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October 20, 2026

RCE™ Monthly Information Call

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Today's Agenda



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- Welcome & Agenda Review
- TEFCA by the Numbers
- TEFCA Exchange Basics
- Project Plan & Process Steps
- TEFCA Vetting Process Overview
- New FAQ: CMS ACCESS Model Participants in TEFCA
- Educational Resources
- Q&A



TEFCA Trusted Exchange Framework
and Common Agreement™



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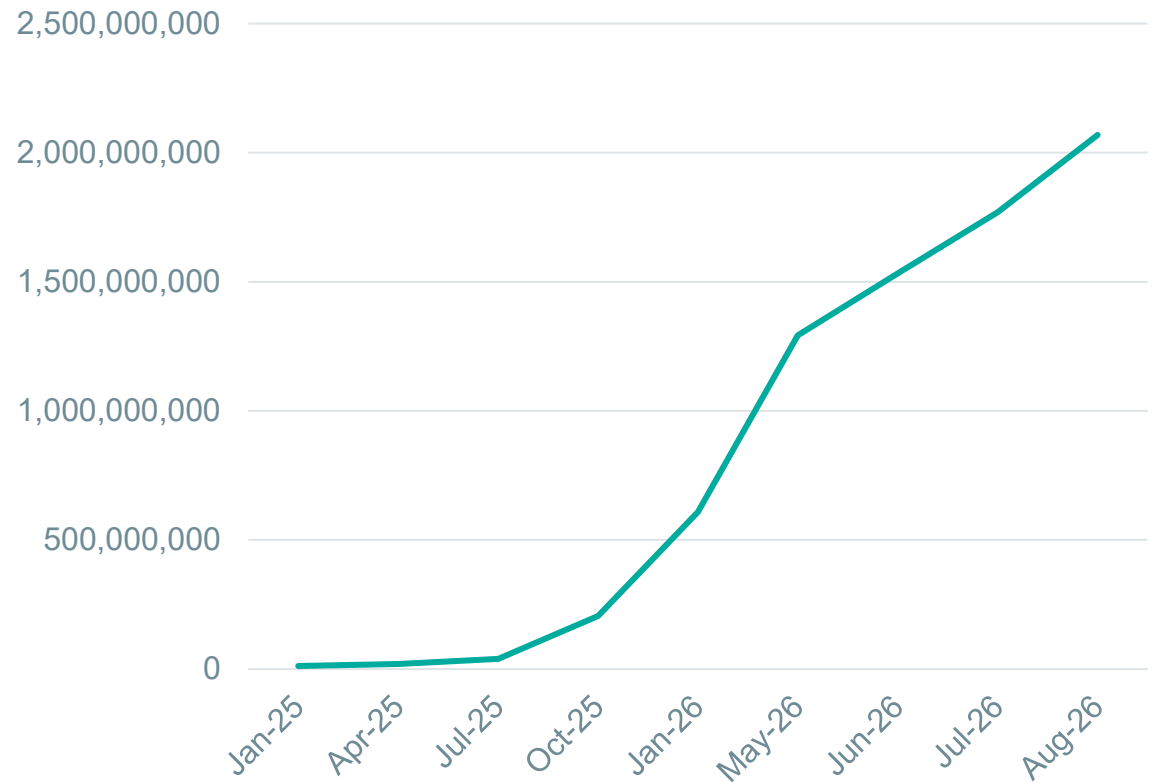
TEFCA by the Numbers



TEFCA NUMBERS

- Over **2 Billion** Documents Shared since Dec 2023
- **24,500** Organizations live on TEFCA
- **107,000** Unique connections

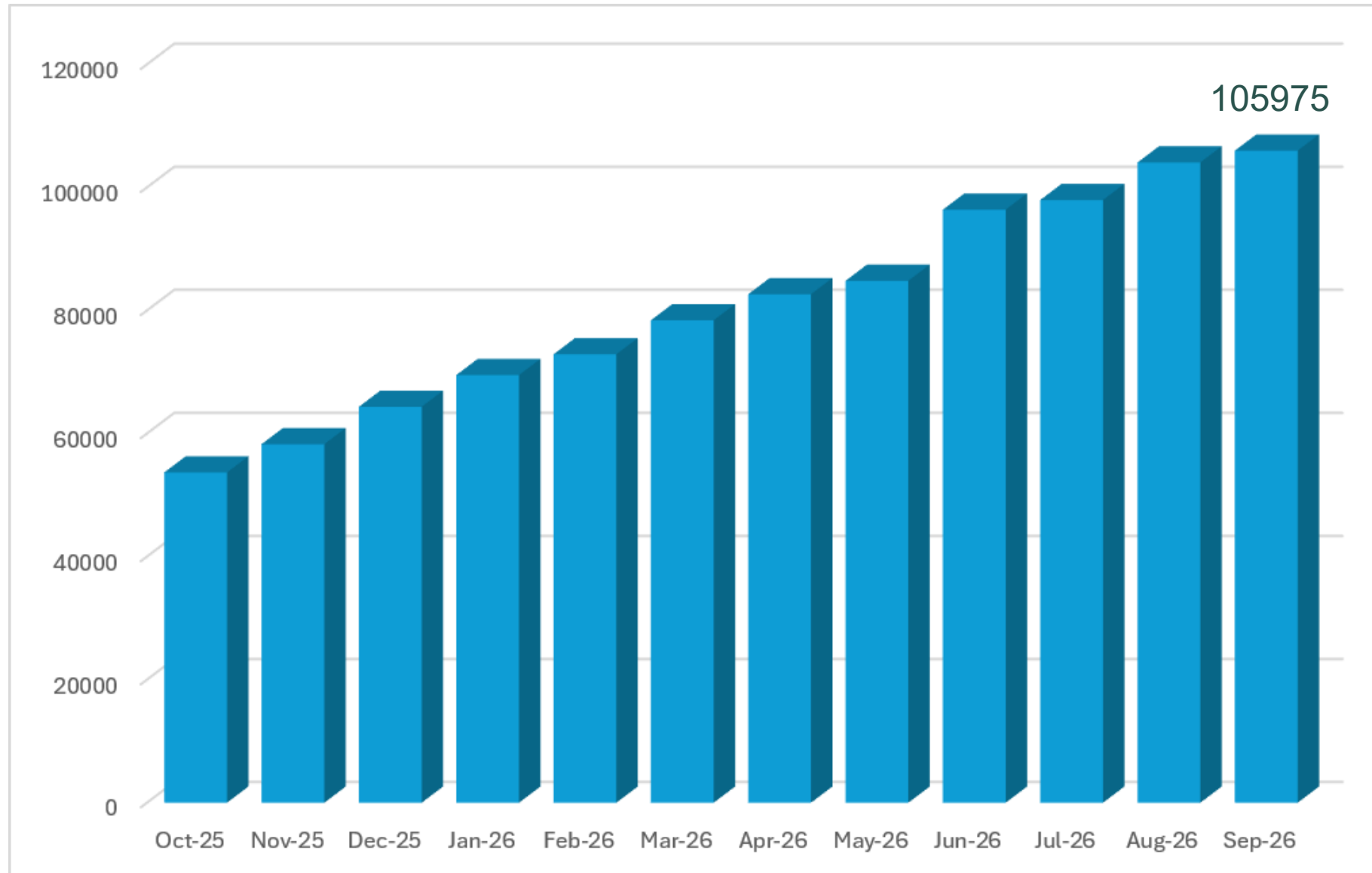
TOTAL DOCUMENTS SHARED VIA TEFCA
EXCHANGE 2024 – August 2026



Organization Growth in TEFCA



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Meet the QHINS



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eClinicalWorks

eHealth Exchange™



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

Meet the Candidate QHINs



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Below are organizations that have completed the Qualified Health Information Network® (QHIN™) application and have been accepted into the project planning and testing phase of the onboarding and designation process. Inclusion on this page is not an endorsement and does not guarantee that an organization will be Designated as a QHIN.



[Meet the Candidate QHINs!](#)



Individual Access Service (IAS) V3 Migration | Tracker

QHIN	Current Version Supported	Go Live Date	Stable State Target Date
QHIN A	V2	10/26	10/26
QHIN B	V3	10/06	10/07
QHIN C	V3	10/11	10/11
QHIN D	V3	9/23	10/20
QHIN E	V2 and V3	10/01	10/01
QHIN F	V3	10/07	10/07
QHIN G	V2 and V3	10/07	10/07
QHIN H	V3	10/02	10/02
QHIN I	V3	10/01	10/01
QHIN J	V2	10/20	10/20
QHIN K	V2	10/14	10/26



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TEFCA Exchange Basics



**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



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



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TEFCA SOP Project Plan & Process Steps

TEFCA SOP Project Plan

Current status and upcoming milestones | October 2026

SOP	CURRENT STATUS	 NEXT PUBLIC REVIEW PERIOD (Posted to Topics in Change Management)	NEXT MILESTONE	TARGET VOTE
Draft Inquiries and investigations SOP v1.0	RCE/ONC reconciling June feedback and finalizing policy	Completed June 2026	Caucus discussions and feedback Nov 2026	Jan 2027
Draft Restricted Participant List SOP v1.0	RCE/ONC reconciling June feedback and finalizing policy	Completed June 2026	Caucus discussions and feedback Nov 2026	Jan 2027
Draft Dispute Resolution SOP v2.0	RCE/ONC finalizing draft after receiving feedback from Caucuses in late 2025. Preparing for Topics in Change Management	Nov 2026	Caucus discussions and feedback	Mar 2027
Draft Treatment XP SOP v3.0	RCE/ONC defining scope and approach for input from non-covered entity providers	TBD	Preparation of first draft Jan – Feb 2027	Late Spring (June) 2027
Draft Governance SOP v2.0	Sent for Caucus feedback Oct. 6; under Caucus review.	Early Dec 2026	Caucus discussions and feedback Jan 2027	Mar 2027

PUBLIC REVIEW PERIOD = Public opportunity to review draft documents and provide feedback through Topics in Change Management.

All future dates are anticipated and subject to change. Additional feedback and Caucus discussions may occur before votes.



Feedback and Review

- Drafts shared with Caucuses for feedback
- Draft published on Topics in Change Management webpage for public feedback
- Feedback is reconciled and revised draft shared with Caucuses for final review



Approval and Effective Date

- Caucus vote on SOP
- ONC sets the SOP effective date



Implementation & Oversight

- RCE operationalizes, implements and monitors the SOP

High-level process; timing and specific activities may vary by SOP.



- 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.



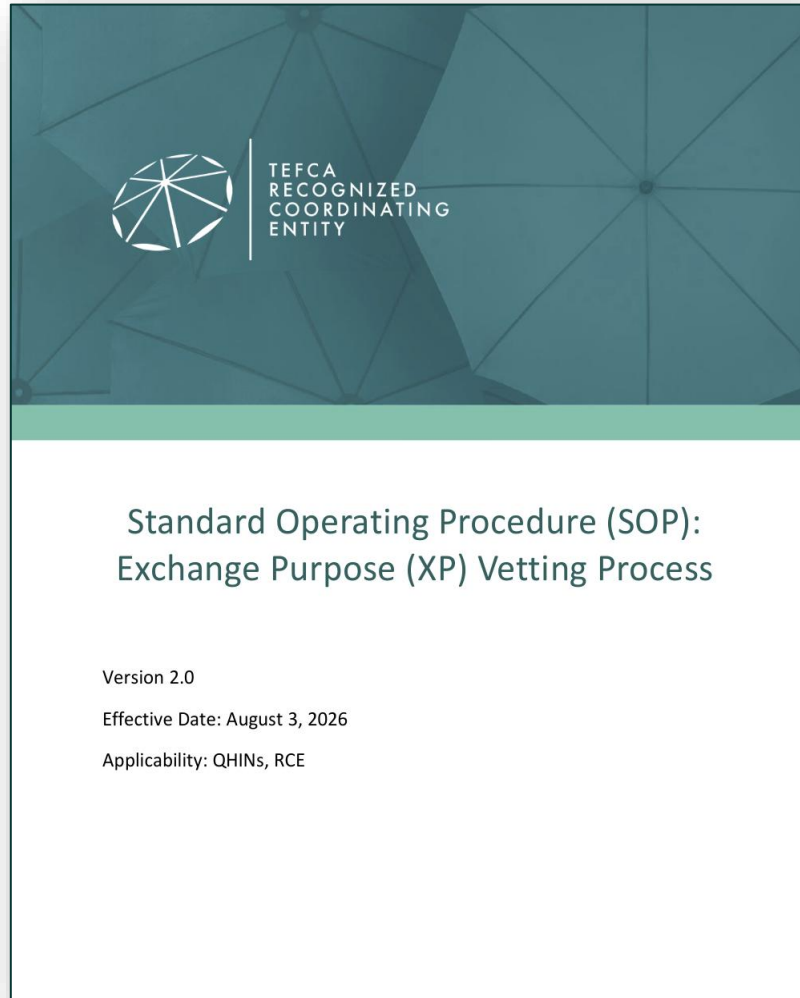
Stay Informed by Subscribing to Updates!

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



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TEFCA Vetting Process Overview



Purpose:

- Establishes a transparent framework for evaluating and approving Entrants before listing in the RCE Directory Service, ensuring they are vetted for their stated Exchange Purpose (XP).
- Fosters trust and collaboration among QHINs through structured reviews and open discussion, strengthening the integrity and effectiveness of TEFCA Exchange.

Procedure:

- 4.1 Entrant Review List Process
- 4.2 Objection Requirements
- 4.3 SOP Amendment
- 4.4 Exchange Purposes for Which Vetting Requirements Apply
- 4.5 Vetting Specifications for Entrants Submitted to the Entrant Review List for T-TRTMNT

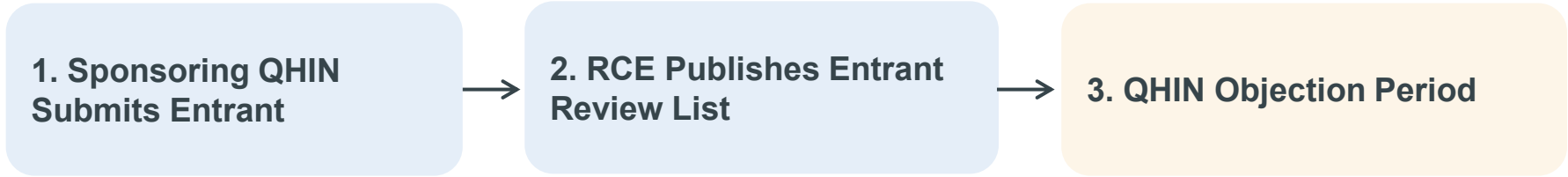
The effective date for QHINs, Participants, and Subparticipants for vetting specifications for Entrants submitted to the Entrant Review List for T-TRTMNT is August 3, 2026

As of July 2026, T-TRTMNT is the only Vetted Exchange Purpose



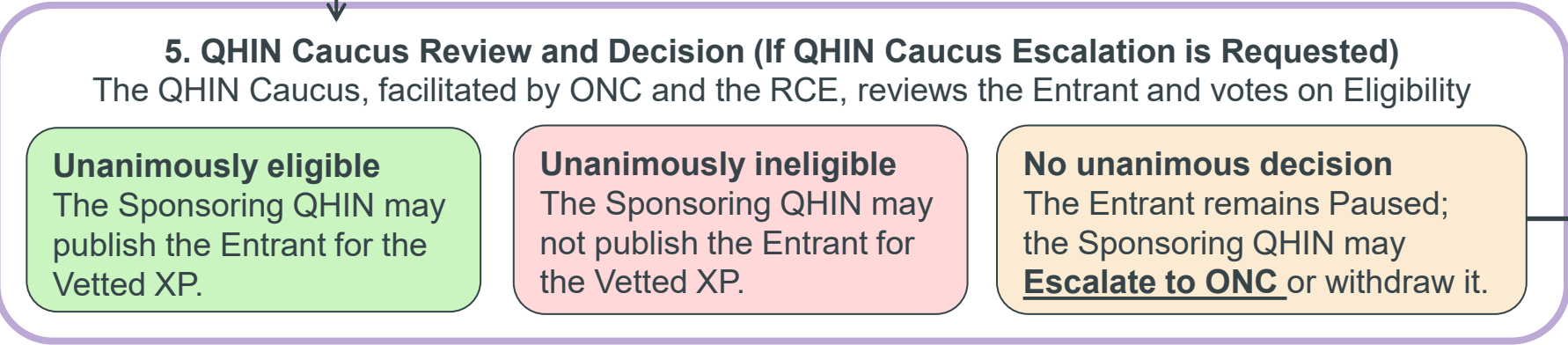
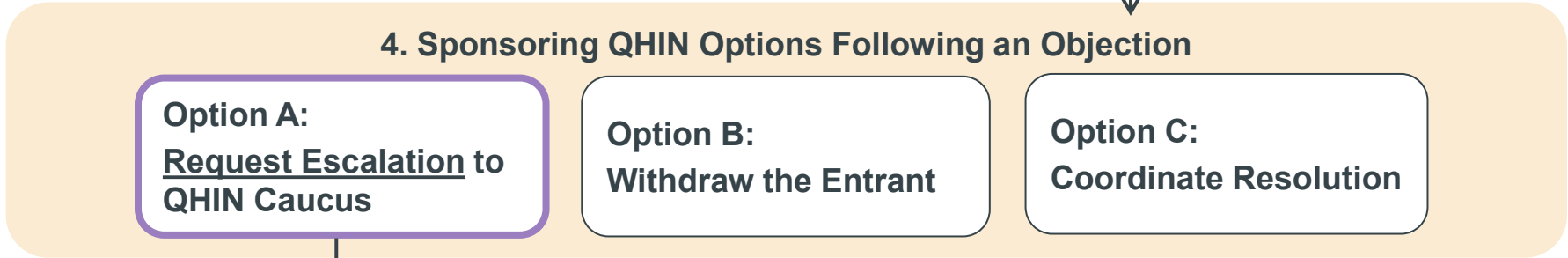
- **Entrant:** a potential Principal that may initiate Queries directly through its own Initiating Node, a shared Initiating Node, or through a Delegated Request for a specific Vetted XP and which is submitted for consideration into the Entrant Review List.
- **Sponsoring QHIN:** the QHIN that submits an Entrant into the Entrant Review List.
- **Objecting QHIN:** the QHIN that objects to an Entrant.
- **Entrant Review List:** the list maintained by the RCE of Entrants submitted by Sponsoring QHINs.
- **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.

Exchange Purpose (XP) Vetting Process



No Objection
The Sponsoring QHIN may publish the Entrant in the RCE Directory Service (Directory) for the Vetted XP

Objection
The Sponsoring QHIN may coordinate resolution, request QHIN Caucus review, or withdraw the Entrant



- ONC will determine eligibility within 15 business days of receiving the RCE’s escalation notice.
- ONC may request additional evidence and extend the decision period in 15-business-day increments, with written notice.



Tier 1 Evidence: Standard Requirement to use T-TRTMNT

A document demonstrating that, within the last 90 days, the Entrant or Representative Entrant engaged in one of the following standard electronic health care transactions:

- X12 270/271 — Eligibility inquiry and response
- X12 835 — Health care claim payment/advice
- X12 837 — Health care claim
- NCPDP Telecommunication Standard Version D.0 pharmacy transactions

Tier 2 Evidence: Temporary Alternative to use T-TRTMNT

A link to the Entrant's listing in a directory maintained by the Centers for Medicare & Medicaid Services (CMS).

Transition Timeline

August 1 – December 31, 2026

Entrants must submit either Tier 1 or Tier 2 evidence

- Tier 1: at least 5 business days for objections
- Tier 2: at least 40 business days for objections

Beginning January 1, 2027

Tier 1 evidence is required. Tier 2 evidence will no longer be accepted.

- Objection Period: at least 5 business days



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New TEFCA FAQ

CMS ACCESS Model Participants in TEFCA



Are CMS ACCESS Model Participants eligible to participate in TEFCA and use the “T-TRTMNT” TEFCA Exchange Purpose Code?

- **Yes.** Organizations participating in the CMS ACCESS Model that seek to participate in TEFCA and query using T-TRTMNT will be vetted against the same criteria as any other entity under the [XP Vetting Process SOP](#).
- CMS ACCESS Model participants must meet all baseline eligibility requirements even though they treat Medicare beneficiaries and engage in care delivery that aligns with the circumstances under which the T-TRTMNT code can be used

Continued on next slide

KEY CMS ACCESS Model Participant Requirements:

- Must be HIPAA covered entities.
- Must be enrolled and paid as health care providers under Medicare Part B to deliver health care to Medicare beneficiaries.
- Must successfully complete CMS program integrity screening and other review conducted under Medicare's Conditions for Medicare Payment and must maintain good standing.
- Must designate a physician to serve as Medical Director and be responsible for the delivery of patient care and outcomes under the ACCESS Model. The Medical Director must be a Doctor of Medicine or Osteopathy who is an employee or is under contract with the ACCESS Model participant.
- Must ensure that all physicians and non-physician practitioners furnishing or supervising care are individually Medicare-enrolled, participating providers or suppliers who have reassigned their Medicare billing rights to the ACCESS Model Participant and practicing within applicable licensure and scope-of-practice standards.
- May be directly selected for treatment by a Medicare beneficiary or may receive a referral from the beneficiary's primary care practitioner or another clinician. Additionally, before initiating alignment, the ACCESS participant must obtain and document the beneficiary's informed consent. Consent may be provided verbally or in writing and must be documented in the patient's record.
- Must make a reasonable, good-faith effort to proactively share electronic care updates with each beneficiary's care team (including referring and primary care practitioners) using secure, nationally recognized exchange methods, to the extent permitted by law.
- Must use a "standardized care plan and update template" provided by CMS.
- Must establish by July 2027 or maintain connectivity to a health information exchange (HIE) that enables bidirectional electronic exchange of health information across the geographic areas where the participant is able to deliver care. Connectivity must support timely, reciprocal exchange of clinical information with other health care providers involved in a beneficiary's care to ensure care coordination and continuity.



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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**

November 17, 2026 | 12:00-1:00pm ET



Questions & Answers

For more information:
rce.sequoiaproject.org



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Thank You

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