DRAFT: Standard Operating Procedure (SOP): Exchange Purpose (XP) Implementation: Government Benefits Determination

Version 1.0

August 10, 2025

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 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

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

Access Consent Policy (ACP): policies that may influence access control decisions and which can be referenced in Queries.

Applicable Law: all federal, state, local, or tribal laws and regulations then in effect and applicable to the subject matter herein. For the avoidance of doubt, federal agencies are only subject to federal law.

Government Benefits Determination (GBD): a determination made by any agency, instrumentality, or other unit of the federal, state, local, or tribal government as to whether an Individual qualifies for government benefits for any purpose other than health care (e.g., Social Security disability benefits) to the extent permitted by Applicable Law. Disclosure of TEFCA Information (TI) for this purpose may require an authorization that complies with Applicable Law.

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

Instance Access Consent Policy (IACP): Policy instances (e.g., patient authorization forms) which may influence access control decisions, and which can be referenced by Queries.

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.

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

3   PURPOSE

This SOP identifies implementation specifications that QHINs, Participants, and Subparticipants must follow when asserting the Government Benefits Determination (GBD) Exchange Purpose (XP), including the Social Security Determination (SSD) sub-Exchange Purpose (sub-XP).

The GBD XP allows government entities at the federal, State, local, or tribal level to determine an Individual's eligibility for non-health care government benefits (e.g., Social Security disability benefits), in accordance with Applicable Law.

The SSD sub-XP enables the Social Security Administration (SSA) to Query and retrieve TEFCA Information to support two programs that provide benefits based on disability: the Social Security Disability Insurance program (title II of the Social Security Act) and the Supplemental Security Income (SSI) program (title XVI of the Act).

Only the SSA, and its Delegate(s), is permitted to Query under the SSD sub-XP Code, but QHINs, Participants, and Subparticipants that are eligible to initiate requests in support of Government Benefits Determinations may assert the general T-GOVDTRM XP for other allowable GBD purposes, provided the requirements in this SOP are met.

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Only the SSA is permitted to Query under the specific SSD sub-XP Code, but QHINs, Participants, and Subparticipants

4   GOVERNMENT BENEFITS DETERMINATION (T-GOVDTRM)

This section defines the Government Benefits Determination XP. It specifies details on workflow, including the XP Code, permitted users, and transaction requirements.

4.1   Exchange Purpose Code (XP Code)

a. All TEFCA Exchange under GBD MUST only use the XP Code T-GOVDTRM when any of its sub-XP Codes, as further defined in this SOP, are not applicable.

4.2   QHIN Technical Framework (QTF)

a. All TEFCA Exchange under GBD MUST follow technical requirements as specified in the QTF.

4.3   Definition

a. TEFCA Exchange under the XP Code T-GOVDTRM means a determination made by any agency, instrumentality, or other unit of the federal, State, local, or tribal government as to whether an Individual qualifies for government benefits for any purpose other than health care (e.g., disability benefits) to the extent permitted by Applicable Law. Disclosure

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of TEFCA Information for this purpose may require a patient authorization that complies with Applicable Law.

4.4 Transactions

4.4.1 QHIN Message Delivery

This SOP supports TEFCA Exchange in the form of a Message Delivery for T-GOVDTRM from any Initiating Node, as authorized by Applicable Law and the Framework Agreements, to any Responding Node that is listed in the RCE Directory Service as capable of receiving Message Deliveries. Further requirements for initiating a Message Delivery are in the QTF.

4.4.2 QHIN Query

This SOP supports TEFCA Exchange in the form of a QHIN Query.

4.4.2.1 *QHIN Query Request*

a. Only Initiating Nodes that are authorized by Applicable Law and the Framework Agreements to assert the Government Benefits Determination Exchange Purpose may Query for T-GOVDTRM.

4.4.2.2 *QHIN Query Response*

a. Responding Nodes SHOULD Respond to Queries for T-GOVDTRM in accordance with Framework Agreements and Applicable Law.

4.4.3 FHIR

This SOP supports TEFCA Exchange in the form of FHIR between Nodes with FHIR Endpoints published in the RCE Directory Service. FHIR refers to the Health Level Seven (HL7®) Fast Healthcare Interoperability Resources® (FHIR) standard.

4.4.3.1 *FHIR Push*

a. Any Initiating Node may initiate a FHIR Push to any other Responding Node, in accordance with Framework Agreements and Applicable Law.

4.4.3.2 *FHIR Query*

a. Only Initiating Nodes that are authorized by Applicable Law and the Framework Agreements to assert the Government Benefits Determination Exchange Purpose may Query for T-GOVDTRM.

4.4.3.3 *FHIR Response*

a. Responding Nodes SHOULD Respond to Queries for T-GOVDTRM, in accordance with Framework Agreements and Applicable Law.

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5   SOCIAL SECURITY DETERMINATION (T-GOVDTRM-SSD)

This section defines the Social Security Determination (SSD) use case. It specifies details on workflow, including the XP Code, permitted users, and transaction requirements.

5.1   Exchange Purpose Code (XP Code)

a. All TEFCA Exchange under Social Security Determination MUST use the XP Code T-GOVDTRM-SSD. The XP Code T-GOVDTRM-ACP MUST be used when requesting IACP documents,

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5.2   QHIN Technical Framework (QTF)

a. All TEFCA Exchange under SSD MUST follow technical requirements as specified in the QTF.

5.3   Definition

a. T-GOVDTRM-SSD means TEFCA Exchange initiated by the United States Social Security Administration, or its Delegate(s), for the purposes of data collection to support Social Security Disability Insurance and Supplemental Security Income determinations.

5.4   Transactions

5.4.1   QHIN Message Delivery
a. Not applicable

5.4.2   QHIN Query
a. This SOP supports TEFCA Exchange in the form of a QHIN Query for T-GOVDTRM-SSD.

5.4.2.1   *QHIN Query Request*
a. Only Initiating Nodes controlled by the Social Security Administration (SSA) or their Delegates may initiate Queries under the XP Code T-GOVDTRM-SSD, in accordance with the Framework Agreements, applicable SOPs, and Applicable Law.[1]
b. SSA MUST coordinate with Responding Nodes and relevant TEFCA connections prior to sending Queries to determine interest and readiness to participate in the SSD sub-

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[1] SSA is allowed to query and retrieve the disability claimant's medical evidence under 20 CFR § 404.1512, 20 CFR § 404.1513, 20 CFR § 404.1514 from treating sources using the SSA-827 Authorization to Disclose Information to the Social Administration under sections 205(a), 223(d), 1614(a), and 1631(d) of the Social Security Act, as amended.

XP. TEFCA connections may reach out to the SSA to initiate coordination.[2] This coordination may include but is not limited to:

    i. Information gathering;

    ii. Assessing available clinical information;[3]

    iii. Assessing whether Responding Nodes have the necessary capability to complete the Access Consent Policy requirements, as described below; and

    iv. Administrative details (e.g., Implementation timelines and contractual modifications, if needed).

c. Initiating Nodes MUST use the QTF Patient Discovery Alternate Flow 1: Querying Specific Organization(s) to send directed Patient Discovery queries to Responding Nodes.

d. QHIN Patient Discovery Query Request

    i. The Initiating Node MUST identify the HomeCommunityID of the Responding Node for directed Patient Discovery Query request using the Initiating QHIN Directory Service.

    ii. Queries MUST include the Initiating Node's HomeCommunityID

    iii. An Initiating Node MAY include a Social Security Number, as available.

e. The Initiating Nodes MUST assert an Access Consent Policy using the flow described in QTF Patient Discovery *Alternate Flow 2: Initiating Node asserts an Instance Access Consent Policy or Access Consent Policy*.

5.4.2.2 Access Consent Policy

a. Responding Nodes in 5.4.2.1. MUST retrieve and store the asserted Access Consent Policy using the flow described in QTF Patient Discovery *Alternate Flow 2: Initiating Node asserts an Instance Access Consent Policy or Access Consent Policy*.

b. Responding Nodes MUST retrieve the patient's authorization/consent using the XP Code T-GOVDTRM-ACP.

5.4.2.3 QHIN Query Response

a. All Responding Nodes that have completed pre-coordination MUST Respond to QHIN Queries for T-GOVDTRM-SSD that contain the information specified in this SOP, in accordance with the Framework Agreements and Applicable Law.

b. All Responding Nodes that have completed pre-coordination MUST Respond with the appropriate clinical content, as determined through coordination with the SSA prior to the QHIN Query, using the Implementation Guide in Table 1.

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[2] Information on onboarding with SSA can be found at https://www.ssa.gov/hit/getting-started.html.

[3] SSA assesses the clinical content of new exchange partners using the SSA-680 form to determine the type of electronic health information that would be available. The SSA-680 form is available at HealthIT/Form_SSA-680.pdf at master · SSAgov/HealthIT · GitHub

TEFCA RECOGNIZED COORDINATING ENTITY

Table 1 SSD Implementation Guide

Exchange Purpose	Implementation Guide
Social Security Determination (SSD)	Social Security Administration Electronic Health Document Implementation Guide For A Healthcare Participant, Version 5.0

5.4.3 Facilitated FHIR
a. Not applicable

6 VERSION HISTORY

Version	Revision Date	Section #(s) of Update
1.0		