

The differences between the **Trusted Exchange Framework and Common Agreement (TEFCA)** and **CMS Aligned Networks** primarily center on their scope, purpose, and the minimum requirements for health information exchange, although they are designed to be complementary efforts to advance nationwide interoperability.

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## TEFCA: The Foundational Framework

**TEFCA** is a national initiative, overseen by the Office of the National Coordinator for Health Information Technology (ONC), to establish a **universal floor** for health information exchange across the country.<sup>1</sup>

- **Primary Goal:** To create a "network of networks" model where different Health Information Networks (HINs), called **Qualified Health Information Networks (QHINs)**, can securely exchange electronic health information with each other, regardless of which network an organization participates in.<sup>3</sup>
  - **Mechanism:** It provides a **Common Agreement**, which is a legal and technical contract, that all participating **QHINs** must adhere to.<sup>5</sup> This agreement sets baseline rules, policies, and technical standards (initially supporting existing standards like C-CDA but evolving to include FHIR) for secure, interoperable data sharing.<sup>6</sup>
  - **Scope:** The framework focuses on **enabling the secure connection** between disparate health information networks to support six core Exchange Purposes: Treatment, Payment, Healthcare Operations, Public Health, Government Benefits Determination, and Individual Access Services.<sup>7</sup>
  - **Participation:** Participation in TEFCA is **voluntary**.<sup>8</sup>
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## CMS Aligned Networks: The Higher Interoperability Bar

**CMS Aligned Networks** are part of the broader **CMS Interoperability Framework**, which sets a higher, more ambitious bar for data sharing and active participation in the healthcare ecosystem, particularly focused on enabling patient and provider access.<sup>9</sup>

- **Primary Goal:** To drive **active intelligence sharing and collaborative care coordination** by requiring a deeper integration and real-time data processing capabilities, moving beyond basic connectivity.<sup>10</sup> It aims to make it feel like one unified system for providers and patients.
- **Mechanism:** It is a **voluntary blueprint** for modern health data exchange.<sup>11</sup> Networks that meet the rigorous criteria of the CMS Interoperability Framework are designated as CMS Aligned Networks.<sup>12</sup> These criteria demand **FHIR R4 API implementation** and go beyond basic standards compliance.
- **Scope:** The focus is on a high level of seamless interoperability for:
  - **Patient Empowerment:** Patients accessing **all** their electronic health information (including clinical and claims data) through an app of their choice using a universal, CMS-approved digital ID, without multiple logins.

- **Provider Access:** Enabling providers to query and retrieve **complete** records for treatment with minimal friction, including structured data and unstructured clinical documents.
- **Relationship to TEFCA:** The CMS Interoperability Framework encourages networks to meet its criteria, which **exceed** the baseline set by TEFCA.<sup>13</sup> The government's vision is that TEFCA's established infrastructure will be an essential part of meeting the goals of the CMS Aligned Network framework.

## Key Differences Comparison

Feature	TEFCA (Trusted Exchange Framework and Common Agreement)	CMS Aligned Networks
Authority	ONC ( $\text{\$}\text{HHS}$ ) Office of the National Coordinator for Health Information Technology)	CMS (Centers for Medicare & Medicaid Services)
Primary Focus	Establishing a <b>universal, national floor</b> for data exchange (connecting the networks).	Driving <b>active, seamless, high-fidelity</b> data exchange for patients and providers (raising the bar).
Standard/Level	Establishes the <b>baseline</b> rules, policies, and technical specifications via the Common Agreement.	Sets a <b>higher bar</b> for performance, demanding deeper integration and active participation.
Technical Requirement	Uses existing standards (like C-CDA) and is evolving to adopt <b>FHIR</b> .	<b>Requires</b> immediate and comprehensive <b>FHIR R4 API implementation</b> for its core criteria.
Claims Data	Claims data is supported as an exchange purpose, but not a primary focus for the baseline.	Explicitly requires the inclusion of <b>claims data</b> in patient and provider access, with CMS Medicare data eventually queryable.

In short, **TEFCA** is the *federally mandated infrastructure* that provides the **minimum required governance and connectivity**, while the **CMS Aligned Networks** represent

a *voluntary, market-driven push* to leverage that infrastructure and achieve a **much higher, more patient-centric standard** of data exchange.

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