

DRAFT – FOR DISCUSSION

**California Data Exchange Framework (DxF)
Qualified Health Information Organization (QHIO) Application 2023**

The first two sections of the QHIO 2023 Application were reviewed with the DxF Implementation Advisory Committee (IAC) on January 10, 2023. The remaining two sections are detailed below in preparation for the Committee’s discussions on February 2, 2023.

C. Functional Capabilities

QHIOs must be capable of executing the transaction patterns using the technical standards described in the DSA Policy and Procedures. Briefly describe the organization’s ability to meet these requirements:

1. Managing Identities. QHIOs must be capable of managing large databases of individual identities. These databases will hold several identifiers and attributes for each person. Please summarize the number of databases fitting this definition that the organization currently manages. Please indicate the size of each database as measured by the number of individual identities it holds.

QHIOs must establish and apply algorithms that attempt to match the individual’s attributes on an incoming query or record to a person in these databases. Please provide a brief description (not to exceed 500 words) of the organization’s person-matching algorithms. Please include in this description the processes the organization follows to test, validate and improve the person-matching algorithms.

2. Managing Participants. QHIOs must be capable of managing a directory of DxF participants, including descriptive information and endpoint identifiers for each participant. Each QHIO must be capable of exporting participant data from this directory in an easily consumable format (e.g., CSV) for import into a potential statewide participant repository. Each QHIO must also be capable of importing participant data received in .CSV format from a potential statewide registry into its local directory.

Please provide a brief description (not to exceed 500 words) of the organization’s current participant registries including the number of entries in each. Please include details on the organization’s ability to import and export data from these registries.

3. Nationwide Network or Framework. To facilitate data exchange, QHIOs must participate in one or more vendor-agnostic health information networks or health information exchange frameworks with nationwide scope. These may include one of the following: eHealthExchange, CommonWell Health Alliance, Carequality, DirectTrust or Trusted Exchange Framework. Please submit a list of national networks or exchanges in which the organization participates, including documentation of approval or acceptance into that network.

4. Request for Information. QHIOs must be capable of generating requests for information and responding to requests for information:

- a. Requests. QHIOs must be capable of constructing a query consistent with the DxF technical standards that contains the attributes associated with a person along with the endpoint(s) associated with query recipient(s) who will be expected to formulate a reply.

Please attest to the organization's ability to construct a transaction that contains person attributes with a request for health and social services information from a specified recipient(s). Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the Request for Information standards.

- b. Response. QHIOs must be capable of receiving a query sent in accordance with the DxF technical standards and attempting a match to a person in the QHIO's person database. If a unique match is found and the QHIO is authorized to send information, the QHIO must be able to craft a response consistent with DxF technical standards. If a match is not found or the QHIO is not authorized to respond, the QHIO must be capable of crafting a response indicating no information is available.

Please submit an attestation indicating the organization's ability to receive a request for information, match the request to a person in the database, and send an appropriate response in reply. Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the response standards.

5. Information Delivery. QHIOs must be capable of delivering health and social services information electronically to a participant. The QHIO must be able to construct transactions consistent with the DxF technical standards, including person attributes, the relevant health and social services information and the intended recipient(s) of the transaction.

Please attest to the organization's ability to construct and transmit information consistent with the DxF technical standards. Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the information delivery transaction standards.

6. Requested Notification. QHIOs must be capable of managing Admit, Discharge, Transfer (ADT) events from acute care facilities. These ADT event capabilities will be introduced over time. In order to achieve qualification in 2023, HIOs must describe their current capabilities and commit to a series of future developments:

- a. Receive. QHIOs must be capable of receiving acute care ADT events from California-based acute care facilities. Please submit an attestation that the organization is currently capable of receiving ADT events from acute care facilities. Also, please include a statement indicating that the organization is prepared to receive events on or before January 31, 2024 without assessing a fee to the sending facility.

- b. Manage Rosters. By April 30, 2024, QHIOs must be capable of receiving and maintaining rosters of persons from DxF participants who have an interest in monitoring for ADT events for these persons. Please describe the organization's current ability to receive and manage person

rosters. If this is not a current capability, please describe the organization's plans to manage rosters by April 30, 2024.

- c. Match. By July 31, 2024, QHIOs must be capable of matching incoming ADT events to a person found on one of its participant's rosters and deleting the transactions that do not match to an entry. Please describe the organization's current ability to match incoming ADT events to persons on a roster. If this is not a current capability, please describe the organization's plans to implement this matching capability by July 31, 2024. Please also attest to readiness to delete ADT events where there is no match or authorization to store the information.
- d. Notify. By July 31, 2024, QHIOs must be capable of notifying a participant when an event matches one of the persons listed on their roster. Please describe the organization's readiness to notify participants of the events associated with a person found on a roster.
- e. Share. By October 31, 2024, each QHIO must share the ADT events it receives with all other DxF QHIOs. Please describe the organization's readiness to securely share the ADT transactions it receives with all DxF QHIOs who will follow the Match and Notify processes described above.

In late 2024, CDII may conduct an audit of the Requested Notification transaction pattern to confirm that QHIOs are supporting these processes. If a QHIO is not able to manage these processes, the QHIO may be subject to loss of its Qualified status effective March 31, 2025. Signatories will be granted an additional ten months (i.e., until January 31, 2026) to transition to other QHIO services as necessary.

D. Operations

1. QHIOs must reliably communicate DxF news and information. Please submit a brief statement committing the organization to the following communication activities:
 - a. Follow CDII guidelines with respect to communicating QHIO status, role and responsibilities.
 - b. As directed by CDII, communicate DSA news and updates to its clients.
 - c. Notify CDII if the organization experiences a change in ownership or anticipates a delay in meeting program deadlines (e.g., phases of Event Notification, security certifications).
2. QHIOs must fully cooperate with CDII and other QHIOs in DxF operations. Cooperation may include engaging in complaint investigation, troubleshooting exchange errors, providing details related to data format and transformation issues, etc. Please submit an attestation indicating the organization's agreement to cooperate with CDII and other QHIOs to resolve operational issues.
3. QHIOs should not limit or restrict their services to signatories on the basis of organization size, type (e.g., plan, hospital, physician group, community health center), or geography. Please submit an attestation indicating the organization is open to serving all DSA signatories who are technically capable of receiving and paying for the organization's services.
4. QHIOs must be prepared to submit onboarding progress reports to CDII for signatories who have received a QHIO Onboarding Grant and manage the receipt of onboarding grant payments on behalf of signatories who choose the QHIO and receive grant funding. Please submit an attestation indicating the organization will submit progress reports and administer grant funds according to the terms of the grant and its agreement with the signatory.

5. QHIOs must proactively manage system performance and reliability. Please provide a brief statement (not to exceed 500 words) to describe how the organization schedules and communicates system maintenance. Please also include how the organization manages and communicates unscheduled downtimes. Please share a history of scheduled and unscheduled downtimes over the past 12 months, including dates, duration and root cause.
6. QHIOs must maintain an audit trail and/or log of DxF transactions and system activity. Please submit a brief statement (not to exceed 500 words) of the organization's approach to maintaining audit trails and logging transaction activity. Please include a description of audit log retention policies.
7. QHIOs must be prepared to support the growth of the DxF. Please share a current summary of the daily transactions by type of transaction type handled by the organization. Also, please submit a brief statement (not to exceed 500 words) to describe how the organization will adapt to growth in the number and type of transactions.
8. QHIOs may be required to submit monthly reports of activity to CDII. These reports are expected to include details on active, named participants, transaction volumes by type, and unscheduled downtimes. Please submit an attestation indicating that the organization is prepared to submit monthly reports of activity.
9. QHIOs must complete an annual attestation confirming that no significant changes in business or operations have occurred in the prior 12 months and the information on the initial application for qualification remains accurate. Please submit a statement confirming the organization's willingness to submit annual attestations.