Good evening,

On behalf of California’s seven Planned Parenthood Affiliates, who collectively operate more than 100 health centers across the state and conduct more than 1.2 million annual patient visits, Planned Parenthood Affiliates of California (PPAC) respectfully submits the following comments regarding the draft Data Exchange Framework (DxF) Data Sharing Agreement (DSA) and its initial set of Policies and Procedures (P&Ps).

As a member of the CalHHS Data Sharing Subcommittee, PPAC appreciates the time and effort that has gone into drafting the DSA and initial Policies and Procedures. PPAC supports the broad endeavor by CalHHS to improve population health through the facilitation of health information across California’s vast and complicated health care landscape. However, as we have voiced throughout the stakeholder process, PPAC remains concerned about the rapid finalization of the DSA without first establishing clear policies and procedures to protect a patient’s right to control their sensitive and confidential health information.

PPAC respectfully requests a one year implementation delay to the timeline of the DxF and DSAto allow providers and other stakeholders additional time to work with the DSA Subcommittee and the DxF Stakeholder Advisory Group on clearer policies and procedures.

Thank you in advance for your consideration of our comments. Please feel free to contact us with any questions or concerns.

Sincerely,

Kelby Lind

**Kelby Lind, Policy Analyst**

Planned Parenthood Affiliates of California

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