



Carequality Public Informational Call

April 30 2026 | 1:00 PM – 1:30 PM ET

| 01

Welcome

Lee Barrett, Carequality Executive Director



Agenda

01

Welcome

02

Announcements

03

Steering Committee Update

04

**Restricted Participation List –
*formerly Requiring Additional
Diligence (“RAD”) or “Not in Good
Standing” Policy***

05

Questions or Comments

| 02

Announcements

News & Insights

Carequality Supports Its CMS Data Network Pledgees: Interoperability in Action

April 13, 2026 | Carequality Blog



- On April 9 in Washington, D.C., healthcare and technology organizations came together to highlight progress on the CMS-aligned data network pledge
- The event showcased real momentum across the industry and growing participation
- Carequality continues to play a key role in advancing interoperability by bringing together networks, frameworks, and organizations
- Over half of early adopters (11 of 21) are Carequality implementers
- More than a quarter of all Carequality implementers have signed the pledge

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Exchange volumes continue to exceed 1.2 billion per month

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

Welcome New Board Member!

Carequality welcomes newly elected board member, Deven McGraw, JD, MPH of Citizen Health!

Deven McGraw is the Chief Regulatory and Privacy Officer for Citizen Health, a platform for patients to gather and manage their health information. Deven is widely recognized for her expertise in health policy and is currently serving on the ONC HITAC Committee.

Deven is also chair of the Carequality Steering Committee



Deven McGraw, JD, MPH

New Advisory Council Members — Term April 1, 2026 - March 30, 2028



Returning Members:

- **Aniruddha Mandale**, Fresenius Medical Care
- **Marilee Benson**, Zen Healthcare IT, LLC
- **Michael Marchant**, Sutter Health
- **David Mendelson, MD**, IHE
- **Navi Gadhiok**, eClinicalWorks
- **Larry Garber, MD**, Reliant Medical Group
- **Ray Duncan, MD**, Cedars-Sinai Health System

New Members:

- **Charles Frazier, MD**, Riverside Health
- **Danny Lebovitz**, Metriport
- **Dennis Sherba**, eHealth Exchange
- **Drew Scott**, Particle Health
- **Marianne Smith**, Central PA Connect HIE / Penn Medicine
- **Mark Mabus, MD**, Parkview Health
- **Matthew Harp**, Kno2
- **Melissa Soliz**, Coppersmith Brockelman PLC
- **Michael Feakins**, Epic
- **Tim Polsinelli**, Redox
- **Vince Hartman**, Abstractive Health

| 03

Steering Committee Updates

Trust Enhancing Workgroup

- Carequality is committed to transparency and enhancing trust in the Framework.
- At the suggestion of the Steering Committee, we are forming a workgroup made up of members of our governing bodies to develop recommendations for practical and actionable measures that Carequality can take to enhance trust.

News & Insights

Safeguarding Trust: Recent and Ongoing Improvements

February 24, 2026 | Carequality Blog, Featured

Trust Enhancing Workgroup Scoping

- As a first step, Carequality has convened a group of Steering Committee members to scope the purpose and goals of the Trust Enhancing Workgroup in mid April.
- The workgroup will then convene to begin its work.
- We will keep the public informed as the work progresses.

| 04

Restricted Participation List – formerly Requiring Additional Diligence (“RAD”) or “Not in Good Standing” Policy

Carequality Framework Policies

New Proposed Section 3.8

- **Amendment:** We are proposing to add a new Section 3.8 to the current Carequality Framework Policies Document.
- **Purpose:** This policy was created in response to requests from Implementers to have more transparency into which Implementers and Connections have been inactivated, suspended, or terminated for non-compliance with the terms of the Framework.
- **Change Management Timeline:**
 - The proposed amendment was first distributed to Implementers on **December 8, 2025**.
 - The proposed amendment was distributed to Implementers for a second review cycle **January 21, 2026**.
 - The proposed amendment was distributed for a 30-day objection period on **April 8, 2026**.

➤ **Objections Due:** May 8
➤ **Effective Date:** May 9

Key Highlights

- Identifies the triggers for which Implementers and Connections are added to the Restricted Participation List (RPL).
- Describes the ways in which the Restricted Participation List designation can be removed.
- Defines the procedure for reporting Implementers and Connections that are on the Restricted Participation List, including timing for reporting to Carequality and the content of the report.
- Requires Implementers to check the Restricted Participation List prior to activating or re-activating any Connections in the Directory and prohibits them from activating or re-activating any Connection on the List.

Implementers and Connections Restricted Participation List

3.8.1 Restricted Participation List

- An Implementer or Connection will be added to the Restricted Participation List under the following circumstances:
 1. Carequality has suspended or terminated the Implementer or Connection for any reason.
 2. The Connection has been inactivated, suspended, or terminated by its Implementer or upstream Connection¹ based on objective, verifiable documentation that the Connection is inappropriately utilizing Carequality including, but not limited to, asserting an inaccurate Permitted Purpose (see Section 3.1 regarding Permitted Purposes).

Restricted Participation List, continued

3. The Connection has been inactivated, suspended, or terminated by its Implementer or upstream Connection under the following circumstances:

- a. to avoid another Implementer filing a complaint or Dispute related to the inactivated, suspended, or terminated Connection,
- b. during the pendency of Carequality's investigation of potential non-compliance related to the inactivated, suspended, or terminated Connection, or
- c. during the pendency of an Implementer or upstream Connection's investigation of the inactivated, suspended, or terminated Connection for potential non-compliance.

4. A Connection has voluntarily inactivated, suspended, or terminated its participation in Carequality under the following circumstances:

- a. to avoid becoming the subject of a complaint or Dispute after being notified of a potential non-compliance issue by Carequality, an Implementer or another Connection, or
- b. during the pendency of Carequality's or its Implementer or upstream Connection's investigation of the inactivated, suspended, or terminated Connection for potential non-compliance.

Carequality Framework Policies Section 3.8.2: Procedure for Reporting Implementers and Connections that are on the Restricted Participation List

1. Each Implementer must report to Carequality within one (1) business day after updating the Directory to reflect the inactivation, suspension, or termination of a Connection for a reason set forth in 3.8.1(1-4). The report must indicate the reason, as set forth in 3.8.1(1-4), for which the Connection is being placed on the Restricted Participation List.
2. The Implementer's report to Carequality must include a detailed description of the facts and circumstances related to the inactivation, suspension, or termination.
3. Carequality will maintain, and make available to all Implementers, a list of Implementers and Connections that are on the Restricted Participation List. The list will identify which circumstance above resulted in the designation. Notwithstanding the foregoing, in the event that the Steering Committee determines that an Implementer or Connection did not properly use a Permitted Purpose, such determination and a summary of the information relied upon by the Steering Committee to make such determination will also be shared with the Implementers.

Carequality Framework Policies Section 3.8.2:

Procedure for Reporting Implementers and Connections that are on the Restricted Participation List

4. An Implementer or Connection's Restricted Participation List designation can only be removed as follows:

- a. If the Implementer or Connection was placed on the Restricted Participation List during the pendency of a Carequality investigation, then the designation can be removed at the conclusion of the Carequality investigation if Carequality finds sufficient evidence that the Implementer or Connection complied with its obligations under the relevant requirements of the Carequality Elements;
- b. If the Connection was placed on the Restricted Participation List during the pendency of an investigation by its Implementer or upstream Connection, then the designation can be removed at the conclusion of the Implementer or upstream Connection's investigation if the Implementer or upstream Connection finds sufficient evidence that the Connection under investigation complied with its obligations under the relevant requirement(s) of the Carequality Elements and the Implementer or upstream Connection's report is provided to Carequality; or
- c. Upon the approval of the Steering Committee or its designee. The Steering Committee will review a written request from an Implementer or Connection for removal of the Implementer or Connection from the Restricted Participation List within fifteen (15) business days after receiving such a request from the Implementer or Connection.

Carequality Framework Policies Section 3.8.2: Procedure for Reporting Implementers and Connections that are on the Restricted Participation List

5. The list and any information about Implementers or Connections on the list that is shared with Implementers pursuant to this Section 3.8 is Carequality's Confidential Information and must be treated as such in accordance with Section 16.1 of the CCA. This means that the list any information about Implementers or Connections on the list may only be shared by an Implementer with its employees and agents who require such information in the ordinary course and scope of their employment or retention, and are obligated to protect the confidentiality of such Confidential Information in a manner substantially equivalent to the terms required in the CCA for treatment of Confidential Information.

Carequality Framework Policies Section 3.8.2: Implementer Responsibilities

In addition to complying with the requirements set forth herein, Implementers are also responsible for the following:

- Acting in good faith when designating a Connection as RAD;
- Checking the Restricted Participation List prior to activating (or reactivating) any Connection in the Carequality Directory; and,
- Not activating (or reactivating) as a Connection in the Carequality Directory any entity that is designated as RAD.

| 05

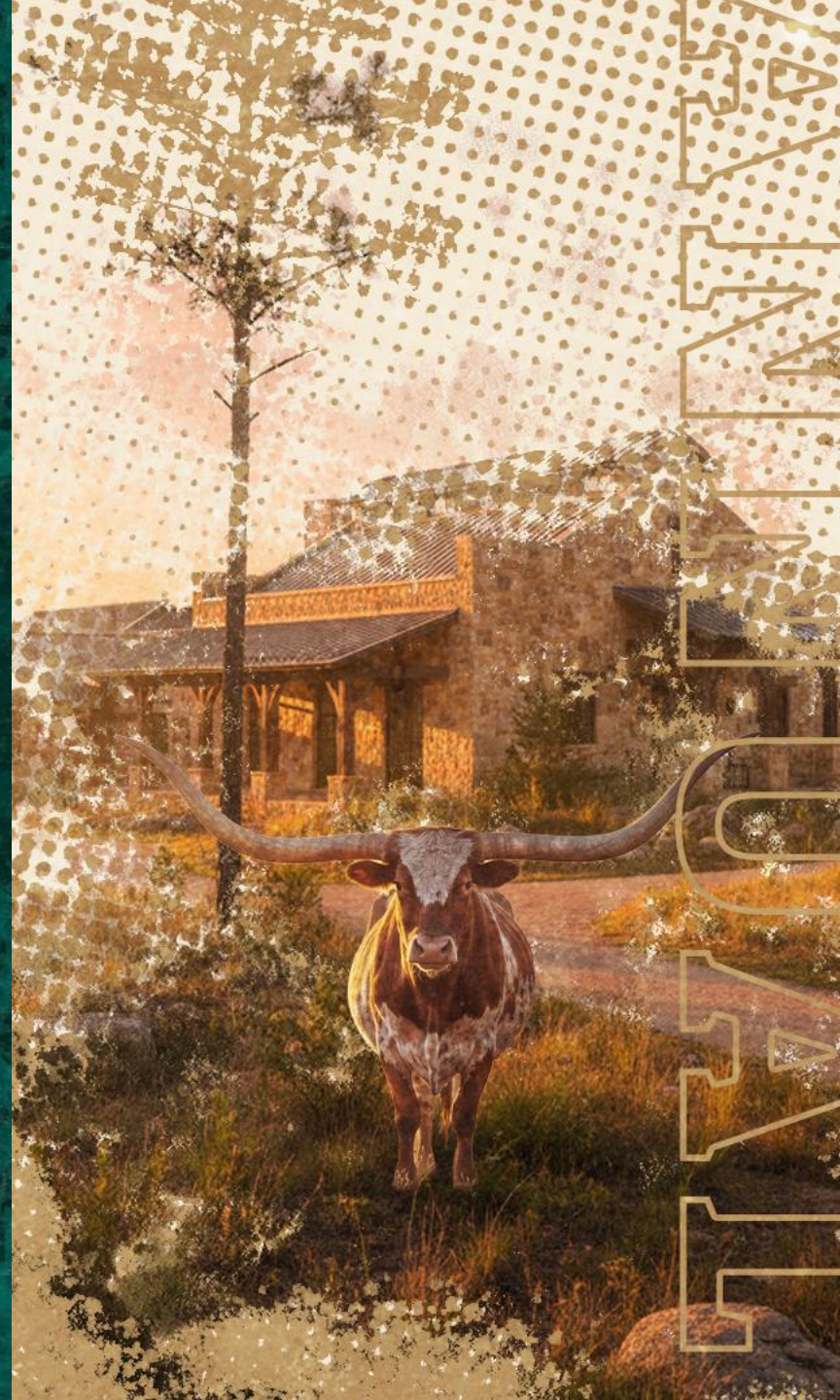
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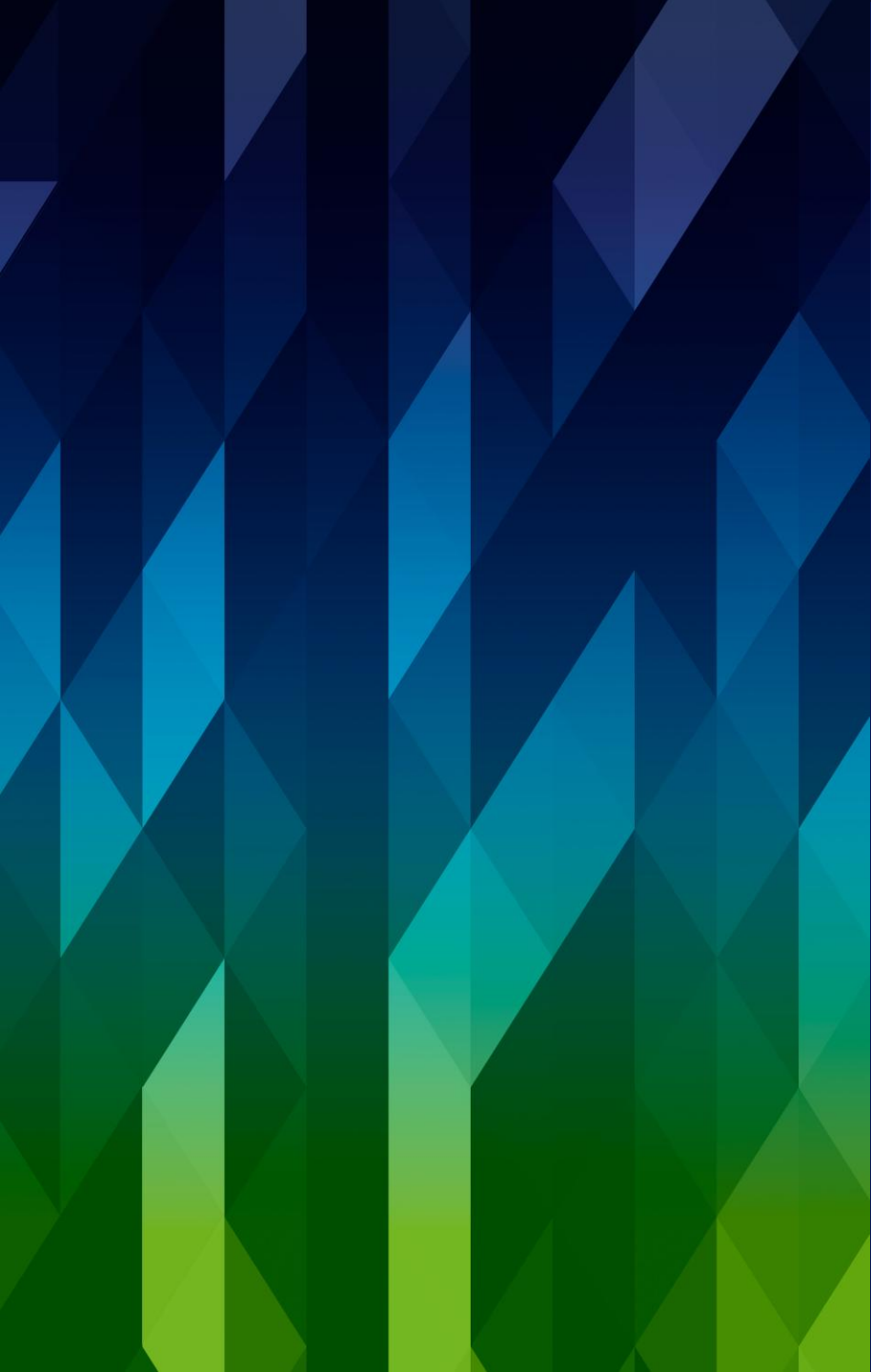
the
sequoia[®]
project



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Registration
Now Open!



A decorative vertical band on the left side of the slide, composed of a complex geometric pattern of triangles and polygons. The colors transition from dark blue at the top to a vibrant green at the bottom.

*care*quality

**Thank You
For Attending**