# COMMONWELL

## HEALTH ALLIANCE

# COMMONWELL INDIVIDUAL ACCESS SERVICES

Evaluating Patient Data
Accessibility in TEFCA™

www.commonwellalliance.org

# About Us

When health care leaders work together on a bold vision, amazing things get done. Since 2013, the CommonWell Health Alliance has been delivering real interoperability in health care.

As a Qualified Health Information Network® (QHIN®) and member-driven alliance, CommonWell is breaking down barriers to health data exchange. Contribute to the future of interoperability by joining our Trusted Exchange Framework and Common Agreement™ (TEFCA)™-ready platform.

## CommonWell Health Alliance

CommonWell Health Alliance is a nonprofit member-driven trade association and Qualified Health Information Network. The organization is dedicated to the secure and seamless flow of health information to improve patient care and the vision that all health data should be available to clinicians, care teams, and patients, on an industry-wide basis, regardless of where care occurs. CommonWell connects tens of thousands of organizations that support more than 261 million lives.

## b.well Connected Health

b.well Connected Health is solving healthcare's fragmentation problem. b.well's scalable, FHIR-based platform unifies all healthcare data, solutions, and services in one place — empowering healthcare organizations to offer their consumers personalized and relevant experiences. b.well enables the creation of longitudinal health records so healthcare consumers can receive proactive health insights, and conveniently shop and access care for themselves and their loved ones.

## An Introduction to this Case Study

As part of an ongoing commitment to enhancing patient access to health data across the industry, b.well, CommonWell, and ELLKAY, our technical service provider, have collaborated on a case study demonstrating how Individual Access Services (IAS) leveraging FHIR® in TEFCA can streamline patient access to their medical records. This initiative showcases the real-world potential of interoperability in increasing accessibility, reducing patient burden, and improving data retrieval efficiency.

# The Need for Patient Access to Data

Patients increasingly demand access to their medical records. According to a recent survey , 61% of respondents expressed a desire to access their records from providers' electronic health records (EHRs) via mobile apps or patient portals. The demand for specific data is even higher:

- 89% want access to laboratory test results.
- 88% seek their history of medical conditions and past diagnoses.
- 87% wish to retrieve treatment plans and radiology images.
- 87% want access to immunization records.

While existing 21st Century Cures Patient Access APIs provide EHR-specific solutions, IAS via FHIR under TEFCA offers a more scalable approach by enabling intelligent search functionality for locating clinical data. However, there are still some limitations that place a burden on patients to know where their records are stored and recall multiple portal login credentials, creating barriers to true interoperability.

# CommonWell's Patient Access Support

CommonWell has maintained a steadfast commitment to patient access since we first introduced the use case to our Alliance in 2016, continuously enhancing its specifications to prioritize privacy and security. In 2021, this commitment was further reinforced with the incorporation of Identity Assurance Level 2 (IAL2) requirements, setting a higher standard towards a more secure patient identity verification.

Over the years, CommonWell has consistently advocated for patient access, incorporating it into industry demonstrations at HIMSS and making it a key discussion point at the annual fall summit. The Patient Access use case enables Personal Health Records (PHRs) and Consumer Apps to become certified Service Adopters, allowing consumers to query the CommonWell network for their clinical data. When patients can access and manage their own health information, they become more engaged in their healthcare journey, which can help improve overall healthcare. The CommonWell Patient Access Use Case empowers consumers to retrieve and aggregate their clinical data within an application of their choice, provided they complete identity verification at IAL2 or higher to ensure security and compliance.

## IAS in TEFCA - Document Exchange

IAS is a required exchange purpose in TEFCA that ensures patients have the ability to retrieve their own health information across the Qualified Health Information Network (QHIN) ecosystem. Like CommonWell's Patient Access Use Case, IAS in TEFCA operates under strict identity proofing requirements, mandating an Identity Assurance Level 2 (IAL2) verification to confirm a patient's identity before granting access to their clinical data. This level of assurance aligns with CommonWell's existing approach to patient access, which helps ensure that only verified individuals can retrieve their records.

In TEFCA, IAS requests made via document exchange follow a query-based model, where an Individual Access Services Provider initiates a request to retrieve documents from participating organizations. Importantly, IAS is a required exchange purpose, meaning QHINs, Participants, and Subparticipants must respond to valid IAS queries. This requirement better ensures that patients can obtain their health records, regardless of where their care was provided, promoting transparency and empowering individuals to manage their own health more effectively.
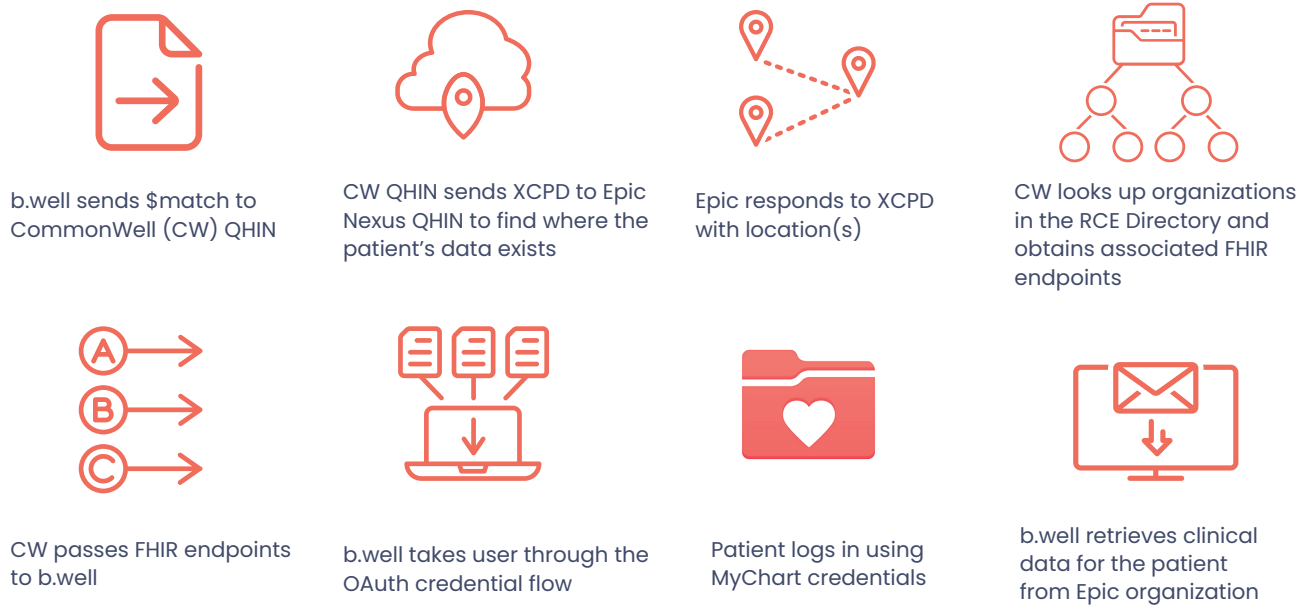
## IAS in TEFCA - FHIR Exchange

In addition to traditional document-based queries, IAS in TEFCA can also leverage FHIR-based exchange, providing a more modern and structured approach to data retrieval. Through FHIR APIs, patients can request and receive discrete data elements in real time, offering enhanced flexibility in what data elements they want to see compared to document-based exchange. IAS as an Exchange Purpose (XP) requires a response, meaning participants must respond to queries under this purpose as outlined in the XP's Standard Operating Procedures (SOP). However, FHIR as an exchange standard is optional. We hope to see a significant increase in this type of support throughout 2025 and encourage IAS via FHIR to be more robustly supported in TEFCA in 2026.

CommonWell's alignment with TEFCA's IAS standards will support patients using CommonWell-enabled applications to access their records through both document exchange and FHIR exchange. The requirement for IAL2 identity proofing remains consistent across both exchange methods, helps ensure that patient data is shared securely and only with verified individuals. As healthcare continues to move toward more API-driven interoperability, the integration of FHIR-based IAS will enhance the speed, usability, and comprehensiveness of patient access within the TEFCA framework.

# FHIR Demo Highlight

As part of ongoing efforts to enhance patient access, b.well, ELLKAY, and CommonWell tested and demonstrated the IAS workflow using FHIR that highlights data connectivity to Epic Nexus. This demonstration underscores an important step in unlocking the power of interoperability to grant patients' access to their own clinical data.

b.well sends $match to CommonWell (CW) QHIN

CW QHIN sends XCPD to Epic Nexus QHIN to find where the patient's data exists

Epic responds to XCPD with location(s)

CW looks up organizations in the RCE Directory and obtains associated FHIR endpoints

CW passes FHIR endpoints to b.well

b.well takes user through the OAuth credential flow

Patient logs in using MyChart credentials

b.well retrieves clinical data for the patient from Epic organization

## The Path Forward: Elevating the Standard

The current FHIR for IAS process should be viewed as a starting point, not the end goal. While FHIR offers a structured framework for health data exchange, inconsistencies in interoperability standards and implementation among QHINs could create disparities in access.

There are two key challenges when it comes to industry-wide patient access to their data:

1. Ensuring that the patient is who they say the are, and
2. Accurately matching patients across care settings

CommonWell helps solve both of these challenges for its Members and the industry. We require identity verification to IAL2 for patients accessing their data through an approved consumer application on the network. The CommonWell MPI uses deterministic matching with robust algorithms to increase accuracy when matching patients at scale. By implementing IAL2 identity verification and a strong matching algorithm, we believe that IAS will be easier for patients and eliminate the burden of remembering numerous portal credentials and past care locations.

## Creating a Unified Approach

To ensure equitable and consistent access, the healthcare industry must adopt a more unified approach by:

- Adopting and sharing the value of integrating with an identity verification vendor
- Share patient matching best practices with community trade partners
- Leveraging emerging standards like the HL7® Security for Scalable Registration, Authentication, and Authorization implementation guide to streamline access and eliminate manual effort
- Creating a trust-based collaborative network that ensures patients can retrieve their records regardless of which QHIN their provider uses
- Meeting patients where they are—whether they prefer accessing data through a patient portal, healthcare app, or third-party platform

## In Conclusion: Building Commitment & Trust

Achieving QHIN parity for patient access is not just about technology—it's about fostering trust, transparency, and engagement. A robust, unified standard ensures that no patient is at a disadvantage due to their provider's network affiliation. By strengthening IAS implementation with support from TEFCA, the industry can move toward truly seamless, scalable, and equitable health data exchange.

The future of interoperability depends on collaboration and commitment to putting patients first. By ensuring that every QHIN upholds the same high standards, we take a critical step toward delivering a unified, patient-centric experience that prioritizes accessibility, convenience, and better health outcomes.

# Get Involved

Join the movement to drive change. Whether you're a provider, developer, or policymaker, your engagement is critical to shaping the future of FHIR for IAS within TEFCA. Let's work together to remove barriers and create a more connected, accessible healthcare experience for all.

## Contact Us

membership@commonwellalliance.org
www.commonwellalliance.org