# VIA ELECTRONIC TRANSMISSION

John Ohanian

Chief Data Officer  
California Health and Human Services Agency  
Director  
Center for Data Insights and Innovation  
[John.Ohanian@chhs.ca.gov](mailto:John.Ohanian@chhs.ca.gov)

# CPCA Comments on the Draft Data Exchange Framework (DxF) June 1, 2022

Director Ohanian:

On behalf of California’s community health centers (CHCs) and the 7.2 million patients they serve, the California Primary Care Association (CPCA) appreciates the opportunity to comment on the draft Data Exchange Framework (DxF) Data Sharing Agreement (DSA) and its draft set of Policies and Procedures (P&Ps).

As a member of the CalHHS DxF Advisory Group, CPCA appreciates the time and effort that has gone into establishing the DxF per AB133 TBL, resulting in the  draft DSA and Policies and Procedures. CPCA supports the effort by CalHHS to improve population health outcomes through the facilitation of health information data sharing and exchange across California’s vast and complicated health care landscape. However, CPCA remains concerned about the rapid finalization of the DSA, so as to comply with a July 1, 2022 deadline as opposed to ensuring that the DSA and its Policies and Procedures will ensure that a Californian’s health and human services information will be available to the resident’s provider of care at the point of care.  We must ensure the safe exchange of health information and trust of Californians is not compromised, adhering to all federal and state data exchange rules and regulations.  The work done to date is impressive but there is more to do.   Comments attached in the CDII provided excel workbook, file name “California Primary Care Association\_McCallin\_June 1, 2022.xls”.

CPCArespectfully suggests a one-year delay to the timeline of the DxF and DSA to allow providers and other stakeholders additional time to work with the DSA Subcommittee and the DxF Stakeholder Advisory Group on clearer policies and procedures and operationalizing the implementation of the DxF.

DeeAnne McCallin

Director of Health Information Technology

California Primary Care Association