

Cal HHS Data Exchange Framework QHIO 2023 Application Criteria

Part A: Organization

#	Question	Criteria
1	Organization information (e.g., name, URL)	Functioning and up-to-date website
2	Documentation of incorporation and status	U.S. corporation in good standing
3	Description of current operations and clients	Current California clients and operations
4	Representative and participatory governance	Documented participatory governance
5	Signed DSA; no conflicting client agreements	Signed DSA and attested to no conflicts
6	List of subcontractors; no conflicting agreements	Attested to no conflicts
7	Documents reflecting financial health	Six months cash or cash equivalents on hand
8	Attest to \$2M/incident and \$5M/year insurance	Attested to insurance levels

Part B: Privacy and Security

#	Question	Criteria
1	Summary of information security program	Summary submitted
2	Information security organization chart	CISO reports to CxO
3	Information security policies	Policies reviewed and updated in 2021 or 2022
4	Information security certifications	National certification received by 10/31/2024
5	Attest to all data managed in United States	Attests all data managed in United States
6	HIPAA-reportable breaches in last 3 years	Two or fewer breaches
7	Approach to security risk assessments	Annually; most recent in 2021/2022
8	Approach to penetration testing	Annually; most recent in 2021/2022
9	Privacy policy	Reviewed/updated in 2021/2022
10	Business continuity and disaster recovery plans	Reviewed/updated in 2021/2022

Part C: Functional Capabilities

#	Question	Criteria
1a	Managing identities	Manages 250,000+ identities
1b	Person matching	Clearly defined process to assess and improve patient matching logic
2	Managing participants	Manages participant registry with import/export capability
3	Nationwide network or framework	Participates in eHealthExchange, CareEquality or CommonWell Health Alliance
4a	Request for information: request	Two references confirm ability to construct a query consistent with DxF standards
4b	Request for information: response	Two references confirm ability to respond to a query consistent with DxF standards
5	Information delivery	Two references confirm ability to deliver information consistent with DxF standards

Part C: Functional Capabilities: Requested Notification*

#	Question	Criteria
6a	Receives ADT events	Attests to capability and ready to receive acute care events without fee by January 31, 2024
6b	Manage rosters of at-risk patients	Current capability or will achieve capability by April 30, 2024
6c	Match incoming ADT events to patients; delete events with no match	Current capability or will achieve capability by July 31, 2024
6d	Notify participants of events associated with at-risk patients	Committed to achieving by July 31, 2024
6e	Share incoming ADT events with other QHIOs	Committed to achieving by October 31, 2024.

**The milestone-based approach to Requested Notification capabilities will demand QHIOs notify CDII of interim progress as well as a CDII audit in Winter 2024-2025 to confirm milestones were met. Failure to meet milestones will lead to loss of Qualified status. (Please note the audit aligns with other milestones (e.g., HITRUST certification.)*

Part D: Operations

#	Question	Criteria
1	Communications	Agrees to all QHIO communication responsibilities
2	Cooperate with QHIO Program	Agrees to cooperate with CDII and other QHIOs
3	Non-discrimination	Agrees to offer services to every capable signatory
4	Onboarding grant progress reports and receipt of grant payments	Agrees to manage grant progress reports and payments
5	System performance and reliability	<ul style="list-style-type: none"> • Offers at least two weeks' notice of scheduled downtime and immediate notification of unscheduled downtime • Less than 10 hours of unscheduled downtime in past year

Part D: Operations

#	Question	Criteria
6	Audit trails and transaction logging	<ul style="list-style-type: none">• Maintains audit logs of individual transactions• Maintains 12 months of transaction activity
7	Growth plans	Submits statement of growth plans
8	Monthly reports of activity	Agrees to submit monthly activity reports
9	Annual attestation	Agrees to submit annual attestation