August 18, 2026

# RCE™ Monthly Information Call

Speakers:

Mariann Yeager, RCE Program Lead

Chantal Worzala, RCE Stakeholder Engagement Lead

Kathryn Lucia, RCE Policy and Governance Manager

# Today's Agenda

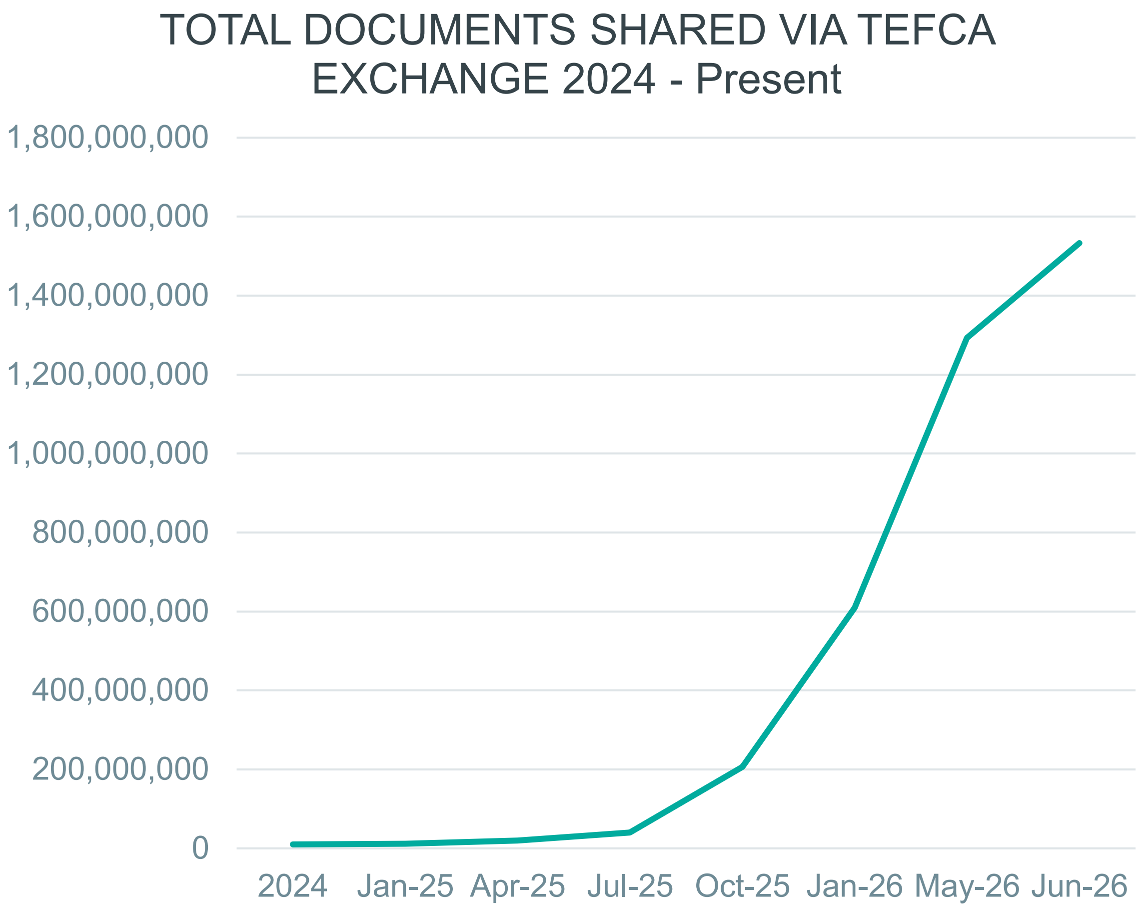
- Agenda Review
- TEFCA by the Numbers
- TEFCA Exchange Basics
- RCE Directory Services Policy SOP Version 1.1
- New Education Brief: Partner-Based Exchange
- Educational Resources
- Q&A

# TEFCA by the Numbers

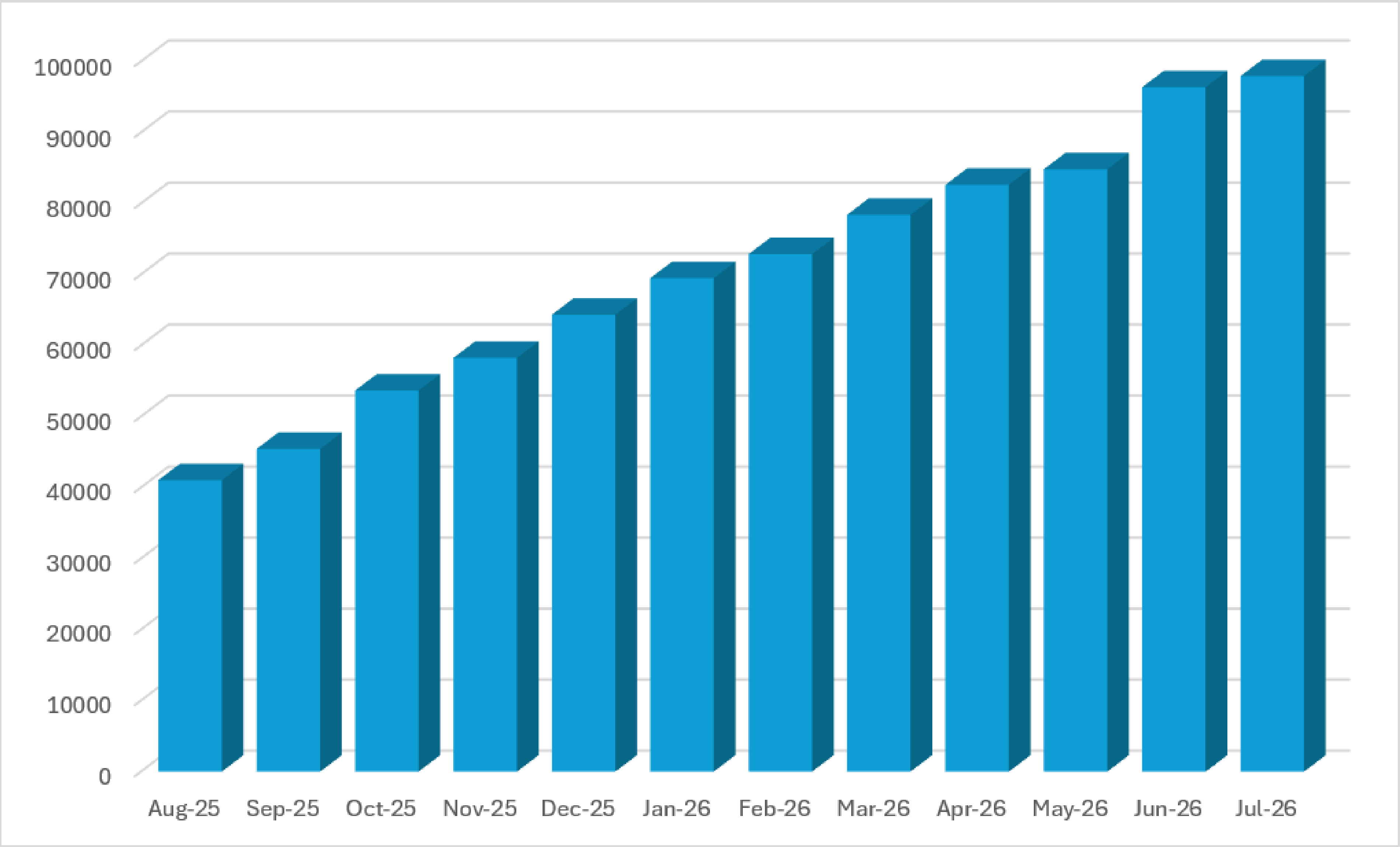
# TEFCA By The Numbers

## TEFCA NUMBERS

- **1.5** Billion Documents Shared since Dec 2023
- **23,000** Organizations live on TEFCA
- **100,000** Unique connections



# Organization Growth in TEFCA



# QHIN Application and Onboarding & Designation

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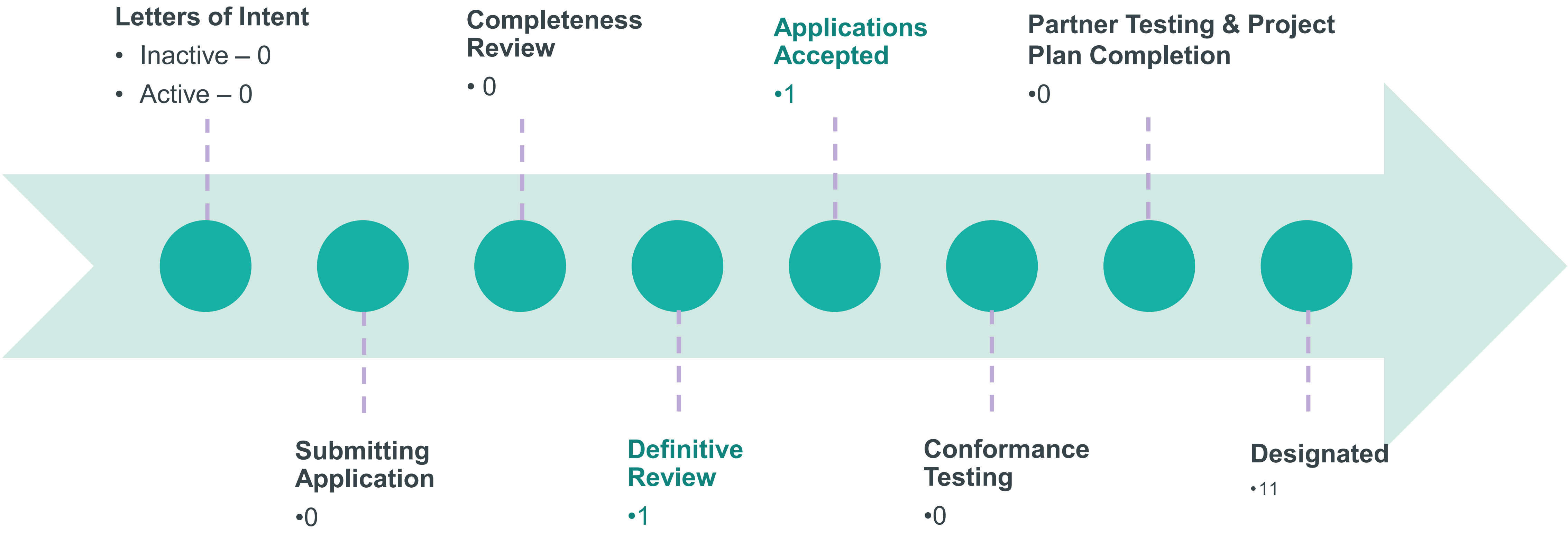

# New Candidate QHIN

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**Congratulations to Zus Health on their recent Candidate QHIN Status!**

Meet the Candidate QHINs: https://rce.sequoiaproject.org/candidate-qhins/

# Meet the QHINS

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- CommonWell Health Alliance
- eClinicalWorks
- eHealth Exchange
- Epic Nexus
- Health Gorilla
- Kno2
- KONZA Health — The Connections to Make a Difference
- MedAllies — A Centauri Health Solutions Company
- Netsmart
- Oracle Health Information Network, Inc.™
- Surescripts Health Information Network™

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

# Focus on QHIN Compliance

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**ONC has tasked the RCE with leading a time-limited task to assess QHIN compliance practices**

QHINs submitted information focused on key topics:

- Cybersecurity
- QHIN Governance
- QHIN Accountability
- Directory Currency
- IAS Provider Compliance
- QHIN Onboarding of Participants and Subparticipants
- Ongoing QHIN Oversight and Monitoring of Participant and Subparticipant Activity

Findings will provide insight into current practices across QHINs, including variations in process design, documentation, supporting artifacts, and metrics

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# ONC Increases Funding for TEFCA RCE in New Contract Year

## More Than 100,000 Organizations Exchange 1.5 Billion+ Documents as Network Continues Rapid Nationwide Expansion

**Vienna, VA – August 17, 2026)** – **The Sequoia Project**, the leading non-profit focused on advancing healthcare interoperability, today announced it will continue its role as the Recognized Coordinating Entity® (RCE®) to support the implementation of the Trusted Exchange Framework and Common Agreement™ (TEFCA®). The non-profit was awarded the next option year with a more than 15% increase in funding under its existing contract to the Department of Health and Human Services' Office of the National Coordinator for Health Information Technology (ONC).

https://rce.sequoiaproject.org/onc-increases-funding-for-tefca-rce-in-new-contract-year/

# TEFCA Exchange Basics

# TEFCA Components

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**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

# Exchange Under TEFCA

**ONC** 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

# TEFCA Topics in Change Management

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- The RCE, together with ONC and the TEFCA governance bodies, will use this webpage to provide transparency into amendments to the Framework Agreements, technical requirements, and SOPs throughout the change management process.
- **When you subscribe to updates, you will receive an email notification when an amendment to an SOP is added to the webpage.**
- We always welcome your thoughts and feedback on amendments under review.

**Stay Informed by Subscribing to Updates!**

https://rce.sequoiaproject.org/tefca-topics-in-change-management/

# What's New and What's Next?

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## What's New?

**Recently Approved and Published SOPs:**

| SOP | Effective Date |
|---|---|
| Individual Access Services (IAS) XP SOP Version 3.0 | 8/3/2026 |
| Treatment XP SOP Version 2.0 | 8/3/2026 |
| Vetting Process XP SOP Version 2.0 | 8/3/2026 |
| Exchange Purposes SOP Version 5.1 | 8/3/2026 |
| Directory Service Requirements Policy SOP Version 1.1 | 9/14/2026 |

## What's Next?

- Inquiries and Investigations SOP Version 1.0
- Restricted Participation List SOP Version 1.0
- Dispute Resolution SOP Version 2.0
- Delegation of Authority SOP Version 1.1
- Governance SOP Version 2.0

**Other priorities for the year ahead..**

- Public Health
- Treatment for Non-Covered Entities
- Health Care Operations
- Government Benefits Determination
- Research

# RCE Directory Services Requirements Policy SOP Version 1.1

(Federal Employer Identification Number (FEIN) Requirement)

# Directory Service Requirements Policy SOP v1.1

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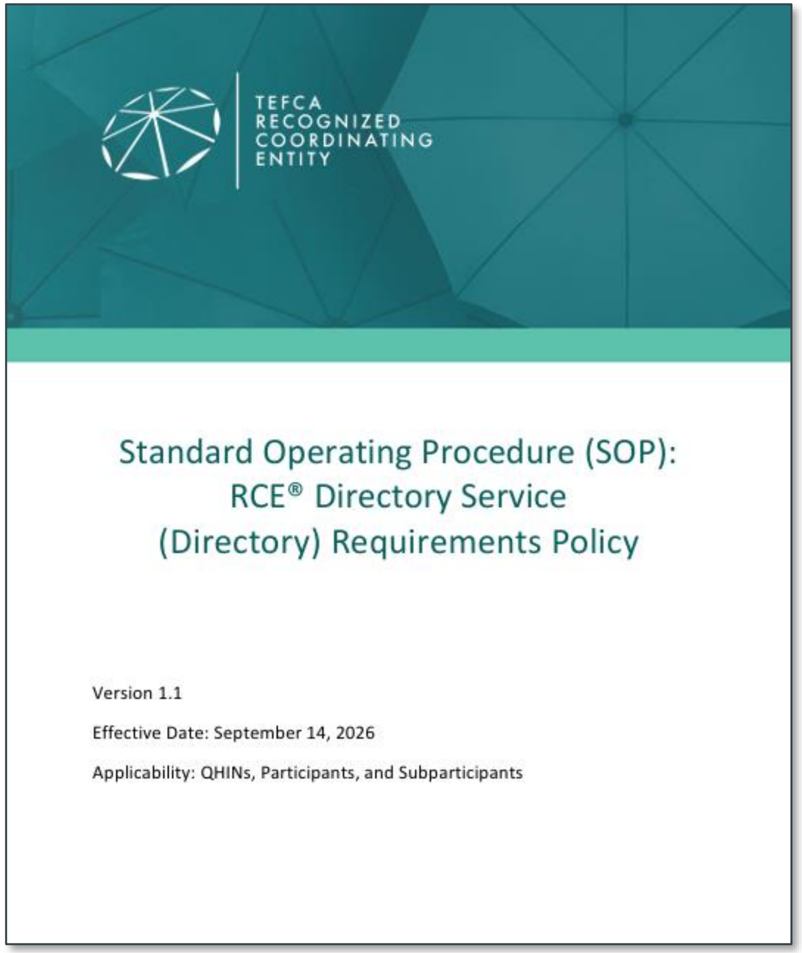
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Standard Operating Procedure (SOP):
RCE® Directory Service
(Directory) Requirements Policy

Version 1.1

Effective Date: September 14, 2026

Applicability: QHINs, Participants, and Subparticipants

This SOP was first published July 1, 2024 (Version 1.0)

**Purpose:** This SOP describes RCE Directory Services policy requirements that QHINs must follow when maintaining Directory Entries, in addition to the specifications set forth in the Framework Agreements, QTF, RCE Directory Service Implementation Guide, and applicable SOPs.

| Section | Title |
|---|---|
| 1. | Common Agreement References |
| 2. | Definitions |
| 3. | Purpose |
| 4. | Procedure |
| *4.1* | *Requirements* |
| *4.2* | *Example Diagram* |

# Defining Terms



## RCE Directory Service:

- a technical service provided by the RCE that enables QHINs to identify their Nodes to enable TEFCA Exchange. The requirements for use of, inclusion in, and maintenance of the RCE Directory Service are set forth in the Framework Agreements, QTF, and applicable SOPs.

## Directory Entry(ies):

- listing of each Node controlled by a QHIN, Participant, or Subparticipant, which includes the endpoint resource for such Node(s) and any other organizational or technical information required by the QTF or an applicable SOP.

## 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.

# Update Overview



**Goal:** Improve the consistency, accountability, and reliability of information maintained in the RCE Directory Service by requiring each Directory entry to be associated with a **Federal Employer Identification Number (FEIN)** assigned by the Internal Revenue Service (IRS).

### Use of FEINs

- FEINs provide a **non-personal tax identifier** that can be used to associate Directory entries with the legal or tax-reporting persons or entities responsible for them.
- The same FEIN may appropriately be associated with **multiple Directory entries** where those entries are legally, operationally, or tax-reporting attributable to the same person or entity.

### Key Clarifications

- Social Security Numbers (SSNs) and Individual Taxpayer Identification Numbers (ITINs) are individual taxpayer identifiers and would **not** be appropriate for publication through the Directory
- FEINs are **not** intended to be a proxy for vetting status, HIPAA Covered Entity status, Health Care Provider status, or legal-entity separateness.
- The SOP provides guidance on the most appropriate FEIN for complex organizational structures.

# Changes in Section 4.1 (13.1)

**13. An Initiating Node MUST publish relevant required identifiers for XPs it initiates, as identified in the QTF, the XPs SOP, or the relevant XP Implementation SOP (e.g., NPI for Treatment).**

***13.1 FEIN Required for Directory Entries***

Each QHIN must ensure that each Organization resource they list in the Directory has an Internal Revenue Service-issued federal Employer Identification Number (FEIN) associated with it.

a) For each entry in the Directory, the QHIN must work with its Participants and Subparticipants to determine the appropriate FEIN as follows:

   i. If the entry in the Directory represents a legal or tax-reporting entity with its own FEIN, the entry in the Directory must include that FEIN.

      1. No FEIN Required for Tribal or Government Agencies. If the entry in the Directory represents a tribal or government agency that does not have a FEIN, a FEIN is not required.

**Key Takeaway**

Directory entries must include an IRS-issued FEIN, except for tribal or government agencies that do not have a FEIN.

# Changes in Section 4.1 (13.1)

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*a) For each Participant Node, Subparticipant Node, or Child entry, the QHIN must determine the appropriate FEIN as follows:…*

ii. For a Child profile that represents a facility, location, department, subdivision, operating unit, product instance, or other component that is not a separate legal or tax-reporting entity from a Participant or Subparticipant, the Child profile must include the FEIN of the Participant or Subparticipant of which the Child profile is a part and that has operational responsibility for that Child profile.

iii. If more than one FEIN could reasonably be associated with the entry in the Directory, the FEIN of the legal or tax-reporting entity responsible for the entry as a whole, at the level represented in the Directory, must be included.

1. A FEIN that is attributable only to a narrower component, subunit, department, service line, billing arrangement, payer enrollment, cost center, or other portion of the entry in the Directory must not be used, unless that narrower component or portion is itself the entry.
2. If the person or entity responsible for the entry in the Directory does not have a FEIN, the applicable upstream QHIN, Participant, or Subparticipant must require that person or entity to obtain a FEIN before the entry may be submitted to, populated in, or maintained in the Directory.

**Key Takeaway**

Directory entries should use the FEIN of the legal or tax-reporting entity responsible for the entry—not a FEIN for a narrower component or subunit. If that responsible entity does not have a FEIN, it must obtain one before the entry can be included in the Directory.

# Changes in Section 4.1 (13.1)

TEFCA RECOGNIZED COORDINATING ENTITY

a) *For each Participant Node, Subparticipant Node, or Child entry, the QHIN must determine the appropriate FEIN as follows:…*

3. Example: A health system operates a home health agency that is listed as a separate Node from the larger health system in the Directory because it has a distinct technology platform and endpoint.
   a. If the home health agency is organized as a separate legal entity, then it should have a unique FEIN that would be included in the Directory.
   b. If the home health agency is operated out of the health system legal entity and is not a separate legal entity, then its Node would be listed in the Directory with the same FEIN as other Nodes belonging to the health system.

**Key Takeaway**

A separate entry in the Directory should use its own FEIN if it is a separate legal entity. If it is not a separate legal entity, it should use the FEIN of it's parent organization.

# Changes in Section 4.1 (13.1)

TEFCA RECOGNIZED COORDINATING ENTITY

a) *For each Participant Node, Subparticipant Node, or Child entry, the QHIN must determine the appropriate FEIN as follows:…*

iv. The same FEIN may be associated with multiple Participant Nodes, Subparticipant Nodes, or Child profiles where those Directory Entries are legally, operationally, or tax-reporting attributable to the same entity.

# Changes in Section 4.1 (13.1)

b) Prohibition on SSNs and ITINs.

Social Security Numbers (SSNs), Individual Taxpayer Identification Numbers (ITINs), and other individual taxpayer identifiers must not be populated, published, displayed, exchanged, or otherwise exposed through the Directory.

# Changes in Section 4.1 (13.1)

c) Limitations on access.

Only the RCE and QHINs will have access to FEINs listed in the Directory. QHINs must ensure that any information from the Directory that it provides to its Participants and Subparticipants does not include FEINs. Note, however, that ONC may request access in accordance with the *ONC Requests for Access to Confidential Information SOP.*

**Key Takeaway**

FEINs in the Directory will only be accessible to the RCE and QHINs and will not be shared with Participants or Subparticipants.

# Changes in Section 4.1 (13.1)

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d) Staggered Implementation Timeline for 13.1 (a. – c.)

i. Once the Directory supports submission of FEINs, each QHIN must include the required FEIN when submitting any new Participant Node, Subparticipant Node, or Child profile.

ii. For Participant Nodes and Subparticipant Nodes that existed in the Directory before the Directory supported submission of FEINs, each QHIN must populate the required FEIN within six months after the Directory supports submission of FEINs.

iii. For child profiles that existed in the Directory before the Directory supported submission of FEINs, each QHIN must populate the required FEIN within twelve months after the Directory supports submission of FEINs.

iv. For any Node that existed in the Directory before the Directory supported submission of FEINs, failure to populate the FEIN in accordance with the timelines listed above will be investigated and subject to the Consequences for QHIN Non-Compliance SOP.

**Key Takeaway**

FEIN requirements will be implemented on a staggered timeline: new Directory entries must include a FEIN once supported, while existing Participant/Subparticipant Nodes have six months and existing Child profiles have twelve months to add the required FEIN..

# Changes in Section 4.1 (13.1)



e) Maintenance of FEINs.

If a QHIN has been informed of a change or correction to a FEIN that has been included in the Directory, the QHIN will update the relevant field in the applicable Directory Entry within 10 business days.

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New Education Brief Coming Soon:

# Partner-Based Exchange

*Coming Soon!*

ONC TEFCA RECOGNIZED COORDINATING ENTITY

EDUCATION BRIEF

# Partner-Based Exchange in TEFCA

## This brief explains:

- What partner-based exchange means for TEFCA
- Why TEFCA includes this approach to exchange
- Which Exchange Purposes qualify for partner-based exchange
- Examples of relationships that can leverage partner-based exchange
- Considerations for QHINs, Participants and Subparticipants interested in leveraging this approach

## Resources

- Common Agreement
- Exchange Purposes SOP
- RCE Resource Library

# What is Partner-Based Exchange in TEFCA?

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- Allows **QHINs, Participants, and Subparticipants** to use TEFCA's network-of-networks for data exchange with **trusted partners for shared business needs**.
- TEFCA sets standard operating policies for exchange based on **Exchange Purposes (XPs)**, such as **Treatment, Payment, and Health Care Operations** and each XP is accompanied by one or more **XP Codes**, which are included in a transaction so the recipient knows the purpose of the Query or Message Delivery.
- When an XP Code **does not require a response**, organizations can use that XP Code to exchange information as part of a **new or existing business relationship** with another participating organization.
- In these cases, organizations **coordinate directly with their exchange partner(s)** to send and receive information for that specific XP Code.
- **All parties must have signed the Common Agreement or Terms of Participation and be participating in TEFCA Exchange.**
- For XPs where a response is not required, the **non-discrimination provision does not apply**, allowing organizations to determine their exchange partners based on their specific business relationships.

# Why did TEFCA adopt this approach?

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- Allows organizations to use TEFCA for data exchange purposes that support **new or existing business relationships,** without the expectation that they must respond to other Participants and Subparticipants who might Query for that same purpose.
- Opens opportunities to create these **exchange relationships** provides ONC and the RCE with a deeper understanding as to the types of exchange are vital to TEFCA's QHINs, Participants, and Subparticipants.
- **Lessons from partner-based exchange** will help expand use cases to be considered for adoption more widely as part of TEFCA.

# Which XPs allow for Partner-Based Exchange?

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- When an XP Code **does not require a response**, organizations can use that XP Code to exchange information as part of a **new or existing business relationship** with another participating organization.
- Specific XP codes are listed in the Education Brief and can be found in the Exchange Purposes (XPs) SOP
- Examples XP Codes include:
  - Treatment (T-TREAT)
  - Health Care Operations (T-HCO) and all subcodes
  - Public Health (T-PH)
  - Government Benefits Determination (T-GOVDTRM)

# Steps to Participate in Partner-Based Exchange

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Sign the Terms of Participation (ToP)

Follow the relevant XP Implementation SOP for the asserted Exchange Purpose(s), if one exists

Define the terms of partner-based exchange with your partner(s)

# 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**
September 15, 2026 | 12:00-1:00pm ET

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# Questions & Answers

For more information:
rce.sequoiaproject.org

# Thank You

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