



ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

Standard Operating Procedure (SOP): Exchange Purpose (XP) Vetting Process

Version 1.0

11/13/2024

Applicability: QHINs, RCE

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 Framework Agreements, 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.

Caucus Escalation Date: the date by which a Sponsoring QHIN must notify the RCE that it elects to escalate an Entrant to the QHIN Caucus in order for the Entrant to be reviewed at the QHIN Caucus's next meeting.

Entrant: a potential Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a specific Vetted XP and which is submitted for consideration into the Entrant Review List.

Entrant Review List: the list maintained by the RCE of Entrants submitted by Sponsoring QHINs.

Objection: a formal request sent by any QHIN to the RCE regarding an Entrant on the Entrant Review List that is intended to question the factual information about the Entrant submitted by the Sponsoring QHIN and which includes the information required by this SOP.

Objecting QHIN: the QHIN that objects to an Entrant.

Objection Period: the period of not less than five business days following publication of an Entrant Review List, during which time a QHIN(s) must register an Objection it has to any Entrant.

Publication Day: the day on which the RCE will publish the Entrant Review List to all QHINs.

Publication Deadline: the specified time by which a Sponsoring QHIN(s) must submit an Entrant in order for such Entrant to be included in the next Entrant Review List.

Sponsoring QHIN: the QHIN that submits an Entrant into the Entrant Review List.

Vetted XP: the XP(s) for which Entrants must be vetted in accordance with this SOP, which includes TEFCA Required Treatment.

3 PURPOSE

This XP Vetting Process SOP establishes a clear and transparent framework for evaluating and approving Entrants before their inclusion in the RCE Directory Service to assert a specific Exchange Purpose (XP). This process promotes trust and collaboration among Qualified Health Information Networks (QHINs) by providing a structured timeline for submitting Entrants for review and discussing any concerns in an open forum. Thorough evaluation and transparency in the XP Vetting Process enhances the integrity and efficacy of TECCA Exchange.

4 PROCEDURE

4.1 Entrant Review List Process

- 4.1.1. Prior to the first business day of each month, the RCE will inform the QHINs of the Publication Deadlines, Publication Days, Objection Periods, and Caucus Escalation Dates for the month, all of which must fall on business days.
- 4.1.2. Prior to adding an Entrant in the RCE Directory Service for a Vetted XP, a Sponsoring QHIN must first publish such Entrant in the Entrant Review List and fulfill the vetting process steps set forth herein.
 - a. The Entrant Review List will be maintained by the RCE. All Entrants submitted by a Sponsoring QHIN to the RCE for inclusion on the Entrant Review List by the Publication Deadline will be included in the Entrant Review List published by the RCE on the next Publication Day. All Entrants submitted by a Sponsoring QHIN after the Publication Deadline will be included in the subsequent Publication Deadline's Entrant Review List.
 - b. When submitting an Entrant for inclusion on the Entrant Review List, the Sponsoring QHIN must ensure that all information required to be included in such submission is complete and accurate. Information required to be included is dependent on the Vetted XP and is set forth in the respective section in this SOP. Failure to provide required information may result in the Entrant being rejected. If an Entrant is rejected, all information about the Entrant that is required as part of the vetting process must be resubmitted to be included on the Entrant Review List. The Entrant will then be included in the subsequent Publication Deadline's Entrant Review List. Information required for the submission of an Entrant is based on the applicable Vetted XP and is set forth in the applicable section(s) below.

- 4.1.3. The RCE will publish the Entrant Review List on the Publication Day. Each QHIN will have until the end of the Objection Period to register an Objection to any Entrant. Any Objection must be sent to the RCE at an email address provided by the RCE by the end of the Objection Period, or otherwise submitted through mechanisms established by the RCE. If the Objection is submitted via email to the RCE, the Objecting QHIN must copy the Sponsoring QHIN on such email.
- 4.1.4. At the end of the Objection Period, the RCE will provide to all QHINs the full content of all Objections for a given Entrant Review List.
- 4.1.5. If there are no Objecting QHINs for an Entrant by the end of the Objection Period, such Entrant may be published in the RCE Directory Service for the Vetted XP by the Sponsoring QHIN.
- 4.1.6. If there is an Objecting QHIN for an Entrant, then the following apply:
 - a. Any Objection must meet the requirements for Objection set forth in Section 4.2.
 - b. The Objecting QHIN may withdraw its Objection at any point in the process by notifying the RCE in writing at an email address provided by the RCE, with a copy to the Sponsoring QHIN, or through other mechanisms specified by the RCE. In the event that all Objecting QHINs withdraw their Objections to an Entrant, then the Entrant may be published in the RCE Directory Service by the Sponsoring QHIN.
 - c. The Sponsoring QHIN may elect to do one of the following with respect to an Entrant for which there is an Objection and must notify the RCE of the option it elects in writing at an email address provided by the RCE or through other mechanisms specified by the RCE. Until the Sponsoring QHIN makes an election, the review of the Entrant will remain paused.
 - i. The Sponsoring QHIN may request that the QHIN Caucus review the Entrant based on the information found in the Entrant Review List, the Objecting QHIN's Objection, and any additional information the Sponsoring QHIN may wish to provide to the QHIN Caucus. The RCE will notify ASTP/ONC when the Sponsoring QHIN requests that the QHIN Caucus review an Entrant.
 - ii. The Sponsoring QHIN may notify the RCE that it is removing the Entrant from the vetting process. This does not preclude the Sponsoring QHIN, or any other QHIN, from resubmitting the Entrant at any time.

- 4.1.7. The QHIN Caucus¹, facilitated by the Assistant Secretary for Technology Policy and Office of the National Coordinator for Health Information Technology (ASTP/ONC) and the RCE, will review Entrants that have been escalated per Section 4.1.6(c)(i) by the Caucus Escalation Date. The QHIN Caucus may only consider information about the Entrant from the Entrant Review List, the information submitted by the Objecting QHIN in the Objection, and any additional information/evidence submitted by the Sponsoring QHIN to address the Objection. The QHIN Caucus will vote on all Entrants escalated to the QHIN Caucus by the Caucus Escalation Date at its next scheduled meeting or within two business days after such scheduled meeting. To the extent voting occurs within two business days after the scheduled meeting, the vote may occur electronically.
- a. If all voting members of the QHIN Caucus vote that the Entrant is eligible to submit Queries for the Vetted XP(s), such Entrant may be published in the RCE Directory Service by the Sponsoring QHIN.
 - b. If all voting members of the QHIN Caucus vote that the Entrant is not eligible to submit Queries for the Vetted XP(s), such Entrant may not be published in the RCE Directory Service by the Sponsoring QHIN for such Vetted XP(s). If, however, new evidence or information about the Entrant becomes available, the Sponsoring QHIN (or any other QHIN) may resubmit the Entrant to a future Entrant Review List.
 - c. If all voting members of the QHIN Caucus do not unanimously agree that the Entrant is eligible or ineligible, then the Sponsoring QHIN must notify the RCE in writing if it desires to further escalate the Entrant to ASTP/ONC for a decision on whether the Entrant can submit Queries for the asserted Exchange Purpose(s) or to withdraw the Entrant from the vetting process.
 - d. Any member of the QHIN Caucus that abstains, is not present at the QHIN Caucus meeting, or does not register a vote electronically by the stated deadline when such vote is conducted electronically, will not be counted as a voting member for purposes of such vote. The Objecting QHIN and Sponsoring QHIN are not required to recuse themselves and may participate in the vote with respect to an Entrant.

¹ Prior to establishment of the QHIN Caucus, the Transitional Council, or a subcommittee thereof which contains a representative from each QHIN, will serve this role.

- 4.1.8. If the Sponsoring QHIN notifies the RCE that it desires to escalate an Entrant to ASTP/ONC per Section 4.1.7(c), ASTP/ONC will decide within 15 business days² of receipt of the notice of the escalation from the RCE whether the Sponsoring QHIN: (i) has provided sufficient evidence that the Entrant may submit Queries for the asserted Exchange Purpose(s), in which case such Entrant may be published in the RCE Directory Service by the Sponsoring QHIN; or (ii) has not provided sufficient evidence that the Entrant may submit Queries for the asserted Exchange Purpose(s), in which case the Sponsoring QHIN may not publish the Entrant in the RCE Directory Service and may only resubmit the Entrant to the Entrant Review List in the event the Sponsoring QHIN (or any other QHIN) has materially new evidence supporting the Entrant's eligibility to submit Queries for the asserted Exchange Purpose(s). ASTP/ONC may request any additional information/evidence to inform its decision. Such request(s) will align with the Confidential Information requirements pursuant to the Common Agreement and applicable SOPs.
- 4.1.9. A Sponsoring QHIN is expected to add an Entrant that has been determined eligible for a Vetted XP to the RCE Directory Service within six (6) months after the eligibility decision. In the event the Sponsoring QHIN adds such Entrant to the RCE Directory Service after six (6) months, the Sponsoring QHIN must attest to the other QHINs that the Entrant has attested that the information about the Entrant in the Entrant Review List remains accurate and complete.
- 4.1.10. If, pursuant to this vetting process, an Entrant is published in the RCE Directory Service by the Sponsoring QHIN, then upon such publication, provided the information included in the Directory Entry is consistent with the evidence and information submitted in the Entrant Review List, every QHIN must process the Entrant's Directory Entry in accordance with the requirements set forth in the QHIN Technical Framework (QTF).
- a. In the event that a QHIN identifies a non-substantive inconsistency in the Directory Entry for an Entrant (e.g., typo in the address or other minor error), the QHIN must notify the Sponsoring QHIN in writing within two (2) business days of the Sponsoring QHIN's publication of the Directory Entry in question. All QHINs must process such Directory Entry, in accordance with the QTF requirements for RCE Directory Service updates, after the Sponsoring QHIN corrects the non-substantive inconsistency.
 - b. In the event that a QHIN identifies a substantive inconsistency in the Directory Entry for an Entrant and, as a result, such QHIN will not be complying with the requirements set forth in the QTF, then such QHIN must notify the Sponsoring QHIN and RCE of its delay and the reason therefor. Such notification must be provided in writing within two (2) business days of the Sponsoring QHIN's publication of the inconsistent Directory Entry.

² ASTP/ONC may, in its discretion, extend this time for an unlimited number of additional 15 business daytime periods with written notification to the Sponsoring QHIN and the Objecting QHIN at least 2 business days prior to the deadline.

- 4.1.11. All evidence, information, and Objections submitted as part of the vetting process may only be used by a QHIN for the purpose of implementing this SOP. The RCE is permitted to share all evidence, information, or Objections submitted as part of the vetting process with the QHIN Caucus for purposes of their review and with ASTP/ONC without the need to observe the processes set forth in the ONC Access to and Request for Confidential Information SOP.

4.2 Objection Requirements

- 4.2.1. The Objecting QHIN must include the following in its Objection:
- a. Name of the Objecting QHIN and the individual at the Objecting QHIN who will serve as the point of contact for the Objection (including name, phone number, and email address);
 - b. Specific components of the applicable Exchange Purpose(s) definition that the Objecting QHIN does not believe the Entrant meets;
 - c. If an Objection concerns the accuracy or completeness of an attestation or evidence submitted by the Sponsoring QHIN, then the documentation and/or other supporting evidence that is intended to demonstrate the inaccuracy or incompleteness of the Sponsoring QHIN's the attestation or evidence;
 - d. If an Objecting QHIN is Objecting to descriptive, narrative information about an Entrant, the specific deficiencies or ambiguities to support its Objection that would call into question the accuracy of the information and the Sponsoring QHIN's conclusion that the Entrant can submit Queries for the applicable Exchange Purpose(s); and
 - e. Request for additional information or evidence that would address the Objecting QHIN's concerns that it has set forth in its Objection.
- 4.2.2. Generally, a QHIN will evaluate an Entrant's ability to Query for a specific Exchange Purpose based on the factual requirements associated with the Vetted XP definition. As a result, the following will typically not be found to substantiate an Objection for TEFCA Required Treatment:
- a. the Entrant's provision of limited treatment services;
 - b. the Entrant's provision of both treatment and non-treatment services;
 - c. the Entrant's secondary use of any information obtained through TEFCA; or
 - d. the Entrant's lack of a physical interaction with an individual patient provided the Entrant has been submitted as a Path 3 Entrant for TEFCA Required Treatment.

The above are examples of bases that will not substantiate an Objection for TEFCA Required Treatment but are not intended to constitute an exhaustive list.

- 4.2.3. An Objecting QHIN may only Object to one Entrant per email. There are, however, no limits on the number of Entrants to which an Objecting QHIN may Object. For avoidance of doubt, if the Objecting QHIN is Objecting to multiple Entrants, then each Entrant that it is Objecting to must be submitted to the QHIN Caucus in separate emails.

4.3 SOP Amendment

Any substantive changes to this SOP must be adopted in accordance with the Common Agreement. Notwithstanding the foregoing, non-substantive changes to the SOP, changes to the evidence and information set forth in the appendices to this SOP, or changes to timelines set forth herein may be modified by a majority of the QHIN Caucus.³

4.4 Entrant Review List Submission for TEFCA Required Treatment

- 4.4.1. By submitting an Entrant in the Entrant Review List for TEFCA Required Treatment, the QHIN is affirming that the Entrant has been informed of the requirements for submitting a Query for TEFCA Required Treatment that are set forth in the XP Implementation SOP for Treatment and that, if approved to initiate Queries for TEFCA Required Treatment, Entrant must comply with such requirements pursuant to the ToP.
- 4.4.2. Each submission to the Entrant Review List of an Entrant that wants to engage in TEFCA Exchange using the TEFCA Required Treatment XP must include all the following:
- a. Sponsoring QHIN Name
 - b. Entrant's name (legal entity name if an organization or individual name if an individual person)
 - c. If Entrant is an organization that is not itself a Covered Entity Health Care Provider but which would list child entries in the RCE Directory Service that are Covered Entity Health Care Provider(s) and that intend to assert TEFCA Required Treatment, then Entrant must name at least one of its prospective child entries that is a Covered Entity Health Care Provider and provide the information in 4.4.1(f) – (l) for such child entry.
 - d. Entrant's DBA (if any)
 - e. Corporate Business Address
 - f. Site of Care Address
 - i. If Entrant does not have a physical site of care address because Entrant provides care in the patient's home or utilizing a mobile vehicle, please indicate.
 - ii. If Entrant does not have a physical site of care address because Entrant only provides care virtually, please indicate.

³ Prior to establishment of the QHIN Caucus, the RCE and ASTP/ONC may approve such changes.

g. **Type of Health Care Provider** (choose from among the following)

- i. a Hospital; skilled nursing facility; nursing facility; home health entity; health care clinic; community mental health center; renal dialysis facility; blood center; ambulatory surgical center; emergency medical services provider; Federally Qualified Health Center; group practice; a pharmacist; a pharmacy; a laboratory; a provider operated by, or under contract with, the Indian Health Service or by an Indian tribe, tribal organization, or urban Indian organization (as defined in section 1603 of title 25); or a rural health clinic; or
- ii. a natural person doctor of medicine or osteopathy, doctor of dental surgery or dental medicine, doctor of podiatric medicine, doctor of optometry, chiropractor, or other natural person who is licensed, certified, registered, or otherwise authorized by a State to provide health care, including but not limited to, a physician assistant, nurse, nurse practitioner, social worker, psychologist, registered dietician or nutrition professional, physical therapist, occupational therapist, or speech-language pathologist; or
- iii. Government Health Care Entity

h. **Vetting path:** The type of evidence and information required to be provided for an Entrant depends on which vetting path the Entrant may utilize. For TEFCA Required Treatment, the following vetting paths are available:

i. **Path 1:**

- Health Care Provider that participates in any plan or program that provides health benefits, which is funded directly, in whole or in part, by the United States Government (other than the Federal Employees Health Benefits Program) or any State health care program (e.g. Medicare, Medicaid, Tricare) and has in-person, physical interactions with patients; or
- Government Health Care Entity (as defined in the Common Agreement)

ii. **Path 2:**

- Health Care Provider that does **not** participate in any plan or program that provides health benefits, which is funded directly, in whole or in part, by the United States Government (other than the Federal Employees Health Benefits Program) or any State health care program (e.g., Medicare, Medicaid, Tricare), but **does** participate with other payers and has in-person, physical interactions with patients.

iii. **Path 3:**

- Health Care Provider that participates with any type of payer and does not have in-person, physical interactions with patients (e.g., virtual-only provider).

- Health Care Provider that does not participate with any type of payer but does conduct HIPAA standard transactions.
- i. **Evidence that the Entrant is a Health Care Provider:**
 - i. Path 1 must provide Type I evidence as set forth in Appendix 1.
 - ii. Path 2 must provide Type II evidence as set forth in Appendix 1.
 - iii. Path 3 must provide Type I or Type II evidence as set forth in Appendix 1.
 - j. **Evidence that the Entrant is a Covered Entity under HIPAA:**
 - i. Path 1 must provide Type I evidence as set forth in Appendix 2.
 - ii. Path 2 must provide Type II evidence as set forth in Appendix 2.
 - iii. Path 3 must provide Type I or Type II evidence as set forth in Appendix 2.
 - k. **Evidence or information that the Entrant provides health care services to patients through interactions with a Licensed Individual Provider (as defined in the applicable SOP(s)):**
 - i. Path 1 is not required to provide any additional evidence.
 - ii. Path 2 must provide Health Care Services Information as set forth in Appendix 3.
 - iii. Path 3 must provide Health Care Services Information as set forth in Appendix 3.
 - l. **Evidence that the Queries submitted by the Entrant will be in connection with or intended to inform health care services by Entrant, which it provides or intends to provide to a patient through a synchronous or asynchronous interaction (either in-person or virtual) with a Licensed Individual Provider:**
 - i. These interactions may include, but are not limited to, querying for records: upon receipt of a notification of admission to or discharge from a hospital; for medication reconciliation and medication management; in support of care management; and, for identification of care gaps all for an individual patient.
 - ii. Path 1 is not required to provide any additional evidence.
 - iii. Path 2 must provide the Patient Interaction Attestation (as defined in Appendix 4). The Patient Interaction Attestation must be in the form set forth in Appendix 4 and provided by the Entrant to the Sponsoring QHIN or the Entrant's Upstream QPS. When the Sponsoring QHIN submits the Entrant to the Entrant Review List, the Sponsoring QHIN must attest to having the Patient Interaction Attestation on file or to having received an attestation from the Entrant's Upstream QPS that the Upstream QPS has the Entrant's Patient Interaction Attestation on file. The Sponsoring QHIN must be able to provide the Patient Interaction Attestation to the RCE, ASTP/ONC, or any other QHIN upon written request.
 - iv. Path 3 must provide Patient Interaction Information as set forth in Appendix 4.

- 4.4.3. A Sponsoring QHIN may provide any other information or explanation it believes is relevant and should be considered by the other QHINs in connection with the evaluation of the Entrant.
- 4.4.4. **Implementation Timeline for Directory Entries Existing as of the Date of Publication of this SOP.**
- a. Within three (3) weeks of the initial publication of this SOP, each QHIN must submit as an Entrant any Participant that is a Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a TEFCA Required Treatment, and is already a Directory Entry as of the date of publication of this SOP.
 - i. Provided that such existing Participant is submitted as an Entrant within three weeks of the initial publication of this SOP, then such Entrant (and its Subparticipants) may continue to Query for TEFCA Required Treatment during the pendency of the vetting process.
 - ii. If the QHIN Caucus unanimously decides, pursuant to Section 4.1.7(b), that the Entrant is not eligible to submit Queries for TEFCA Required Treatment or ASTP/ONC decides that the Sponsoring QHIN has not provided sufficient evidence that the Entrant can submit Queries for TEFCA Required Treatment, pursuant to Section 4.1.8, then the Sponsoring QHIN must prohibit the Entrant (and its Subparticipants) from continuing to Query for TEFCA Required Treatment.
 - iii. In the event that, within three weeks of the initial publication of this SOP, a Sponsoring QHIN does not submit as an Entrant an existing Participant that is a Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a TEFCA Required Treatment, then the Sponsoring QHIN must not permit such Participant (and its Subparticipants) to Query for TEFCA Required Treatment until it submits such Participant as an Entrant and fulfills the process set forth in this SOP.
 - b. Within six (6) months of the initial publication of this SOP, each QHIN must submit as an Entrant any Subparticipant that is a Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a TEFCA Required Treatment, and is already a Directory Entry as of the date of publication of this SOP.
 - i. Provided that such existing Subparticipant is submitted as an Entrant within six months of the initial publication of this SOP, then such Entrant (and its Subparticipants) may continue to Query for TEFCA Required Treatment during the pendency of the vetting process.

- ii. If the QHIN Caucus unanimously decides, pursuant to Section 4.1.7(b), that the Entrant is not eligible to submit Queries for TEFCA Required Treatment or ASTP/ONC decides that the Sponsoring QHIN has not provided sufficient evidence that the Entrant can submit Queries for TEFCA Required Treatment, pursuant to Section 4.1.8, then the Sponsoring QHIN must prohibit the Entrant (and its Subparticipants) from continuing to Query for TEFCA Required Treatment.
- iii. In the event that, within six months of the initial publication of this SOP, a Sponsoring QHIN does not submit as an Entrant an existing Subparticipant that is a Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a TEFCA Required Treatment, then the Sponsoring QHIN must not permit such Subparticipant (and its Subparticipants) to Query for TEFCA Required Treatment until it submits such Subparticipant as an Entrant and fulfills the process set forth in this SOP.

Beyond compliance with the ToP and applicable SOP(s), including the XPs SOP and Treatment XP Implementation SOP, what additional evidence is required per pathway?

	Health Care Provider (Appendix 1)	Covered Entity (Appendix 2)	Provides Health Care Services (Appendix 3)	Interaction between LIP and Patient (Appendix 4)
Path 1	Type I		No additional evidence required	
Path 2	Type II	Type II	Health Care Services Information	Patient Interaction Attestation
Path 3	Type I or II	Type I or II	Health Care Services Information	Patient Interaction Information

APPENDIX 1: HEALTH CARE PROVIDER EVIDENCE

Type I Evidence (choose one of the following)

- Link* to the Entrant’s listing in any directory maintained by the Centers for Medicare and Medicaid Services (“CMS”) including, but not limited to, the following:
 - <https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/medicare-fee-for-service-public-provider-enrollment>
 - <https://data.cms.gov/tools/medicare-inpatient-hospital-look-up-tool>
 - <https://data.cms.gov/provider-characteristics/hospitals-and-other-facilities/hospital-enrollments/data>
 - <https://data.cms.gov/tools/medicare-physician-other-practitioner-look-up-tool>
 - <https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/order-and-referring/data>
 - <https://data.cms.gov/provider-characteristics>
 - <https://www.medicare.gov/care-compare/>
 - <https://data.cms.gov/provider-characteristics/hospitals-and-other-facilities/skilled-nursing-facility-enrollments/data>
- Link* to the Entrant’s listing on any state government list of Medicaid providers
- Confirmation that the Entrant is a Government Health Care Entity (as defined in the Common Agreement)

**In lieu of a link to the applicable website, a Sponsoring QHIN may provide the general link with information required to identify the Entrant on the site or a screen shot of the Entrant’s inclusion on the site.*

Type II Evidence (choose one of the following)

- Documentation reasonably showing the Entrant’s receipt of payment from a payer within the six months immediately preceding publication in the Entrant Review List (Documentation should be redacted so that it does not include PHI, financial or any other confidential information).
- Link to the Entrant’s NPI listing in NPPES showing that the Entrant is the type of Health Care Provider listed in the submission
- Link to the Entrant’s listing on a state government website confirming it is licensed as the type of Health Care Provider listed in the submission
- Copy of a Certificate of Coverage for professional medical malpractice coverage

- Copy of or link to Entrant's national accreditation as a health care provider (Joint Commission, AAAHC, NCQA, URAC, etc.)
- Link to the Entrant's listing of its CLIA certification on [S&C QCOR](#)
- Link to the Entrant's inclusion on a list of participating providers published by a payer
- Copy of a letter from a payer confirming that Entrant is a participating provider

APPENDIX 2: COVERED ENTITY EVIDENCE

Type I Evidence (choose one of the following)

- Link* to the Entrant’s listing in any directory maintained by the Centers for Medicare and Medicaid Services (“CMS”) including, but not limited to, the following:
 - <https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/medicare-fee-for-service-public-provider-enrollment>
 - <https://data.cms.gov/tools/medicare-inpatient-hospital-look-up-tool>
 - <https://data.cms.gov/provider-characteristics/hospitals-and-other-facilities/hospital-enrollments/data>
 - <https://data.cms.gov/tools/medicare-physician-other-practitioner-look-up-tool>
 - <https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/order-and-referring/data>
 - <https://data.cms.gov/provider-characteristics>
 - <https://www.medicare.gov/care-compare/>
 - <https://data.cms.gov/provider-characteristics/hospitals-and-other-facilities/skilled-nursing-facility-enrollments/data>
- Link* to the Entrant’s listing on any state government list of Medicaid providers
- Confirmation that the Entrant is a Government Health Care Entity (as defined in the Common Agreement)

**In lieu of a link to the applicable website, a Sponsoring QHIN may provide the general link with information required to identify the Entrant on the site or a screen shot of the Entrant’s inclusion on the site.*

Type II Evidence (choose one of the following)

- Documentation reasonably showing the Entrant’s submission of claims to a payer or other HIPAA standard transactions within the six months immediately preceding publication in the Entrant Review List. (Documentation should be redacted so that it does not include PHI, financial or any other confidential information.)
- Link to the Entrant’s inclusion on a list of participating providers published by a payer
- Copy of a letter from a payer confirming that Entrant is a participating provider

APPENDIX 3: INFORMATION THAT THE ENTRANT PROVIDES HEALTH CARE SERVICES TO PATIENTS THROUGH INTERACTIONS WITH A LICENSED INDIVIDUAL PROVIDER

Health Care Services Information

- Explain the ways in which the Entrant provides health care services to patients
- Explain when in relation to health care services provided to patients, the Entrant will make Queries for information through TEFCA Exchange (e.g., right before a visit, at a visit, upon notification of an event, at regularly scheduled intervals, etc.). If the Queries will be automated, explain the triggers for the Queries.

APPENDIX 4

Evidence that the Queries submitted by the Entrant will be in connection with or intended to inform health care services by Entrant, which it provides or intends to provide to a patient through a synchronous or asynchronous interaction (either in-person or virtual) with a Licensed Individual Provider

- Patient Interaction Attestation (see Exhibit A)
- Patient Interaction Information
 - Explain the ways in which the Entrant’s Licensed Individual Providers interact with patients; and
 - Explain how the Queries will be connected to or intended to inform the health care services the Entrant is providing or intends to provide to a patient.

Exhibit A: Path 2 Patient Interaction Attestation

Patient Interaction Attestation

Entity Name:

Corporate Address:

Type of Health Care Provider Entity:

On behalf of the entity named above (“Entity”), the undersigned, being the [Insert Title] of Entity, hereby attests to the following:

1. Any Queries for records made by or on behalf of Entity utilizing the TEFCA Required Treatment Exchange Purpose (XP) Code will be in connection with or intended to inform health care services by Entity, which it provides or intends to provide to a patient through a synchronous or asynchronous interaction (either in-person or virtual) with a Licensed Individual Provider. These interactions include, but are not limited to, querying for records upon receipt of a notification of admission to or discharge from a hospital; for medication reconciliation and medication management; in support of care management; or, for identification of care gaps all for an individual patient.
2. Queries initiated using the TEFCA Required Treatment XP Code are intended to support health care services for individual patients.

By: _____

Name: _____

Title: [Executive Title]

5 VERSION HISTORY

Version	Revision Date	Section #(s) of Update
November 13 2024	Initial Publication	N/A