

# Cal HHS Data Exchange Framework Policy and Procedure

<b>Subject: Development of and Modifications to Policies and Procedures</b>	
<b>Status:</b>	<b>Policy:</b>
<b>Effective:</b>	<b>Version</b>

## **I. Purpose**

The Governance Entity has responsibility for developing, maintaining, repealing, amending and retaining Policies and Procedures (“Policies”) to implement the California Health and Human Services Data Exchange Framework (“Data Exchange Framework”). The purpose of this policy is to set forth the procedures by which the Governance Entity will fulfill these responsibilities.

## **II. Policy**

The Governance Entity shall follow the process set forth in this policy in order to develop, amend, repeal and/or replace Policies. An amendment to a Policy shall be effective only if implemented as provided in this Policy.

## **III. Procedures**

### **1. RETENTION, MAINTENANCE AND DISSEMINATION OF POLICIES AND PROCEDURES**

a. All Policies shall be maintained in an accessible electronic and printable format by the Governance Entity in a location that is accessible to the public. All current Policies as well as originals of all amended, repealed and replaced Policies shall be maintained for the duration of their usefulness as determined by the Governance Entity.

### **2. SUBMISSION OF PROPOSED NEW, AMENDED, REPEALED OR REPLACED POLICIES AND PROCEDURES**

a. Any Participant or other stakeholder the Governance Entity deems appropriate may submit in writing to the Governance Entity a request for the development of a new Policy, or a request for the amendment or repeal of an existing Policy. Any member of the Governance Entity may also bring forth any concern or question regarding the Policies. All such requests shall (i) identify the Policy that is the subject of the requested change (if any), (ii) identify the type of Policy sought (if it is a development request), (iii) provide a thorough description of why the request is necessary, and (iv) provide an analysis of the expected impact of adopting the new Policy or modifying/repealing an existing Policy.

### **3. SUBMISSION OF PROPOSED NEW, AMENDED, REPEALED OR REPLACED POLICIES AND PROCEDURES**

a. The Governance Entity will consider any requests that meet the submission criteria set forth above at its next regularly scheduled meeting following receipt of such request.

i. The Governance Entity will (a) prioritize requests; (b) consider the merits of the request, as well as the impact on Participants and individuals whose Health and

Social Services Information is transmitted through the Data Exchange Framework; and (c) communicate actions taken with the requestor.

ii. Prior to approving any new, amended, repealed or replaced Policy, the Governance Entity shall solicit and consider comments from the Participants on the new, amended, repealed or replaced Policy. To promote openness and transparency, the Governance Entity shall post proposed changes to the Policies to a publicly accessible location.

iii. Following the Governance Entity's approval of the new, amended, repealed or replaced Policy, the Participants shall be given at least forty-five (45) calendar days to review the approved Policy and provide written comments to the Governance Entity, except in the event that a shorter time period is necessary in order to comply with Applicable Law.

#### **4. IMPLEMENTATION OF CHANGES TO THE OPERATING POLICIES AND PROCEDURES**

a. If the Governance Entity receives no comments from Participants during the above-referenced comment period, the new, amended, repealed or replaced Policy shall go into effect as approved by the Governance Entity and on the date identified by the Governance Entity, unless the Governance Entity withdraws the new, amended, repealed or replaced Policy prior to such date.

b. If the Governance Entity receives comments from Participants during the above-referenced comment period, the Governance Entity shall review the new, amended, repealed or replaced Policy in light of the comments and make a determination as to how to modify the new, amended, repealed or replaced Policy, if at all.

c. Once the Governance Entity finalizes its determination, it shall provide at least one hundred and eighty (180) calendar days' notice of the effective date of the new, amended, repealed or replaced Policy, except in the event that a shorter time period is necessary in order to comply with Applicable Law. Notice of the new, amended, repealed or replaced Policy will include a summary of the comments received and the reasons the Governing Entity accepted, accepted in part, or rejected proposals made in the comments.

#### **IV. Definitions**

All capitalized terms not defined herein shall have the same meaning as set forth in the Data Sharing Agreement.

#### **V. References**

#### **VI. Related Policies and Procedures**

**VII. Version History**

	<b>Date</b>	<b>Author</b>	<b>Comment</b>
	April 21, 2022	CalHHS CDII	Draft for DxF Data Sharing Agreement Subcommittee review
	May 12, 2022	CalHHS CDII	Draft for DxF Stakeholder Advisory Group review and public comment

DRAFT