



# TEFCA Treatment Exchange Purpose

Changes Under Consideration – February 2026

## Vision and Context<sup>1</sup>

Currently, certain HIPAA Covered Entity Health Care Providers are **excluded** from being able to participate in Trusted Exchange Framework and Common Agreement™ (TEFCA™) Exchange using the T-TRTMNT XP Code.

The Assistant Secretary for Technology Policy/Office of the National Coordinator for Health IT (ASTP/ONC) and the Recognized Coordinating Entity® (RCE®) are working with the QHIN™ Caucus and the Participant/Subparticipant Caucus to create a consistent, unified validation and participation approach for all HIPAA Covered Entity Health Care Providers to use the T-TRTMNT XP Code that has a required response for queries related to Treatment, as defined under HIPAA. This work benefits from discussion by the Treatment Workstream, which included both Caucus members and outside expert volunteers. Non-HIPAA Covered Entity Health Care Providers' use of the T-TRTMNT XP Code is **not** under consideration at this time.

All HIPAA Covered Entity Health Care Providers are equally accountable under the law and should have an equal opportunity to participate in TEFCA Exchange using the T-TRTMNT XP Code.

## Treatment Exchange Purpose Changes Under Consideration

*Changes under consideration apply to the pink cells. Other cells are unchanged but provided for context.<sup>2</sup>*

Treatment XP Name	Treatment XP Code	Who can initiate a query using the XP Code?	For what purposes can the XP Code be used?	Who must respond to the XP Code?
Treatment	T-TREAT	All Initiating Nodes that are associated with (a) Health Care Providers and (b) their Delegates	In connection with Treatment as defined by 45 CFR § 164.501	All Responding Nodes SHOULD Respond
TEFCA Required Response for Treatment	T-TRTMNT	Initiating Nodes that are associated with (a) Health Care Providers that have been validated as HIPAA Covered Entities and (b) their Delegates	In connection with Treatment as defined by 45 CFR § 164.501  The RCE/ASTP will develop examples regarding various uses of the T-TRTMNT XP Code	a) All Responding Nodes that are operated by or associated with a Health Care Provider or its Delegate MUST respond b) All Responding Nodes that are operated by or associated with an IAS Provider MUST Respond when the IAS Provider has the capability to Disclose and the Individual has chosen for the IAS Provider to Disclose in response to a query for T-TRTMNT

<sup>1</sup> This document summarizes, at a high level, changes that are currently under consideration to inform the community and provide transparency about ongoing discussions. Pending further work by the Caucuses, ASTP and the RCE will release proposed changes to the relevant SOPs following our Change Management Process.

<sup>2</sup> See the existing [Exchange Purpose \(XP\) Implementation SOP: Treatment v1.2](#) that goes into effect on February 15, 2026.

### Onboarding and Validation

Changes under consideration include replacing the current vetting process with the following:

- **Know Your Participant (KYP):** During Onboarding, QHINs will collect 1) the information in the Standard KYP List from each prospective Participant and Subparticipant (P/S), and 2) the information in the T-TRTMNT KYP List from HIPAA Covered Entity Health Care Providers intending to use T-TRTMNT.
  - QHINs will be responsible for maintaining up-to-date KYP Lists for their entire network.
  - RCE will perform ongoing audits of KYPs.
- **T-TRTMNT Validation Criteria:** Objective evidence to validate HIPAA Covered Entity Health Care Providers.
  - Submission to its QHIN of an X12 837 or NCPDP Version D.0 showing reimbursement to the HIPAA Covered Entity Health Care Provider from a health plan dated within 30 days of the date on which the HIPAA Covered Entity Health Care Provider is added into the RCE Directory.

#### Standard Know Your Participant (KYP) List | All P/S

- Legal name
- State of incorporation/organization
- Website (verify that the descriptions of the services provided are consistent with the definitions of the desired XP Code that the Participant/Subparticipant will be asserting)
- Verification that address, legal entity name, etc. is consistent with customer provided identification number to be included in the Directory (e.g., NPI, CLIA, NAIC, etc.)
- Confirmation that the QHIN has (i) determined whether the Participant/Subparticipant already has a TEFCAID; and (ii) if the Participant/Subparticipant already has a TEFCAID, confirmation that the Participant/Subparticipant's existing Node(s) are not the same as the Node the Applicant will be entering into the RCE Directory Service
- Determination of whether the Participant/Subparticipant has been previously connected to TEFCA and if so, the circumstances under which they terminated such participation
- List of all individuals or entities that own, directly or indirectly, 5% or more of the Participant/Subparticipant
- Organizational chart
- Determination that neither the entity nor its owners are listed on the HHS OIG List of Excluded Individuals and Entities (LEIE)

#### T-TRTMNT KYP List | Covered Entity Health Care Providers

- Completion of the T-TRTMNT Validation Criteria
- Confirmation that the Participant/Subparticipant's response data complies with applicable SOP requirements
- A description of the Principal's workflow(s) that triggers T-TRTMNT Query(ies), if the Principal's Initiating Node is not an EHR

### RCE Directory Transparency

- Certain KYP elements would be included in the P/S Directory Entry.
- Certain KYP elements would be included on the public-facing TEFCA map.



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## Next Steps

We are requesting feedback on the changes under consideration from Caucus members, specifically on the following:

- Proposed updates to the T-TRTMNT XP Code,
- The proposed information in the Standard and T-TRTMNT KYPs,
- Suggestions for how to ensure QHINs are maintaining accurate and current KYPs (e.g. central repository?),
- Suggestions for satisfactory ongoing validation of the KYP information,
- Which element(s) of the KYP to include in the RCE Directory and on the public-facing map, and
- The proposed T-TRTMNT Validation Criteria, including suggestions for objectively validating HIPAA Covered Entity Health Care Providers.

### Feedback due February 20

Initial feedback from caucus members is due to:

[rce@sequoiaproject.org](mailto:rce@sequoiaproject.org)

Join ASTP leadership and the RCE to discuss these changes on our [next monthly informational call](#).