

California Data Exchange Framework

Qualified Health Information Organization Application 2023

Draft for Public Comment

Introduction

The Qualified Health Information Organization (QHIO) Application 2023 will assist California’s Center for Data Insights and Innovation (CDII) in determining if an organization has the structure and capabilities to function as a QHIO in California’s Data Exchange Framework (DxF). QHIOs will be identified publicly for consideration by DxF participants who may seek assistance to meet their Data Sharing Agreement (DSA) obligations. Organizations interested in serving as QHIOs are required to complete this application for consideration.

General Instructions

QHIO applicants must respond to the questions in each of the following sections:

- A. Organization Information
- B. Privacy and Security
- C. Functional Capabilities
- D. Operations

Applicants should keep responses brief, following specific response format and word-limit instructions.

- If a question requests an attachment, submit the attachment as a PDF file unless otherwise specified. Label the attachment with the applicant’s name/nickname, the section and number of the question, and the submission date. For example, an attachment describing the corporate history of fictional applicant HealthyExchange might be labeled HealthyXChg A4 05.15.2023.
- Avoid lengthy attachments but, if a lengthy attachment is necessary, identify the section(s) or page number(s) of the attachment to be considered in addressing the question.
- If a question requires an attestation, refer to Appendix A. Appendix A will collect all attestations.
- For more information, refer to the *QHIO Application Guide 2023*.

Note:

- All information collected by CDII as part of the QHIO Application are public records subject to the California Public Records Act.
- Failure to respond to a question or misrepresenting the applicant’s capabilities may be cause for failure to receive (or subsequent removal of) qualified status.

Timeline

QHIO applications must be submitted via email to cdii@chhs.ca.gov on or before 5:00pm PST on [Month Day], 2023. The email Subject line should read “QHIO Application” followed by the name or nickname of the applicant. Applications received after this date and time will not be considered in this round of review. The next application cycle will be announced at a future date.

CDII will reach out to applicants as needed for questions and clarification. CDII expects to announce the first QHIOs in [Month] 2023, unless otherwise notified.

A. Organization Information

1. Complete the chart below with details regarding the applicant:

Question	Response
Organization name	
Alternative names/nicknames	
Address of principal place of business	
Primary telephone number	
Primary website URL	
State/jurisdiction where incorporated	
Date of incorporation/founding	

2. QHIOs must be registered corporations in United States and/or organizations operating under U.S. jurisdiction. Submit a brief letter, certificate, or other form of documentation from the state where the applicant is incorporated/located that reflects its current status (e.g., good standing). For example, applicants incorporated in California might submit a letter of good standing from the California Secretary of State.
3. Confirm the applicant has no history of defaulting on its obligations to the State of California and is eligible to conduct business with the State by reviewing and initialing attestation A3 in Appendix A.
4. QHIOs must have current business with health and/or social services organizations in California. Submit a brief description (not to exceed 500 words) of the applicant’s history, current products and services, clients, regions served, etc. Attach a list (or a reference to an online web resource) of current clients delivering health and/or social services in California.
5. QHIOs must demonstrate the organizational infrastructure to responsibly serve DxF participants, including multi-stakeholder, participatory governance that incorporates consumer perspectives. Submit relevant documentation and a description (not to exceed 1,000 words) of the applicant’s governance function including:
 - a. Corporate documentation that provides authority to the governing body
 - b. Details on eligibility to serve on the governing body and how representatives are selected
 - c. Details describing how often the governing body convenes
 - d. Description of the scope of decisions that the governing body is charged with
 - e. Details describing how the governing body’s actions are communicated

6. As DxF participants, QHIOs must sign the DSA. Review and initial attestation A6 in Appendix A. Note: applicants will not be qualified until the applicant signs the DSA.
7. QHIOs must confirm that agreements with current clients who are DSA signatories do not conflict with the terms of the DSA and its Policies and Procedures. Review and initial attestation A7 in Appendix A.
8. QHIOs who leverage the services of third parties to transmit and/or manage health and social services information must have agreements in place with these third parties that do not conflict with the DSA and its Policies and Procedures. Review and initial attestation A8 in Appendix A. Also, submit a list (not to exceed one page) of these third parties including their corporate name, location and the nature of the services they provide to the applicant.
9. QHIOs must be financially viable companies, capable of serving DSA signatories for several years. Provide documentation that reflects the financial health of the applicant. This may include one or more of the following documents:
 - a. Internal Revenue Service Form 990 for the most recent year
 - b. Audited financial statements for the most recent year
 - c. A financial auditor’s attestation indicating the applicant is financially stable with fiscal resources to support operating as a QHIO without financial strain and has available cash (or cash equivalents) equal to at least four months of operating expense.
10. QHIOs must be insured up to \$2M per incident and \$5M per annum to address general liability, errors and omissions, and cyber risks. Review and initial attestation A10 in Appendix A.
11. Complete the chart below with the name, title, phone, and email of the applicant’s contacts. In the first column, place an asterisk (*) to indicate the primary contact for communication regarding this application. The primary contact will be included on all correspondence with the applicant.

*	Contact	Response
	Executive <i>(name, title, phone, email)</i>	
	Technical <i>(name, title, phone, email)</i>	
	Operations <i>(name, title, phone, email)</i>	
	Financial <i>(name, title, phone, email)</i>	

B. Privacy and Security

1. Security Certification. QHIOs will play an important role in establishing and maintaining trust in the DxF. Each QHIO must achieve and maintain HITRUST r2 certification which reflects robust structures and processes are in place to protect the privacy and security of health and social services information.

Submit documentation of the applicant's HITRUST r2 certification. If the applicant has not achieved HITRUST r2 certification, submit a statement indicating the date by which HITRUST r2 certification is expected. Note: Applicants will not be qualified until HITRUST r2 certification is achieved.

2. Data Management. Protected Health Information (PHI) and Personally Identifiable Information (PII) associated with the DxF and managed by the applicant (or its subcontractors) cannot be transmitted or stored outside of the United States. This is inclusive of data archives and backups. Review and initial attestation B2 in Appendix A.
3. Data Breaches. Submit a summary (not to exceed 500 words) of the applicant's reportable breaches involving 500 or more individuals' data from 2020 through 2022 including the nature of the breach, the number of individuals affected by the breach, and the amount of any fines or penalties. Avoid sharing any details that might jeopardize the applicant's current information security posture.
4. Privacy Policy. Submit the organization's current privacy policy including the most recent date it was reviewed and updated.

C. Functional Capabilities

QHIOs must comply with all DSA Policies and Procedures, including the technical standards found in the DSA's Technical Requirements for Exchange Policy and Procedure. Briefly describe the applicant's ability to meet these technical requirements:

1. Managing Identities. QHIOs must demonstrate the ability to manage databases of individual identities. These databases will hold several identifiers and attributes for each person. Submit a brief description (not to exceed 500 words) of the applicant's experience managing such databases. Please include the size of these databases (i.e., the number of individual identities they hold).

QHIOs must also establish algorithms to match the attributes on an incoming query or record to a person in these databases. Include in the above description the processes the organization follows to test, validate, and improve person-matching algorithms.

2. Managing DxF Participant Data. QHIOs must be capable of collecting and storing DxF participant information including endpoint identifiers. QHIOs must be capable of exporting this participant data in an easily consumable format (e.g., .CSV) for secure transfer and import into a statewide participant registry. QHIOs must also be capable of securely receiving and importing DxF participant data (in .CSV format) from a statewide registry.

Provide a brief description (not to exceed 500 words) of the applicant's current DxF participant data capabilities, including details on the applicant's ability to import and export DxF participant data.

3. Nationwide Network or Framework. To facilitate data exchange, QHIOs must participate in one or more vendor-agnostic health information networks or frameworks with nationwide scope. These may include one of the following: eHealthExchange, CommonWell Health Alliance, or Carequality. Submit a list of national networks or frameworks in which the applicant participates either directly or via an intermediary, including any documentation of approval or acceptance into that network or framework the applicant received.

If the applicant has not been accepted into one of these networks or frameworks, submit a statement indicating the date acceptance is anticipated. Note: applicants will not be qualified until a connection to one of the national networks or frameworks is established.

4. Requests for Information and Response to Requests. QHIOs must demonstrate the ability to generate requests for information and respond to requests for information:
 - a. Requests. QHIOs must construct query transactions that comply with DSA Policies and Procedures, including the Technical Requirements for Exchange. Review and initial attestation C4a in Appendix A. In addition, submit either the applicant's acceptance into eHealth Exchange or the names of at least three organizations (including contact information) that can confirm the applicant's ability to meet the request standards.
 - b. Responses. QHIOs must receive requests for information and attempt to match the request to a person in the QHIO's person database. If a unique match is found and the QHIO has the authority to send information, the QHIO must be able to craft a response consistent with the Technical Requirements for Exchange Policy and Procedure. 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. Review and initial attestation C4b in Appendix A. In addition, submit the names of at least three organizations (including contact information) that can confirm the applicant's ability to meet the response standards.
5. Information Delivery. QHIOs must deliver health and social services information electronically to a DxF participant. The QHIO must construct transactions that comply with the Technical Requirements for Exchange Policy and Procedure, including person attributes, the relevant health and social services information and the intended recipient(s) of the transaction. Review and initial attestation C5 in Appendix A. In addition, submit the names of at least three organizations (including contact information) that can confirm the applicant's ability to meet the information delivery transaction standards.
6. ADT Notifications. QHIOs must receive, process, and forward Admit, Discharge, Transfer (ADT) event notifications from acute care facilities and emergency departments. These ADT capabilities will be introduced over time. In order to achieve qualification in 2023, an applicant must commit to a series of future developments. Submit a statement (not to exceed 2,000 words) regarding the following capabilities, and review and initial attestations C6a through C6e in Appendix A:
 - a. Receive Notifications. QHIOs must receive HL7 Version 2.5 ADT messages (or a later, compatible version) from California-based acute care facilities and emergency departments without assessing a fee to the sending organization. Describe the applicant's current ability to receive ADT messages. If this is not a current capability, include in the statement the applicant's plan to receive ADT messages by January 31, 2024.

- b. Manage Rosters. By April 30, 2024, QHIOs must receive and maintain rosters of persons from DxF participants who seek to monitor for ADT events for these persons. Describe the applicant's current ability to receive and manage person rosters. If this is not a current capability, include in the statement the applicant's plan to manage rosters by April 30, 2024.
- c. Match. By July 31, 2024, QHIOs must determine whether an incoming ADT message is associated with a person found on a participant roster. Include in the statement the applicant's current ability to match incoming ADT events to persons on a roster. If this is not a current capability, describe the applicant's plan to implement this matching capability by July 31, 2024.
- d. Notify. By July 31, 2024, QHIOs must notify participants when an event matches a person listed on the participant's roster and is an event of interest to the participant. Participants may seek events filtered by facility type, event type, event reason, etc. Describe the applicant's current ability to notify participants of select events associated with a person found on a participant's roster. If this is not a current capability, include in the statement the applicant's plan to implement this notification capability by July 31, 2024.
- e. Share Rosters. By July 31, 2024, QHIOs must securely share the identities of the individuals on their rosters with other QHIOs so that these other QHIOs can also monitor for events on these individuals. If an event is found for an individual on a shared roster, the QHIO receiving the event will securely forward the event to the QHIO holding the original roster to enable delivery of the event to the DxF participant. Include in the statement the applicant's readiness to share rosters with other QHIOs, match incoming events to the individuals on all rosters, and notify the originating QHIO of matched events.

As soon as August 2024, CDII will confirm QHIOs are supporting these ADT processes. If a QHIO is not able to manage these processes by the dates specified, the QHIO may be subject to loss of its qualified status. Should a QHIO lose its qualified status, DxF participants that are participants of that QHIO will be granted an additional nine months to transition to other QHIO services if necessary.

D. Operations

1. QHIOs must fully cooperate with CDII and all other DxF participants (including other QHIOs) to support DxF operations. Cooperation may include, but is not limited to, engaging in complaint investigation, troubleshooting exchange errors, forwarding DxF communications, providing details regarding data formats and transformations, and participating in other activities requested by CDII. Review and initial attestation D1 in Appendix A.
2. QHIOs must be transparent with respect to any limitations or restrictions that limit the DxF participants who are eligible to contract for the QHIO's services. Submit a brief description (not to exceed 500 words) to describe any limits or restrictions the applicant will apply to its clients. These may include restrictions based on organization type, available technologies, location, etc. Review and initial attestation D2 in Appendix A.
3. QHIOs must submit onboarding progress reports to CDII for DxF participants who have received a QHIO Onboarding Grant in a time and manner specified by CDII. The QHIO must also work with CDII and its third-party grants administrator to receive and manage QHIO Onboarding Grant payments

on behalf of DxF participants who choose the QHIO and are awarded a QHIO Onboarding Grant. Review and initial attestation D3 in Appendix A.

4. QHIOs must proactively manage system performance and reliability. Submit a statement (not to exceed 500 words) to describe how the applicant communicates system maintenance events to its clients, including how unscheduled downtimes that result in a loss of or delay in service are communicated. Include in this statement, the applicant's 2022 service availability as a percentage of total service hours (e.g., 99.9%).
5. QHIOs must maintain an audit trail and/or log of DxF transactions. Submit a brief statement (not to exceed 500 words) of the applicant's approach to maintaining audit trails and logging transaction activity. Include a description of audit log retention policies.
6. QHIOs must be prepared to support the growth of the DxF. Share a current summary of the daily transactions (by type of transaction) handled by the applicant. Also, submit a brief statement (not to exceed 500 words) to describe how the applicant will monitor volumes and scale services to address growth.
7. QHIOs may be required to submit reports of activity to CDII in a time and manner specified by CDII. Reports may request details on active, named participants, transaction volumes by type, average response times by participant, unscheduled downtimes, and other metrics of exchange utilization and efficacy. Review and initial attestation D7 in Appendix A.
8. QHIOs must complete an annual report identifying any significant changes in business and/or services that occurred in the prior 12 months (or are expected in the next 12 months) that would bring the QHIO out of compliance with their attestations or invalidate the information collected on this application for qualification. Review and initial attestation D8 in Appendix A.

Appendix A – Attestations

Review each of the following statements. Initial each statement to indicate the applicant’s acknowledgement and agreement with the statement. Sign and date the form before submitting.

- 1. The signatory listed below is authorized to respond to these attestations and make commitments on the applicant’s behalf. _____
- A3. The applicant has no history of defaulting on its obligations to the State of California and is eligible to conduct business with the State. _____
- A6. The applicant has or will sign the DSA and understands that being a DSA signatory is a requirement for qualification. _____
- A7. The applicant and has no agreements in place with DxF participants that conflict with the terms of the DSA or its Policies and Procedures. _____
- A8. The applicant has a valid and enforceable written agreement with each third-party that transmits and/or manages data for the applicant, and such agreement is consistent with the DSA and its Policies and Procedures. _____
- A10. The applicant is insured up to \$2M per incident and \$5M per annum to address general liability, errors and omissions, and cyber risks. _____
- B2. The applicant (and its subcontractors) do not transmit or store Protected Health Information (PHI) or Personally Identifiable Information (PII) (inclusive of archives and backups) outside of the United States. _____
- C4a. The applicant has the technology in place to construct a request for health and social services information consistent with the Technical Requirements for Exchange Policy and Procedure. _____
- C4b. The applicant has the technology in place to respond to a request for health and social services information in a manner consistent with the Technical Requirements for Exchange Policy and Procedure. _____
- C5. The applicant has the technology in place to deliver health and social services information consistent with the Technical Requirements for Exchange Policy and Procedure _____
- C6a. On or before January 31, 2024, the applicant will receive ADT event notifications from California-based acute care facilities and emergency departments without assessing a fee to the sending facility. _____
- C6b. On or before April 30, 2024, the applicant will establish the technology to accept and manage rosters of individuals sent by DxF participants. _____
- C6c/d. On or before July 31, 2024, the applicant will establish the technology to match incoming ADT events to persons on the rosters it manages and notify the appropriate participant of the event. _____

- C6e. On or before July 31, 2024, the applicant will establish the technology to securely share the rosters it manages with other QHIOs. The applicant will also establish the technology to notify another QHIO of an event that matches an individual on a roster shared by that QHIO. _____
- D1. The applicant will cooperate with CDII and other DxF participants (including other QHIOs) to support DxF operations. _____
- D2. The applicant will be fully transparent with respect to any limits or restrictions that prevent some DxF participants from contracting for the applicant's services. _____
- D3. The applicant will submit progress reports and administer grant funds awarded to DxF participants in accordance with the terms of the grant and its agreement with the DxF participant. _____
- D7. The applicant is prepared to submit reports of DxF activity as soon as March 31, 2024. _____
- D8. The applicant will complete an annual report identifying any significant changes in business or services, and indicating whether the information found on applicant's initial application for qualification remains accurate. _____

Applicant: _____

Authorized Representative: _____

Title of Authorized Representative: _____

Email Address of Authorized Representative: _____

Signature: _____ Date: _____