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TEFCA Individual Access Services Providers Requirements

Kathryn Bingman, VP of Interoperability Adoption
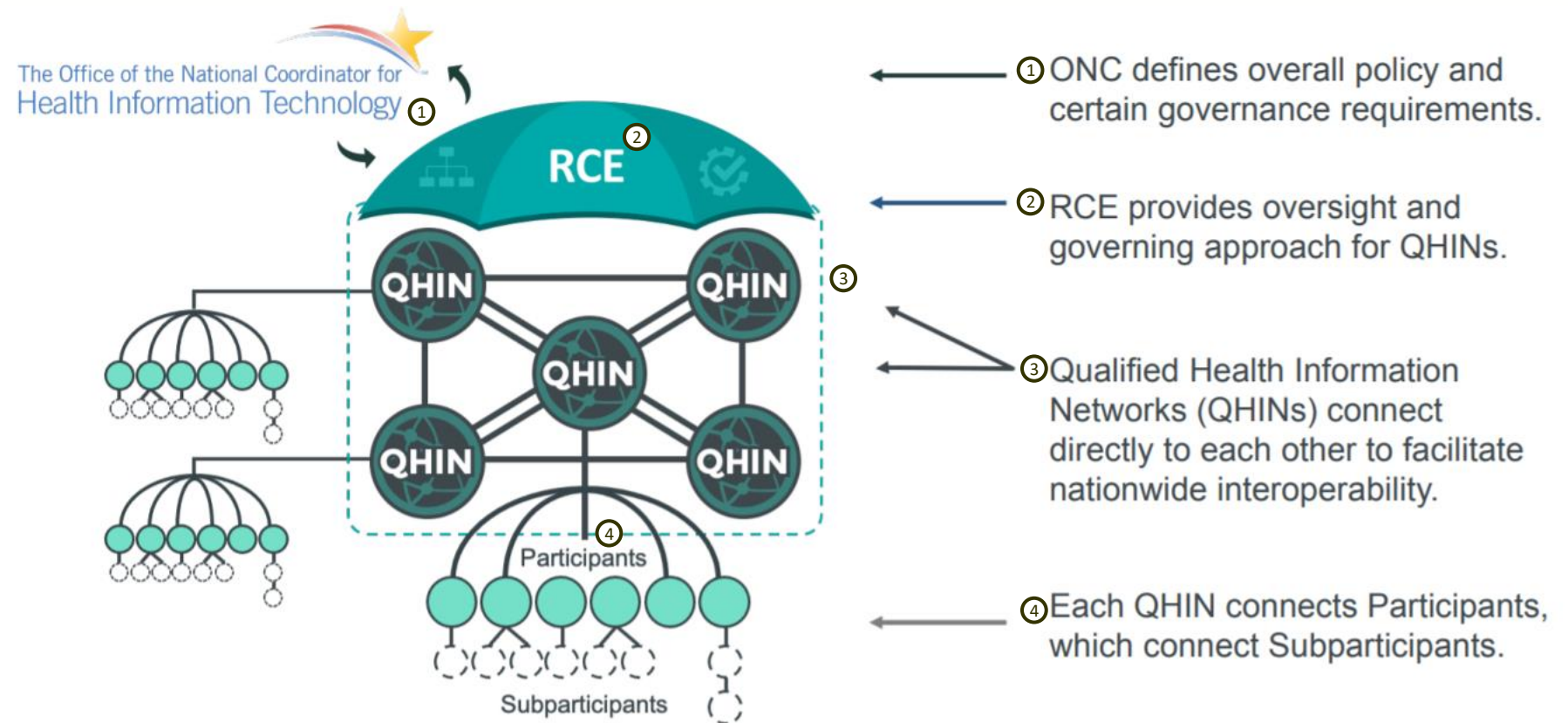*Eric Heflin, Consultant*

Agenda

- TEFCA Overview
- TEFCA Individual Access Services Provider Overview
- TEFCA Individual Access Services Provider Specific Requirements
- TEFCA Readiness Checklist Interactive Review
- Q&A
- For More Information

TEFCA Overview

How will TEFCA Work?

Common Agreement

QHIN Technical Framework

Standard Operating Procedures

FHIR Roadmap

The Office of the National Coordinator for Health Information Technology

RCE

QHIN

Participants

Subparticipants

① ONC defines overall policy and certain governance requirements.

② RCE provides oversight and governing approach for QHINs.

③ Qualified Health Information Networks (QHINs) connect directly to each other to facilitate nationwide interoperability.

④ Each QHIN connects Participants, which connect Subparticipants.
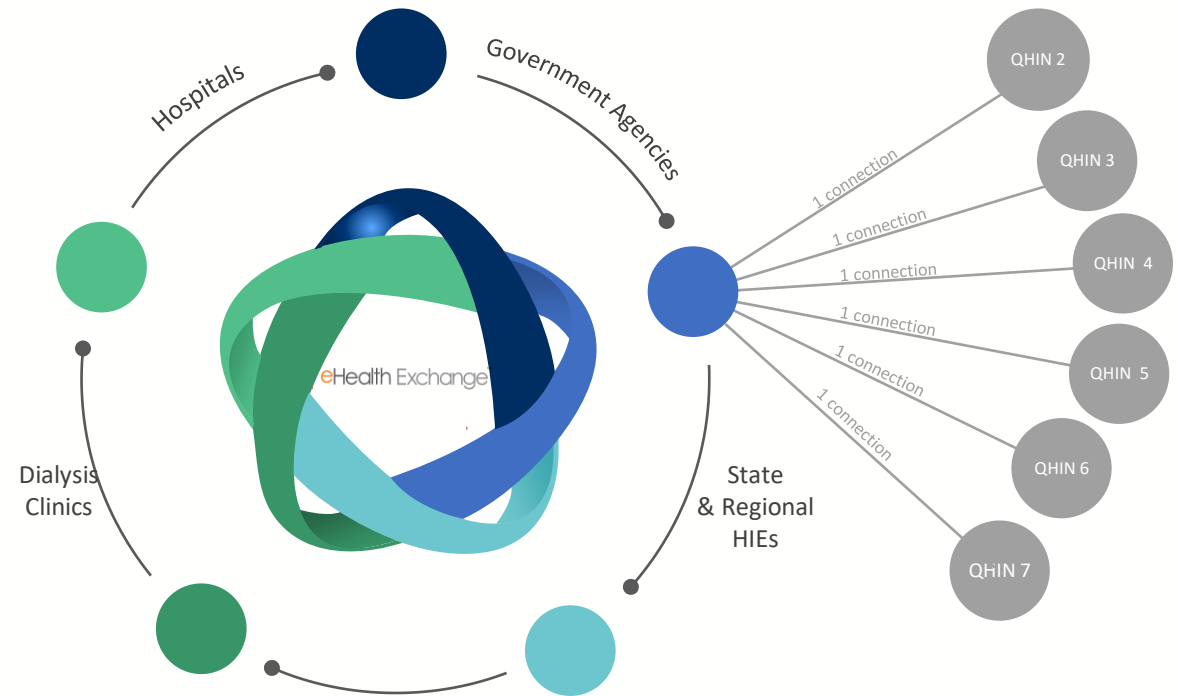
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What is the Trusted Exchange Framework (TEFCA)?

It's a federally endorsed governance framework for **cross-network** exchange of healthcare records.

Similar to Carequality, it's a framework, and not a network:

- Technical & policy agreements

- Governing structure

- Federated architecture

Enables healthcare organizations connected to a TEFCA Qualified Health Information Network (QHIN) to exchange patient data with other healthcare organizations connected to other QHINs.

Which networks exchange via TEFCA?

The HHS announced that the **eHealth Exchange** is one of six applicants that have had their applications to become a Qualified Health Information Network (QHIN) approved

It's not yet clear which healthcare organizations will agree to exchange via TEFCA. Will yours?
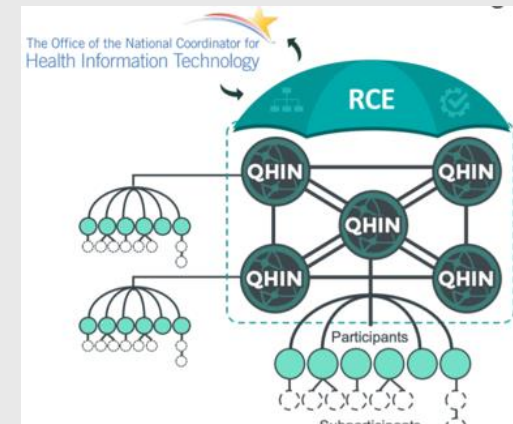
What's changing?

Prior to eHealth Exchange Connecting with TEFCA	Once eHealth Exchange Goes Live on TEFCA
Your organization can exchange with the eHealth Exchange's 320+ health systems, federal agencies, providers and provider collaboratives.	**Option** for your organization to **also** exchange with healthcare organizations participating in TEFCA QHINs.

How is the eHealth Exchange different?

eHealth Exchange

- ✓ National non-profit focused on the Public Good
- ✓ Single technical connection instead of hundreds
- ✓ Vendor agnostic
- ✓ 24x7x365 monitoring
- ✓ Enforced content quality assurance
- ✓ Analytics dashboard
- ✓ Broad federal agency connectivity
- ✓ Trust (no patient tracking, no selling data)

Other Networks

- ⚠ Single technical connection instead of hundreds
- ⚠ Vendor agnostic
- ⚠ 24x7x365 monitoring
- ✋ Mandatory content testing
- ⚠ Analytics portal dashboard
- ✋ Broad federal agency connectivity

✓ Yes
⚠ Sometimes
✋ No

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TEFCA Individual Access Services (IAS) Providers

Context and Background

- Recognized Coordinating Entity (RCE) and ONC use case

Applicability:
3.1, 3.2, 3.3, 3.4, and 3.6: IAS Providers Leveraging
Demographics-Based Patient Matching for Requests

3.5: QHINs, Participants, Subparticipants (for purposes of IAS Responses)

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

Standard Operating Procedure
(SOP): Individual Access Services
(IAS) Exchange Purpose
Implementation
Publication Date: September 16, 2022

Applicability:
3.1, 3.2, 3.3, 3.4, and 3.6: IAS Providers Leveraging
Demographics-Based Patient Matching for Requests

3.5: QHINs, Participants, Subparticipants (for purposes of IAS Responses)

The Office of the National Coordinator for
Health Information Technology

ONC
TEFCA
RECOGNIZED
COORDINATING
ENTITY

Common Agreement for Nationwide
Health Information Interoperability

eHealth Exchange TEFCA Participants Web Site Updates Coming Soon

- Updated TEFCA checklist (v1.3) with new IAS Providers requirements

- New Individual Access Providers TEFCA Protocol DRAFT

- The current 5 eHealth Exchange TEFCA Protocols DRAFTS

- eHealth Exchange web site at: https://ehealthexchange.org/what-we-do/tefca-and-ehealth-exchange/
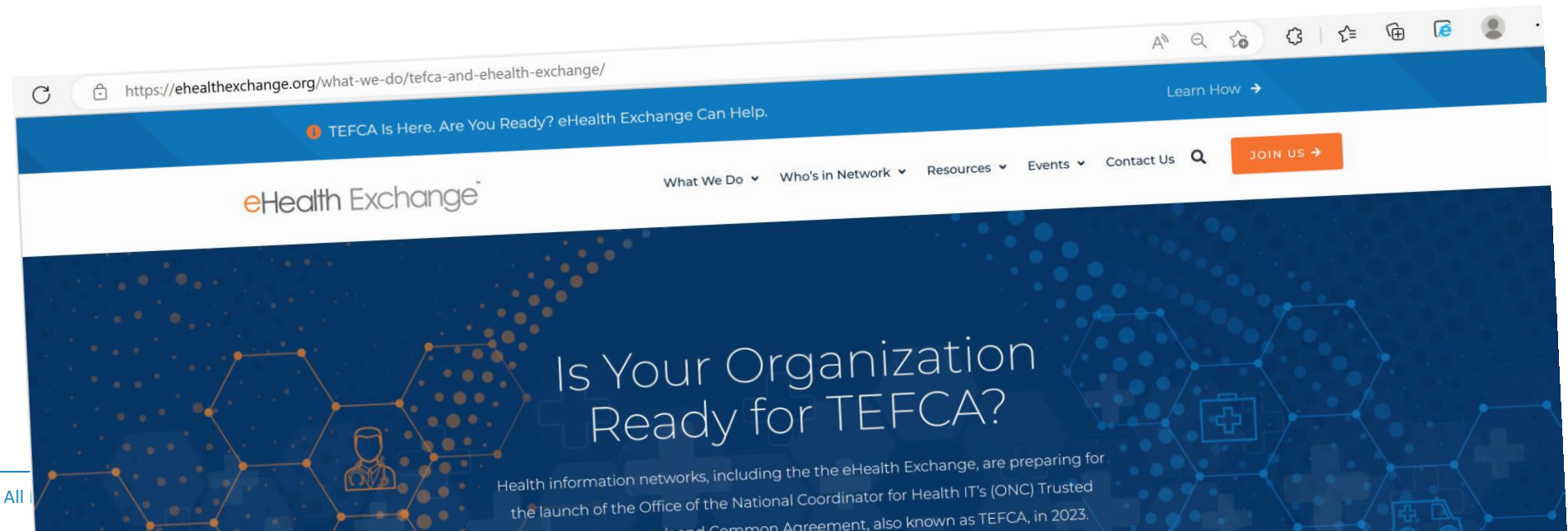
Technical, Legal, and Protocol Requirements

eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-01 [If functioning as an Individual Access Service Provider] **Delete Individual Data:** IAS Providers MUST implement the technology and processes to delete an individual's data upon request (with audit log exceptions). Note the text "unless such deletion is prohibited by Applicable Law" exclusion which may apply to medical records retention.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-02 [If functioning as an Individual Access Service Provider] **Export Individual Data:** IAS Providers MUST implement the technology and processes to **export** an individual's data upon request.

eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-03 [If functioning as an Individual Access Service Provider] **Additional Security Requirements:** IAS Providers MUST implement the technology and processes to

  - a) secure **all** IAS Provider Individual data as if it were Trusted Information (TI),
  - b) encrypt **all** Individual data at rest or in transit,
  - c) implement security incident notifications and procedures.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-04 [If functioning as an Individual Access Service Provider] **Credential Service Provider:** IAS Providers are required to use an RCE-approved Credential Service Provider (CSP).

- The CSPs MUST identity proof Individuals to NIST 800-63A Identity Assurance Level 2 (IAL2) including following prescriptive procedures for evidence collection, validation and verification for remote or in-person identity proofing.

- See NIST 800-63A for more information.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-05 [If functioning as an Individual Access Service Provider] **Identity Verification Requirement:** IAS Providers are required to verify the identities of Individuals via a CSP prior to the Individual's first use of Connectivity Services, and then again after credentials expire.

  - a) Verification MUST include: First Name, Last Name, Date of Birth, Address, City, State, ZIP.

  - b) Verification SHOULD include: Sex, Middle Name, Middle Initial, Suffix, Email Address, Mobile Phone Number, SSN, SSN last 4 digits, ZIP+4, Medical Record Number, and other identifiers.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-06 [If functioning as an Individual Access Service Provider] **Evidence of Individual Identity Proofing:** IAS Providers are required to demonstrate that all Individuals are identity proofed to NIST IAL2. The proof of identity verification is included in the QHIN Query or QHIN Message Delivery request SAML via a <saml:AttributeStatement> tag set which includes:
  - i) <saml:Attribute name="csp" NameFormat=""> comprising the Business Name or URL of the CSP and,
  - ii) saml:Attribute name="validated_attributes" NameFormat=""> with a comma or space separated list of the user demographics and identifiers that have been verified by the CSP.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-07 [If functioning as an Individual Access Service Provider] **Validated Attribute Codes:** IAS Providers MUST use the following demographic codes for any validated demographics supplied: First Name 'fname', Last Name 'lname', Middle Name 'mname', Middle Initial 'minitial', Suffix 'suffix', Date of Birth 'dob', Sex 'sex', Address 'address', City 'city', State 'state', ZIP/ZIP+4 'zip', Phone Number 'phone', Email Address 'email', Social Security Number 'ssn', SSN last 4 digits 'ssn4', Medical Record Number 'mrn', Identifier 'identifier'.

eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-08 [If functioning as an Individual Access Service Provider] **Historical Demographic Codes:** IAS Providers supplying validated historical demographic codes MUST prepend the code name with a "h". Secondary historical demographic code names must be appended by a mononically increasing integer starting with "2".

- Example first historical lname would be "hlname", and the second historical lname would be "hlname2".

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- IASP-09 [If functioning as an Individual Access Service Provider] **Error Processing:** IAS Requests without the validated attribute SAML codes must result in a SOAP fault code of urn:oasis:names:tc:SAML:2.0:status:AuthnFailed.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-10 [If functioning as an Individual Access Service Provider] **CSP Token:** An IAS Provider MAY include in its QHIN Query or QHIN Message Delivery a token provided by the CSP asserting IAL2 verification of the Individual has been completed. However, this token format is not yet formally defined by the RCE.

- The eHealth Exchange has confirmed that the CSP Token is optional at this time and will likely be similar to the recently defined Carequality CSP JSON Token.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-11 [If functioning as an Individual Access Service Provider] **Use of Proven Demographics:** IAS Providers MUST submit queries only using CSP IAL2 validated demographics.

  - a) Historical demographics MAY be included if CSP IAL2 validated.

  - b) Historical demographics must be marked as historical as per section 3.3.d.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- IASP-12 [If functioning as an Individual Access Service Provider] **Response:** IAS queries received MUST be responded to provided the requirements in section 3 are met and an acceptable match quality is made.

- Responders are not allowed to require more than the demographics in section 3.2 unless required by applicable law.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- LGL-03 **Individual Access Service (IAS):** The Common Agreement requires your organization to respond to requests for data from Individuals as long as Applicable Law permits.

- Note that in the Common Agreement, an "Individual" is broadly defined.

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eHealth Exchange Summary of Individual Access Services Providers Requirements for eHealth Exchange TEFCA Participants

- PRO-06 **Individual Access Service Provider Protocol Draft:** Same status as the Governance Protocol Draft.

TEFCA Readiness Checklist

TEFCA Participant Flow-Down Checklist

- UPDATED! TEFCA Checklist (focus on technical requirem
  – Performance & Service Specifications
  – Data Classes & Elements
  – Technical Messages
  – Directory (Populating & Consuming)
  – Operations
  – Reporting
  – New! Individual Access Services Providers
- Other Checklist items (not covered today)
  – Testing Requirements
  – Legal Flow-Downs
  – eHealth Exchange TEFCA Protocols

Image credit: Licensed from iStockPhoto

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Readiness Checklist Interactive Review of New IAS Provider Items

- https://ehealthexchange.org/what-we-do/tefca-and-ehealth-exchange/

TEFCA Protocols (aka Policies)

- Please see this section of the TEFCA Flowdown Checklist for more details…

ID	TEFCA Protocols (aka Policies)
PRO-01	**eHealth Exchange TEFCA Governance Protocol Draft**: QHIN Participants and Sub-Participants should review and comply this new TEFCA Protocol (aka Policy) as it will apply to them. The current version of this protocol has been submitted to the RCE and is pending review. This is one of multiple policies required by the RCE. According to **OPP#10**, notification will be sent by the Coordinating Committee for eHealth Exchange Participants to review the requirements and **make a decision to Opt-Out within 60 days**. If the Participant does not opt out per OPP#10, they are bound by the eHealth Exchange TEFCA Terms and Conditions, eHealth Exchange TEFCA Protocols, and eHealth Exchange TEFCA Supplements which include all flow-downs in the Common Agreement.
PRO-02	**TEFCA Security Incident Protocol Draft:** Same status as the Governance Protocol Draft.
PRO-03	**Change Management Protocol Draft:** Same status as the Governance Protocol Draft.
PRO-04	**Participant Enforcement Protocol Draft:** Same status as the Governance Protocol Draft.
PRO-05	**Dispute Resolution Protocol Draft:** Same status as the Governance Protocol Draft.
PRO-06	**Individual Access Service Provider Protocol Draft:** Same status as the Governance Protocol Draft.
PRO-07	**New Additional Protocols**: Once the eHealth Exchange QHIN Governance Committee is established, there could be additional protocols that the committee deems necessary to operate the eHealth Exchange QHIN network.

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References

- Please see this section of the TEFCA Flowdown Checklist for more details, especially the eHealth Exchange analysis and educational materials for TEFCA Participants:

References:	
eHealth Exchange TEFCA Terms & Conditions, TEFCA educational materials, TEFCA (Draft) procols, etc.	https://ehealthexchange.org/what-we-do/tefca-and-ehealth-e:
eHealth Exchange Technical Specifications	https://ehealthexchange.org/testing-program/technical-specifi
USCDI v1	https://www.healthit.gov/isa/sites/isa/files/2020-10/USCDI-Ve
Project US@	https://oncprojectracking.healthit.gov/wiki/download/attachm
IHE ITI Tech Framework v17+	https://profiles.ihe.net/ITI/TF/index.html
TEFCA QHIN QTF v1.0	https://rce.sequoiaproject.org/wp-content/uploads/2022/01/(
Concise C-CDA v2.0	https://carequality.org/wp-content/uploads/2022/03/Improve
Older IHE ITI Tech Framework v17 cited by the QTF	https://www.ihe.net/uploadedFiles/Documents/ITI/IHE_ITI_TF
ONC RCE TEFCA Resources	https://rce.sequoiaproject.org/tefca-and-rce-resources/
QTF v1	https://rce.sequoiaproject.org/wp-content/uploads/2022/01/(
RCE TEFCA flow down provisions	https://rce.sequoiaproject.org/summary-of-required-flow-dow
RCE Common Agreement	https://rce.sequoiaproject.org/wp-content/uploads/2022/01/(
RCE Individual Access Standard Operating Procedure	https://rce.sequoiaproject.org/wp-content/uploads/2022/09/F
NIST 800-63A Digital Identity Guidelines	https://pages.nist.gov/800-63-3/sp800-63a.html

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Major Technical Differences eHealth Exchange QHIN Participants Must Support

1. Adopt USDCI v1 data classes and elements

2. Adhere to the Concise Consolidated CDA 1.1 Specification

3. Adhere to Project US@ patient addressing

4. Adopt IHE ITI Technical Framework Revisions 17.0 (versus Revision 8.0)

5. Accept aggregated XCPD responses

6. Various requirements such Purpose Of Use values, different consent attribute structure, sub-participant directory entries and detailed reporting, onboarding log submissions, specific test patients, and quarterly reporting.

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Next Steps

1. Review the published policy documents (not discussed today)
2. Review the TEFCA Readiness Checklist
3. Let the eHealth Exchange staff know of your organization's intentions

email: administrator@ehealthexchange.org

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Questions?

How might I obtain additional information?

How	When	Where
1. Visit eHealth Exchange Web Site	Any time	https://ehealthexchange.org/what-we-do/tefca-and-ehealth-exchange
2. Monthly Participant Web Meetings	Typically, the 3rd Thursday of Each Month at 1 pm ET	https://ehealthexchange.org/events
3. Monthly TEFCA Policy Compliance Meetings	Dates coming soon!	https://ehealthexchange.org/events
4. Monthly TEFCA Technical Compliance Meetings	Dates coming soon!	https://ehealthexchange.org/events
5. Email	Any time if you have a specific question	administrator@ehealthexchange.org

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