June 17, 2025

RCE™ Monthly Information Call

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Agenda

- Welcome
- ASTP Welcome
- TEFCA Exchange Basics
- TEFCA Policy Development Timeline
- Exchange Purposes Deep Dive
- Update on TEFCA Governance bodies
- Educational Resources
- Questions & Answers

THE NUMBERS ARE IN

TEFCA Exchange is Ramping Up!

There are 6,171 organizations live on TEFCA (QHINs, Participants, and Subparticipants).

More than 20 **million documents shared** since go-live in December 2023.

20+ MILLION Documents Shared

Meet the Qualified Health Information Networks (QHINs)

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

commonwell
HEALTH ALLIANCE

eClinicalWorks

eHealth Exchange

Epic Nexus

HEALTH® GORILLA

Kno2®

KONZA
NATIONAL NETWORK

MedAllies

surescripts
Health Information Network™

Candidate QHINs

Netsmart

ORACLE Health
Information Network, Inc.™

Learn More: https://rce.sequoiaproject.org/designated-qhins/

Thomas Keane, MD, MBA
Assistant Secretary for Technology Policy
National Coordinator for Health Information Technology

TEFCA Exchange Basics
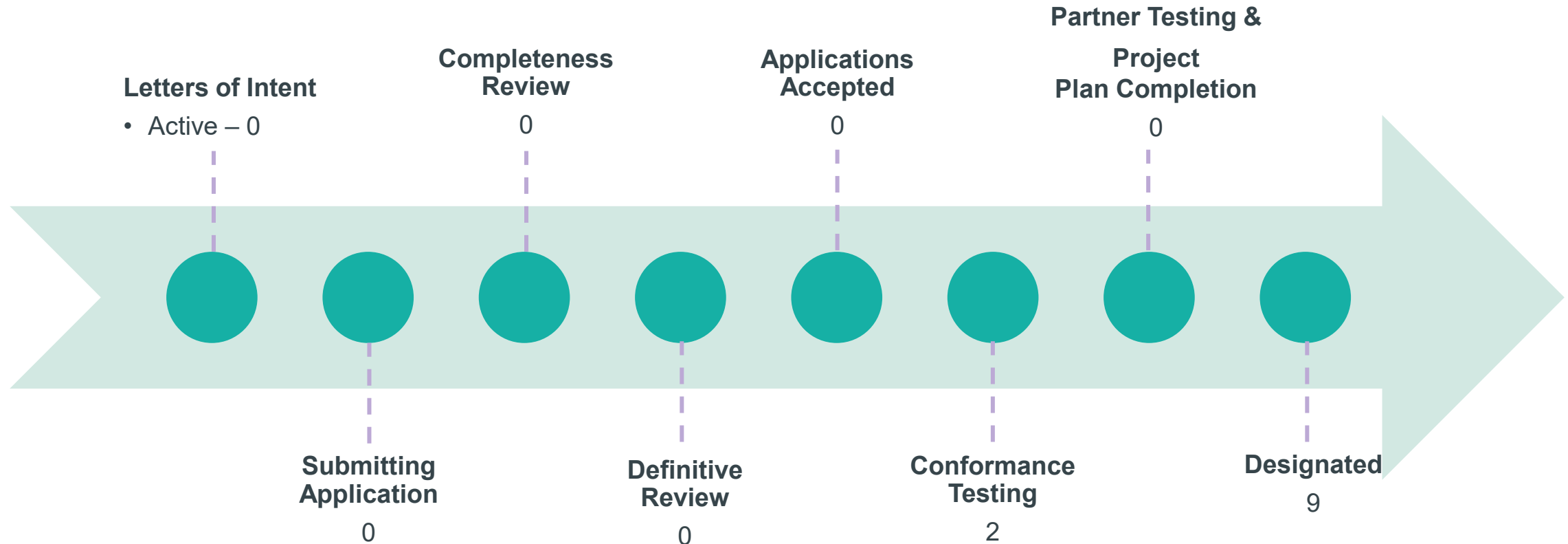
QHIN Application and Onboarding & Designation

Letters of Intent

• Active – 0

Completeness Review

0

Applications Accepted

0

Partner Testing & Project Plan Completion

0

Submitting Application

0

Definitive Review

0

Conformance Testing

2

Designated

9

TEFCA Components

Framework Agreements

Standard Operating Procedures

Technical Requirements

RCE Directory

Oversight & Compliance

Governance

Exchange Under TEFCA
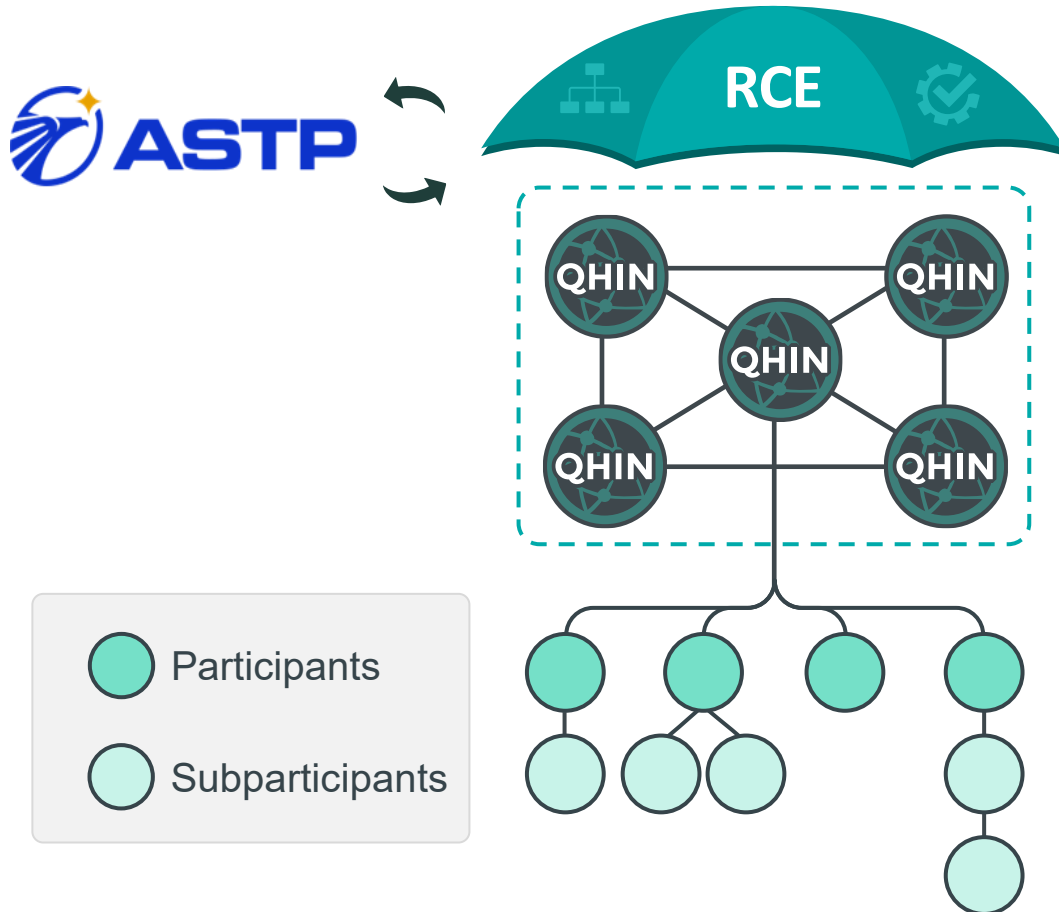
ASTP defines overall policy and certain governance requirements

RCE provides oversight and governing approach for QHINs

QHINs connect directly to each other to facilitate nationwide interoperability

Each QHIN connects Participants, which connect Subparticipants

Participants and Subparticipants connect to each other through TEFCA Exchange

- Participants contract directly with a QHIN and may choose to also provide connectivity to others (Subparticipants), creating an expanded network of networks

- Participants and Subparticipants sign the same Terms of Participation and can generally participate in TEFCA Exchange in the same manner

TEFCA provides strong privacy protections

- Most connected entities will likely be HIPAA Covered Entities or Business Associates of Covered Entities, and thus already be required to comply with HIPAA privacy and security requirements

- In the case of entities that are neither a Covered Entity nor a Business Associate otherwise subject to HIPAA, "Non-HIPAA Entities" (NHE), the Common Agreement requires the NHE to protect Individually Identifiable Information as if it were protected health information and they were a Covered Entity or Business Associate subject to HIPAA

- Individual Access Providers (IAS) Providers have additional requirements (see Framework Agreements)

Please see framework agreement and relevant SOPs on privacy requirements for full details.

TEFCA provides strong security protections

- **QHINs are required to meet a high bar for security, including:**

  - » Third-party certification to industry-recognized cybersecurity standards, in addition to complying with the HIPAA Security Rule
  - » Annual security assessments
  - » Have a Chief Information Security Officer
  - » Have cyber risk coverage

- **Terms of Participation contract provisions for all Participants and Subparticipants:**

  - » Non-HIPAA Entities (NHEs) must comply with the HIPAA Security Rule as if they were a Covered Entity or Business Associate subject to HIPAA

- **Notice of TEFCA Security Incidents involving or affecting TEFCA Exchange:**

  - » Are required of QHINs, Participants, and Subparticipants
  - » Are generally designed to avoid conflict with Applicable Law and duplicative notification requirements

- **The RCE actively facilitates security activities, with the support of the Cybersecurity Council**

Please see framework agreement and relevant SOPs on security requirements for full details.

TEFCA Policy Development Timeline

SOP Publications Dates 2024 - 2025

Published July 2024

- QHIN Technical Framework (QTF) Version 2.0
- Facilitated FHIR Implementation SOP Version 1.0
- Individual Access Services (IAS) Provider Requirements
- Governance Approach SOP Version 1.0
- Delegation of Authority SOP Version 1.0
- Expectations for Cooperation SOP Version 1.0
- Exchange Purposes (XPs) SOP Version 2.0
- RCE Directory Service Requirements Policy SOP Version 1.0
- TEFCA Security Incident Reporting SOP Version 1.0
- XP Implementation SOP: Treatment Version 1.0

Published August 2024

- Public Health Exchange Purpose (XP) Implementation SOP
- Health Care Operations XP Implementation SOP
- Individual Access Services XP Implementation SOP Version 2.0
- Exchange Purposes (XPs) SOP Version 3.0
- QHIN Security for the Protection of TEFCA Information Version 2.0

Published November 2024

- XP Vetting Process SOP Version 1.0

Published in 2025

- TEFCA Governance SOP Version 1.0 (1/10/2025)
- QHIN Onboarding & Designation SOP Version 3.0 (1/14/2025)
- Exchange Purposes (XPs) SOP Version 4.0 (1/17/2025)
- QHIN, Participant, and Subparticipant Additional Security Requirements SOP Version 1.0 (1/17/2025)
- QHIN Application Version 3.0 (4/1/2025)

Deep Dive:
Exchange Purposes (XPs)

Standard Operating Procedures (SOP)

What is an SOP?

- An SOP is a written procedure or other provision that is incorporated by reference into the Framework Agreements to provide detailed information or requirements related to TEFCA Exchange

- SOPs address, among other things, governance, privacy and security requirements, RCE directory services, and QHIN application and designation

- Each SOP identifies the parties to which it applies (QHINs, Participants, Subparticipants)

What is the Exchange Purposes (XPs) SOP?

The XPs SOP details specifications relevant to when and how information can be requested or shared through TEFCA Exchange

What is an Exchange Purpose (XP) Implementation SOP?

XP Implementation SOPs provide additional details for specific use cases, as needed

Why SOPs?

- SOPs create the flexibility for TEFCA to evolve and expand over time

- SOPs will be created and modified as needed and finalized through a defined change management process

- Access the SOPs on the RCE website

The TEFCA Glossary is intended to serve as an in-depth compilation of terms and their definitions referenced in the Common Agreement Version 2.1, 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.

Exchange Purposes (XPs)

- The Exchange Purposes are the reasons for which information can be shared through TEFCA Exchange

- The Exchange Purposes SOP (XPs SOP) identifies the authorized Exchange Purposes and related use cases, identifies which require a response, who must respond, the exceptions to a response, and when fees are allowed between a responding Node and an initiating Node

- Additional implementation guidance is provided in Exchange Purpose Implementation SOPs as needed

Exchange Purposes

| Treatment |
| Payment |
| Health Care Operations |
| Public Health |
| Government Benefits Determination |
| Individual Access Services |

Additional Exchange Purposes and use cases may be added over time

Current Exchange Purposes (XPs)

Exchange Purposes SOP Version 4.0

Health Care Operations (HCO) XP SOP

Public Health XP SOP

Individual Access Services (IAS) XP SOP

Vetting XP SOP

Treatment XP SOP
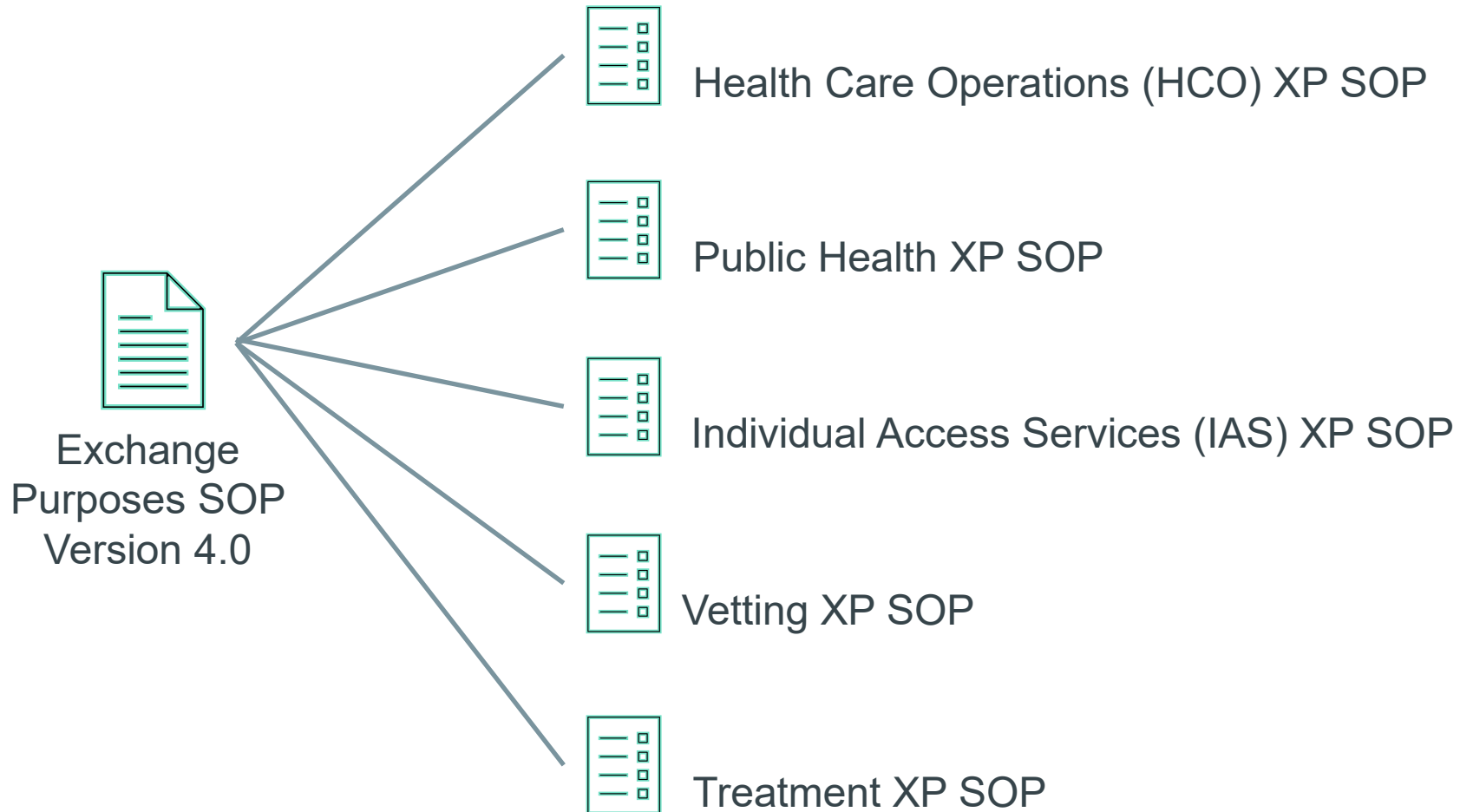
The Exchange Purposes SOP Version 4.0 serves as the reference document for all current XP SOPs.

Exchange Purposes (XPs)

- Every transaction that occurs via TEFCA Exchange MUST include the XP Code that represents the reason for why the transaction is being initiated

- Each of the authorized XPs may also have specific use cases that are identified with their own XP Code

- The XP codes for more specific use cases will begin with the same characters as the broader XP

For example, a use case under the Public Health XP Code would always begin with "T-PH", and the specific use-cases would be T-PH-ECR

Authorized XP	XP Code
Treatment	**T-TREAT**
TEFCA Required Treatment	T-TRTMNT
Payment	**T-PYMNT**
Health Care Operations	**T-HCO**
Care Coordination/Case Management	T-HCO-CC
HEDIS Reporting	T-HCO-HED
Quality Measure Reporting	T-HCO-QM
Public Health	**T-PH**
Electronic Case Reporting	T-PH-ECR
Electronic Lab Reporting	T-PH-ELR
Individual Access Services	**T-IAS**
Government Benefits Determination	**T-GOVDTRM**

SOP: Exchange Purposes (XPs)

Responding Nodes MUST Respond to Queries for the XP Codes that have a required Response, unless an exception applies (such as for PHAs), as set forth in the Exchange Purposes SOP

XP Codes that Require Response

- TEFCA Required Treatment
- Individual Access Services (IAS)

XP Codes that Permit a Response

- Payment
- Health Care Operations
- *Care Coordination / Case Management
- *HEDIS Reporting
- *Quality Measure Reporting
- Public Health
- Electronic Case Reporting
- Electronic Lab Reporting
- Government Benefits Determination

*February 16th Responses for these XPs will be required

Queries, Uses, and Disclosures

- TEFCA **Queries** will be transmitted via TEFCA Exchange, consistent with the requirements of the Framework Agreements

  » Only TEFCA connected entities can make Queries for an Exchange Purpose.

- **Uses and Disclosures** must adhere to the privacy and security requirements in the Framework Agreements, any privacy and security notices, and any requirements of Applicable Law

- **Responses are not required if:**

  » Providing the information is prohibited by Applicable Law;

  » The response is inconsistent with Signatory's IAS Privacy and Security Notice, if applicable; or

  » The response is not in accordance with the Common Agreement.

- **The Framework Agreements permit but do not require a Response from the following entities:**

  » Public Health Authorities

  » Government agencies using TEFCA Exchange solely for purposes of Requesting information for Government Benefits Determination

  » Federal agencies, to the extent that the requested Disclosure of Required Information is permitted under Applicable Law

Who Can Conduct Exchange Pursuant to an Exchange Purpose?

Who Can Conduct Exchange Pursuant to an Exchange Purpose?

A QHIN, Participant, or Subparticipant may only Query for information under TEFCA for a specific Exchange Purpose if it is permissible pursuant to Applicable Law, the Framework Agreements, and an applicable SOP.

Example

Only a Health Care Provider as defined in the HIPAA Rules or the information blocking regulations (or a Business Associate, agent, or contractor acting on that Health Care Provider's behalf) may Query for Treatment

TEFCA Required Treatment

TEFCA Required Treatment specifies the conditions under which QHINs, Participants, and Subparticipants are required to respond to a treatment query

Authorized XP	XP Code
Treatment	T-TREAT
TEFCA Required Treatment	T-TRTMNT

The Treatment XP SOP establishes conditions to operationalize trust in required responses, including:

- Query is initiated by a Covered Entity Health Care Provider including licensed individuals; a government health care entity; or a contracted Delegate of either (except for health plans);

- In connection with or indented to inform health care services that an entity is providing or intends to provide to a patient through synchronous or asynchronous interaction with a Licensed Individual Provider (either in-person or virtual)

- This includes 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.
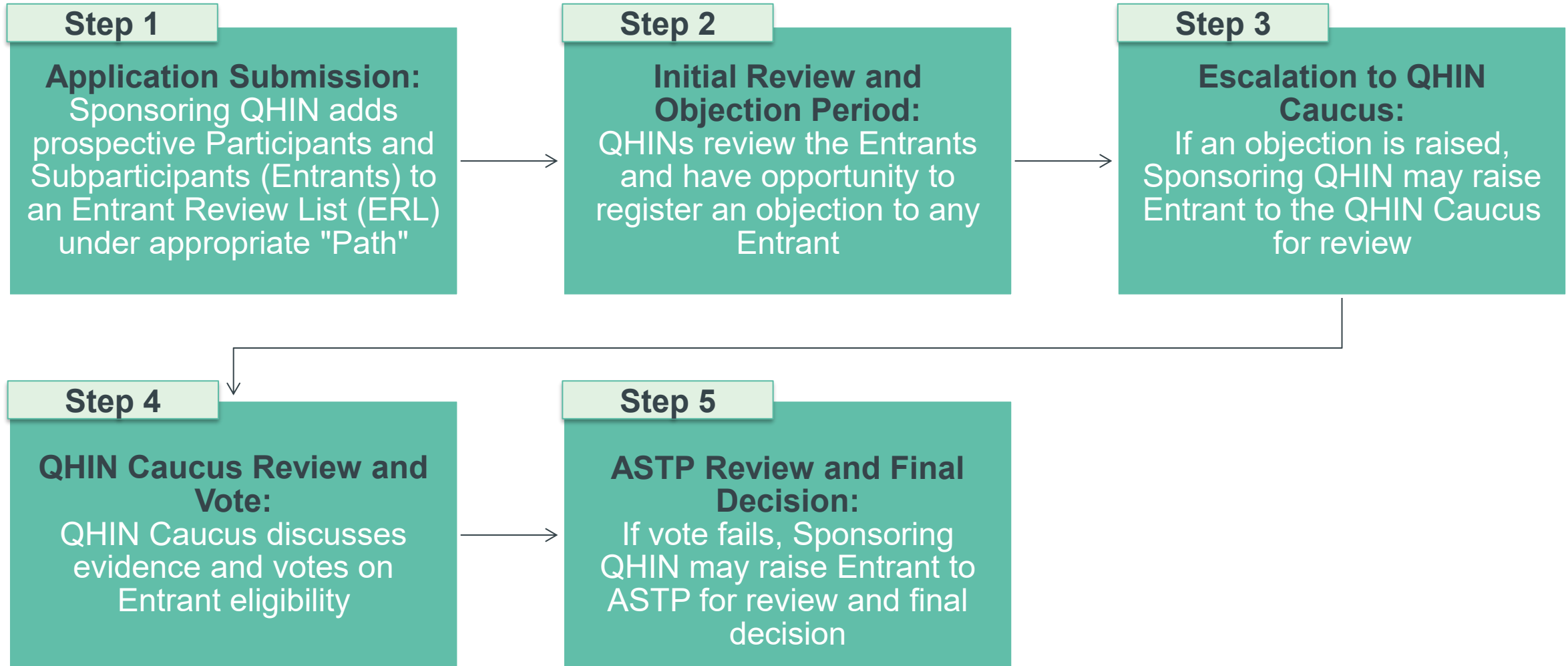
Vetting XP SOP and TEFCA Required Treatment

- The 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)

- The vetting process requires QHINs to work with prospective Participants and Subparticipants to provide appropriate evidence that they fit the definition to request information for a given XP

- The process promotes trust and collaboration among QHINs by providing structured timeline for submitting Entrants for review and discussing any concerns in an open forum

For TEFCA Required Treatment, the evidence needed varies by the vetting path, but could include one or more of the following:

Types of Evidence:

- Type I data that demonstrate participation in Medicare or Medicaid
- Type II data that demonstrate the entity meets the definition as both
  - a Health Care Provider; and
  - a Covered Entity under HIPAA
- Information on the Health Care Services the entity provides
- Information on how the entity engages in Patient Interactions with Licensed Professionals
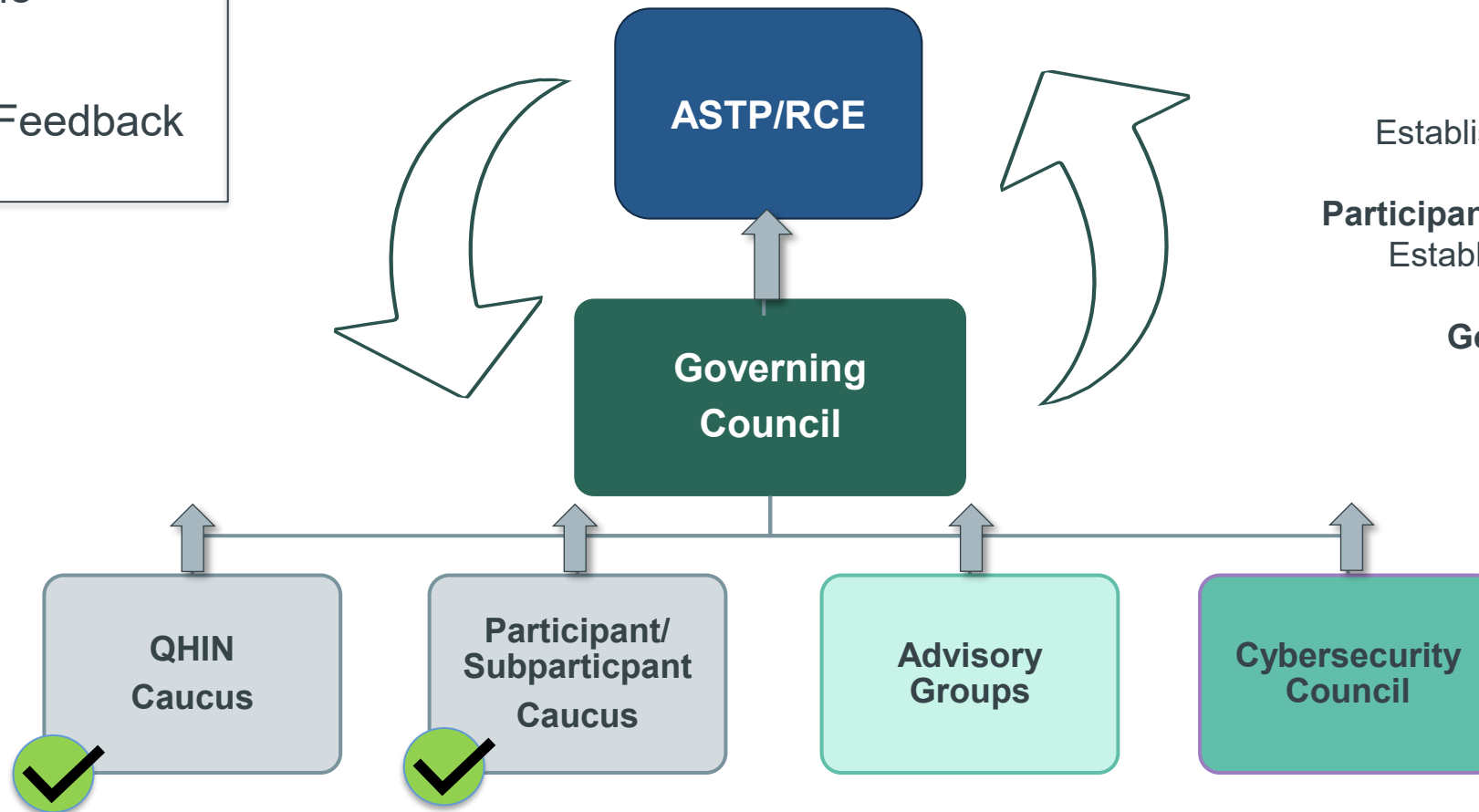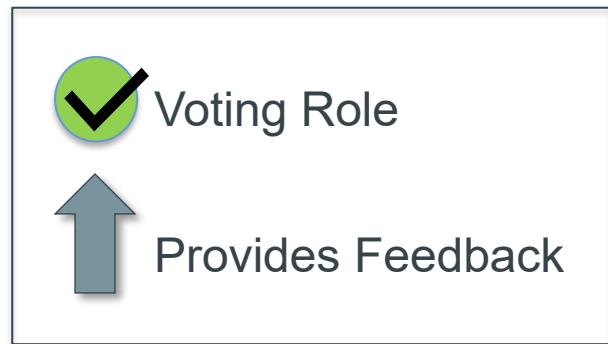
Vetting Process Steps

Step 1

Application Submission:
Sponsoring QHIN adds prospective Participants and Subparticipants (Entrants) to an Entrant Review List (ERL) under appropriate "Path"

Step 2

Initial Review and Objection Period:
QHINs review the Entrants and have opportunity to register an objection to any Entrant

Step 3

Escalation to QHIN Caucus:
If an objection is raised, Sponsoring QHIN may raise Entrant to the QHIN Caucus for review

Step 4

QHIN Caucus Review and Vote:
QHIN Caucus discusses evidence and votes on Entrant eligibility

Step 5

ASTP Review and Final Decision:
If vote fails, Sponsoring QHIN may raise Entrant to ASTP for review and final decision

TEFCA Governance Bodies Update

Governance Roles & Voting Responsibilities

Governance Bodies Key Responsibilities

Governance Body	Who Participates	Key Responsibilities
Governing Council	• Up to nine (9) individuals will be elected by the QHIN Caucus • Up to nine (9) individuals will be elected by the Participant/Subparticipant Caucus • Up to five (5) individuals that are Affiliated With a federal agency • RCE	• Considers proposed amendments to TEFCA Framework Agreements and other technical and policy documents • Supports the RCE with monitoring TEFCA Exchange and dispute resolution
QHIN Caucus	• One voting representative Affiliated With each QHIN • Candidate QHINs may appoint one representative to the QHIN Caucus as a non-voting member	• Votes on amendments to the Common Agreement, QTF, and SOPs as defined in the Common Agreement • Reviews and vote on entrants that have been escalated for Vetting purposes
Participant / Subparticipant Caucus	• 25-30 Participants / Subparticipants who are actively involved in or enabling TEFCA Exchange or plan to within 6 months	• Votes on amendments that have material impact on Participants/Subparticipants as outlined in the Common Agreement

Advisory Groups provide input on key topics like updates to the Common Agreement, QTF, SOPs, or new Exchange Purposes. They are a flexible tool used by the RCE and Governing Council to gather stakeholder feedback.

The RCE may establish an Advisory Group if input from stakeholders or experts is needed, after consultation with ASTP and the Governing Council

Membership is determined by the RCE in collaboration with the Governing Council and is guided by:

- **Background:** Including different roles and perspectives
- **Expertise:** Relevant knowledge in the topic area
- **Availability:** Ability to actively participate
- **Objectivity:** Willingness to consider issues fairly

Governing Council

- QHIN Caucus
- Participant/ Subparticipant Caucus
- Advisory Groups
- Cybersecurity Council
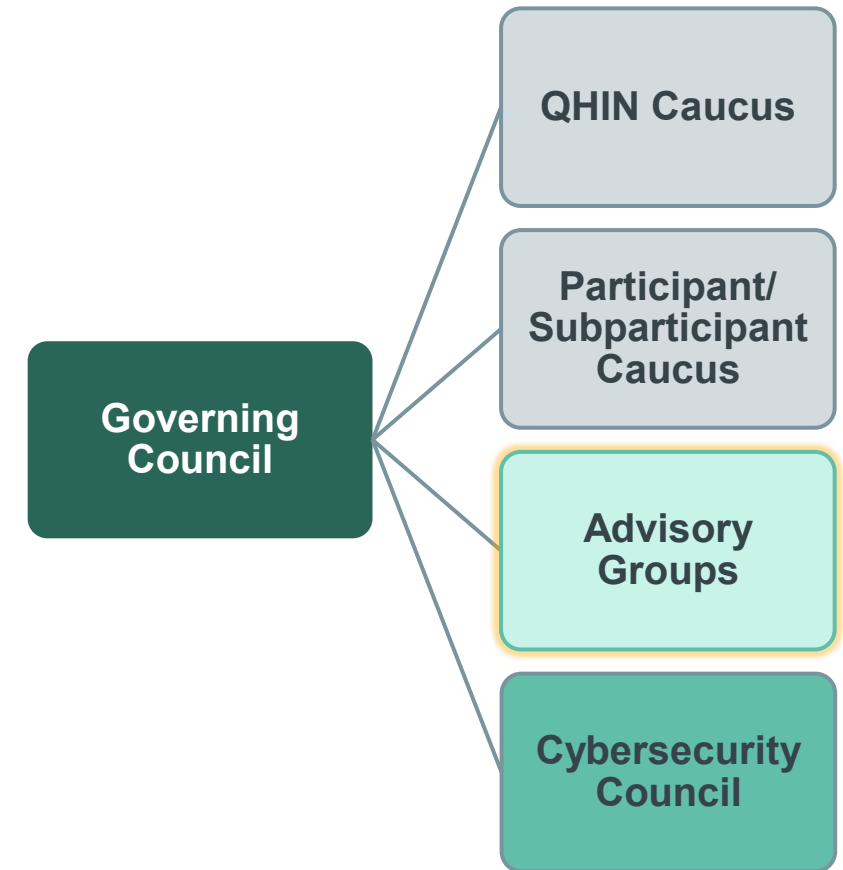
Change Management Process: SOPs

- **Step 1:** Proposed amendments may originate from multiple sources

- **Step 2**: The RCE collects all proposed amendments and may consult with the Governing Council and Caucuses before submitting to ASTP to determine if further action is warranted

- **Step 3:** If ASTP determines, the RCE presents the proposed amendment to the Governing Council for feedback
  - » *If ASTP vetoes the submission, amendment does not move forward or is further refined*

- **Step 4:** Governing Council evaluates the proposed amendment and, if applicable, seeks further recommendations and feedback from the QHIN Caucus, and/or the Participant/Subparticipant Caucus

- **Step 5:** Governing Council provides RCE with written feedback, including feedback from the caucuses as applicable

- **Step 6:** RCE consults with ASTP about the feedback and ASTP determines whether the amendment should proceed for a vote and the time period for vote. ASTP has 3 months from step 5 to decide whether to send for a vote.
  - » *ASTP can delay proceeding with the amendment for one additional three-month period OR an unlimited number of three-month periods*
  - » *If ASTP vetoes the submission, amendment does not move forward or is further refined*

- **Step 7:** QHIN Caucus and P/S Caucus votes – <u>each need 2/3 of the votes cast to pass</u>
  - » *The P/S caucus does not have to vote if the amendment does not have any bearing on P/S*

- **Step 8:** If an amendment is passed, it becomes effective on the date identified by ASTP

If the RCE determines that an amendment to an SOP is required in order for the RCE to remain in compliance with Applicable Law, the RCE is not required to provide the QHIN Caucus or the Participant/Subparticipant Caucus with an opportunity to vote on the amendment.

https://rce.sequoiaproject.org/wp-content/uploads/2024/11/Common-Agreement-2.1_ASTP-508.pdf

TEFCA Governing Body Members

Election to the Governing Bodies

QHIN Caucus:

- The QHIN Caucus shall be composed of one voting representative Affiliated With each QHIN and will be appointed by the respective QHIN. Candidate QHINs may appoint one representative to the QHIN Caucus as a non-voting member

Participant /Subparticipant Caucus

- Initially, the Transitional Council will appoint the members for the Participant/Subparticipant Caucus. Composition of the Participant/Subparticipant Caucus should strive to include stakeholder groups that fully and equitably represent the types of stakeholders actively involved in or enabling TEFCA Exchange. Additional details on stakeholder representation should be included in a Participant/Subparticipant Caucus's charter created by the Caucus participants

Governing Council

- The Governing Council shall be composed of voting representatives from QHINs, Participant/Subparticipants, federal agencies participating in TEFCA Exchange, and the RCE.
  - » Up to nine (9) individuals will be elected by the QHIN Caucus.
  - » Up to nine (9) individuals will be elected by the Participant/Subparticipant Caucus
  - » Up to five (5) individuals that are Affiliated With a federal agency invited by the Governing Council

Guiding Criteria

- Representation across different Participants/Subparticipant types (providers, payers, public health, etc.)

- Representation of diverse competencies (e.g., compliance, clinical, technical, executives, etc.)

- Balanced QHIN Participation

- Experience with Governance

https://rce.sequoiaproject.org/wp-content/uploads/2025/01/TEFCA-Governance-SOP-2024-1.10.25-final-508.pdf

Participant/Subparticipant Caucus Members (1)

Organization	Name	Title
Acadia	Stephanie Eken, MD	Chief Medical Officer
Alabama One	Gary Parker, JD, MBA	Chief Data Officer
Aledade	Arien Malec	Interoperability Consultant
Ascension Medical Group	Jennifer Manahan	Health Information Manager
Association of Public Health Laboratories	Michelle Meigs, MBA	Director
Athenahealth	Melissa Massardo	Product Market Strategy, Senior Manager
Baptist Health System KY & IN	Brett Oliver, MD	Chief Medical Information Officer	M.D.
Cambridge Health Alliance	Hannah Galvin, MD, FAAP, FAMIA, CHCIO	Chief Medical Information Officer
Cedars-Sinai Health System	Ray Duncan, MD, FAAP, FAMIA	Executive Director, Technology R&D
Citizen Health	Deven McGraw, JD, PH, LLM	Chief Regulatory & Privacy Officer
Cleveland Clinic	**Kara Justi, BS, MS (Vice Chair)**	**Value Stream Director, Population, Community Care & Integrated Health Services**
CRISP Maryland	Sheena Patel, MD, CMPE	Executive Director, Public Health Modernization
CRISP Shared Services	Nichole Sweeney, JD	General Counsel and Chief Privacy Officer
Datavant	Alya Sulaiman, JD, CIPP/US	Chief Compliance and Privacy Officer & SVP of Regulatory Affairs
Greenway Health	Mike Warner	Director of Product Management

Organization	Name	Title
HCA Healthcare	William Gregg, MD	Vice President, Clinical Data and Interoperability
Humana	Richa Singh	Lead PM, HC Quality Reporting & Improvement
Intermountain Health	Angela Mares	Director of Health Information Management Systems
Kaiser Permanente	Lindsey Lopez, JD	Product Manager - Health Information Exchange
NYC Health + Hospitals	Gabriel M. Cohen, MD	CMIO, Population Health
Ozarks Healthcare	Priscilla A. Frase, MD	Senior Director, Interoperability Strategy
PointClickCare	Robin Roberts	CMIO / IM-Peds
SacValley MedShare	John Helvey	Healthcare Technology Affairs Director
SSI Group LLC, Patient.com	Katrina Parrish, MD	President and Chief Medical Officer
Stanford Health Care	Matthew Eisenberg MD, FAAP	Associate Chief Medical Information Officer
The Garage	Pranam Ben	Founder and CEO
Trinity Health	Laura Williams MD, MPH, FACP	Internist Epidemiologist Informaticist
Veradigm	Tina Joros, JD	VP Policy and Innovation
Zus Health	**Amy Bagge-Smith, JD (Chair)**	**General Counsel, Chief Privacy Officer & VP of Regulatory Affairs**

QHIN Caucus Members

QHIN	Name	Title
CommonWell Health Alliance	**Liz Lewis (Chair)**	**Director of Product**
eClinical Works	Tushar Malhotra	Director, Interoperability
eHealthExchange	Cait Riccobono, JD	Legal Counsel
Epic Nexus	**Matt Doyle (Vice Chair)**	**R&D Team lead**
Health Gorilla	Derek Plansky	SVP Strategic Governance
Kno2	Matt Becker	VP of Interoperability
Konza	Laura McCrary, Ed.D	CEO and President
MedAllies	Dianne Koval	Chief Operating Officer
Surescripts Health Information Network	Justin McMartin	Manager, Interoperability Affairs
*Netsmart	Ben Rosen	Senior Client Success Manager
*Oracle Health Information Network	Hans Buitendijk	Senior Director, Interoperability Strategy

Candidate QHIN

Governing Council

Coming Soon!

Educational Resources

Resources

- TEFCA Documents
- QHIN Application, Onboarding, and Designation Process
- Benefits of Participation
- CSP Approval Organizations
- Frequently Asked Questions
- QHIN Cybersecurity Certification

Core Requirements

- Common Agreement for Nationwide Health Information Interoperability Version 2.1 (QHINs)
- Types of Entities that can be a Participant or Subparticipant in TEFCA SOP
- Terms of Participation (Participant/Subparticipant)

Technical Requirements

- QHIN Technical Framework (QTF) Version 2.0
- Technical Trust Requirements
- Delegation of Authority SOP
- Facilitated FHIR Implementation SOP
- RCE Directory Service Requirements Policy SOP
- RCE Directory Service Implementation Guide 1.2.0
- QHIN Cybersecurity Certification

Exchange Purposes (XP) Implementation SOPs

- Exchange Purposes (XP) Version 4.0
- IAS XP Credential Service Provider (CSP) Approval Organizations List
- XP Implementation: Individual Access Services (IAS)
- XP Implementation: Treatment
- XP Implementation: Public Health
- XP Implementation: Health Care Operations
- XP Vetting Process

Privacy and Security SOPs

- IAS Provider Requirements
- QHIN Cybersecurity Certification
- QHIN Cybersecurity Coverage
- QHIN Security Requirements for the Protection of TEFCA Information Version 2.0
- TEFCA Security Incident Reporting
- QHIN, Participant, and Subparticipant Additional Security Requirements SOP

Governance SOPs

- Conflicts of Interest
- Dispute Resolution
- Expectations for Cooperation
- TEFCA Governance

Fact Sheets

- FHIR Roadmap for TEFCA Exchange Version 2.0
- TEFCA Cross Reference Resource
- TEFCA Glossary
- TEFCA Guide
- Questions to ask your QHIN or other TEFCA connectors
- 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

These Frequently Asked Questions address common questions and will be updated regularly:

- **What is TEFCA?**
- **How Does TEFCA Work?**
- **How Do I Participate in TEFCA Exchange?**
- **How is TEFCA Governed?**
- **How are QHINs Designated?**

https://rce.sequoiaproject.org/rce/faqs/

Additional TEFCA Resources from ASTP:
https://www.healthit.gov/topic/interoperability/policy/trusted-exchange-framework-and-common-agreement-tefca

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/tefca-and-rce-resources/

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

All Events Registration and Recordings:

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

Upcoming Webinars:
July 15, 2025 |12:00-1:00pm ET

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

Questions & Answers

For more information:
rce.sequoiaproject.org