01

Welcome and Agenda Review

Agenda

01   **Welcome and Introductions**

02   **January/February in Review**

03   **Ongoing Priorities**

04   **Production Operations Update**

05   **Questions or Comments**

02

January/February In Review

Highlights

- Annual Meeting 2024

- New Advisory Council Terms began in December

  - 42 applications received for 12-18 available seats

- 10.6 Billion clinical documents exchanged in 2024!

- 2025 priorities under way, first policy redline shared with Implementer community

  - More to come!

2025 Steering Committee and Advisory Council

Representative	Organization
Brendan Keeler	HTD Health
Deven McGraw	Citizen Health
Eric Rel	CVSHealth
Glenn Raley	Humana
Hans Buitendijk	Oracle Health
Jay Nakashima	eHealth Exchange
Jeff Coughlin	AMA
John Blair	MedAllies
Laura Williams	Trinity Health
Lucy Johns	Health Care Planning & Policy
Matt Becker	Kno2
Nancy Beavin	Medica Health Plan
Nichole Sweeney	CRISP
Paul Wilder	CommonWell Health Alliance
Rob Klootwyk	Epic
Ryan Howells	CARIN Alliance
Sean Fry	SSA
Shamekka Marty	Representative of Patients and Consumers

Council Member	Organization
Aniruddha Mandale	Fresenius Medical Care North America
Ben Rosen, BSN RN	Netsmart Technologies
Brandon Dupuie	Oracle Health
Brian Malachowski	CVSHealth
Charles Jaffe, MD	HL7
Chrissa McFarlane	Patientory, Inc.
Clark Downum	Redox
David Mendelson, MD	IHE
Derek Plansky	Health Gorilla
Evan Currie	Blue Cross Blue Shield
Holly Miller, MD, MBA	MedAllies
Jaffer Traish	Findhelp
JaMor Hairston	Emory University
Jean Barmash	Particle Health
Jim Willis	CommonSpirit Health
Justin McMartin	Surescripts
Keith Cromwell	Penn Medicine / Central PA Connect Health Information Exchange
Kirkley Cheney	athena
Kristian Feterik, MD, MBA	UPMC
Larry Garber, MD	Reliant Medical Group
Liz Lewis	CommonWell Health Alliance
Marilee Benson	Zen Healthcare IT
Marty Prahl	SSA
Michael Marchant	Sutter Health
Navi Gadhiok	eClinicalWorks
Nihit Bajaj	Epic
Ray Duncan, MD	Cedars-Sinai Health System
Scott Macdonald	UC Davis Health
Sid Thornton	Intermountain Healthcare
Steve Williams	Kno2

03

Ongoing Priorities

Carequality Milestones

2014 – Founded

2015 – Carequality Interoperability Framework published

2016 – First exchange of clinical documents

     for treatment

2018 – 59 million documents exchanged to-date

2020 – 2 billion documents exchanged to-date

2022 – 4+ billion documents shared that year

2023 – 6+ billion documents shared that year

2024 – 10+ billion documents shared that year

     (1.1+ billion shared in December 2024 alone)

Exchange began with treatment and expanded to include federal agency queries, public health activities, individual access, and more

A community committed to building and maintaining trust

CLEAR AND STRUCTURED GOVERNANCE

- Oversight
- Dispute Resolution
- Enforcement

ONGOING MONITORING OF COMPLIANCE

- Directory integrity controls under review
- Issue resolution

ONBOARDING IMPLEMENTERS

- Carequality vetting of Implementers during application and testing phases
- Implementers vetting connections prior to being added to the directory

FOUNDATIONAL RULES OF THE ROAD

- Contractual
- Technical

Blog Post: Priorities for 2025

- https://carequality.org/priorities-for-2025/

- The Carequality Steering Committee, Advisory Council, and Board of Directors have prioritized a set of activities to further enhance trust and best align Carequality with developments in TEFCA. The governance groups have agreed that the top four issues to tackle first are:

    - Modifications to the "On Behalf Of" policy

    - Directory improvements

    - Connection vetting and onboarding

    - Narrowing the definition of treatment when response is required

- In addition, a Subcommittee of the Steering Committee will be formed to address topics such as updating the dispute resolution process and conflict of interest policies. Additional topics to be addressed soon include use cases beyond treatment, as well as monitoring and reporting processes.

Priorities for 2025

- **Modifications to the "On Behalf Of" policy:** Develop an action plan to update the Carequality OBO policies to align with TEFCA's definition of delegation of authority.

- **Directory improvements:** Identify and scope targeted improvements to the directory that will enhance transparency and trust. Identify and characterize the level of burden on Implementers, as well as the timeline for implementation

- **Connection vetting and onboarding:** Evaluate the Carequality vetting process for improvements that will increase trust, which could include adopting elements of the new TEFCA vetting process.

- **Narrowing the definition of treatment when response is required:** Establish a framework for how best to increase trust that a request for Treatment in Carequality is appropriate, which may include aligning Carequality's definition with the TEFCA Required Treatment. Provide insight on an action plan for what needs to be changed in Carequality to support implementation.

OBO Background

- "On Behalf Of" (OBO) was developed in 2023 to address issues with Full Participation presented by Connections that were querying on behalf of healthcare providers that did not create or derive new data and therefore had nothing to return in response to a query

- In an OBO query, the OBO entity points to the underlying healthcare provider. Healthcare providers have asked for increased transparency of OBO entries

- Steering Committee Recommendation from Fall 2024 (in Dispute Final Resolution):

  - To better align with TEFCA and promote trust in Carequality, the Steering Committee will consider that before listing any new OBO entries in the Directory, each Implementer must secure the written confirmation of the relationship from the organization on whose behalf the Implementer's Candidate Implementer/Connection will be exchanging information. This written confirmation must be provided by an individual who has primary responsibility for the organization's privacy compliance (e.g. compliance officer or privacy officer) and the individual who serves as the main point of contact for the organization's relationship with its EHR vendor.

Overview: Carequality Activities to Date on OBO Modifications and Proposed Phased Approach

- In fall 2024, the Steering Committee made a recommendation to modify the OBO policy to better align with TEFCA and promote trust in Carequality that was discussed by the Advisory Council and recommended for adoption

- Since that time, Carequality staff analyzed the differences across the Carequality and TEFCA policies

- The Steering Committee has discussed a phased approach on modifying the OBO policy:
    - **Phase 1:** Modify the existing OBO policy to align with the recommendation in the Dispute Final Resolution
    - **Phase 2:** Consult with the Advisory Council to further analyze and propose to the Steering Committee a process for further alignment, with possible joint SC/AC workgroup
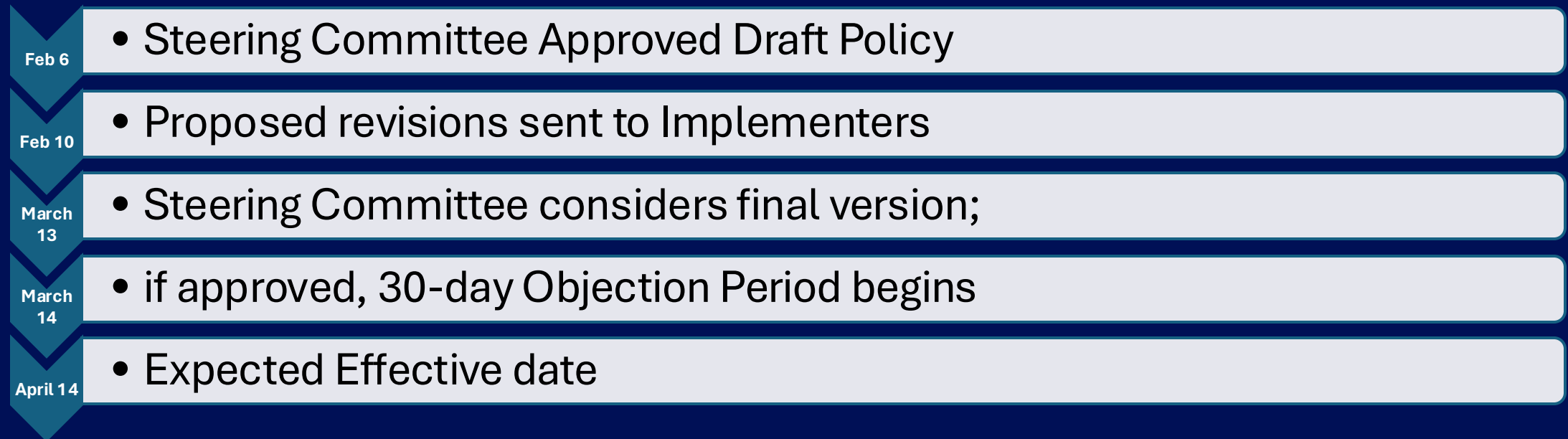
Phase I - Proposed Changes to OBO

- **Phase I** – Policy Alignment
  - Require Underlying Provider to confirm in writing that (i) a Connection is authorized to do OBO on its behalf and (ii) the OBO entity does not have any new or derived data to return in response to a query ("OBO Confirmation")
  - Once approved through change management, policy will go into effect immediately for new OBO entries and Implementers will have 3 months to get OBO Confirmations for existing OBO entries

Next Steps on OBO

Phase 1: Change management process underway

Feb 6	• Steering Committee Approved Draft Policy
Feb 10	• Proposed revisions sent to Implementers
March 13	• Steering Committee considers final version;
March 14	• if approved, 30-day Objection Period begins
April 14	• Expected Effective date

Phase 2: Workgroup Formed to begin work

Next Steps on Other Priorities

- Directory review underway to support directory improvements and vetting

- Steering committee to consider changes to the Business Rules policy to support local policies that are implemented in a non-discriminatory manner

- Formation of joint Advisory Council / Steering Committee policy and technical workgroups to inform decisions

04

Production Operations Updates

Monthly Clinical Records Exchanged

05

Questions or Comments

Carequality Team

HIMSS25

- Cybersecurity in the Era of National-Level Health Information Exchange
  - Alan Swenson, Johnathan Coleman, Chantal Worzala
  - Tuesday, March 4th, 12:45-1:45pm
  - Caesars | Academy 415

Save the Date!

Annual Meeting 2025

NASHVILLE TENNESSEE

NOV 19-20

carequality

Thank You
For Attending

Next Schedule Meeting

April 24th, 2025