

# DRAFT: Standard Operating Procedure (SOP): Restricted Participation Status

Version 1.0

Effective Date: \_\_\_\_, 2026

Applicability: QHINs

## 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 applicable Framework Agreement, 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. DEFINITIONS

Select terms used throughout this SOP are defined in this Section for ease of reference. All capitalized terms used in this SOP have the respective meanings assigned to such term in the TEFCA Glossary.

**Upstream QPS:** the QHIN, Participant, or Subparticipant through which the inactivated, suspended, or terminated Participant or Subparticipant connects to TEFCA.

## 3. PURPOSE

In the interest of transparency and accountability, all QHINs should know which Participants or Subparticipants have been suspended or terminated from TEFCA Exchange under certain circumstances. This SOP describes those circumstances and the procedure that the QHINs will use to share this information with each other.

## 4. PROCEDURE

### 4.1 Restricted Participation Designation

1. A QHIN will be designated as being in Restricted Participation status if its participation in TEFCA Exchange has been suspended or terminated by the RCE with the prior approval of ONC.

2. A Participant or Subparticipant will be designated as being in Restricted Participation status for purposes of TEFCA Exchange under the following circumstances:
  - a. The RCE has instructed the QHIN to suspend or terminate the Participant or Subparticipant for any reason.
  - b. The Participant or Subparticipant has been inactivated, suspended, or terminated by its Upstream QPS based on objective, verifiable documentation that the Participant or Subparticipant is inappropriately utilizing TEFCA Exchange including, but not limited to, asserting an inaccurate Exchange Purpose.
  - c. The Participant or Subparticipant has been inactivated, suspended, or terminated by its Upstream QPS under any of the following circumstances:
    - i. to avoid another QHIN filing a complaint or Dispute related to the inactivated, suspended, or terminated Participant or Subparticipant,
    - ii. during the pendency of the RCE's investigation of the QHIN for potential non-compliance related to the inactivated, suspended, or terminated Participant or Subparticipant, or
    - iii. during the pendency of an Upstream QPS's investigation of the inactivated, suspended, or terminated Participant or Subparticipant for potential non-compliance.
  - d. A Participant or Subparticipant has voluntarily inactivated, suspended, or terminated its participation in TEFCA under any of the following circumstances:
    - i. to avoid becoming the subject of a complaint or Dispute after being notified of a potential non-compliance issue by the RCE, a QHIN or another Participant or Subparticipant, or
    - ii. during the pendency of the RCE's or its Upstream QPS's investigation of the Upstream QPS, Participant, or Subparticipant for potential non-compliance.

## **4.2 Procedure for Reporting QHINs, Participants, or Subparticipants that are in Restricted Participation Status**

1. Each QHIN must report to the RCE within one (1) business day after updating the RCE Directory to reflect the inactivation, suspension, or termination of a Participant or Subparticipant for a reason set forth in Section 4.1.2(b) – (d). The report must indicate under which section the Participant or Subparticipant was designated as Restricted Participation status.
2. The QHIN's report to the RCE must include a detailed description of the facts and circumstances related to the inactivation, suspension, or termination.

3. The RCE will maintain, and make available to all QHINs, a list of QHINs, Participants, or Subparticipants that are in Restricted Participation status. The list will identify under which section of this SOP the QHIN, Participant, or Subparticipant was designated as Restricted Participation status. Notwithstanding the foregoing, in the event that the RCE or a Dispute determines that QHIN, Participant, or Subparticipant did not properly use an Exchange Purpose, such determination and a summary of the information relied upon to make such determination will also be shared with the QHINs.
4. A Participant's or Subparticipant's Restricted Participation designation can only be removed as follows:
  - a. If the Participant or Subparticipant was designated as Restricted Participation during the pendency of an RCE investigation, then the designation can be removed at the conclusion of the RCE's investigation if the RCE finds sufficient evidence that the Investigated QHIN, and therefore the Participant or Subparticipant, complied with its obligations under the Common Agreement, SOPs, or QTF;
  - b. If the Participant or Subparticipant was designated as Restricted Participation during the pendency of an investigation by its Upstream QPS, then the designation can be removed at the conclusion of the Upstream QPS's investigation if the Upstream QPS finds sufficient evidence that the Participant or Subparticipant complied with its obligations under the Terms of Participation, SOPs, or QTF and the Upstream QPS's report is provided to the RCE; or
  - c. Upon the approval of the Governing Council or its designee. The Governing Council will review a written request from a QHIN, Participant, or Subparticipant for removal of the Restricted Participation status designation within fifteen (15) business days after receiving such a request from the QHIN, Participant, or Subparticipant and will strive to issue a determination within thirty (30) business days after receiving such a request.
5. The list and any information about QHINs, Participants, or Subparticipants on the list that is shared with QHINs pursuant to this SOP is Confidential Information and must be treated as such pursuant to Section 7 of the Common Agreement. This means that the list any information about QHINs, Participants, or Subparticipants on the list may only be shared by a QHIN with its employees and agents who require such information in the ordinary course and scope of their employment or retention, and are obligated to protect the confidentiality of such Confidential Information in a manner substantially equivalent to the terms required in the Common Agreement for treatment of Confidential Information.

### 4.3 QHIN Responsibilities

In addition to complying with the requirements set forth herein, QHINs are also responsible for the following:

- Acting in good faith when designating a Participant or Subparticipant as Restricted Participation;
- Checking the Restricted Participation list prior to activating (or reactivating) any Participant or Subparticipant in the RCE Directory; and,
- Not activating (or reactivating) as a Participant or Subparticipant in the RCE Directory any entity that is designated as in Restricted Participation status.

## 5 VERSION HISTORY

Version	Revision Date	Section #(s) of Update
Version 1.0	____ __, 2026	All sections