

CalHHS Data Exchange Framework Policy and Procedure

Subject: Early Exchange	
Status:	Policy: OPP-X
Publication Date:	Version: 1.0

Purpose

California Health and Safety Code section 130290 was enacted in 2021 and establishes the creation of the California Health and Human Services Data Exchange Framework (“Data Exchange Framework”), which requires certain data sharing among Participants. As set forth in the Requirement to Exchange Health and Social Services Information Policy and Procedure, Participants are required to start sharing Health and Social Services Information on January 31, 2024 or on January 31, 2026. Some Participants may choose to start sharing Health and Social Services Information using the Data Sharing Agreement (“DSA”) before January 31, 2024 (“early exchange”). This policy explains the steps Participants must take for early exchange.

I. Policy

Participants may choose to exchange Health and Social Services Information under the DSA before January 31, 2024. Participants engaging in early exchange of Health and Social Services Information using the DSA must comply with this policy. Early exchange is voluntary, and nothing in this policy requires Participants to share Health and Social Services Information prior to January 31, 2024.

This policy shall be effective immediately upon publication and shall automatically terminate at 11:59pm on January 30, 2024.

II. Procedures

Participants that choose to engage in early exchange using the DSA shall:

- (i) Execute the DSA; and
- (ii) Verify that the other Participant(s) has executed the DSA before providing access to or exchanging Health and Social Services Information with the other Participant(s).

Participants that choose to engage in early exchange using the DSA shall comply with all published Policies and Procedures and shall comply with new or updated Policies and Procedures within a reasonable time ~~ten (10) days~~ after the publication date, regardless of the effective date written in the Policy or Procedure.

Comment: Configuration updates may require up to 18 months when code changes are needed. Therefore, we believe that it would not be possible based on current industry standards to implement and comply with all new or updated Policies and Procedures within ten days during the early exchange period.

III. Definitions

All capitalized terms not defined in this policy shall have the same meaning listed in the DSA.

IV. References

Requirement to Exchange Health and Social Services Information Policy and Procedure

V. Version History

	Date	Author	Comment
	January 10, 2023	CalHHS CDII	Draft for public comment

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