

## Carequality Implementer Issue Resolution Process

Approved 06/21/2024

### Process to Request Carequality Review of an Issue

- An Implementer may voluntarily escalate an Issue involving that Implementer's own processes or Connections for review by the Carequality staff and Issue Resolution Subcommittee.
  - An "Issue" is any controversy, issue, grievance, matter, or disagreement that is not the subject of a current Dispute under the Carequality Dispute Resolution Policy arising out of or related to the interpretation or implementation of the Carequality Elements, Carequality Framework policies, or Carequality Connected Agreement or Connection Terms.
- A request for issue review (an "Issue Review Request") must include:
  - A written summary of the issue, including the parties involved
  - Any relevant documentation that gave rise to the Issue
  - Where relevant, a legal memo setting forth the Implementer's interpretation of the relevant Carequality Elements, Carequality Framework policies, or Carequality Connected Agreement or Connection Terms
  - The guidance that the Implementer is asking Carequality to provide on the interpretation or implementation of a Carequality Elements, Carequality Framework policies, or Carequality Connected Agreement or Connection Terms
- An Issue Review Request must be sent to [admin@carequality.org](mailto:admin@carequality.org) and the subject must state "Submission of Issue Review Request."

### Review with the Issue Resolution Subcommittee

- Carequality staff will send all non-affiliated members of the Issue Resolution Subcommittee the Issue Review Request and submitted materials within two (2) business days of receiving an Issue Review Request.
  - Carequality will include in that communication a list of the affiliated Subcommittee members who will not participate in the review of the Issue.
- Carequality staff will review each Issue Review Request, work with the submitter to gather relevant information, and prepare an issue brief for the Subcommittee.
- Within ten (10) business days of receipt of the Issue Review Request, Carequality staff will present the issue brief to non-affiliated members of the Issue Resolution Subcommittee. The issue brief will be based on the information that Carequality has been provided to date and may be supplemented following the initial presentation if additional information becomes available.
- Carequality staff will work with the Issue Resolution Subcommittee to develop a summary of findings and recommendations for presentation to the Steering Committee. The Issue Resolution Subcommittee will strive to provide such a summary within twenty (20) business days after the Subcommittee's receipt of the initial issue brief from Carequality staff.

- Carequality staff and the Issue Resolution Subcommittee will consider various factors when developing findings and recommendations for each issue, including, but not limited to:
  - Urgency of resolving the issue
  - Whether the issue would be more appropriately resolved through a different Carequality process (*e.g.*, Dispute Resolution Process or Adverse Security Incident reporting process)
  - Potential for disruptive effect on exchange within the Carequality Framework
  - Alignment with other national networks (such as TEFCA)

#### Approval from the Steering Committee

- The Steering Committee must provide approval to implement recommendations from the Issue Resolution Subcommittee.
- The Steering Committee's final action on the Issue will be communicated to the parties.
- The Steering Committee will determine whether any outcomes from the Issues should be communicated to other stakeholder groups within Carequality.
- If a party is dissatisfied with the Steering Committee's final action, such party may escalate the Issue to a Dispute, which will be addressed pursuant to the Dispute Resolution Process.

#### Timelines

- Any timeframes set forth herein may be extended by agreement of the [parties/party submitting the Issue Review Request/Issue Resolution Subcommittee].
- In the event there are more than three (3) active Issues at any one time, all timeframes may be extended by five (5) business days at Carequality's discretion. Carequality shall provide notice to the Subcommittee in the event it elects to extend such timeframes.