

**From:** [Sara Flocks](#)  
**To:** [CHHS CDII](#)  
**Subject:** Data Exchange Framework Advisory Group #9 Public Comment  
**Date:** Thursday, June 23, 2022 12:03:59 PM

Hello,

I would like to submit the following comments to the Stakeholder Advisory Group per their meeting #9 on June 23<sup>rd</sup> on behalf of the California Pan Ethnic Health Network

CPEHN thanks CalHHS for the inclusive and transparent process to develop the data exchange framework. We believe that increased health information exchange holds tremendous potential to advance health equity. We appreciate the updates made to the data sharing agreement and related policies and procedures related to bidirectional consumer access, consumer education, and informed consent. These changes help to ensure that Californians are able to be active participants in their own health care and, ultimately, will improve health outcomes. We do continue to urge CalHHS to ensure that the data exchange framework uses the most current version of demographic data standards, including the anticipated USCDI V3. These data standards will enable providers to accurately understand the unique needs of their patients, and will allow the state to do more to advance equity goals.

Finally, we want to express our strong support of the proposed governance structure, including the proposed Data Exchange Board with clear authority and strong conflict of interest provisions. This Board is imperative to the success of the data exchange framework. Californians must be able to trust that the exchange of their personal health information is overseen by an independent authority that will engage in fair and transparent decision making. Finally, we believe that the Board and CalHHS must be granted sufficient enforcement authority to ensure that the data exchange framework is implemented with fidelity and in the best interest of consumers. Thank you again for the inclusion of consumer advocates in the process and we look forward to supporting implementation of the framework.

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