

The Sequoia Project TEFCA Update

HIMSS18 03/02/2018





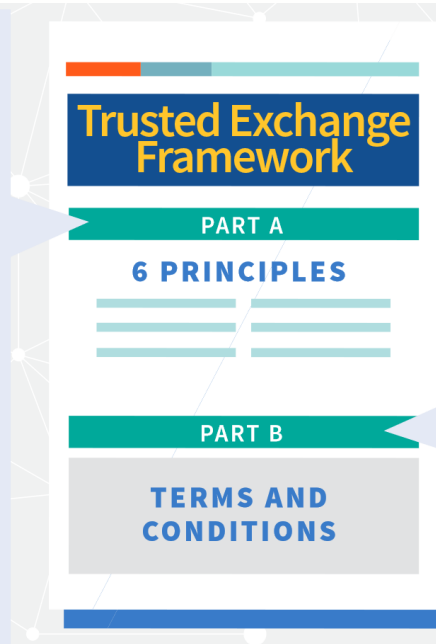
Overview of ONC's Draft Trusted Exchange Framework (TEF)

What is the Draft Trusted Exchange Framework?

Part A—Principles for Trusted Exchange

General principles that provide guardrails to engender trust between Health Information Networks (HINs). Six (6) categories:

- » **Principle 1 - Standardization:** Adhere to industry and federally recognized standards, policies, best practices, and procedures.
- » **Principle 2 - Transparency:** Conduct all exchange openly and transparently.
- » **Principle 3 - Cooperation and Non-Discrimination:** Collaborate with stakeholders across the continuum of care to exchange electronic health information, even when a stakeholder may be a business competitor.
- » **Principle 4 - Security and Patient Safety:** Exchange electronic health information securely and in a manner that promotes patient safety and ensures data integrity.
- » **Principle 5 - Access:** Ensure that patients and their caregivers have easy access to their electronic health information.
- » **Principle 6 - Data-driven Accountability:** Exchange multiple records at one time to enable identification and trending of data to lower the cost of care and improve the health of the population.



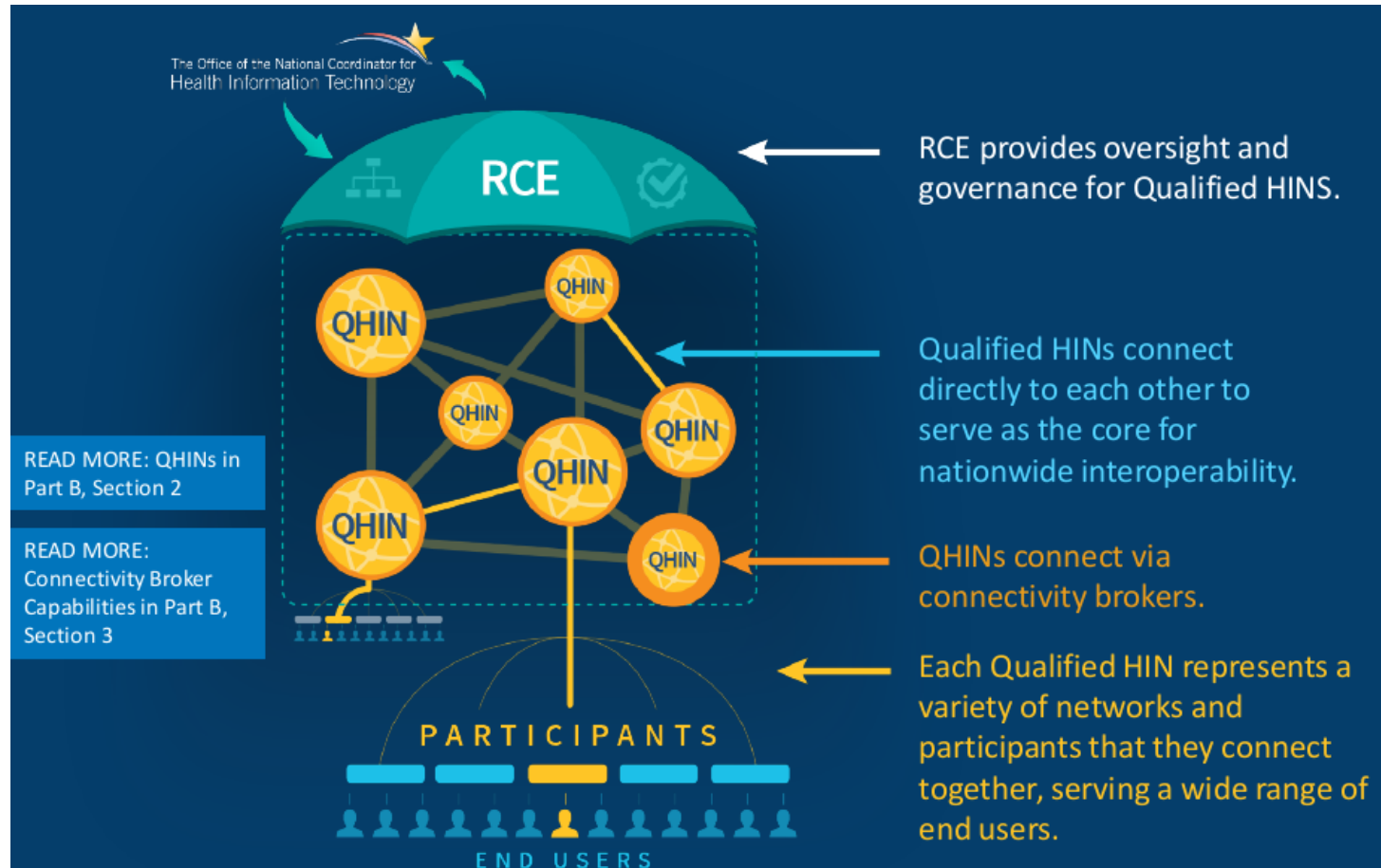
Part B—Minimum Required Terms and Conditions for Trusted Exchange

A minimum set of terms and conditions for the purpose of ensuring that common practices are in place and required of all participants who participate in the Trusted Exchange Framework, including:

- » Common authentication processes of trusted health information network participants;
- » A common set of rules for trusted exchange;
- » A minimum core set of organizational and operational policies to enable the exchange of electronic health information among networks.

© ONC. A User's Guide to Understanding the Draft Trusted Exchange Framework¹

How Will the Trusted Exchange Framework Operate?



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The Sequoia Project's Perspectives on ONC's Draft Trusted Exchange Framework (TEF)

Grounded in Experience

Our comments are based on decades of experience including:

- Significant experience supporting **large-scale, nationwide health data sharing initiatives**
- History of serving as an experienced, **transparent and neutral convener** of public and private-sector stakeholders
- Capability to address and resolve practical challenges to **real-world interoperability implementation**
- Success and lessons learned in developing and **implementing trust frameworks and common agreements**

Our aim is to support ONC and the future Recognized Coordinating Entity (RCE) for long-term success in our shared goal to improve the health and health care of patients, consumers, and our nation.

We support the overall intent, high-level approach,
and policy goals of the Draft TEF.

We are **encouraged by the Draft TEF's focus on private-sector standards and organizations**, including the central role of a Recognized Coordinating Entity (RCE) to achieve effective interoperability.

As ONC works with the RCE to finalize and implement the TEFC, **we urge ONC to adjust its proposed approach to prioritize minimal disruption of existing exchange initiatives** and networks that are on a trajectory consistent with both 21st Century Cures provisions and TEFCA goals, while eliminating barriers to their success.

We are pleased that ONC **intends to work with a private-sector RCE** to consider comments received and to collaboratively create and implement the final TEFCA.

We suggest that ONC **focus on refining and articulating policy goals and principles**, rather than on detailed agreement terms and technical requirements.

We urge ONC to allow a **phased and modular implementation** of the TEFCA.

We recommend that ONC, as it works with the RCE to finalize the TEF, **revise and expand the definition of a QHIN** to enable enough HINs to qualify and participate as QHINs so that a wide range of participants and end users are willing and able to connect to a QHIN.

We suggest that ONC work with the RCE, drawing on input from the industry, to **determine where uniformity of architecture and approach is needed, and where policy goals can be achieved in a more varied environment.**

Proposed RCE Eligibility and Operational Criteria Summary

Corporate Structure and General Capabilities

- Legal entity established and operated for public benefit as evidenced by 501(c)(3) tax-exempt status;
- Can operationalize TEFCAs under current structure ;
- Organizational ability to avoid conflicts of interest;
- Financially stable;
- Operational experience and demonstrated role as national convener of diverse stakeholders;
- Demonstrated track record with RCE tasks

Governance and Operations

- Governance structure with needed authority;
- Balanced stakeholder representation and engagement;
- Formal, open, and transparent governance and operational process;
- Publicized mechanisms for stakeholder and public input; and
- Mechanism for and experience with dispute resolution.

Ability to Act in a Fair and Neutral Manner

- Not invested in any specific technical architecture;
- Not under obligation to any vendor or type of system;
- Has taken specific and enforceable steps to address conflicts of interest; and
- Has formal code of conduct for governing body members, staff, and leaders.



Questions?