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Carequality Public Informational Call

October 30th, 2025 | 1:00 PM – 2:00 PM ET

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**Update on Delegation of
Authority Implementation and
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Dispute Resolution

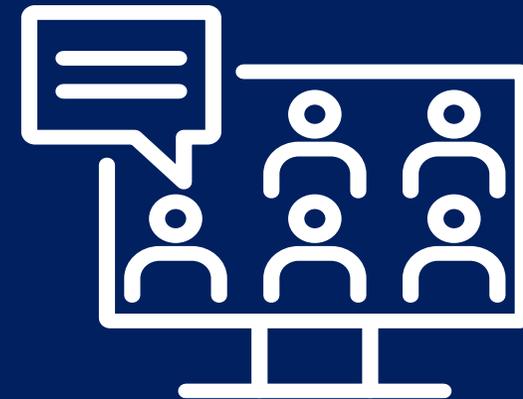
01

Administrative Updates

Steering Committee Application Update

We're looking for leaders to take a stand in accelerating trusted exchange of health data by joining the Carequality [Steering Committee](#).

The application for the 2025 Steering Committee Elections will be **closing on Monday, November 3, 2025**.



Learn more about the Steering Committee commitment and [submit your application today](#).

Administrative Updates

- **Exchange volumes continue to exceed 1.2 billion per month**
- **Governing bodies updating dispute resolution process**
- **Strong focus continues to be on Implementer success**

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Our interoperability framework is **connecting health information networks** throughout the country, changing health data exchange in the U.S

02

Update on Delegation of Authority Implementation

Updated Timeline

Milestone	Previous Date	Steering Committee Approved New Date
Effective Date	May 12	<i>Unchanged</i>
Delegate Identification	July 14	<ul style="list-style-type: none"> September 30 Anyone who doesn't submit loses write access to the Directory Implementers may submit a written request for an extension to the Steering Committee
No More Delegated Queries without Delegation Notices	August 22	Feb 1, 2026
Testing Begins	August 22	<i>Unchanged</i>
Testing Ends; Production Begins	September 15	September 26
Technical Production	September 22	October 3

We are working with the Steering Committee and Implementers on specific guidance in three areas:



Testing



Implementation of the process for submitting and approving a Delegation notice



Identifying a Delegate

03

Dispute Resolution

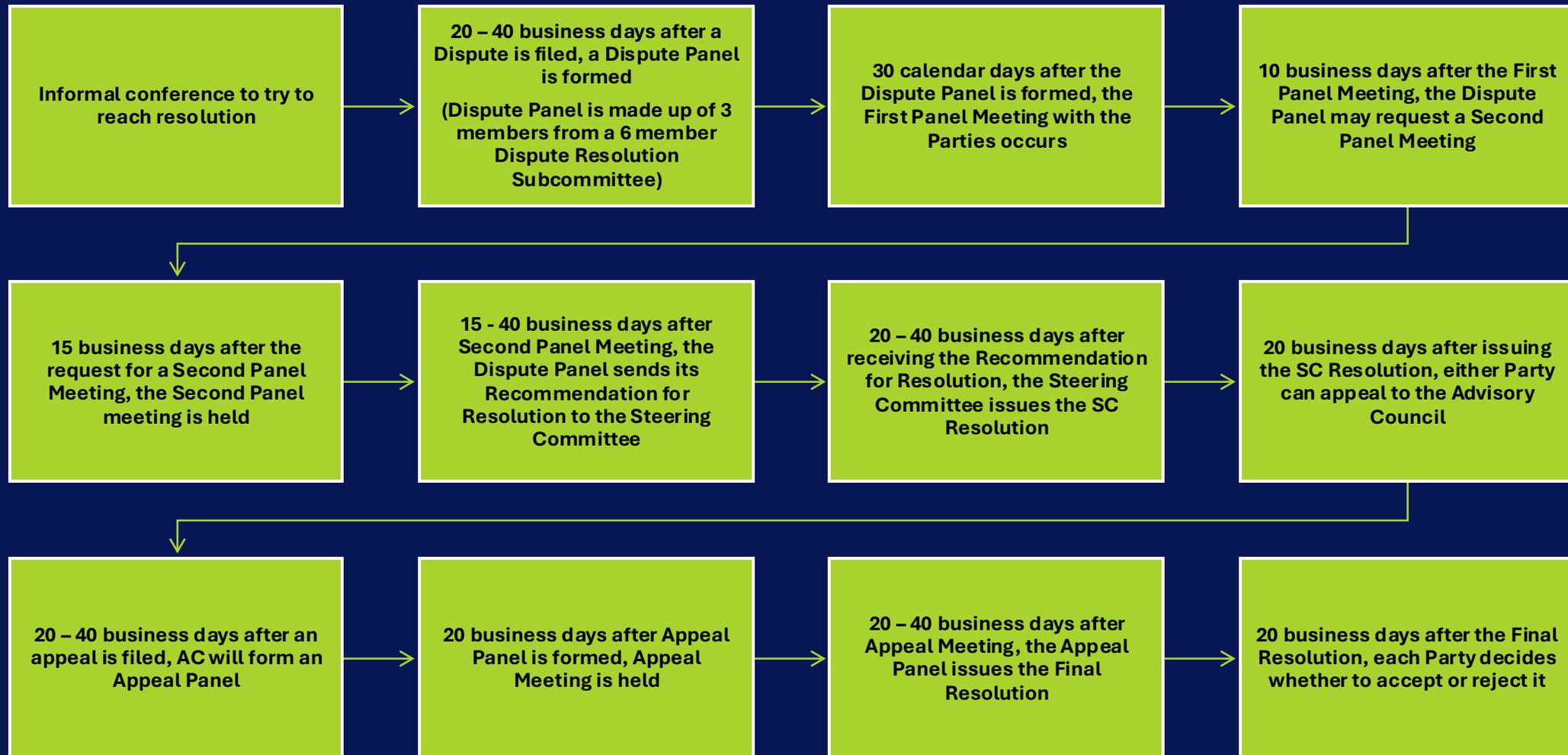
Carequality Connected Agreement

- **Dispute:** Any controversy, dispute, or disagreement arising out of or relating to the interpretation or implementation of the Carequality Elements.
- **Dispute Resolution Process:** the non-binding Dispute resolution process established by Carequality and included as Exhibit 2 to the CCA.

CCA – Section 20

20.1 Applicant acknowledges that it may be in its best interest to resolve Disputes between or among Applicant or Applicant’s Carequality Connections, and Carequality, other Implementers or their Carequality Connections through a collaborative, collegial process rather than through civil litigation. Applicant has reached this conclusion based upon the fact that the legal and factual issues involved in this Agreement are unique, novel, and complex and limited case law exists which addresses the legal issues that could arise from this Agreement. Therefore, Applicant shall submit Disputes to the non-binding dispute resolution process established by Carequality (“Dispute Resolution Process”) (Exhibit 2). Applicant also agrees to direct its Carequality Connections to use their best efforts to resolve issues that may arise between its Carequality Connections and other Implementers’ Carequality Connections or other Implementers to the extent that such Implementers do not have Carequality Connections through informal discussions before seeking to invoke the Dispute Resolution Process. In addition, Applicant agrees that if such informal discussions do not successfully resolve the issues after good faith efforts, then before a Dispute is submitted to the Dispute Resolution Process, Applicant will seek to facilitate the informal resolution of such issues directly between itself and the other affected Implementer(s). To the extent that such issues cannot be resolved through cooperation between Applicant and the other Implementer(s), Applicant on behalf of its Carequality Connection may choose to submit the Dispute to the Dispute Resolution Process. Under no circumstances will the Dispute Resolution Process give Carequality any power to assess monetary damages against Applicant, Applicant’s Carequality Connections, or any other Implementer or Carequality Connection. Except in accordance with Section 20.2, if Applicant refuses to participate in the Dispute Resolution Process, such refusal shall constitute a material breach of this Agreement and may be grounds for termination in accordance with Section 5.2.

Existing Dispute Resolution Process



Issues with the Existing Dispute Resolution Process

- Process is too long
 - If the maximum time is taken on each step, it is over 1 year
- Process has too many escalations
 - DR Subcommittee – DR Panel – Steering Committee – Advisory Council/Appeal Panel
- Ambiguities in the existing process can lead to additional conflict during a Dispute
- Parties do not have an opportunity to review and provide comment on draft Findings
- Members of the DR Subcommittee/DR Panel do not necessarily have the expertise needed to resolve Disputes

Overview of Proposed Revisions

- Clarify the roles of all parties to a Dispute (Implementers and Connections)
- Clarify what constitutes a Conflict of Interest for someone hearing the Dispute
- Formalize the informal conference so that all Parties and Carequality are aware that it is a precursor to a Dispute for all types of Disputes
- Clarify the roles of the Steering Committee and Board
- Streamline and shorten the process
- Divide Disputes into three groups

Path A

- Disputes related to Treatment Permitted Purpose utilization
- Faster resolution
- Specialized panel of experts hears the Dispute

Path B

- All other Disputes
- More robust, yet streamlined process
- Dispute Resolution Committee (DRC) hears the Disputes, makes a recommendation, and Steering Committee approves final resolution

Path C

- Disputes between Implementer and CQ
- Non-binding, third party mediation

Next Steps: Dispute Resolution Change Management

- For a January 1 effective date, the 90 day notice period must start October 3 (Friday)
 - October 3 – October 24: 21 day comment period
 - October 24 – October 29: CQ staff to revised based on feedback received
 - November 2: Final amendment issued for 1/1/26 effective date
 - November 3- December 3: 30 day objection period
 - January 1: effective date of new DRP

04

Annual Meeting

Annual Meeting

2025

NOV
19-20

NASHVILLE TENNESSEE

The **Sequoia Project & Carequality 2025 Annual Meeting** is the premier gathering of healthcare leaders, policy experts, and technology innovators dedicated to advancing nationwide health data exchange. With an expected record attendance of 250-300 leaders, this is the single best networking opportunity for our Implementers and Connections.

[Register Now!](#)

Carequality Implementers automatically receive a discounted rate when registering with an email address domain from a Carequality Implementer or The Sequoia Project member.

2025 Annual Meeting Agenda Preview

Trust Tested: Carequality's Post-Dispute Governance Evolution: One year after completing its first-ever formal dispute resolution process, Carequality has a wealth of experience in putting its foundational trust and governance framework to the ultimate test. This panel will examine the critical strategies and policy enhancements enacted following the resolution.

Delegation of Authority: Our policy experts will delve into the TEFCA Delegation of Authority policy, which was implemented this year by Carequality. Unpack what Delegation means, why it is needed, and the best practices in an educational session, as well as an unconference session.

TEFCA & Trusted Exchange: Gain clarity and hear the latest updates on the Trusted Exchange Framework and Common Agreement (TEFCA) and its direct impact on the Carequality framework.

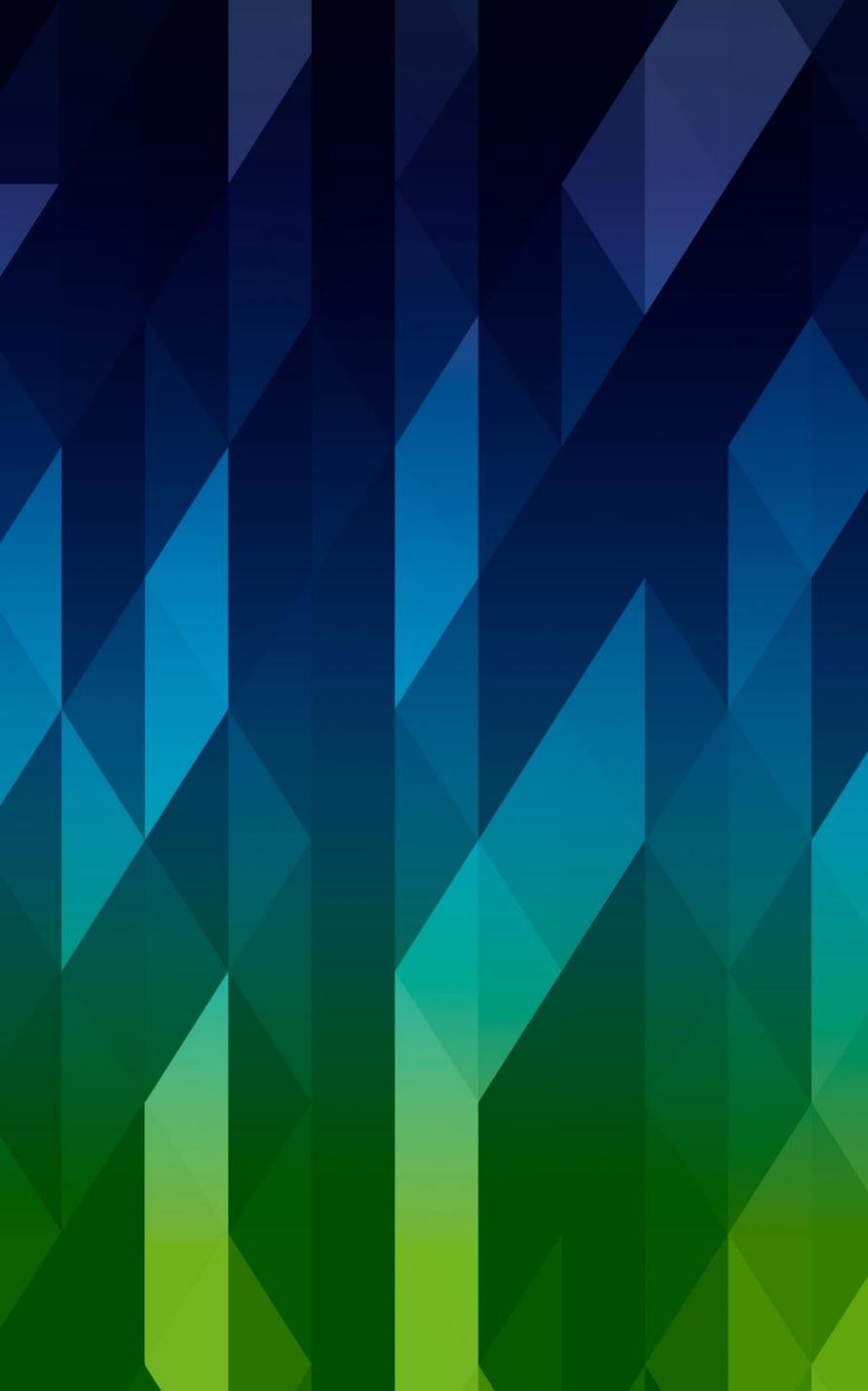
FHIR® in Practice: Explore real-world implementation strategies and best practices for leveraging FHIR® to enhance data exchange capabilities in an interactive unconference session.

Data Usability & Quality: Dive into an unconference session focused on improving the quality and usability of exchanged data, ensuring seamless workflows for providers and better outcomes for patients.

Regulatory & Policy Landscape: Get essential updates on **Government Affairs** and discussions around **Information Blocking** enforcement and **Privacy and Consent** to keep your organization compliant and ahead of the curve.

05

Questions or Comments



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**Thank You
For Attending**