



TEFCA QHIN Compliance Bulletin No. 2

Version: 1.0

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Effective Date: October 26, 2026

Interim Technical Direction on IAS Claims Token Verification in TEFCA

Introduction

This Trusted Exchange Framework and Common Agreement™ (TEFCA®) Qualified Health Information Network® (QHIN™) Compliance Bulletin provides interim technical direction to implement the Exchange Purpose (XP) Implementation SOP: Individual Access Services (IAS) version 3.0 (IAS SOP v3.0) specification and to facilitate the transition to the requirements in the IAS SOP v3.0.

Effective October 13, 2026, QHINs must process IAS Claims Tokens under the interim technical direction in this Bulletin. Any QHIN that cannot follow this technical direction must inform the Recognized Coordinating Entity® (RCE®) of their anticipated compliance date and update the RCE on their progress daily. Any QHIN that is not compliant as of 5:00 pm ET, October 26, 2026, may face consequences as outlined in the [Consequences for QHIN Non-Compliance SOP](#).

This interim technical direction will be in effect until further notice.

Interim Technical Direction

1. Scope, Precedence, and Effective Date

(a) IAS SOP version 3.0 replaces all previous versions of the IAS SOP. Requirements from previous versions are no longer in effect unless explicitly restated in IAS SOP v3.0.

(b) Where the IAS SOP v3.0 is ambiguous, the SOP SHALL be interpreted consistently with this Bulletin and where this Bulletin conflicts with the SOP, this Bulletin takes precedent.

2. Token Version

(a) Every IAL2 Claims Token issued based on the IAS SOP v3.0 SHALL include the `tefca_ial2claims_version` claim with the string value "3.0".

3. Email and Phone Number Claims

(a) Every IAL2 Claims Token SHALL include at least one of the following. A token MAY include both.

- a `phone_number` claim with value set to a verified phone number (per Section 4.3 of IAS SOP version 3.0)
- an `email` claim with value set to a verified email address (per Section 4.3 of IAS SOP version 3.0)

(b) An IAL2 Claims Token MAY include an unverified `email` claim only if both of the following are true:

- the token also includes the standard OIDC claim `email_verified` with the boolean value `false`.
- the token also includes a verified `phone_number` claim.



(c) An IAL2 Claims Token MAY include an unverified `phone_number` claim only if both of the following are true:

- the token also includes the standard OIDC claim `phone_number_verified` with the boolean value `false`.
- the token also includes a verified `email` claim.

(d) An IAL2 Claims Token SHALL NOT include both an unverified `email` claim and an unverified `phone_number` claim.

(e) If a token includes a `phone_number` claim, it MAY include `phone_number_verified` with the boolean value `true`. If `phone_number_verified` is not present, the phone number SHALL be treated as verified.

(f) If a token includes an `email` claim, it MAY include `email_verified` with the boolean value `true`. If `email_verified` is not present, the email address SHALL be treated as verified.

(g) The permissions in 3(b) and 3(c) are temporary and remain in effect only until the RCE gives further notice. After the RCE gives that notice, an IAL2 Claims Token SHALL NOT include any unverified claims per the overarching requirements of the IAS SOP v3.0 in Section 4.9(a)(iii).

4. Historical Address Claim

(a) When present, the value of the `historical_address` claim SHALL be one of the following:

- an Address object, or
- an array containing one or more elements, each of which SHALL be an Address object.

(b) In either case, each Address object SHALL comply with Table 3 of the IAS SOP version 3.0.

5. Audience (aud) Claim

(a) An IAL2 Claims Token SHALL include an `aud` claim. The value SHALL be one of the following:

- a string, or
- an array containing exactly one string

(b) In either case, the string SHALL be the unique HCID of the IAS Provider's Directory Entry that is the intended recipient of the token, in the form of a URI per RFC 3061.

(c) The recipient SHALL treat the two forms described in 5(a) as equivalent.

Next Steps

We will continue facilitating QHIN discussions and addressing questions as we work toward full SOP compliance. The long-term approach will be discussed within the IAS Implementation Workgroup to ensure all stakeholders, including Credential Service Providers (CSPs), can collaborate on the development of a forward-looking plan for full IAS SOP v3.0 adoption.

Please direct any questions to the RCE Team at rce@sequoiaproject.org.

Technical examples will be shared separately.