2/2024

February 2024
- Stakeholder feedback period ends 2/5/2024
- Ongoing targeted stakeholder input
- Transitional Council convenes 2/2/2024

March 2024
- Anticipated release of final Common Agreement Version 2.0, QTF Version 2.0, and SOPs end of Q1 2024

Future Work
- Additional Exchange Purpose (XP) Implementation SOPs
- Ongoing operations and change management

Feedback Period and Process

Much Anticipated Draft Common Agreement Version 2 and Other Materials Released for Feedback

https://rce.sequoiaproject.org/rce-draft-documents-for-feedback/

- The RCE is seeking stakeholder input online through **Monday, February 5.** Stakeholders can submit input via the **feedback form on our website**, **email feedback to rce@sequoiaproject.org**, or attend upcoming webinars

    - The deadline for the XP Implementation SOP: Public Health SubXP-1 and the Public Health Educational Guidance Document has been extended to **Monday, February 12**

- The RCE will thoroughly review all feedback received via the webinars and online feedback forms for each document

- The community is encouraged to submit comments all year long on the RCE website's general feedback form

Documents for Feedback

The RCE has released a set of draft materials in support of FHIR adoption and other advancements. These build from the existing framework and include:

Common Agreement Version 2.0

QHIN Technical Framework Version 2.0

Participant/Subparticipant Terms of Participation (ToP)

New Standard Operating Procedures (SOPs)

- Expectations for Cooperation
- Delegation of Authority
- Governance Approach
- XP Implementation SOP: Public Health (PH) SubXP-1
- RCE Directory Service Requirements Policy

Updated SOPs

- Exchange Purposes (XPs)
- XP Implementation SOP: Individual Access Services (IAS) Demographic Matched – *Updated from IAS Exchange Purpose Implementation*
- IAS Provider Requirements – *Updated from IAS Provider Privacy and Security Notice and Practices*
- XP Implementation SOP: Health Care Operations (HCO) SubXP-1 – *Updated from previously released draft*

New Explanatory Resources

- TEFCA Glossary
- TEFCA Cross Reference Resource

Common Agreement Versions At-a-Glance

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January 2022

Common Agreement   v1

The Common Agreement version 1 was the initial version of the Common Agreement and reflected policies developed with extensive public input.

Related QTF Version: 1
Related FHIR Roadmap Version: 1

December 2023

Common Agreement   v1.1

The Common Agreement version 1.1 included changes required by HHS prior to TEFCA exchange going live. *This is the version in operation as of the official launch of TEFCA exchange.*

Related QTF Version: 1.1
Related FHIR Roadmap Version: 2

Common Agreement   v2

The Common Agreement version 2 will include enhancements and updates to require support of HL7 FHIR® based transactions.

Related QTF Version: 2 – DRAFT
Related FHIR Roadmap Version: 2

Common Agreement Version 2.0 and Participant/Subparticipant Terms of Participation (ToP) Deep Dive

Refresh and Discussion of Key Concepts

Walk through of each Section of the Common Agreement

Highlight the key concepts that have evolved from Version 1.1 to Version 2.0 and what's new

Identify which Standard Operating Procedures (SOPs) are relevant to which sections of the applicable Framework Agreement

Note corresponding Participant/Subparticipant Terms of Participation (ToP) Sections (look for the green star!)

Key Definition

Framework Agreement(s) means with respect to QHINs, the Common Agreement; and with respect to a Participant or Subparticipant, the Terms of Participation (ToP)

TEFCA Glossary and Cross Reference Resource

The TEFCA Glossary is intended to serve as an in-depth compilation of terms and their definitions referenced in the Common Agreement Version 2.0, QTF Version 2.0, Participant/Subparticipant Terms of Participation (ToP) Version 1.0, and the SOPs.

The TEFCA Cross Reference Resource is intended to help QHINs, Participants, and Subparticipants understand which SOPs are relevant to which sections of the applicable Framework Agreements.

TEFCA Glossary

PURPOSE

This TEFCA glossary is intended to serve as an in-depth compilation of terms and th... as referenced in the Common Agreement Version 2, the Participant/Subpartici... Participation (ToP) Version 1, the Qualified Health Information Network (QH... Framework (QTF) Version 2, and the Standard Operating Procedures (SOPs).

All references to Signatory in a definition below or in the Common Agreement ... QHIN or Upstream QPS as applicable in the ToP.

GLOSSARY OF TERMS

A

Access Consent Policy (ACP): policies that may influence access control de... which can be referenced in queries. *Source: QTF Version 2*

Actor: a QHIN, Participant, Subparticipant. *Source: QTF Version 2*

Applicable Law: all federal, State, local, or tribal laws and regulations then... applicable to the subject matter herein. For the avoidance of doubt, feder... are only subject to federal law. *Source: Common Agreement Version 2*

Applicant or Applicant QHIN: means any organization that has submitted a... Apply to be a QHIN to the RCE as specified in the QHIN Onboarding and De... that has been accepted by the RCE and has not withdrawn that Intent to A... Applicant also includes those organizations that have submitted a QHIN Ap... the RCE for completeness review as set forth in in the QHIN Onboarding an... Designation SOP. *Source: QHIN Onboarding & Designation SOP*

Assigning Authority: the organization that issues a patient identifier. *Source...*

B

Breach of Unencrypted Individually Identifiable Information: the acquisiti... Disclosure of unencrypted Individually Identifiable information maintained... Provider that compromises the security or privacy of the unencrypted Indiv... Identifiable information. *Source: Common Agreement Version 2*

Business Associate: has the meaning assigned to such term at 45 CFR § 16... Common Agreement Version 2

TEFCA Cross Reference Resource

CROSS REFERENCE TABLE

Common Agreement v2 Section	ToP Section	Applicable SOPs
Section 1		
Cybersecurity Council		QHIN Security Requirements for Protection of TEFCA Information
Exchange Purposes (XPs)	Section 1	Exchange Purposes (XPs)
Governance Services	Section 1	QHIN Onboarding & Designation
Participant & Subparticipant	Section 1	Types of Entities that can be a Participant or Subparticipant in TEFCA
Privacy and Security Notice	Section 1	IAS Provider Requirements
Qualified Health Information Network	Section 1	QHIN Onboarding & Designation
RCE Directory Service	Section 1	RCE Directory Services Requirements Policy
TEFCA Exchange	Section 1	Exchange Purposes (XPs)
Section 3.2		Governance Approach Transitional Council TEFCA Governing Council
Section 3.3		Advisory Groups
Section 4.1		QHIN Onboarding & Designation
Section 4.1(i)		Means to Demonstrate U.S. Ownership & Control of a QHIN
Section 4.1(iii)		QHIN Onboarding & Designation
Section 4.1(iv)		QHIN Onboarding & Designation
Section 6.1	Section 2.1	Expectations for Cooperation
Section 7.2	Section 3.2	ONC Access to and Requests for Confidential Information

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Participant/Subparticipant ToP Overview

What is the Participant/Subparticipant ToP?

- Exhibit to the Common Agreement
- Sets forth the requirements that *each* Participant and Subparticipant must agree to and comply with to participate in TEFCA
- Incorporates all applicable SOPs and the QHIN Technical Framework

Who agrees to the ToP? Who is responsible for putting the ToP in place?

- Legally enforceable contract between a Participant or Subparticipant and its Upstream QPS
- The Upstream QPS must ensure that the ToP are included (*without modification*) directly (or by reference) in a contract with its Participants and Subparticipants

Key Definition

Upstream QPS:
the QHIN, Participant, or Subparticipant (QPS) that enters into the ToP with its Participants and Subparticipants and is named as the Upstream QPS in such ToP

Common Agreement Version 2.0 & Terms of Participation (ToP) Comparison Table

Section Title	Common Agreement Version 2.0 Section	Corresponding ToP Section
Definitions and Relevant Terminology	Section 1	Section 1
Cooperation	Section 6.1	Section 2.1
Non-Discrimination	Section 6.2	Section 2.2
Non-Interference	Section 6.3	Section 2.3
Confidential Information	Section 7.1	Section 3.1
Disclosure of Confidential Information	Section 7.2	Section 3.2
ONC's and the RCE's Approach when Requesting Confidential Information	Section 7.3	Section 3.3
Utilization of the RCE Directory	Section 8.2	Section 4.1
Initiating Node Directory Entries	Section 8.5	Section 4.2
Framework Agreement Record	Section 8.6	Section 4.3
TEFCA Exchange Activities	Section 9	Section 5
Individual Access Services	Section 10	Section 6
Privacy	Section 11	Section 7
Security	Section 12	Section 8
General Obligations	Section 13	Section 9
Stability of the QHIN Network	Section 17	Section 10 Term, Termination, and Suspension
Contract Administration	Section 19	Section 11
Fees Charged for Required Responses	Section 18.3	Section 9.4

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New and Updated terms include (non-exhaustive):

Section 1 of Terms of Participation

- Breach of Unencrypted Individually Identifiable Information
- Connectivity Services
- Delegate
- Designated Network
- Designated Network Services
- Framework Agreements
- Governance Services
- Individual
- Individual Access Services
- Initiating Node
- Node

- Participant/Subparticipant Terms of Participation (ToP)
- Passthrough Node
- Principal
- Responding Node
- RCE Directory Service
- Required Information
- TEFCA Exchange
- TEFCA Information
- Workforce Member

TEFCA Glossary (sequoiaprotect.org)

Note: Section 3 had no substantive changes

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- **Role of the RCE and ONC**
  - » Under the contract, ONC oversees the work of the RCE, which has specific obligations to follow the governance procedures set forth in the Common Agreement

- **Participation in Governance**
  - » QHINs, Participants, and Subparticipants shall have the opportunity to engage in governance under the Common Agreement
  - » RCE establishes Transitional Council and then a Governing Council

- **Advisory Groups**
  - » RCE, in consultation with Transitional or Governing Council, may establish Advisory Groups to seek input from stakeholder groups to inform the governance process

GOVERNING COUNCIL
- QHIN CAUCUS
- PARTICIPANT/ SUBPARTICIPANT CAUCUS
- ADVISORY GROUPS
- CYBERSECURITY COUNCIL
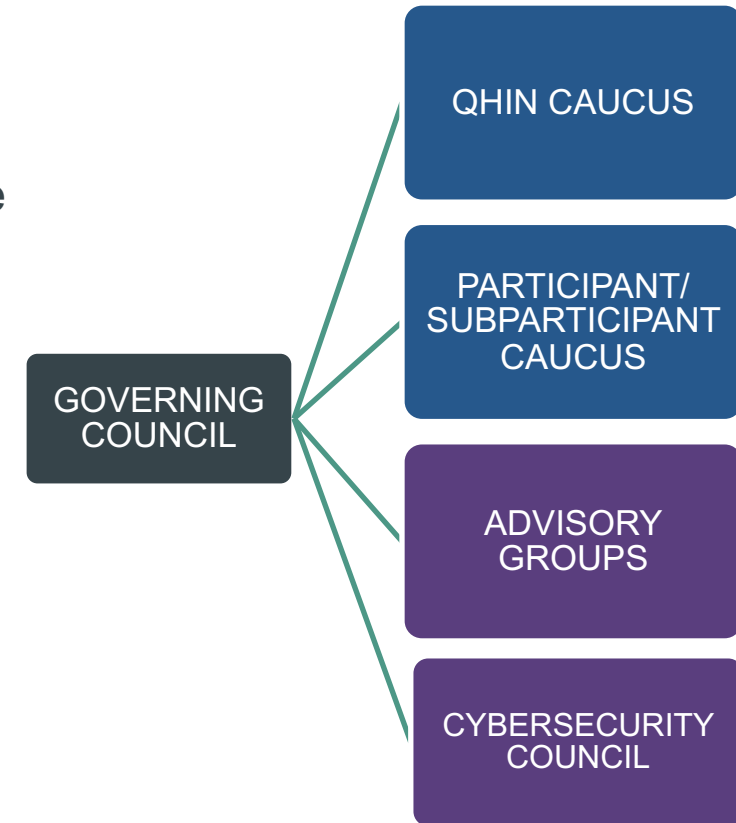
Key Concepts Updated for Version 2.0

- Details, including formation, composition, responsibilities and duration of the Transitional Council and Governing Council are set forth in a newly created Governance Approach SOP
- Substantive details did not change, just the location

Related SOPs
Advisory Groups
New Governance Approach
Transitional Council
TEFCA Governing Council

- **Eligibility to be Designated**
  - » Sets forth the core eligibility criteria for QHINs to be Designated

- **Affirmation of Application**
  - » Representation by the QHIN that all information submitted for its application continues to be accurate and complete

Key Concepts Updated for Version 2.0

- Common Agreement is effective upon Designation
- Details surrounding application and designation requirements moved to Onboarding and Designation SOP

Related SOPs
QHIN Onboarding and Designation
Means to Demonstrate U.S. Ownership & Control of a QHIN

Note: Section 5 had no substantive changes

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- **Sets forth the Change Management Framework for the Common Agreement, QTF, and SOPs**
  - » The RCE will coordinate changes in conjunction with ONC
  - » The RCE will work with ONC, Governing Council, and the QHIN and Participant/Subparticipant Caucuses (when established) to consider amendments
- **Includes:**
  - » Process for amending the Common Agreement or the QTF
  - » Process for amending, adopting, or repealing an SOP
  - » Voting Method

Key Concepts Updated for Version 2.0
- No updates; maintained current processes and framework

Related SOPs
Advisory Groups
New *Governance Approach*
Transitional Council
TEFCA Governing Council

Section 6 Cooperation and Non-Discrimination

Section 2.1 of Terms of Participation

- **Cooperation**
  - » Common Agreement and ToP require QHINs, Participants, and Subparticipants to reasonably cooperate with the RCE, ONC, other QHINs (and their representative Participants and Subparticipants) in all matters related to TEFCA Exchange
- **Non-Discrimination**
  - » Prohibition against exclusivity
  - » No discriminatory limits on exchange of TEFCA Information (TI)
    - – QHINs, Participants, and Subparticipants are prohibited from limiting interoperability with others in a discriminatory manner
  - » Implementation of updates to (and notice of updates to) connectivity services in non-discriminatory manner
- **Non-Interference** (*New*)
  - » A QHIN shall not prevent a Participant or Subparticipant from changing the QHIN through which the Participant or Subparticipant engages in TEFCA Exchange

Key Concepts Updated for Version 2.0

- Details on expectations for reasonable cooperation moved to newly created Expectations for Cooperation SOP
- Non-interference provision added

Related SOPs:
New Expectations for Cooperation SOP

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- **Confidentiality**

  Sections 3.1, 3.2 , 3.3 of Terms of Participation

  - » **Confidential Information**
    - Defines scope of Confidential Information and its use and disclosure parameters
  - » **Disclosure of Confidential Information** *(added in Version 1.1)*
    - RCE may disclose any Confidential Information to ONC
    - Reminder that ONC is subject to Freedom of Information Act (FOIA) and that
      disclosure of Confidential information is subject to Applicable Law and applicable SOP(s)
  - » **ONC's and the RCE's approach when Requesting Confidential Information** *(added in Version 1.1)*
    - ONC and RCE will only request the information necessary to inform specific facts and circumstances of a matter

Related SOPs:
ONC Access to and Requests for Confidential Information

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- **Accountability**
  - » QHIN Accountability: QHINs are responsible for their own acts and omissions and that of its Participants and Subparticipants (no change)
  - » RCE Accountability: QHINs will not hold RCE or governance bodies responsible for losses related to the Common Agreement except to the extent they are the result of the RCE's breach of the Common Agreement (no change)
- **Limitation of Liability**
  - » $2 million per incident and $5 million in the aggregate (no change)

Key Concepts Updated for Version 2.0
- Limited updates for 2.0; incorporated updates from Version 1.1

Related SOPs:
ONC Access to and Requests for Confidential Information

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Sections 4.1, 4.2 , 4.3 of Terms of Participation

What's New:

- **No Duplicative Responding Node Directory Entries**
- **Initiating Node Directory Entries**
  - QPS must ensure that each Initiating Node is associated with a Responding Node
  - If a Delegate, QPS must ensure that each Principal for which they are providing services has at least one Responding Node
- **Framework Agreement Record**
  - QHINs must maintain a record of all ToPs entered into with its Participants and Subparticipants (and those entered into between its Participants and their Subparticipants) and provide to RCE upon request

Key Definitions
See TEFCA Glossary

Principal
Delegate
Directory Entry(ies)
Node
Initiating Node
Passthrough Node
Responding Node
RCE Directory Service

Key Concepts Updated for Version 2.0

- Introduction of Nodes and Principal/Delegate roles and responsibilities
- Participants/Subparticipants may conduct TEFCA Exchange in multiple QHINs using multiple Nodes

Related SOPs:
New RCE Directory Services Requirements Policy SOP

Section 9 TEFCA Exchange Activities

Section 5 of Terms of Participation

- **Utilization of TEFCA Exchange** *(Updated)*
- **Uses**
- **Disclosures**
- **Responses** *(Updated)*
- **Special Legal Requirements**

Key Concepts Updated for Version 2.0

- Language updated and/or removed to accommodate FHIR
- Details, including Exceptions to Required Response, moved to Exchange Purposes SOP

Key Definition

TEFCA Exchange:
the transaction of information between Nodes using a TEFCA-specific Exchange Purpose code as defined in the applicable SOP

Related SOPs
New Delegation of Authority
Updated Exchange Purposes (XPs)
New RCE Directory Services Requirements Policy
New and Updated XP Implementation

Section 10 Individual Access Services

- **Individual Access Services Offerings**

- **Individual Consent** *(Updated)*

- **Additional Security Requirements for IAS Providers** *(Updated)*

- **Survival for IAS Providers** *(Updated)*

Section 6 of Terms of Participation

Key Concepts Updated for Version 2.0

- Consolidated key contractual obligations related to consent and the Privacy and Security Notice in the Individual Consent section (Section 10.2)

- Moved details, including requirements for written Privacy and Security Notice and Individual Rights, to *New* IAS Provider Requirements SOP

- Obligation of an IAS Provider to notify an individual of a breach has been expanded to include a breach of any unencrypted Individually Identifiable information; requirements for such notification moved to applicable IAS and Security SOPs

- Updated survival of IAS provisions to track data retention periods

Related SOPs
Updated IAS Provider Requirements
Updated XP Implementation SOP: IAS: Demographic Matched
New RCE Directory Services Requirements Policy
New and Updated XP Implementation SOPs

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Section 7 of Terms of Participation

- **Compliance with HIPAA Privacy Rule**
  - » Ensuring privacy of Individually Identifiable information exchanged pursuant to a Framework Agreement is essential at every level
  - » The Common Agreement and ToP required that all engaged in TEFCA Exchange, including NHEs, with few exceptions, comply with the provisions of the HIPAA Privacy Rule with respect to all Individually Identifiable information

- **Written Privacy Policy**
  - » QHINs, Participants, and Subparticipants must develop, implement, and make publicly available written privacy policy
  - » Policy must describe privacy practices for use and disclosure of Individually Identifiable information

Key Concepts Updated for Version 2.0

- Key Privacy provisions maintained in Version 2.0
- Requirements strengthened for Non-HIPAA Entities (NHEs)

Key Definitions
See TEFCA Glossary

Non-HIPAA Entity (NHE)
Individually Identifiable (information)
Individual Access Services (IAS) Provider
Privacy and Security Notice

Section 8 of Terms of Participation

- **General Security Requirements** *(Updated)*
- **TEFCA Information (TI) Outside the United States** *(Updated)*
- **TEFCA Security Incident Reporting** *(Updated)*
- **Encryption** *(Updated)*

Key Concepts Updated for Version 2.0

- Addition of required encryption for Individually Identifiable information in transit and at rest for all Non-HIPAA Entities (NHEs); applies same requirements that are already in place for IAS Providers to also be applicable to NHEs

Related SOPs
QHIN Cybersecurity Coverage
QHIN Security Requirements for the Protection of TEFCA Information (TI)
QHIN Onboarding and Designation

SOPs Coming Soon
TEFCA Security Incident Reporting
Participant/Subparticipant Security Requirements

Section 9 of Terms of Participation

- **Compliance with Applicable Law and the Framework Agreements**
- **Compliance with Specific Obligations**
  - » Responsibility for Subcontractors and Agents of Signatory *(New)*

Key Concepts Updated for Version 2.0

- Responsibility of Subcontractors previously applied to IAS Providers only; relocated and expanded to apply to all subcontractors and agents of QHINs, Participants, and Subparticipants that have access to TEFCA Information
- Participant/Subparticipant suspension language covered directly in ToP so language was removed from Common Agreement

Note: Listed Sections had no substantive changes

Section 14: Specific QHIN Obligations

- Transparency
- Compliance with Standard Operating Procedure(s)

Section 15: Dispute Resolution

- Acknowledgement and Consent to Dispute Resolution Process
- Injunctive Relief
- Activities During Dispute Resolution Process
- Implementation of Agreed Upon Resolution
- Reservation of Rights
- Escalation and Reporting of Disputes to ONC
- Reporting of Anonymized Dispute Information to ONC

Section 16: Appeals to ONC

- Provisions enable QHINs to appeal RCE decisions to suspend or terminate TEFCA participation to ONC
- Newly added with Common Agreement Version 1.1, no key concepts updated for Version 2.0
- Highlights that ONC anticipates publishing regulations to address these types of appeals of RCE decisions

Key Concepts Updated for Version 2.0

- Substantive details did not change

Related SOPs:

Dispute Resolution

ONC Access to and Requests for Confidential Information

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Section 10 of Terms of Participation

- **Term**
- **Termination**
- **Suspension**
- **Successor RCE and Transition**

Key Concepts Updates for Version 2.0

- Sections specific to withdrawal and termination prior to Designation moved to Onboarding & Designation SOP
- Consolidated language regarding the RCE's ability to suspend a QHIN's Participants or Subparticipants
- Provisions updated and included in ToP to accommodate FHIR

Related SOPs
Onboarding and Designation
SOPs Coming Soon
Suspension by Recognized Coordinating Entity® (RCE™)

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Section 9.4 of Terms of Participation

- **Fees Paid by QHINs to the RCE**

- **Fees Paid by QHINs to Other QHINs**

- **Fees Charged for Required Responses** *(New)*

Key Concepts Updated for Version 2.0

- In response to questions regarding fees by or to Participants or Subparticipants, added language clarifying that no parties may charge fees when a Response is required for the XP (Exchange Purpose)

- This updated section does not prohibit QHINs from charging their Participants and Subparticipants fees for use of their Designated Network Services

Related SOPs
Updated Exchange Purposes
(XPs)

Note: Section 19 had no substantive changes

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Standard contract terms are in this section

Section 11 of Terms of Participation

- **Authority to Execute**
- **Notices**
- **Governing Law, Forum, and Jurisdiction**
- **Assignment**
- **Force Majeure**
- **Severability**
- **Counterparts**
- **Captions**
- **Independent Parties**
- **Acts of Contractors and Agents**
- **Entire Agreement; Waiver**

- **Effect of Agreement**
- **Priority**
- **QHIN Time Periods**
- **Remedies Cumulative**
- **Survival of Rights and Obligations**

Delegation of Authority SOP

Standard Operating Procedure
(SOP): Delegation of Authority

Version 1.0

DRAFT for Stakeholder Feedback

January 19, 2024

Applicability: QHINs, Participants, Subparticipants

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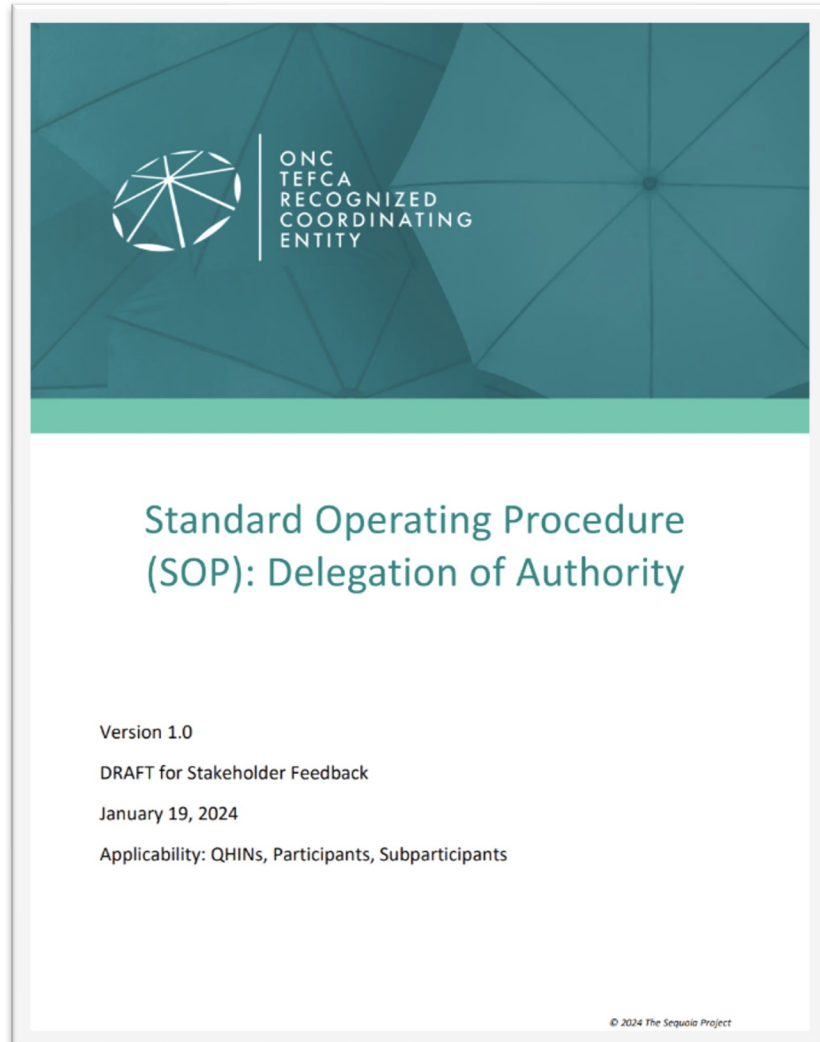
Purpose

This SOP identifies specific requirements that Delegates are required to follow when initiating Delegated Requests or otherwise transmitting information via TEFCA Exchange.

SOP Sections

1. Common Agreement References
2. SOP Definitions
3. Purpose
4. Procedure
   - 4.1 Overarching Requirements
   - 4.2 RCE Directory Services
   - 4.3 QHIN Query
   - 4.4 Facilitated FHIR

- **Principal:** a QHIN, Participant, or Subparticipant that is acting as a Covered Entity, Government Health Care Entity, Non-HIPAA Entity (NHE) Health Care Provider, a Public Health Authority, a government agency that makes a Government Benefits Determination, or an IAS Provider (as authorized by an Individual) when engaging in TEFCA Exchange. *Source: Common Agreement Version 2*

- **Delegate:** a QHIN, Participant, or Subparticipant that (i) is not a Principal and (ii) has a written agreement, directly or indirectly, with a Principal authorizing the Delegate to conduct TEFCA Exchange activities for or on behalf of the Principal. For purposes of this definition, a "written agreement" shall be deemed to include a documented grant of authority from a government agency. *Source: Common Agreement Version 2*

- **Delegated Request:** a TEFCA Exchange Request initiated by a Delegate working for a Principal. *Source: Delegation of Authority SOP*

- **Directory Entry(ies):** the listing of each Node controlled by a QHIN, Participant or Subparticipant, which includes the Endpoint for such Node(s) and any other organizational or technical information required by the QTF or applicable SOP. *Source: Common Agreement Version 2*

Delegation of Authority SOP
Procedure: 4.1 Overarching Requirements

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- **4.1 Overarching Requirements**
   1. Delegated Requests MUST follow all requirements that apply to the Principal, as set forth in the applicable Exchange Purpose (XP) Implementation SOP

   2. The Initiating QHIN for a Delegated Request MUST verify that the Principal referenced in the transaction (Section 4.3 and 4.4 of the SOP) matches a Principal listed in the Delegate's Directory Entry, as described in Section 4.2 of the SOP. A transaction from a Delegate that does not appropriately reference a Principal from that Delegate's Directory entry MUST NOT be accepted

- **4.2 RCE Directory Service**
    1. The Delegate's Organization resource in the RCE Directory MUST have:
       a) The "queryingFor" extension with the List resource with all List.entry.item references to the Organization resources of all Principal(s) for whom the Delegate will be transmitting Delegated Requests.
       b) The expected date of first Delegated Request as the List.entry.date.
       c) The date registered in the List.entry.date MUST match the effective_date in the Delegated Request Access File in Table 1 of this SOP, where present.

    2. By listing a Principal in the Directory, Delegate is attesting that it has a written agreement, directly or indirectly, with such Principal authorizing the Delegate to conduct TEFCA Exchange for or on behalf of the Principal.

- **4.3 QHIN Query**

The specifications in this section are required, unless otherwise stated herein or in an applicable SOP.

1. All Delegated Requests MUST append the following within the SAML for each transaction sent to the Responding QHIN: This element MUST have the Name attribute set to "urn:oasis:names:tc:xacml:1.0:resource:resource-id" with FriendlyName set to "QueryAuthGrantor". The value MUST be the Directory Entry assigned to the Principal for whom the Delegate is initiating the Request, using the FHIR Resource format.

```
<saml:Attribute FriendlyName="QueryAuthGrantor" Name="urn:oasis:names:tc:xacml:1.0:resource:resource-id">
<saml:AttributeValue>Organization/2.16.840.1.113883.3.7204.1</saml:AttributeValue>
</saml:Attribute>
```

Delegation of Authority SOP
Procedure: 4.3 QHIN Query

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- **4.3 QHIN Query**

The specifications in this section are required, unless otherwise stated herein or in an applicable SOP.

2. The SAML MUST include the following segment, which provides the document OID or a URL to the Delegated Request JSON object for that client relationship. An example of each is below.

```
<saml2:Attribute Name="DelegationDetail"
NameFormat="urn:oasis:names:tc:SAML:2.0:attrname-format:uri">
<saml2:AttributeValue>urn:oid:1.2.3.yyyy</saml2:AttributeValue>
</saml2:Attribute>
<saml2:Attribute Name="DelegationDetail"
NameFormat="urn:oasis:names:tc:SAML:2.0:attrname-format:uri">
<saml2:AttributeValue>http://example.org/tefca-dra/dra-defbaa92-cef9-42fcb994-
     e1bb4873d8f1.json</saml2:AttributeValue>
</saml2:Attribute>
```

Delegation of Authority SOP
Procedure: 4.3 QHIN Query

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- ## **4.3 QHIN Query**

The specifications in this section are required, unless otherwise stated herein or in an applicable SOP.

3. The JSON file MUST contain the entries as described in Table 1 Delegated Request Access File Contents

Table 1 Delegated Request Access (DRA) File Contents

Delegated Request Access File		
Element	**Optionality**	**Requirement**
tefca_dra	required	Fixed string value: "true"
dra_version	required	Fixed string value: "1"
grantor	required	RCE Directory Organization.ID of the Principal on whose behalf the Request is being made on
grantor_company	required	Organization name as listed in the RCE Directory Service that matches the Organization.ID
grantor_contact	required	Email address of contact at grantor_company for verification of contract status
receiving_data_source	conditional	HCID of Node where data will reside- Required if not grantor
supplier_contact_name	optional	Name of individual or group at Delegate's organization for verification of contract status
supplier_contact	required	Email address of contact at Delegate's organization for verification of contract status
contract_id	optional	Contract number or other Identifier representing contractual authority for the Delegate to make Delegated Requests
effective_date	optional	Date of contract start as YYMMDD e.g., 250324 for March 24, 2024
expiry_date	optional	Date of contract end as YYMMDD e.g., 240325 for March 25, 2025

See Table 1 in SOP

An example of the Delegated Request Access file is as follows:

```
{
"tefca_dra": true,
"dra_version" : 1,
"grantor" : "Organization/1.2.3.xxxxxx",
"grantor_company" : "Veterinarian's Hospital",
"grantor_contact" : "administration@vethospital.org",
"receiving_data_source" : 1.2.4.xxxxx
"supplier_contact_name" : "John Jacob Jingleheimer Schmidt",
"supplier_contact" : "contracts@example.org",
"contract_id" : "DRA660809",
"effective_date" : "250324",
"expiry_date" : "240325"
}
```

- ## 4.4 Facilitated FHIR

The specifications in this section are required, unless otherwise stated herein or in an applicable SOP.

1. Facilitated FHIR flows for all Delegated Requests MUST have separate authorization to ensure separation of Delegate role for each set of Requests

2. An Initiating Node MUST NOT use an authorization code for a Request that does not correspond to the code granted for the Delegated Request attached to the Principal for which the information is being retrieved

3. Each Code Grant OAuth flow authorizing the Delegate MUST contain the tefca_dra extension which MUST contain the same information as the SAML for Request

Table 2 TEFCA DRA OAuth Extension

tefca_dra	
queryAuthGrantor	MUST be the RCE Directory Organization.ID of the Principal on whose behalf the Request is being made, using the FHIR Resource format.
delegationDetail	MUST be a DocumentReference resource id OR a full URL to the Delegated Request JSON object for that client relationship.

RCE Directory Service Requirements Policy SOP

Standard Operating Procedure
(SOP): RCE™ Directory Service
(Directory) Requirements Policy

Version 1.0

DRAFT for Stakeholder Feedback

January 19, 2024

Applicability: QHINs

© 2024 The Sequoia Project
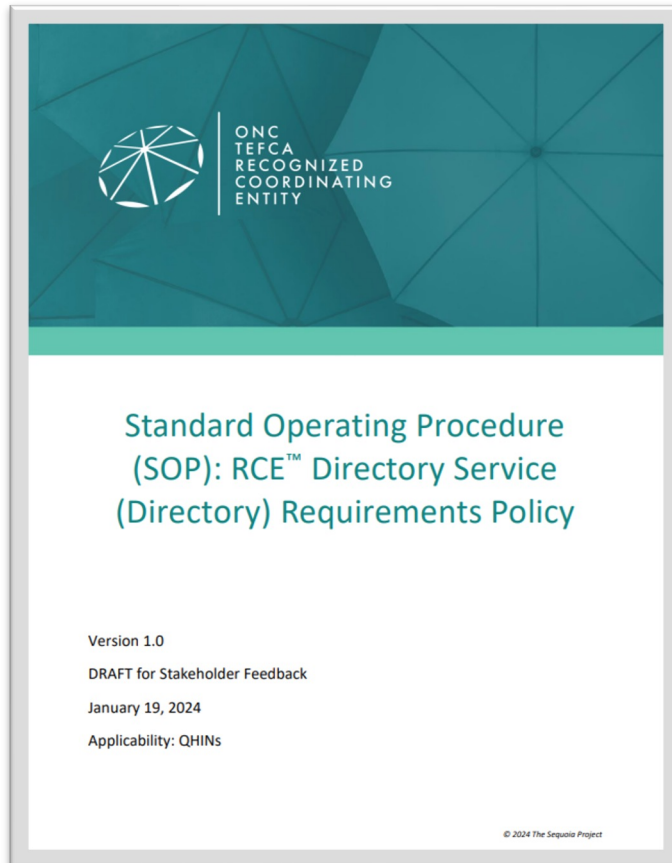
Purpose

This SOP describes RCE Directory Service (Directory) policy requirements that QHINs must follow when maintaining Directory Entries, in addition to the specifications set forth in the Common Agreement, QTF, RCE Directory Service Implementation Guide, and applicable SOPs

SOP Sections

1. Common Agreement References
2. SOP Definitions
3. Purpose
4. Procedure
   - 4.1 Requirements
   - 4.2 Diagram

- **Directory Entry(ies)**

- **Node:** a technical system controlled directly or indirectly by a QHIN, Participant, or Subparticipant as listed in the RCE Directory Service. *Source: Common Agreement Version 2*

- **Initiating Node:** a Node through which a QHIN, Participant, or Subparticipant initiates transactions for TEFCA Exchange and, to the extent such transaction is a Request, receives a Response to such Request. *Source: Common Agreement Version 2*

- **Responding Node:** a Node through which the QHIN, Participant, or Subparticipant Responds to a received transaction for TEFCA Exchange. *Source: Common Agreement Version 2*

- **Passthrough Node:** a Node that is neither an Initiating nor Responding Node and through which a QHIN, Participant, or Subparticipant passes transactions to and from Initiating and Responding Nodes, including any other services it provides. *Source: Common Agreement Version 2*

4.1 Requirements

1. Directory Represents Technical Relationships Only

2. All Technical Systems (Nodes) Must be Controlled By a QHIN, Participant, or Subparticipant and Listed in the Directory

3. Directory Includes Range of Exchange Purposes (XPs) for a QHIN

4. Directory Includes Types of Transactions and XPs for Each Node

5. Participants and Subparticipants May Participate in Multiple QHINs if They Have Multiple Nodes with Separate HomeCommunityIDs or FHIR Endpoints

6. A Responding Node May be Separated by Individual Transaction Type

4.1 Requirements

7. QHINs, Participants, and Subparticipants cannot have more than one Responding Node that share a source database

8. Each Transaction Type MUST Be Listed No More Than Once (Within a hierarchical chain of Directory Entries)

9. Initiating Node Must Also Be or Have an Associated Responding Node

10. All Principals MUST be represented in the Directory and in Requests sent by Delegate

11. An Initiating Node MUST publish relevant required identifiers for XPs it initiates, as identified in the QTF or relevant XP Implementation SOP (e.g., NPI for Treatment)

4.2 Example Diagram

1. QHIN A is fully federated, passing all transactions to its Participants

2. QHIN B maintains an eMPI/RLS, returns a consolidated patient ID, followed by an aggregated document list. It passes down subsequent requests for documents

3. Initiating Nodes: Without leveraging exceptions, only the following may be Initiating Nodes, due to Responding with documents: Sub Z, Y, Participant 2, Sub U, V

4. Participant 3 is a federated gateway, passing through the transactions, and so must be in the Directory. If it were simply passing down terms, but not handling transactions, Subs W & V could be directly below QHIN B
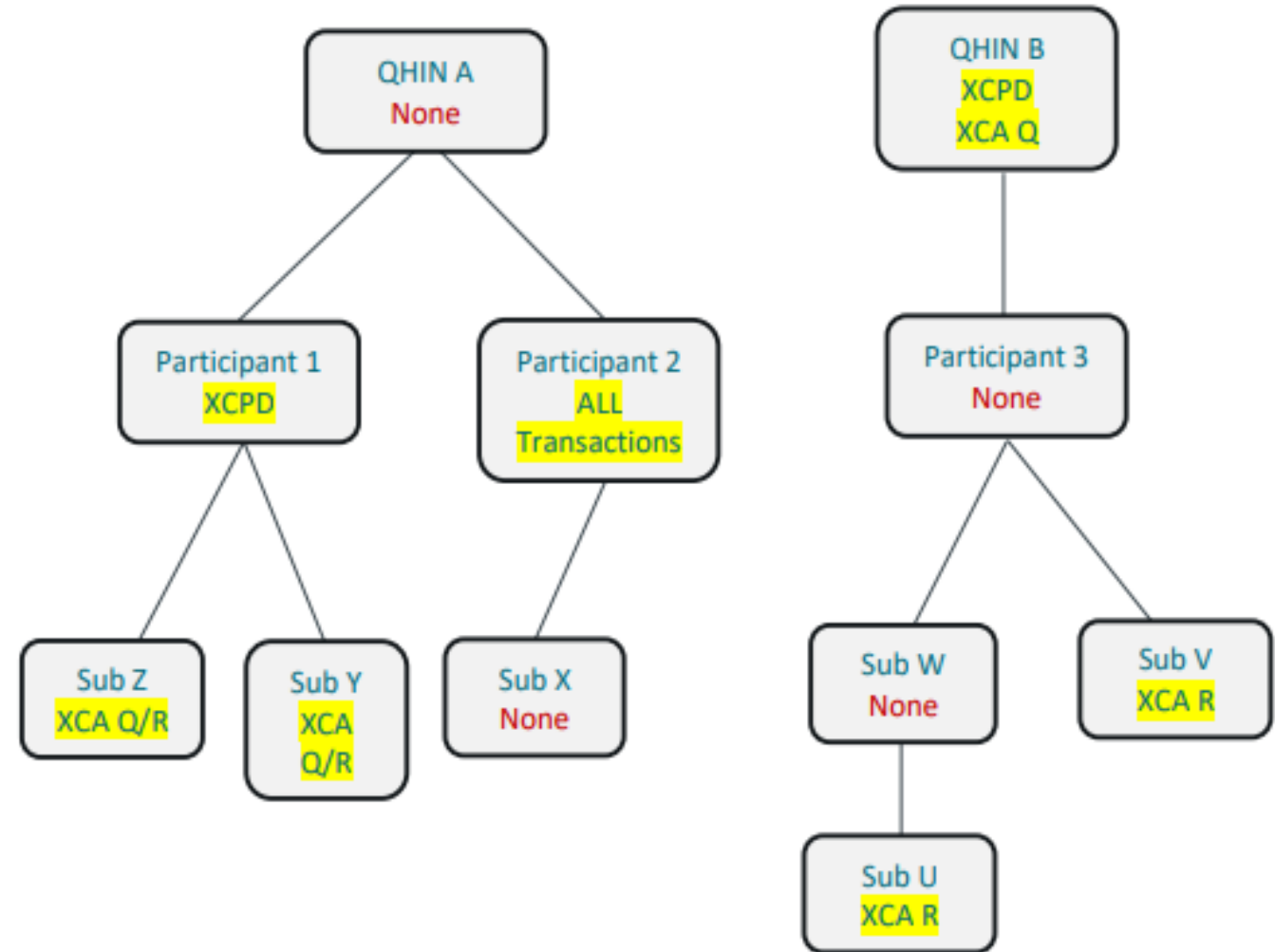
Educational Resources and Upcoming Events

New Fact Sheets

Fact Sheets

- 📄 FHIR Roadmap for TEFCA Exchange v2
- 🔗 Questions to ask your QHIN or other TEFCA connector
- 🔗 TEFCA for Executives
- 🔗 TEFCA on FHIR
- 🔗 TEFCA for Individuals
- 📄 Benefits for Health Information Networks (HINs)
- 🔗 Benefits for State Governments and Public Health
- 🔗 Benefits for Patients and Consumers
- 🔗 Benefits for the Payer Community
- 🔗 Benefits for Health Care Providers Across the Continuum

TEFCA FOR EXECUTIVES

You may have heard that TEFCA is now live

This means that the Trusted Exchange Framework and Common Agreement[SM] for sharing health information is operational and exchange is happening every minute. familiar exchange purposes, enabling driving innovation.

TEFCA provides an efficient vehicle to standardized electronic health inform participants across the nation.

TEFCA FOR INDIVIDUALS

Individuals can access their health information via TEFCA

Almost everyone needs to access their own health information—or that of a loved one—over time. The Trusted Exchange Framework and Common Agreement[SM] (TEFCA[SM]) will make it easier for an individual's health information to be appropriately and securely shared online.

TEFCA will reduce the burden many patients experience as they navigate the health care system and seek to be sure that they, their doctors, and their caregivers have the right information at the right time.

What is TEFCA?

TEFCA AND FHIR

HL7 FHIR is the latest addition to TEFCA Exchange

The draft Common Agreement (CA) v2.0 and draft Qualified Health Information Network[TM] (QHIN[TM]) Technical Framework (QTF) V2.0 enable use of FHIR Release 4 for all use cases. Updated Implementation Standard Operating Procedures (SOPs) will also specify how to use FHIR for specific uses.

Once these documents are finalized, Participants and Subparticipants will be able to use Facilitated FHIR to exchange data if they want to. Facilitated FHIR is designed to allow organizations to conduct transactions directly with other participants in TEFCA exchange without having a prior connection in place. It is facilitated by usage of the RCE[TM] Directory Service for scalable endpoint discovery, the Common Agreement for consistent policy requirements, and the QTF and relevant SOPs for TEFCA-specific technical requirements.

While the initial discovery of where a patient's data resides will be done through a query to their QHIN, TEFCA exchange can be done directly with FHIR-enabled organizations that have listed a FHIR endpoint in the RCE Directory Service. This will allow organizations with FHIR capabilities to do specific queries targeted to the data they need in support of the TEFCA use cases defined.

https://rce.sequoiaproject.org/rce-resources-new/

THINKING ABOUT JOINING TEFCA?

Questions to ask your QHIN or other TEFCA connector

Nationwide sharing of health information is now possible under the Trusted Exchange Framework and Common Agreement^{SM} (TEFCA^{SM}). The federally endorsed framework provides access to clinical data when and where it is needed for informed decisions, efficient care, and better outcomes.

In order to assist providers, payers, health information networks, public health agencies, app developers, and others that want to participate in TEFCA exchange choose the best QHIN, health information network, or other technology partner for connecting, the RCE has assembled a list of important questions to ask potential QHIN vendors or intermediary connectors.

RCE Resource Library

TEFCA is a multifaceted, living framework that enables seamless and secure nationwide exchange of health information.

GETTING STARTED
↓

Below is a guide to the Common Agreement, Standard Operating Procedures (SOPs), technical documents, and other resources that make up TEFCA's rules of the road. Start your journey to next generation interoperability here.

https://rce.sequoiaproject.org/rce-resources-new/

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

All Events Registration and Recordings:

https://rce.sequoiaproject.org/community-engagement/

Upcoming Webinars:
February 2, 2024, 1:00pm – 2:00pm ET

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Questions & Answers

For more information:
rce.sequoiaproject.org