

EHEALTH EXCHANGE TEFCA VETTING PROTOCOL

Scope and Authority

This Protocol addresses the vetting process(es) required for certain Exchange Purpose (XP) Codes under TEFCA.

In accordance with eHealth Exchange Operating Policy & Procedures (OPP) #10 (Participant Opt-Out of New Data Sharing Agreements), this protocol applies to all Participants that do not opt-out of the eHealth Exchange QHIN and are thus bound by the TEFCA Terms and Conditions and the Participant/Subparticipant Terms of Participation (ToP).

Purpose

The QHIN Governance Committee (QGC) must establish and maintain reasonable Protocols for the implementation of TEFCA requirements within the eHealth Exchange QHIN network. Protocols are process documents that describe how such TEFCA requirements are operationalized in the eHealth Exchange QHIN network. As may become necessary for the proper function of the eHealth Exchange QHIN network, the QHIN Governance Committee may establish new Protocols, or it may amend, repeal, and/or replace any existing Protocols consistent with the TEFCA Change Management Protocol and the TEFCA Terms and Conditions.

This protocol addresses the requirements for implementation with and by TEFCA Participants of the vetting process that is required prior to initiating Queries via TEFCA Exchange for certain XP Codes.

Protocol

This Protocol outlines the process by which the eHealth Exchange will operationalize the TEFCA vetting process that is set forth in the TEFCA Exchange Purpose (XP) Vetting Process SOP (the "Vetting SOP") with respect to Participants and their Subparticipants in the eHealth Exchange QHIN.

The Vetting SOP focuses on the overall TEFCA vetting process and the expectations of QHINs for submitting their Participants and Subparticipants to the vetting process as "Entrants" and for moving those organizations through that process. The purpose of this Protocol is, therefore, to outline how the eHealth Exchange QHIN will engage with its TEFCA Participants to collect and communicate the information and documentation necessary to submit Participants and/or their Subparticipants to the Entrant Review List and move such Entrants through the vetting process.

EHEALTH EXCHANGE TEFCA VETTING PROTOCOL

Procedure

A. Vetting as Prerequisite to Initiating.

1. Prior to adding a Participant or Subparticipant ("P/S") to the RCE Directory Service as an Initiator for any XP Code that requires vetting (each a "Vetted XP"), the QHIN Staff must ensure that the P/S is approved as eligible to assert such Vetted XP through the TEFCA vetting process established by the RCE/ASTP and set forth in the Vetting SOP.
2. In the event that a P/S is already listed in the RCE Directory Service as an Initiator for an XP Code that subsequently becomes a Vetted XP, the P/S will need to undergo vetting for that XP within the timeframe established by the RCE/ASTP in order to continue to initiate for that XP.

B. XP Requirements & Collection of Vetting Documentation

1. The QHIN Staff and QGC will make resources available to Participants to facilitate the collection and provision of information and evidence required for each Vetted XP (the "Vetting Documentation").
2. Participants are responsible for the collection of Vetting Documentation from their Subparticipants.
3. Participants must provide their Vetting Documentation, and that of their Subparticipants, to the QHIN Staff in accordance with the instructions therein.

C. eHealth Exchange QHIN Review & Submission of Vetting Documentation

1. The QHIN Staff will review the Vetting Documentation for completeness and will work with/through Participants if any additional information is needed prior to submission of the P/S to the Entrant Review List for the applicable Vetted XP.
2. After QHIN Staff review but prior to submission to the Entrant Review List, if there are questions or concerns as to whether the Vetting Documentation is substantively sufficient and/or consistent with the requirements for the Vetted XP, the Vetting Documentation will be escalated for review by the eHealth Exchange's representative on the QHIN Caucus / Vetting Subcommittee or their designee, who will work with/through the Participant as needed to obtain clarification.

EHEALTH EXCHANGE TEFCA VETTING PROTOCOL

3. If there are remaining questions/concerns after further engagement with/through the Participant, the matter will be referred to the QGC at the next regularly scheduled meeting for a determination as to whether the submission to the Entrant Review List may:
 - i. Proceed as-is;
 - ii. Proceed with modification(s) (e.g., with additional Vetting Documentation, under a different vetting path, etc.); or
 - iii. May not proceed based on the requirements for the Vetted XP that are set forth in the applicable TEFCA SOP(s).
4. The QHIN Staff will add the P/S to the Entrant Review List for the applicable Vetted XP within ten (10) business days of a determination by the QHIN Staff or the QGC, in accordance with the above, that the Vetting Documentation is complete and appears consistent with the applicable TEFCA requirements.

❖ **Note:** Once the QHIN Staff add a P/S to the Entrant Review List, subsequent timelines for the vetting process are determined by the RCE/ASTP as described in the Vetting SOP.

D. TEFCA Vetting Process

1. Upon submission of the P/S to the Entrant Review List, the TEFCA Vetting Process will follow the procedure set forth in the Vetting SOP and applicable timelines communicated by the RCE/ASTP.
2. At the close of the applicable Objection Period, the QHIN Staff will notify the Participant if any Objections were received or, absent any Objections, confirm that the P/S may be published in the RCE Directory Service for the Vetted XP.
3. In the event of any Objection(s), the QHIN Staff will work with/through the Participant to communicate the asserted basis/bases for the Objection(s). The Participant is responsible for notifying the QHIN Staff whether the P/S wants the eHealth Exchange QHIN, as the Sponsoring QHIN, to:
 - i. Withdraw the P/S from the vetting process (which does not preclude the P/S from being resubmitted at any time); or
 - ii. Escalate the matter as set forth in the Vetting Process SOP.
4. If the P/S elects to escalate the matter as provided in the SOP, the eHealth Exchange staff will notify the Participant of the outcome of each stage of escalation, as applicable, and

EHEALTH EXCHANGE TEFCA VETTING PROTOCOL

the Participant will be responsible for notifying the QHIN Staff of applicable decision points by the P/S regarding withdrawal or further escalation.

Definitions

All capitalized terms, if not defined herein, shall have the same meaning as set forth in the TEFCA Materials.

References

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

- Version 1: <https://rce.sequoiaproject.org/wp-content/uploads/2024/11/SOP-XP-Vetting-Process-508.pdf>

Related Protocols

None

| Date | Author | Comments |
|------|-----------------------------|--|
| | Cait Riccobono, Pat Russell | New Protocol for eHealth Exchange QHIN |