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Sent: Tuesday, February 14, 2023 1:47 PM
To: Ohanian, John@CDII <John.Ohanian@chhs.ca.gov>; CHHS CDII <CDII@chhs.ca.gov>
Cc: Matsubara, Lisa <Lisa.Matsubara@ppacca.org>; Pedroza, Sofia <Sofia.Pedroza@ppacca.org>
Subject: PPAC Comments on the DxF Draft Policies and Procedures

Good afternoon,

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 Data Exchange Framework (DxF) Draft Policies and Procedures for California Information Blocking Prohibitions (OPP-[X]) and Privacy Standards and Security Safeguards (OPP-6).

As a member of the California Health and Human Services (CalHHS) Data Sharing Subcommittee, PPAC appreciates the time and effort spent on drafting the Data Sharing Agreement (DSA) and the Policies and Procedures. PPAC continues to support the broad endeavor by CalHSS 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 and in our June 1, 2022 comment letter, PPAC remains concerned about Policies and Procedures that do not clearly and adequately protect patient data.

PPAC respectfully requests that CalHHS consider additional protections from the increasingly hostile legal landscape that providers and patients face, especially for sensitive services, when delineating the Policies and Procedures for the DxF pertaining to information blocking, privacy standards, and security safeguards.

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

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