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# Standard Operating Procedure (SOP): Delegation of Authority

Version 1.0

July 1, 2024

Applicability: QHINs, Participants, Subparticipants

## 1 COMMON AGREEMENT REFERENCES

The requirements set forth in this Standard Operating Procedure (SOP) are 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 Agreement™ (TEFCA™) 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 are introduced here and can be found in the TEFCA Glossary. Capitalized terms used in this SOP have the respective meanings assigned to such term in the TEFCA Glossary.

**Delegate:** a First Tier Delegate or Downstream Delegate.

**Delegated Request:** a TEFCA Exchange Request initiated by a Delegate working, directly or indirectly, for a Principal.

**Delegation Notice:** the notice provided by a Participant or Subparticipant to its QHIN that the Participant or Subparticipant wants to authorize a Delegate to initiate Delegated Requests on behalf of the Participant or Subparticipant.

**Delegation Revocation:** the notice provided by a Participant or Subparticipant to its QHIN that the Participant or Subparticipant wants to remove a Delegate's authorization to initiate Delegated Requests on behalf of the Participant or Subparticipant.

**Downstream Delegate:** a QHIN, Participant, or Subparticipant that (i) is not acting as a Principal when initiating or Responding to a transaction via TEFCA Exchange and (ii) has a direct written agreement with a First Tier Delegate or another Downstream Delegate authorizing the respective Downstream Delegate to initiate or Respond to transactions via TEFCA Exchange for or on behalf of a Principal.

**First Tier Delegate:** a QHIN, Participant, or Subparticipant that (i) is not acting as a Principal when initiating or Responding to a transaction via TEFCA Exchange and (ii) has a direct written agreement with a Principal authorizing the First Tier Delegate to initiate or Respond to transactions via TEFCA Exchange 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.

**Initiating Node Only Attestation:** an attestation provided by a Participant or Subparticipant to its QHIN attesting the data obtained or created by the Participant’s or Subparticipant’s Initiating Node that becomes part of a Designated Record Set of a Principal is shared with another Responding Node that is identified in such attestation. For purposes of the Initiating Node Only Attestation, Designated Record Set has the meaning assigned to that term in 45 CFR §164.501 but applies to a Principal regardless of whether the Principal is a Covered Entity.

**Principal:** a QHIN, Participant or Subparticipant that is acting as a Covered Entity, Government Health Care 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.

The following defined terms from the Common Agreement are repeated here for reference.

**Directory Entry(ies):** listing of each Node controlled by a QHIN, Participant, or Subparticipant, which includes the endpoint resource for such Node(s) and any other organizational or technical information required by the QTF or an applicable SOP.

**Initiating Node:** a Node through which a QHIN, Participant, or Subparticipant initiates transactions for TEFCA Exchange.

**Node:** a technical system that is controlled directly or indirectly by a QHIN, Participant, or Subparticipant and that is listed in the RCE Directory Service.

**RCE Directory Service:** a technical service provided by the RCE that enables QHINs to identify their Nodes to enable TEFCA Exchange. The requirements for use of, inclusion in, and maintenance of the RCE Directory Service are set forth in the Framework Agreements, QTF, and applicable SOPs.

**Responding Node:** a Node through which the QHIN, Participant, or Subparticipant Responds to a received transaction for TEFCA Exchange.

### 3 PURPOSE

This SOP identifies specific requirements that QHINs, Participants, and Subparticipants are required to follow when authorizing a Delegate to initiate Delegated Requests.

## 4 PROCEDURE

### 4.1 Overarching Requirements

1. Delegated Requests MUST follow all requirements that apply to the Principal, as set forth in the Exchange Purposes (XPs) SOP or applicable XP Implementation SOP.
2. All Principals MUST meet the definition of Principal and have a Responding Node, unless it meets one of the following exceptions:
  - a. It is hierarchically below a Responding Node for Document Retrieval where such Responding Node is sharing all Required Information from a downstream Participant or Subparticipant that would otherwise be provided by the Participant's or Subparticipant's Initiating Node, if the Initiating Node were a Responding Node;
  - b. It provides an Initiating Node Only Attestation to the QHIN, per the RCE Directory Service Requirements Policy SOP; or
  - c. It is exempted from required Responses pursuant to the XPs SOP.

### 4.2 Delegated Requests

1. All Delegated Requests MUST list the Principal for whom the Delegate is initiating the Request, as described in Sections 4.4 and 4.5 of this SOP.
2. The Initiating QHIN for a Delegated Request MUST verify that the Principal referenced in the transaction matches a Principal listed in the RCE Directory Service, as described in Section 4.3 of this SOP. A transaction from a Delegate that does not appropriately reference a Principal MUST NOT be accepted.

### 4.3 RCE Directory Service

1. All QHINs, Participants, and Subparticipants MUST list any directly contracted Delegates in their Directory Entry(ies).
2. A Principal is responsible for providing the Delegation Notice to its QHIN when the Principal wants to authorize a First Tier Delegate to initiate Delegated Requests in connection with the services provided by the First Tier Delegate to the Principal.
3. A First Tier Delegate is responsible for providing the Delegation Notice to its QHIN when the First Tier Delegate wants to authorize a Downstream Delegate to initiate Delegated Requests in connection with the services provided by the Downstream Delegate to the First Tier Delegate.

4. A Downstream Delegate is responsible for providing the Delegation Notice to its QHIN when the Downstream Delegate wants to authorize another Downstream Delegate to initiate Delegated Requests in connection with the services provided by the Downstream Delegate to the Downstream Delegate making the notification to its QHIN.
5. By submitting a Delegation Notice, the QHIN, Participant, or Subparticipant submitting the Delegation Notice is attesting that it has a direct written agreement with such Delegate authorizing the Delegate to conduct TEFCA Exchange for or on behalf of a Principal that is also listed in the RCE Directory Service.
6. Upon receipt of a Delegation Notice from an individual(s) authorized to provide the Delegation Notice for a Participant or Subparticipant entity, the QHIN MUST inspect the Delegation Notice for completeness and validity and notify the Participant or Subparticipant of its determination within five (5) business days.
  - a. The QHIN MUST update the RCE Directory Service within one (1) business day of determining the Delegation Notice to be complete and valid. The Directory must be updated by the QHIN by listing the First Tier Delegate or Downstream Delegate within the Directory Entry of the Participant or Subparticipant submitting the Delegation Notice. The Directory Entry of the Participant or Subparticipant submitting the Delegation Notice must use the “Delegation of Authority (DOA)” extension with reference to the Organization resource(s) for the Delegate named in the Delegation Notice.
  - b. If the QHIN determined that the Delegation Notice is incomplete and additional information is required to validate the legitimacy of the Delegation Notice, the QHIN MUST request such information from the Participant or Subparticipant that submitted the Delegation Notice by the end of third (3<sup>rd</sup>) business day after receipt.
7. QHINs must cooperate with other QHINs, the Delegate, and the Principal during the validation process and keep each other apprised of any discrepancies and path to resolution.
8. Upon receipt of a Delegation Revocation from an authorized individual, per Section 4.3(6), the QHIN must update the RCE Directory Service within one (1) business day to remove the Delegate as a Directory Entry of the Participant or Subparticipant submitting the Delegation Revocation.

#### 4.4 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 `<Attribute>` element MUST have the `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">
<saml:AttributeValue>Organization/2.16.840.1.113883.3.7204.1</saml:Attribute
Value>
</saml:Attribute>
```

### 4.5 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 1: TEFCA DRA OAUTH EXTENSION**

| tefca_dra               |   |
|-------------------------|---|
| <b>queryAuthGrantor</b> | MUST be the RCE Directory Organization.ID of the Principal on whose behalf the Request is being made, using the FHIR Resource format. |

## 5 VERSION HISTORY

| Version                  | Revision Date    | Section #(s) of Update |
|--------------------------|------------------|------------------------|
| <b>Draft Version 1.0</b> | January 19, 2024 | N/A                    |
| <b>Version 1.0</b>       | July 1, 2024     | All sections           |