



TEFCA
RECOGNIZED
COORDINATING
ENTITY

Standard Operating Procedure (SOP): Exchange Purpose (XP) Vetting Process

Version 2.0

Effective Date: August 3, 2026

Applicability: QHINs, RCE

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 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.

Caucus Escalation Date: the date by which a Sponsoring QHIN must notify the RCE that it elects to escalate an Entrant to the QHIN Caucus in order for the Entrant to be reviewed at the QHIN Caucus's next meeting.

Entrant: a potential Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a specific Vetted XP and which is submitted for consideration into the Entrant Review List.

Entrant Review List: the list maintained by the RCE of Entrants submitted by Sponsoring QHINs.

Objection: a formal request sent by any QHIN to the RCE regarding an Entrant on the Entrant Review List that is intended to question the factual information about the Entrant submitted by the Sponsoring QHIN and which includes the information required by this SOP.

Objecting QHIN: the QHIN that objects to an Entrant.

Objection Period: the period of not less than five business days following publication of an Entrant Review List, during which time a QHIN(s) must register an Objection it has to any Entrant.

Publication Day: the day on which the RCE will publish the Entrant Review List to all QHINs.

Publication Deadline: the specified time by which a Sponsoring QHIN(s) must submit an Entrant in order for such Entrant to be included in the next Entrant Review List.

Sponsoring QHIN: the QHIN that submits an Entrant into the Entrant Review List.

Representative Child Entity: (i) An operational location or department of the Entrant which is not a separate legal entity from the Entrant or (ii) a wholly-owned subsidiary of the Entrant for which the Entrant has accepted responsibility under the Terms of Participation signed by the Entrant. If a wholly-owned subsidiary of the Entrant has signed the Terms of Participation in its own right making the wholly-owned subsidiary responsible for its own compliance with the Terms of Participation, then such wholly-owned subsidiary would be a Subparticipant and not a Representative Child Entity.

Representative Individual Provider: A natural person who is (i) licensed, certified, registered, or otherwise authorized by a State to provide health care; (ii) employed by the Entrant to provide health care services; and (iii) has a Type I NPI that is used by the Entrant for billing purposes for health care services provided by the Representative Individual Provider to the Entrant's patients.

Vetted XP: the XP(s) for which Entrants must be vetted in accordance with this SOP, which includes T-TRTMNT.

3 PURPOSE

This XP Vetting Process SOP establishes a clear and transparent framework for evaluating and approving Entrants before their listing in the RCE Directory Service that allows them to initiate exchange while asserting a specific Exchange Purpose (XP) for which vetting is required. This process promotes trust and collaboration among Qualified Health Information Networks (QHINs) by providing a structured timeline for submitting Entrants for review and discussing any concerns in an open forum. Thorough evaluation and transparency in the XP Vetting Process enhances the integrity and efficacy of TEFCA Exchange.

4 PROCEDURE

4.1 Entrant Review List Process

- 4.1.1. Prior to the first business day of each month, the RCE will inform the QHINs of the Publication Deadlines, Publication Days, Objection Periods, and Caucus Escalation Dates for the month, all of which must fall on business days.
- 4.1.2. Prior to adding an Entrant in the RCE Directory Service for a Vetted XP, a Sponsoring QHIN must first publish such Entrant in the Entrant Review List and fulfill the vetting process steps set forth herein.

- a. The Entrant Review List will be maintained by the RCE. All Entrants submitted by a Sponsoring QHIN to the RCE for inclusion on the Entrant Review List by the Publication Deadline will be included in the Entrant Review List published by the RCE on the next Publication Day. All Entrants submitted by a Sponsoring QHIN after the Publication Deadline will be included in the subsequent Publication Deadline's Entrant Review List.
 - b. When submitting an Entrant for inclusion on the Entrant Review List, the Sponsoring QHIN must ensure that all information required to be included in such submission is complete and accurate. Information required to be included is dependent on the Vetted XP and is set forth in the respective section in this SOP. Failure to provide required information may result in the Entrant being rejected. If an Entrant is rejected, all information about the Entrant that is required as part of the vetting process must be resubmitted to be included on the Entrant Review List. The Entrant will then be included in the subsequent Publication Deadline's Entrant Review List. Information required for the submission of an Entrant is based on the applicable Vetted XP and is set forth in the applicable section(s) below.
- 4.1.3. The RCE will publish the Entrant Review List on the Publication Day. Each QHIN will have until the end of the Objection Period to register an Objection to any Entrant. Any Objection must be submitted through mechanisms established by the RCE.
 - 4.1.4. By the end of the Objection Period, the RCE will provide to all QHINs the full content of all Objections for a given Entrant Review List.
 - 4.1.5. If there are no Objections for an Entrant by the end of the Objection Period, such Entrant may be published in the RCE Directory Service for the Vetted XP by the Sponsoring QHIN.
 - 4.1.6. If there is an Objection for an Entrant, then the following apply:
 - a. Any Objection must meet the requirements for Objection set forth in Section 4.2.
 - b. The Objecting QHIN may withdraw its Objection at any point in the process by notifying the Sponsoring QHIN, and by updating the status of the Objection using the mechanisms specified by the RCE. In the event that all Objecting QHINs withdraw their Objections to an Entrant, then the Entrant may be published in the RCE Directory Service by the Sponsoring QHIN.
 - c. The Sponsoring QHIN may elect to do one of the following with respect to an Entrant for which there is an Objection and must notify the RCE of the option it elects through the mechanism specified by the RCE. Until the Sponsoring QHIN makes an election, the Entrant will remain paused and will not have such Vetted XP Code associated with its Directory Entry, if one exists.
 - i. The Sponsoring QHIN may request that the QHIN Caucus review the Entrant based on the information found in the Entrant Review List, the Objecting QHIN's Objection, and any additional information the Sponsoring QHIN may wish to provide to the QHIN Caucus. The RCE will notify ONC when the Sponsoring QHIN requests that the QHIN Caucus review an Entrant.

- ii. The Sponsoring QHIN may withdraw the Entrant from the vetting process. This does not preclude the Sponsoring QHIN, or any other QHIN, from resubmitting the Entrant at any time.
 - iii. The Sponsoring QHIN may coordinate with the Objecting QHIN(s) to resolve Objections and have the Objections withdrawn as described in 4.1.6.b.
- 4.1.7. The QHIN Caucus, facilitated by the Office of the National Coordinator for Health Information Technology (ONC) and the RCE, will review Entrants that have been escalated per Section 4.1.6(c)(i) by the Caucus Escalation Date. The QHIN Caucus may only consider information about the Entrant from the Entrant Review List, the information submitted by the Objecting QHIN in the Objection, and any additional information/evidence submitted by the Sponsoring QHIN to address the Objection. The QHIN Caucus will vote on all Entrants escalated to the QHIN Caucus by the Caucus Escalation Date at its next scheduled meeting or within two business days after such scheduled meeting. To the extent voting occurs within two business days after the scheduled meeting, the vote may occur electronically.
- a. If all voting members of the QHIN Caucus vote that the Entrant is eligible to initiate Queries for the Vetted XP(s), such Entrant's listing in the RCE Directory Service may have the Vetted XP added to it by the Sponsoring QHIN.
 - b. If all voting members of the QHIN Caucus vote that the Entrant is not eligible to submit Queries for the Vetted XP(s), such Entrant may not be published in the RCE Directory Service by the Sponsoring QHIN for such Vetted XP(s). If, however, new evidence or information about the Entrant becomes available, the Sponsoring QHIN (or any other QHIN) may resubmit the Entrant to a future Entrant Review List.
 - c. If voting members of the QHIN Caucus do not unanimously agree that the Entrant is eligible or ineligible, the Entrant remains paused. The Sponsoring QHIN must notify the RCE in writing if it desires to further escalate the Entrant to ONC for a decision on whether the Entrant can permissibly initiate Queries for the Vetted XP(s). Alternatively, the Sponsoring QHIN may elect to withdraw the Entrant from the vetting process.
 - d. Any member of the QHIN Caucus that abstains, is not present at the QHIN Caucus meeting, or does not register a vote electronically by the stated deadline when such vote is conducted electronically, will not be counted as a voting member for purposes of such vote. The Objecting QHIN and Sponsoring QHIN are not required to recuse themselves and may participate in the vote with respect to an Entrant.

- 4.1.8. If the Sponsoring QHIN notifies the RCE that it desires to escalate an Entrant to ONC per Section 4.1.7(c), ONC will decide within 15 business days¹ of receipt of the notice of the escalation from the RCE whether the Sponsoring QHIN: (i) has provided sufficient evidence that the Entrant may submit Queries for the asserted Exchange Purpose(s), in which case such Entrant may be published in the RCE Directory Service by the Sponsoring QHIN for the Vetted XP(s); or (ii) has not provided sufficient evidence that the Entrant may submit Queries for the asserted Exchange Purpose(s), in which case the Sponsoring QHIN may not publish the Entrant in the RCE Directory Service for the Vetted XP(s) and may only resubmit the Entrant to the Entrant Review List in the event the Sponsoring QHIN (or any other QHIN) has materially new evidence supporting the Entrant's eligibility to submit Queries for the Vetted XP(s). ONC may request any additional information/evidence to inform its decision. Such request(s) will align with the Confidential Information requirements pursuant to the Common Agreement and applicable SOPs.
- 4.1.9. A Sponsoring QHIN is expected to add an Entrant that has been determined eligible for a Vetted XP to the RCE Directory Service within six (6) months after the eligibility decision. In the event the Sponsoring QHIN adds such Entrant to the RCE Directory Service after six (6) months, the Sponsoring QHIN must attest to the other QHINs that the Entrant has attested that the information about the Entrant in the Entrant Review List remains accurate and complete. Such attestation must be submitted through mechanisms established by the RCE.
- 4.1.10. If, pursuant to this vetting process, an Entrant is published in the RCE Directory Service by the Sponsoring QHIN, then upon such publication, provided the information included in the Directory Entry is consistent with the evidence and information submitted in the Entrant Review List, every QHIN must process the Entrant's Directory Entry in accordance with the requirements set forth in the QHIN Technical Framework (QTF).
- a. In the event that a QHIN identifies a non-substantive inconsistency in the Directory Entry for an Entrant (e.g., typo in the address or other minor error), the QHIN must notify the Sponsoring QHIN in writing within two (2) business days of the Sponsoring QHIN's publication of the Directory Entry in question. All QHINs must process such Directory Entry, in accordance with the QTF requirements for RCE Directory Service updates, after the Sponsoring QHIN corrects the non-substantive inconsistency.

¹ ONC may, in its discretion, extend this time for an unlimited number of additional 15 business daytime periods with written notification to the Sponsoring QHIN and the Objecting QHIN at least 2 business days prior to the deadline.

- b. In the event that a QHIN identifies a substantive inconsistency in the Directory Entry for an Entrant and, as a result, such QHIN will not be complying with the requirements set forth in the QTF, then such QHIN must notify the Sponsoring QHIN and RCE of its delay and the reason therefor. Such notification must be provided in writing within two (2) business days of the Sponsoring QHIN's publication of the inconsistent Directory Entry.
- 4.1.11. All evidence, information, and Objections submitted as part of the vetting process may only be used by a QHIN for the purpose of implementing this SOP. The RCE is permitted to share all evidence, information, or Objections submitted as part of the vetting process with the QHIN Caucus for purposes of their review and with ONC without the need to observe the processes set forth in the ONC Access to and Request for Confidential Information SOP.

4.2 Objection Requirements

- 4.2.1. The Objecting QHIN must include the following in its Objection:
 - a. Name of the Objecting QHIN and the individual at the Objecting QHIN who will serve as the point of contact for the Objection (including name, phone number, and email address);
 - b. Specific components of the applicable Exchange Purpose(s) definition that the Objecting QHIN does not believe the Entrant meets;
 - c. If an Objection concerns the accuracy or completeness of an attestation or evidence submitted by the Sponsoring QHIN, then the documentation and/or other supporting evidence that is intended to demonstrate the inaccuracy or incompleteness of the Sponsoring QHIN's the attestation or evidence;
 - d. If an Objecting QHIN is Objecting to descriptive, narrative information about an Entrant, the specific deficiencies or ambiguities to support its Objection that would call into question the accuracy of the information and the Sponsoring QHIN's conclusion that the Entrant can submit Queries for the applicable Exchange Purpose(s); and
 - e. Request for additional information or evidence that would address the Objecting QHIN's concerns that it has set forth in its Objection.
- 4.2.2. Generally, a QHIN will evaluate an Entrant's ability to Query for a specific Exchange Purpose based on the factual requirements associated with the Vetted XP definition. As a result, the following will typically not be found to substantiate an Objection for T-TRTMNT:
 - a. the Entrant's provision of limited treatment services;
 - b. the Entrant's provision of both treatment and non-treatment services;

- c. the Entrant's secondary use of any information obtained through TECCA; or
- d. the Entrant's lack of a physical interaction with an individual patient.

The above are examples of bases that will not substantiate an Objection for T-TRTMNT but are not intended to constitute an exhaustive list.

4.3 SOP Amendment

Any substantive changes to this SOP must be adopted in accordance with the Common Agreement. Notwithstanding the foregoing, non-substantive changes to the SOP, changes to the evidence and information set forth in the appendices to this SOP, or changes to timelines set forth herein may be modified by a majority of the QHIN Caucus.

4.4 Exchange Purposes for Which Vetting Requirements Apply

The list below identifies the XP codes that are Vetted XPs for which an Entrant must complete the vetting process outlined in this SOP before such Entrant's listing in the RCE Directory Service may reflect that the Entrant is eligible to initiate exchange asserting that XP Code.

- a. T-TRTMNT

4.5 Vetting Specifications for Entrants Submitted to the Entrant Review List for T-TRTMNT

4.5.1 By submitting an Entrant in the Entrant Review List for T-TRTMNT, the QHIN is attesting to the RCE, a contractor of ONC, that the information about the Entrant is accurate. The QHIN also attests that the Entrant has been informed of the requirements for submitting a Query for T-TRTMNT that are set forth in the XP Implementation SOP for Treatment and that, if approved to initiate Queries for T-TRTMNT, Entrant must comply with such requirements pursuant to the ToP.

4.5.2 Each submission to the Entrant Review List of an Entrant that wants to engage in TECCA Exchange using T-TRTMNT must include all the following:

- a. Sponsoring QHIN Name
- b. Entrant's name (legal entity name)²
- c. Entrant's DBA (if any)
- d. Corporate Business Address
- e. Entrant's Website.

² The Entrant is a Participant or Subparticipant, by definition a Participant or Subparticipant is a U.S. Entity as defined in the Common Agreement.

- i. If the Entrant has a website, it must be submitted as part of the vetting process. If a website is not submitted, the QHIN is attesting that the Entrant does not have a website.
 - f. Site of Care Address
 - i. The Sponsoring QHIN may indicate that the Entrant does not have a physical site of care address because Entrant provides care in the patient's home, utilizes a mobile vehicle, or provides virtual health care services. Such designation is not disqualifying of the Entrant's ability to assert T-TRTMNT.
 - g. National Provider Identifier (NPI) Number
 - h. Type of Health Care Provider
 - i. Evidence that the Entrant is a HIPAA Covered Entity Health Care Provider or Government Health Care Entity, including the HIPAA Covered Entity Healthcare Provider Evidence as set forth in Appendix 1.
 - j. A description of the triggers for T-TRTMNT Queries, if the Principal Node of the Entrant is not an EHR (certified nor non-certified EHR).
- 4.5.3 Representative Entrants. If Entrant is an entity or organization that is not itself a HIPAA Covered Entity Health Care Provider, does not have an organizational (Type 2) NPI, or does not use its organizational (Type 2) NPI for billing purposes, it may submit a Representative Child Entity(ies) or Representative Individual Provider(s) to complete vetting.
- a. The Entrant Legal Name, DBA, and Corporate Address must continue to represent the Participant or Subparticipant that is being vetted.
 - i. If the Entrant has a Type 2 NPI, it must submit such NPI even if it is not used for billing purpose and the NPI set forth in (ii) or (iii) below.
 - ii. When a Representative Child Entity is submitted as a representative for vetting (e.g., one physical care facility with a Type 2 NPI out of many that are part of the parent organization), the Sponsoring QHIN must submit the Site of Care Address, NPI, and applicable evidence for that Representative Child Entity.
 - iii. When a Representative Individual Provider with a Type I NPI is submitted as a representative for vetting, the Sponsoring QHIN must submit the Site of Care Address, NPI, and applicable evidence for that Representative Individual Provider, which must clearly match the Site of Care Address of the Entrant.
 - iv. When a Representative Child Entity or Representative Individual Provider is submitted, the Evidence submitted for the Entrant must align with the information submitted on the Representative Child Entity or Representative Individual Provider.

5 COMPLIANCE DATES

SOP Section Number	Compliance Requirement	Applicability	Compliance Date
2, 4	Vetting Specifications for Entrants Submitted to the Entrant Review List for T-TRTMNT	Q/P/S	August 3, 2026

APPENDIX 1: HIPAA COVERED ENTITY HEALTH CARE PROVIDER EVIDENCE

Between August 1, 2026 – December 31, 2026, each submission to the Entrant Review List of an Entrant that wants to engage in TECCA Exchange using T-TRTMNT MUST include either the Tier 1 HIPAA Covered Entity Health Care Provider Evidence or Tier 2 HIPAA Covered Entity Health Care Provider Evidence. For Tier 1 Evidence, the Objection Period is not less than five (5) business days. For Tier 2 Evidence, the Objection Period is not less than forty (40) business days. Beginning on January 1, 2027, each submission to the Entrant Review List of an Entrant that wants to engage in TECCA Exchange using T-TRTMNT MUST include the Tier 1 HIPAA Covered Entity Health Care Provider Evidence. For Tier 1 Evidence, the Objection Period will be not less than five (5) business days. Tier 2 Evidence will no longer be accepted.

Tier 1 Evidence: HIPAA Covered Entity Health Care Provider Evidence

- A document demonstrating that, within the last 90 days, the Entrant or Representative Entry engaged in one of the following standard electronic health care transactions. Any such document must be appropriately redacted to remove any Protected Health Information before submission through the vetting mechanism.
 - X12 270/271 – Health Care Eligibility Benefit Inquiry and Response
 - X12 835 – Health Care Claim Payment/Advice
 - X12 837 – Health Care Claim (including, as applicable, professional, institutional, or dental claims)
 - NCPDP Telecommunication Standard Version D.0 Pharmacy Transactions

Tier 2 Evidence: HIPAA Covered Entity Health Care Provider Evidence

Link to the Entrant's listing in any directory maintained by the Centers for Medicare and Medicaid Services ("CMS") including, but not limited to, the following:

- <https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/medicare-fee-for-service-public-provider-enrollment>
- <https://data.cms.gov/tools/medicare-inpatient-hospital-look-up-tool>
- <https://data.cms.gov/tools/medicare-physician-other-practitioner-look-up-tool>
- <https://data.cms.gov/provider-summary-by-type-of-service/medicare-physician-other-practitioners/medicare-physician-other-practitioners-by-provider>
- <https://data.cms.gov/provider-summary-by-type-of-service/medicare-part-d-prescribers/medicare-part-d-prescribers-by-provider>

5 VERSION HISTORY

Version	Publication Date	Section #(s) of Update
November 13, 2024	Initial Publication	N/A
Version 2.0	July 8, 2026	All