

Carequality Policy on Full Participation During COVID-19 Emergency

The following Carequality Policy is adopted by the Carequality Steering Committee, with immediate effect as of March 17, 2020.

Recognizing that access to patient medical records through the Carequality Framework will be beneficial to clinicians battling the COVID-19 outbreak within the United States, and the extraordinary situation the outbreak represents, the Carequality Steering Committee is providing a temporary waiver with respect to some aspects of Carequality's Full Participation requirements for the Query-Based Document Exchange Use Case.

Specifically, notwithstanding anything to the contrary in the Query-Based Document Exchange Implementation Guide, Carequality Connections may participate in exchange activities via the Carequality Elements only in the role of Query Initiator, including for the Permitted Purpose of Treatment, without an obligation to also serve as a Query Responder, under the specific conditions outlined below. Any organization with the ability to serve as a Query Responder is still expected to do so, and in fact has a fundamental duty to society to do so during the current emergency.

Carequality Connections qualify for this Full Participation exception under the following conditions:

- The national emergency declaration with respect to COVID-19 remains in effect, or the state in which the Carequality Connection operates has an emergency declaration in effect with respect to COVID-19.
 - Carequality Connections operating in multiple states may qualify if at least one such state has a relevant emergency declaration, but must only provide access to exchange activities via the Carequality Framework to End Users operating within the state(s) with a relevant emergency declaration.
- The Carequality Connection does not already have production access to exchange activities via the Carequality Framework, through other means.
- The Carequality Connection must identity-proof End Users in a manner that meets the requirements for NIST IAL2, as outlined in NIST Special Publication 800-63A.
- The Carequality Connection must authenticate End Users in a manner that is consistent with the requirements of the Carequality Elements.
- The Carequality Connection's entry in the Carequality Directory has the value of "Provider Organization (Initiator Only)" in the Organization Type (Org-Type) field.
- There is no fee charged by the Carequality Connection's Implementer, or any intermediary entity, for the access to exchange activities via the Carequality Elements.

The Carequality Steering Committee may, in its sole discretion, choose to rescind this Carequality Policy if it believes conditions with respect to the outbreak no longer warrant any waivers with respect to Full Participation requirements, even if state or national emergency declarations remain in place.