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# RCE™ Monthly Information Call

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# Today's Agenda



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Welcome & Agenda

TEFCA Exchange Basics

Recognized Coordinating Entity® (RCE®) Updates

Draft Government Benefits Determination Standard Operating Procedure (SOP) Questions Answered and Reminder

Educational Resources New TEFCA FAQs

Q & A



**TEFCA** Trusted Exchange Framework  
and Common Agreement™



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# TEFCA Exchange Basics



**Framework  
Agreements**



**Standard  
Operating  
Procedures**



**Technical  
Requirements**



**RCE  
Directory**



**Oversight &  
Compliance**



**Governance**

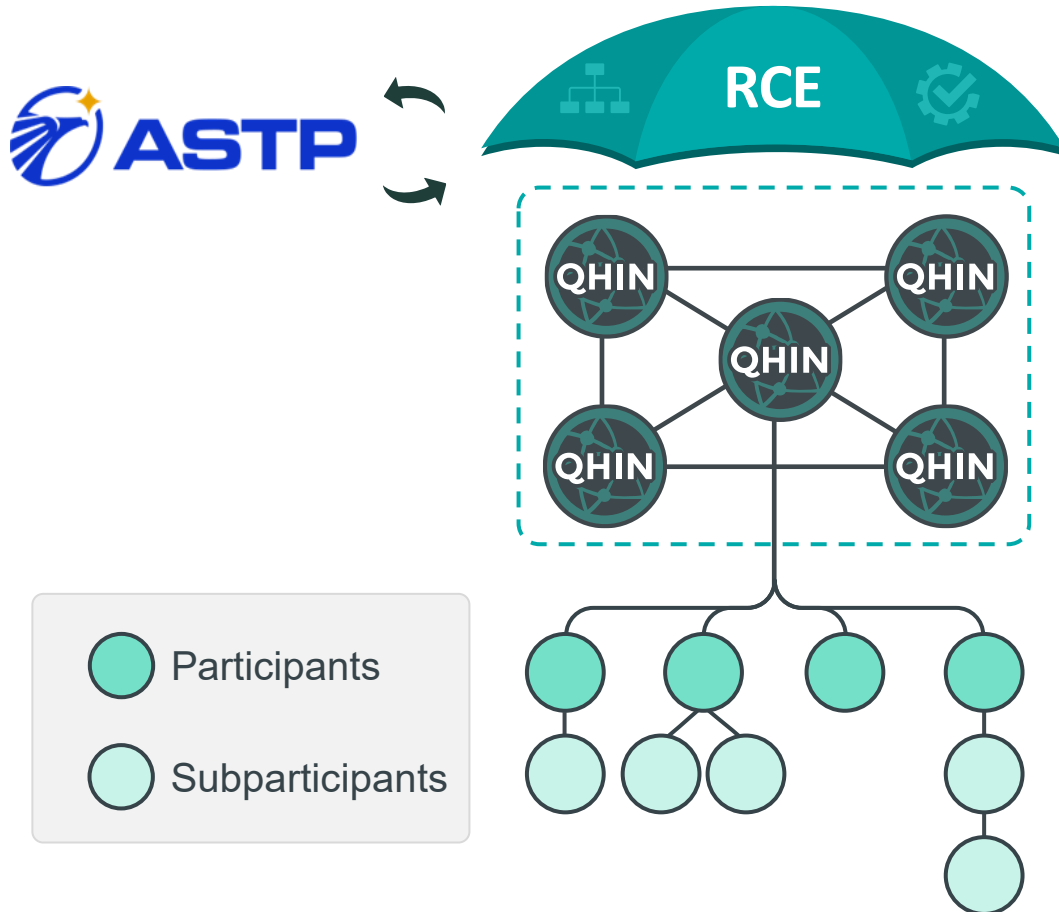
**Need the basics? Check out the TEFCA Guide:**

[https://rce.sequoiaproject.org/wp-content/uploads/2024/10/TEFCA-Guide-September-2024\\_508.pdf](https://rce.sequoiaproject.org/wp-content/uploads/2024/10/TEFCA-Guide-September-2024_508.pdf)

# Exchange Under TEFCA



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**ASTP** defines overall policy and certain governance requirements

**RCE** provides oversight and governing approach for the Qualified Health Information Networks (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



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# Recognized Coordinated Entity (RCE) Updates



## August TEFCA RCE Public Information Call in Review

*By Mariann Yeager*

READ NOW



*TEFCA is moving from a concept to a reality, and the ongoing dialogue on these monthly calls is proof of that progress. It's a collective effort, and the insights shared are invaluable for everyone on this journey toward true nationwide interoperability.*

[August TEFCA RCE Public Information Call in Review | LinkedIn](#)





THE NUMBERS ARE IN

## TEFCA Exchange is Ramping Up!

There are 9,412 organizations live on TEFCA (QHINs, Participants, and Subparticipants) representing over 44,000 unique connections to clinicians, hospitals, clinics, post-acute care/long-term care facilities, public health authorities, and more. [See our TEFCA Map.](#)

More than 39 **million documents shared** since go-live in December 2023.



# Meet the QHINS



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*eClinicalWorks*

eHealth Exchange™



Candidate QHIN(s)

**ORACLE** Health  
Information Network, Inc.™

[Learn More: https://rce.sequoiaproject.org/designated-qhins/](https://rce.sequoiaproject.org/designated-qhins/)

# Public Call for Experts - Update



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- The RCE appreciates the tremendous interest from stakeholders to support TEFCA Implementation by participating in time-limited workstreams on specific issues.  
**We have heard from more than 160 experts - Thank you!**
- All those that expressed interest will have opportunities to provide input, even if they are not chosen for a workstream.
- The RCE offers multiple opportunities for stakeholders to contribute to our process, such as through our monthly informational calls and stakeholder feedback periods, on draft versions of new or revised SOPs and other materials.
- We are very grateful to the community for your interest in advancing TEFCA implementation and look forward to continuing to work together.



**Experts bring specialized knowledge to the TEFCA Governance Bodies by filling knowledge gaps and supporting updates to SOPs**

**Any additional opportunities will be posted to our website <https://rce.sequoiaproject.org/>  
We will also take input on a rolling basis. Please email: [rce@sequoiaproject.org](mailto:rce@sequoiaproject.org)**

# Upcoming Treatment and IAS Implementation Workstreams



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The RCE, in coordination with ASTP, is launching two, time-limited workstreams to address updates to the Treatment and IAS Implementation SOPs.

## Treatment Workstream

Health Care Providers

Data Responders

Business Associates

HIPAA Experts

Technology Vendors

## IAS Workstream

Credential Service Providers

IAS Providers

Data Responders

Technical and Security Experts

Consumer Advocates

Each workstream will include QHINs and Participant/Subparticipants from the Caucuses, as well as individuals identified through the RCE call for experts



- **Draft Released:** July 7, 2025
- **Public Feedback Period:** July 7 – July 28, 2025
- **Current Status:** The RCE collaborated with the QHIN Technical Workgroup to incorporate feedback, and the updated draft is now with ASTP for review and additional input

## Feedback Summary (currently under review):

- General comments on how the growth of TEFCA within the Payer community and FHIR needs to be prioritized
- Appreciation of the inclusion of documents exchanged by exchange purpose being added to the monthly reporting
- Alignment with USCDI 3.1
- Identification of recipients able to respond to Directed Query in the directory
- Changes to audit log export records



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# Draft Government Benefits Determination Standard Operating Procedure (SOP)



## What is the TEFCA Government Benefits Determination Exchange Purpose?

The Government Benefits Determination Exchange Purpose is one of the six authorized Exchange Purposes under the TEFCA framework. This enables federal, state, local, or tribal government agencies to request and receive health information to make determinations about an individual's eligibility for non-healthcare related government benefits, such as Social Security disability benefits. The exchange of this information is required to be consistent with the HIPAA Privacy Rule and other applicable laws.

- The RCE is seeking feedback on the **draft Government Benefits Determination Exchange Purpose Standard Operating Procedure (SOP) and draft Exchange Purposes SOP v4.1**, released on August 18, 2025.
- Feedback will be accepted until **TOMORROW September 17th at 11:59 p.m. ET.**
- Feedback can be submitted through email to [rce@sequoiaproject.org](mailto:rce@sequoiaproject.org) or through the online form.

**Draft Government Benefits Determination Exchange Purpose SOP Feedback**

**Name (Required)**

First Last

**Email (Required)**

**Organization (Required)**

**Organization URL**

**Section 2: SOP Definitions**

<https://rce.sequoiaproject.org/draft-government-benefits-determination-exchange-purpose-sop-feedback/>

# 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, such as Social Security Determination
- The XP codes for more specific use cases will begin with the same characters as the broader XP

Authorized XP	XP Code
Government Benefits Determination	T-GOVDTRM
Social Security Determination	T-GOVDTRM-SSD
Access Consent Policy	T-GOVDTRM-ACP



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





## Topics from the August RCE Monthly Informational Call

- What kinds of information would the SSA expect to receive in response to a T-GOVDTRM-SSD Query?
- What is involved in prior coordination with the SSA?
- Are there plans to expand the Gov Benefits Determination SOP to include other specific benefit programs, such as at the State level?



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# Educational Resources

# 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/>

**Next RCE Monthly  
Information Call**

October 21 | 12:00-1:00pm ET



## 5 New and Updated FAQs Released!

- Clarifies how TEFCA addresses HIPAA's "minimum necessary" requirements
- Confirms whether RCE or ASTP can access ePHI shared via TEFCA
- Explains who can query information under the Public Health Exchange Purpose
- Clarifies the "Alternate Uses" provision in the Public Health Exchange Purpose SOP, including when third-party use is allowed
- Provides guidance on fees in TEFCA

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>



## How does TEFCA address “minimum necessary” requirements under HIPAA?

QHINs, Participants, and Subparticipants are expected to abide by applicable law, including HIPAA. Therefore, organizations must consider their HIPAA compliance obligations when responding to requests that require sharing only the minimum necessary information for the given Exchange Purpose, such as Public Health or Health Care Operations. HIPAA minimum necessary provisions generally do not apply to sharing health information among providers for Treatment or with individuals (or their authorized representatives) for Individual Access Services.

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



## Will the RCE or ASTP have access to electronic personal health information (ePHI) shared via TEFCA?

No. Neither the RCE nor ASTP participate in the exchange of ePHI or have access to data shared among the QHINs. Section 3.2 of the Terms of Participation describes the limited circumstances under which the RCE or ASTP may request Confidential Information to address a specific matter, such as a dispute among QHINs. However, Confidential Information is defined to **exclude** ePHI. QHINs, Participants, and Subparticipants are expected to remove ePHI from information that is shared with ASTP or the RCE.

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



## Who can query for information under the Public Health Exchange Purpose?

Only Initiating Nodes of a Public Health Authority (PHA) or its Delegate may initiate a QHIN Query using the T-PH XP Code, in accordance with applicable law and the Common Agreement. A query may be initiated for any allowable Public Health Exchange Purpose (as defined in Section 2 of the Public Health XP Implementation SOP) or in response to reporting under the Electronic Case Reporting or Electronic Laboratory Reporting use cases.

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





**The Public Health Exchange Purpose Implementation SOP includes a provision on Alternate Uses (Section 5.4) that states “Information transacted under the Public Health Exchange Purpose MUST NOT be persisted or used by any Node along the transaction chain that is not the addressed recipient, unless agreed to by the data source or recipient through a specific written agreement or as needed for a required audit as specified in the QTF.” *Why doesn’t the provision require both the data source and the recipient to agree to a third party being able to Use Public Health data transacted via TEFCA?***

This provision provides additional protection for Public Health data transacted via TEFCA while allowing Public Health Authorities (PHA) and other TEFCA-connected entities to use third parties to support their data exchange. For example, a health care provider may use a state or local health information exchange to transform data into the specifications required by the PHA to which they are reporting. As a second example, a PHA may contract with an organization that hosts an immunization registry. Such arrangements would be subject to all applicable law, including any federal, state, or local public health and privacy laws.



## Are fees allowed in TEFCA?

The Common Agreement prohibits QHIN-to-QHIN fees but does not specify how much QHINs and other TEFCA connectors can charge for their connectivity services. Whether fees are allowed between an initiator and a responder for a query under a given Exchange Purpose is specified in the [Exchange Purposes SOP](#).

In all cases, fees are also subject to applicable law. Responders may not charge fees for queries under the Treatment and Individual Access Services Exchange Purposes.

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



# Questions & Answers

For more information:  
[rce.sequoiaproject.org](http://rce.sequoiaproject.org)