



**California Health & Human Services Agency
Center for Data Insights and Innovation
Data Exchange Framework Implementation Advisory Committee and Data Sharing
Agreement Policies & Procedures Subcommittee
Meeting #7 Transcript (10:30AM – 1:00PM PT, June 5, 2023)**

The following text is a transcript of the June 5 meeting of the California Health and Human Services Agency and Center for Data Insights and Innovation Data Exchange Framework Implementation Advisory Committee (IAC) and Data Sharing Agreement (DSA) and Policies and Procedures (P&P) Subcommittee. The transcript was produced using Zoom's transcription feature. It should be reviewed concurrently with the recording – which may be found on the [CalHHS Data Exchange Framework website](#) to ensure accuracy.

The following meeting was conducted in a “hybrid” format, where presenters, IAC members, DSA P&P Subcommittee members, and members of the public were both present in-person at the Clifford L. Allenby Building, 1215 O Street, Sacramento, CA 95814 and able to join virtually via Zoom. The meeting transcript notes all comments delivered in-person and recorded via the in-room microphone as “CalHHS CDII” not differentiating between meeting attendees. CDII recommends reviewers seeking to know the exact speakers, review the full video recording of the meeting, also available on our website.

[Emma P - Events] 13:30:42

Hello and welcome. My name is Emma, and I'll be in the background to support with Zoom, if you experience technical difficulties, please type your question into the live, closed captioning will be available.

[Emma P - Events] 13:30:52

Please click on CC. To enable or disable.

[Emma P - Events] 13:30:57

There are a few ways that participants may join us today.

[Emma P - Events] 13:31:01

Members who are on site are encouraged to log in through their panelists, link on zoom.

[Emma P - Events] 13:31:06

Please. Keep video laptop video, microphone and audio off for the direct of the meeting.

[CalHHS CDII] 13:31:09

No!

[Emma P - Events] 13:31:11

The rooms, cameras, and microphones will broadcast video and audio for the meeting instructions for connecting to the conference rooms.

[Emma P - Events] 13:31:17

Wi-fi are posted in the room. And please, email qua with any questions or technical issues for onsite meeting.

[Emma P - Events] 13:31:24

Her email is Kh o u a dot vang v a n g@ch.ca.gov.

[Emma P - Events] 13:31:51

Participants may submit comments and questions through the zoom box all comments will be recorded and reviewed by Cdi staff participants may also submit comments and questions as well as request to receive data, exchange framework updates to cdi@chs.ca questions that

[Emma P - Events] 13:31:51

require followup should be sent to the same email. Address.

[Emma P - Events] 13:31:56

Members of the public, and lac subcommittee members must raise their hand for zoom facilitators unmute to share comments.

[Emma P - Events] 13:32:02

The chair will notify participants or members of the appropriate time to volunteer feedback.

[Emma P - Events] 13:32:07

If onsite and logged into zoom, press, raise hand in the reactions area, or physically raise your hand, and if selected to share your comment, please begin speaking and do not unmute your laptop the rooms microphones will broadcast audio.

[Emma P - Events] 13:32:20

If you are on site and not logged into zoom.

[Emma P - Events] 13:32:23

Physically raise your hand in the chair, will recognize you if you're off site and logged into zoom, press, raise hand in the reactions area and if selected to share your comment, you'll receive a request to unmute, and if you're logged on by a phone only press star

[Emma P - Events] 13:32:36

9 to raise your hand. Listen for your phone number to be called, and if selected to share your comment, please ensure you are unmuted by pressing Star 6.

[Emma P - Events] 13:32:45

Public comment will be taken during the meeting at designated times.

[Emma P - Events] 13:32:50

It will be limited to the total amount of time allocated for public comment on particular issues.

[Emma P - Events] 13:32:53

The chair will call on individuals in the order in which hands were raised, beginning with those in the room, and followed by those dialed in or connected remotely, individuals will be recognized for up to 2 min, and are asked to state their name and organizational affiliation at the top of their statements

[Emma P - Events] 13:33:09

participants are encouraged to use the comment box to ensure all feedback is captured or email comments to cdi@chs.ca, and now I will hand it over to John and Dean.

[Emma P - Events] 13:33:30

And the room is muted.

[CalHHS CDII] 13:33:45

Just stay there okay, let's try that again. Thank you all.

[CalHHS CDII] 13:33:49

Thank you for joining us and welcome to our combined meeting of the Calhs Data Exchange framework implementation Advisory Committee and data sharing agreement and policies of procedures.

[CalHHS CDII] 13:33:58

Subcommittee today. During our time together, we're going to discuss the vision for data exchange in California meeting objectives.

[CalHHS CDII] 13:34:06

We're gonna have updates on the Qvio application process updates on our grant program implementation.

[CalHHS CDII] 13:34:14

We're gonna discuss policies and procedures that are currently under development updates on our digital identities as well as updates on the participant register.

[CalHHS CDII] 13:34:23

We will then have it will definitely have time at the end to take public comments and share some of those remarks, and next steps.

[CalHHS CDII] 13:34:30

So with that, I'd like to start with a roll call of our lac members.

[CalHHS CDII] 13:34:35

Starting with Andrew Byman.

[Andrew Bindman] 13:34:36

I'm here nice to see you.

[CalHHS CDII] 13:34:39

Nice to see you. Good morning, Joe. Diaz.

[CalHHS CDII] 13:34:46

Hey? David Ford, yeah.

[Joe Diaz] 13:34:46

Present, Present.

[CalHHS CDII] 13:34:50

Okay, and we have Joe as well. Great morning. Joe Michelle Gibbons.

[Joe Diaz] 13:34:53

Thank you.

[CalHHS CDII] 13:35:00

Okay. Gary, stammering. Pizzer.

[Cameron Kaiser] 13:35:11

Good morning!

[CalHHS CDII] 13:35:13

Semi counter.

[Troy Kaji] 13:35:16

Good morning!

[] 13:35:21

Here. Nice to see you.

[CalHHS CDII] 13:35:24

Paul Kimsey.

[] 13:35:27

Good morning!

[CalHHS CDII] 13:35:35

William

[Linnea Koopmans] 13:35:38

Good morning. I'm here.

[CalHHS CDII] 13:35:41

We have Matthew.

[CalHHS CDII] 13:35:47

Hey, Amy Miller?

[CalHHS CDII] 13:35:53

How about Poly Matursei?

[Ali Modaressi] 13:35:56

Good morning!

[CalHHS CDII] 13:35:58

Jonathan Russell.

[Jonathan Russell] 13:36:02

Good morning, everyone.

[CalHHS CDII] 13:36:06

Karen, savage, sanguine.

[Kiran Savage-Sangwan] 13:36:08

Yep, I'm here. Hi, John!

[CalHHS CDII] 13:36:10

Good morning. We next have Cathy Centralling Mcdonald's.

[Cathy Senderling-McDonald] 13:36:15

Good morning. Nice to see everyone.

[CalHHS CDII] 13:36:18

Alright we have! Hey, John! Hey!

[Jim Willis] 13:36:23

Good morning!

[CalHHS CDII] 13:36:25

Excellent! Hey, everyone! And now I'll be doing the roll call for the Dsa.

[CalHHS CDII] 13:36:35

Policy and Procedure Subcommittee Members.

[CalHHS CDII] 13:36:44

Bill, Burlona.

[William (Bill) Barcellona] 13:36:46

Good morning!

[CalHHS CDII] 13:36:48

Hi Shelley Brown.

[Michelle Brown] 13:36:54

Good morning!

[CalHHS CDII] 13:36:55

Hello, Jason Buckner!

[Jason Buckner] 13:36:59

Morning.

[CalHHS CDII] 13:37:00

Hello!

[Jason Buckner] 13:37:01

Bye!

[] 13:37:05

Good morning!

[CalHHS CDII] 13:37:07

Hello, Matthew Eisenberg.

[CalHHS CDII] 13:37:17

John Hebby, John, please help. Yeah. Sanjay Jane.

[Sanjay Jain] 13:37:25

Good morning!

[CalHHS CDII] 13:37:29

Brian Johnson.

[CalHHS CDII] 13:37:36

Diane account for Tom?

[Diana Kaempfer-Tong] 13:37:39

Good morning!

[CalHHS CDII] 13:37:41

Hello, Justin Talibak.

[CalHHS CDII] 13:37:51

Telling, Kim.

[CalHHS CDII] 13:37:59

Stephen Lane.

[Steven Lane] 13:38:01

Good morning!

[CalHHS CDII] 13:38:03

Hi! Oh, you've been able to answer in transit.

[CalHHS CDII] 13:38:07

Thanks. Lisa Matzburg.

[Helen Kim] 13:38:09

Hi, I did not. I? Sorry it might have been my body, but I answered, okay.

[CalHHS CDII] 13:38:14

Hi! Helen!

[CalHHS CDII] 13:38:19

Okay, we we can hear you now. Thanks, Lisa.

[CalHHS CDII] 13:38:28

And her debin, Mcgraw or not available conflicting meeting.

[CalHHS CDII] 13:38:36

Jackie, Norda!

[Jackie Nordhoff] 13:38:37

Good morning!

[CalHHS CDII] 13:38:39

Hi Eric Ruffin.

[Eric Raffin (he/him)] 13:38:42

Good morning!

[CalHHS CDII] 13:38:44

Good morning, introducing Paula Reece with a California Department of State Hospitals.

[CalHHS CDII] 13:38:55

I believe here in replacing alien eco or invited Mark Savage.



[CalHHS CDII] 13:39:03

Hi! Tom Schrodinger!

[Tom Schwaninger, L.A. Care Health Plan] 13:39:07

Good morning, everyone.

[CalHHS CDII] 13:39:09

Hello Morgan Stains.

[Morgan Staines, DHCS (he)] 13:39:12

I'm here. Good morning, everybody. Good to see you all again.

[CalHHS CDII] 13:39:16

Hello, Elizabeth Stephens!

[Elizabeth Steffen] 13:39:19

Good morning!

[CalHHS CDII] 13:39:20

Hi! Wait! 10!

[Lee Tien] 13:39:23

Here!

[CalHHS CDII] 13:39:25

Hi! Belinda!

[CalHHS CDII] 13:39:29

And Terry Wilcox.

[Terry Wilcox] 13:39:31

Good morning. I'm here.

[CalHHS CDII] 13:39:33

Hi! Thanks everyone alrighty. So today's lineup of speakers we're trying to help clarify as we pass the ball.

[CalHHS CDII] 13:39:44

Old school. What's that gotomeeting or something? Citrix?

[CalHHS CDII] 13:39:47

But as we're talking today and presenting different sections of the slides, are myself.

[CalHHS CDII] 13:39:53

DM. Mcallen, John O'connion, my and my colleagues within Cdi.

[CalHHS CDII] 13:39:58

And Courtney, Hanson and Rim, Katherine he doesn't really look like that, but he's in the room, and next slide, please, and then also our colleagues in the advisors from in that help Helen Fister Jonah Frolic who is in the room.

[CalHHS CDII] 13:40:14

With us Cindy Barrow and Juliet Molen.

[CalHHS CDII] 13:40:16

So thanks for everyone who will be presenting today. And as we switch sections and move to the next slide, content and area, we'll try to do a better job letting you know who the next speaker is.

[CalHHS CDII] 13:40:29

But it should be any one of those 8 people. Alrighty!

[CalHHS CDII] 13:40:33

Next slide covering the vision and meeting objectives. The vision for the data exchange framework in California.

[CalHHS CDII] 13:40:40

Once implemented across California, the dxap will create new connections and efficiencies between health and social services.

[CalHHS CDII] 13:40:48

Services, providers, improving whole person, care the Dx.

[CalHHS CDII] 13:40:53

Is California's first, ever statewide data sharing agreement.

[CalHHS CDII] 13:40:56

That requires the secure and appropriate exchange of health and human services.

[CalHHS CDII] 13:41:01

Information to enable providers to work together and improve in individual's health and well-being.

[CalHHS CDII] 13:41:09

That is our vision. Next slide, what we're looking to achieve today is to provide an update on the Qaio qualified health information organization provide an update on the grant program for the both education grantees.

[CalHHS CDII] 13:41:28

But more, a lot of focus on the data sharing agreements, signatory grant that launched a couple of weeks ago in the implementation of that program discuss policies and unprecuredes that are under development provide an update on digital identities and provide an update on the purchase PIN directory so

[CalHHS CDII] 13:41:45

we it probably will be fairly heavy on P. And P. And remembering that it's a combined meeting here where we have the policy and procedure subcommittee joining me aac a review of the timeline both past an upcoming milestone so we've crossed through january

[CalHHS CDII] 13:42:05

30, first, 2023, the date for the execution of the data, sharing agreements, and we are now in the spring, working on the Qhio application process.

[CalHHS CDII] 13:42:18

We're responding to working on public comments that were submitted.

[CalHHS CDII] 13:42:23

There were a lot so much appreciated there. The Q.

[CalHHS CDII] 13:42:27

Hio onboarding and technical assistance grants launched in May and the round one is open through June sixteenth, then we'll be announcing working on announcing the Qhios this summer, and all of this is leading towards about 7 months.

[CalHHS CDII] 13:42:44

From now the where many entities must start implementing exchange under the data exchange framework.

[CalHHS CDII] 13:42:50

January 30, first, 2024, with a number of remaining entities, have a 2 years beyond that date.

[CalHHS CDII] 13:43:00

So all of these dates and timelines, of course, are subject to change, except for the ones that are actually in regulation, we can't move those.

[CalHHS CDII] 13:43:08

But the things that the programs that support the the regulation is where we can move them a little bit, that we try not to next slide.

[CalHHS CDII] 13:43:18

Please.

[CalHHS CDII] 13:43:22

So reminder that mandatory see signatory should sign the Dsa. Immediately.

[CalHHS CDII] 13:43:28

The date was the due date to sign was January 30.

[CalHHS CDII] 13:43:32

First the signing portal is still open. You can go to the signing portal to Login and sign.

[CalHHS CDII] 13:43:38

It's an electronic signigning. There's some entities that we've found have thought that they signed, but they weren't finding their name on the list that we are publishing on our website.

[CalHHS CDII] 13:43:47

Their entity name, and maybe they didn't do a finals return back of the I think it's adobe sign.

[CalHHS CDII] 13:43:55

It could be acrobat something, but make sure if you don't see your name on the list, and you think you signed you can reach out to us, and we'll help connect you.

[CalHHS CDII] 13:44:02

You can pull down a copy of the Dsa. From our website.

[CalHHS CDII] 13:44:06

There are the policies and procedures that support the Dsa.

[CalHHS CDII] 13:44:12

Faqs, lots of meetings and things that you can go back to and listen to and look at the slide decks as well, and the list of our signatories that now show a Zip code if you're looking for folks in your medical neighborhood that have signed and the type of entities

[CalHHS CDII] 13:44:31

that have signed as well. So that's all available on our website.

[CalHHS CDII] 13:44:35

Please do not hesitate to reach out to us.

[CalHHS CDII] 13:44:38

If you have any questions about signing the Dsa.

[CalHHS CDII] 13:44:40

If you have not, and we encourage everybody to sign as soon as possible.

[CalHHS CDII] 13:44:45

Next slide, please.

[CalHHS CDII] 13:44:50

So more than 400 organizations have signed the list that's on our website will be in an even slightly higher number, because there's parent organizations.

[CalHHS CDII] 13:45:00

And then their sub entities, some just signed as a parent, with no sub entity, so that we're not spending our time like tying this number out precisely so, but it's really pretty close numbers where we're showing more than 900 of different type of ambulatory care and hospitals have

[CalHHS CDII] 13:45:20

signed 900 of a lot of the clinical organizations have signed more than a hundred 40 hospitals, 80 plus long-term care facilities, more than 50 health plans and insurers, some clinical labs we have voluntary organizations such as community based

[CalHHS CDII] 13:45:44

organizations, health information, organizations, social services, and at least 50 that have signed as indicating a county or a county affiliation that have signed so, thanks to everybody who has signed to date and continue signing along as we go and hopefully we'll start seeing these numbers go up through

[CalHHS CDII] 13:46:03

the rest of this year. Here is a roadmap to what we're looking ahead.

[CalHHS CDII] 13:46:10

We will, though this is Slide says we will soon confirm whether the June twenty-seventh that should be on the subcommittee meetings.

[CalHHS CDII] 13:46:18

Calendars will be holding a joint session or not.

[CalHHS CDII] 13:46:21

I am pretty sure, like ninety percent, plus that it will be a subcommittee meeting.

[CalHHS CDII] 13:46:26

This is about our third joint meeting together, and it's time to like dive back into some weeds with the subcommittee, and that's only about 3 weeks from now.

[CalHHS CDII] 13:46:35

So plan. On June twenty-seventh, hopefully, Subcommittee members will be available for a virtual meeting that day to join and cover what we're presenting a lot of today and taking it all to the next step.

[CalHHS CDII] 13:46:47

So, and then, right after that tentative is August seventeenth for the subcommittee meeting, and then lac. Meetings are lined up for July twentieth and August 3.

[CalHHS CDII] 13:47:04

Alrighty! So at this point in time the Qhio application updates can't quite see my slide number.

[CalHHS CDII] 13:47:12

But I think my presenter next to cover this slide is, or this content area is Cindy Barrow.

[CalHHS CDII] 13:47:20

With Manette. Help and call me on that. If I'm wrong.

[Cindy Bero] 13:47:22

You are correct, Deanne. Thank you very much.

[Cindy Bero] 13:47:27

So over the last several meetings we've talked about the Qhio process.

[Cindy Bero] 13:47:34

What a qhio is, and and how we hope to identify these organizations that have demonstrated.

[Cindy Bero] 13:47:40

They have the capability to support the data exchange framework and helps signatories meet their obligations.

[Cindy Bero] 13:47:48

We recently published a draft application and made it available for public comments.

[Cindy Bero] 13:47:56

And what we are hoping to do today is to review with you some of the comments we received, and get your your thoughts.

[Cindy Bero] 13:48:03

And input we also have use that application to test the application process itself.

[Cindy Bero] 13:48:10

Collecting data, running it through a scoring or assessment process. And then, the lastly, we, you know, go through some next steps.

[Cindy Bero] 13:48:22

So in response to the public comment that the application was posted on April eighteenth, and comments were received through the morning of May fifteenth, we received comments from 22 different commenters, providing a total of a hundred 63 comments some of you are probably

[Cindy Bero] 13:48:45

in this session right now, and I want to thank you for the comments.

[Cindy Bero] 13:48:48

It all very helpful, and it's great to have many sets of eyes on this kind of thing to make sure that we're doing the best that we can for the for the State.

[Cindy Bero] 13:48:57

We did get a nice breadth of of, you know, respondents or commenters to, you know, including Hie's health plans, hospitals, professional Association State Department, so very happy with the the number and the breadth of the comments that we got today, what I'd like to do

[Cindy Bero] 13:49:16

is, I said, is to walk through some of those comments and share with you the observations.

[Cindy Bero] 13:49:25

Let me start first by saying the about a third of the comments were just general suggestions for ways we could rephrase things to make the question a little clearer, to make a little more specific about what we were seeking in in the application again, appreciate those

[Cindy Bero] 13:49:46

comments. You know you're when you write something.

[Cindy Bero] 13:49:48

You're writing it with your own frame of mind, and having others look at it and take it, you know, from their perspective.

[Cindy Bero] 13:49:57

Really helps to make this a better document so appreciate that.

[Cindy Bero] 13:50:02

So many of those areas that work suggested for rewarding.

[Cindy Bero] 13:50:07

We will be taking those suggestions and incorporating that into the final application there were a number of questions about how well, how is the scoring going to work? What is?

[Cindy Bero] 13:50:16

What are you? You know. What is the rubric, if you will, for this particular question the every question is going to be looked at from a sort of past fail standpoint did you demonstrate the capability?

[Cindy Bero] 13:50:31

Do you have that? The the requirement met? Yes or no?

[Cindy Bero] 13:50:36

And then all the all questions will need to be passed in order for the Hio to be qualified.

[Cindy Bero] 13:50:43

And then the third area that came through were some questions around what actually will be become part of the Queuehio program.

[Cindy Bero] 13:50:52

Looking for details about. How's the complaint process gonna work?

[Cindy Bero] 13:50:57

And and what are some of the reporting requirements that I might have as a qhio, and those are all important things, but they really aren't part of the criteria set that will determine which organizations are qualified in which or not so it.

[Cindy Bero] 13:51:13

They are not part of the application process. Let me pause and see if there are.

[Cindy Bero] 13:51:20

These are sort of overall comments, and then I have comments in each of the 4 sections of the application. But let me pause and see if there are questions, and I see Felix has a question.

[CalHHS CDII] 13:51:35

With regards to the first item here question, wording, yeah.

[Cindy Bero] 13:51:37

Yeah.

[CalHHS CDII] 13:51:40

So the example here on, for instance, the detail of the governance model, I think, for many of us, at least, we're speaking for our comments.

[CalHHS CDII] 13:51:47

It wasn't just believe phraseology when it came to just our questions about the the application.

[CalHHS CDII] 13:51:55

But more in many cases. What are what defines success like?

[CalHHS CDII] 13:52:02

What are Cdi and and and others who are running?

[CalHHS CDII] 13:52:06

This process looking for when it comes to as an example, governance right like in what constitutes, say, minimally coherent and comprehensive stakeholder participatory process, right done when it comes to how a Wjo or an aspiring is structured and takes

[CalHHS CDII] 13:52:30

direction that I think you know feeds into the second item here on the the scoring basis, and I understand that it's basically binary pass fail on all the questions as proposed.

[CalHHS CDII] 13:52:45

And you basically our file. Only if you pass all of the components, I take it.

[CalHHS CDII] 13:52:50

But but even under that kind of rubric you know what in many cases, is the actual definition of of qualification and success is what we were getting at.

[Cindy Bero] 13:53:03

Yeah. So let me try to respond, and I encourage my colleagues to to chime in if they have some additional thoughts, I think that some of these are very.

[Cindy Bero] 13:53:17

It depends on the question, I guess, is what I'm saying.

[Cindy Bero] 13:53:20

I'd say is, some questions are a little easier to determine.

[Cindy Bero] 13:53:25

A subjective measure, if you will of pass or fail, others are, gonna be more sorry.

[Cindy Bero] 13:53:31

An objective measurement. Others are going to be more subjective, and for those questions we will ask people with some subject matter expertise to review the responses and provide a sort of an expert opinion about whether or not it meets a certain level of qualification I don't know if that helps or not but

[Cindy Bero] 13:53:52

that's you know. It's not a clearing.

[Cindy Bero] 13:53:55

It's not necessarily a easy to determine. Yes or no. It's it's going to require some judgment.

[CalHHS CDII] 13:54:03

I appreciate that? And the only question slash suggestion that would add onto that is, I recognize that for especially their organizational, the first section of the application that deals with you know, organizational structure of the applicants that's there are probably opportunities

[CalHHS CDII] 13:54:26

for Cdi to insert. You know, some notions of what constitutes a sufficiently representative stakeholder.

[CalHHS CDII] 13:54:39

Governance, body, right like. I know that right now.

[CalHHS CDII] 13:54:42

There's some mention of having consumer perspectives.

[CalHHS CDII] 13:54:45

It would seem to make sense to also incorporate you know, minimum thresholds of having California based members of the Board having a representation from the types of signatories that are going to be ultimately served by the Qhao.

[CalHHS CDII] 13:55:04

That no, I was the thrust of what we were hoping to get more specificity on in the final version of the application.

[CalHHS CDII] 13:55:13

So I appreciate your consideration of that of that suggestion. Thank you.

[Cindy Bero] 13:55:18

Thank you.

[Cindy Bero] 13:55:20

David.

[CalHHS CDII] 13:55:21

Yep. Also in the room is David. Go ahead, sure, I imagine, like many of us around the table and on the zoom, I keep caring for faculty needs that are still trying to decide whether they plan to go forward and apply to be a based on the outcome.

[CalHHS CDII] 13:55:41

You know, the sort of final outcome of this conversation about the application, but based on that, I'm a little thrown by this reference that there will be forthcoming Qhio program guidance.

[CalHHS CDII] 13:55:53

Can I understand the timeline at the moment?

[CalHHS CDII] 13:55:58

So we've all submitted our comments, you're saying a few more weeks for the final application.

[CalHHS CDII] 13:56:03

Where does that guidance fit? Because I think that's going to be really important, as folks are trying to decide.

[CalHHS CDII] 13:56:09

And then I think that's that's very important for a lot of entities that are sitting out there right now trying to decide if they want to apply for qhi, or Grant, because right now they're not sure the it was the bar so if you could just break down the timeline for me it'd be

[CalHHS CDII] 13:56:23

helpful!

[Cindy Bero] 13:56:24

Yes, certainly. So the timeline is that we hope to publish the final application in the finish.

[Cindy Bero] 13:56:37

Sorry, incorporate all the edits from the public comment, and from this meeting this week do a round of review, and hopefully, by the end of this month have the final application available for people to fill out, which would mean that we're looking at applications in the end of July

[Cindy Bero] 13:56:59

timeframe, the guidance we're talking about with the Qhio program is something like the let's take the complaint process.

[Cindy Bero] 13:57:06

Will there need to be a complaint process if people are unhappy with the way the Qhio program is working, yes, there will need to be a complaint process.

[Cindy Bero] 13:57:18

Have we defined that complaint process at this point in time?

[Cindy Bero] 13:57:20

No, that will be part of the future programs that will be developed.

[Cindy Bero] 13:57:25

Probably in the same timeframe. Later this summer. But it doesn't.

[Cindy Bero] 13:57:30

The process for complaints doesn't.

[Cindy Bero] 13:57:35

Set a criterion, for who could be a qhio?

[Cindy Bero] 13:57:39

Does that make sense?

[CalHHS CDII] 13:57:41

Yeah, it does. And on on a related note, once the final application is done, are plans in place for some sort of for lack of better term, bidders, Conference.

[CalHHS CDII] 13:57:54

With is it an opportunity for folks who are thinking about it?

[Cindy Bero] 13:58:00

Yes.

[CalHHS CDII] 13:58:05

June right now. So either later June or July, there's 2 penciled in office hours.

[CalHHS CDII] 13:58:12

So that's also, if you're intending to be an applicant for a qhio, you would certainly want it.

[CalHHS CDII] 13:58:19

Apply like, show up to those office hours, and if you want to know more about who might be applying, that will be a good time to come, because then you'll hear who's asking questions.

[CalHHS CDII] 13:58:28

And engaged, and stuff like that, and one of the reasons why number 2, we're the one about the forthcoming guidance and stuff is in the comments we received, and it ties in a little bit by the way, this is Dean, if anybody wasn't sure who was

[CalHHS CDII] 13:58:43

talking, ties in a little bit to what Felix was asking and bringing up in the actual comments we received.

[CalHHS CDII] 13:58:51

There was a lot of crossover between the application comments.

[CalHHS CDII] 13:58:57

The policy, the draft, policy and procedure comment and then program.

[CalHHS CDII] 13:59:02

And so that's where we I really thought we needed to call up like programs.

[CalHHS CDII] 13:59:08

So like for the signatory, for the grants, program, we have a grants guidance document and that's come after a few of these other things.

[CalHHS CDII] 13:59:15

We're trying to do them as simultaneous as possible, but they are 3 different things.

[CalHHS CDII] 13:59:20

The Guidance document has more flexibility to be like.

[CalHHS CDII] 13:59:23

This is what. But we're still gonna stick to what the the Hio had to go through, and their application to get a queue, and what the policy and procedure guides us for its building under.

[CalHHS CDII] 13:59:37

Program so interrelated, but 3 different things hope that all helps.

[CalHHS CDII] 13:59:43

And then we have Aaron, and then we'll move on, because probably some more of Cindy's like, I think the one at the top of the slide means one of the few more slides coming.

[Cindy Bero] 13:59:52

Yes.

[CalHHS CDII] 13:59:53

So we'll we'll go to Aaron, and then we'll go to next slide.

[CalHHS CDII] 13:59:57

Yeah, just to add I think one thing here is, is the application process going to be collaborative hit that Qa Chs will apply and then work with you to get to the past store.

[CalHHS CDII] 14:00:12

Will that be an opportunity for them to modify answers?

[CalHHS CDII] 14:00:16

If possible, to get to the past. I think that's that's what's being asked here, or is it?

[CalHHS CDII] 14:00:26

Just gonna be. They make the application. It's pass fail.

[CalHHS CDII] 14:00:29

And then it's yeah. I don't think we're gonna have a hundred percent clarity on every application coming in.

[CalHHS CDII] 14:00:35

So I don't think it will be that rigid.

[CalHHS CDII] 14:00:39

Can I guarantee we'll reach out to everybody about every dotted eye across T.

[CalHHS CDII] 14:00:44

Probably not, but for the things that are material and critical there will be engagement from Cdi to say, Okay, we don't see this done.

[CalHHS CDII] 14:00:54

Do you have it? And we have some timelines, and you know we respond to you.

[CalHHS CDII] 14:00:58

We're not going to wait 6 weeks.

[CalHHS CDII] 14:01:03

Alright Cindy! Next slide.

[Cindy Bero] 14:01:04

Okay, moving on. We did receive in the section A, we did receive some comments on the level of insurance.

[Cindy Bero] 14:01:17

Many suggesting I shouldn't say many, cause there's in total.

[Cindy Bero] 14:01:21

There were like 6 comments on this, but some suggested that the insurance minimum wasn't high enough, that we should require higher insurance standards here.

[Cindy Bero] 14:01:33

So instead of 2 million per incident and 5 million per annum, they thought the numbers should be higher.

[Cindy Bero] 14:01:37

The reason we selected these numbers is, they did align with Kuka's Qin program, and we're possible.

[Cindy Bero] 14:01:45

We have been trying to align with national standards.

[Cindy Bero] 14:01:50

So this felt like the sort of the right level to us, and certainly, if in organization wants to maintain higher levels of insurance, they can.

[Cindy Bero] 14:02:01

But we would not require higher levels of insurance.

[Cindy Bero] 14:02:06

And the second is a issue that has been coming up since.

[Cindy Bero] 14:02:10

You know the very beginning, I think, is the question of whether or not Qah.

[Cindy Bero] 14:02:16

los need to be 501 c. 3 organizations while I am a big fan of the 50.

[Cindy Bero] 14:02:23

One c. 3, and the wonderful work that they do. I don't think that that's a necessary requirement for providing Qhio.

[Cindy Bero] 14:02:31

Services, and I. And for those reasons I just don't.

[Cindy Bero] 14:02:35

I I guess we just couldn't figure out why it had to be a requirement here. So let me pause, because I know that there are probably some questions on this. These 2.

[CalHHS CDII] 14:02:46

And Cindy, I'll add on for you. There are Cdi stands behind that.

[CalHHS CDII] 14:02:51

It's not Cindy or I'm not saying so.

[Cindy Bero] 14:02:53

I'm so sorry. Yeah.

[CalHHS CDII] 14:02:55

No, but it's a Cdi. Agrees that we're not making that a requirement.

[CalHHS CDII] 14:03:01

Alrighty! Let's go to Felix, and then Lori!

[CalHHS CDII] 14:03:07

Thanks, Deanne and Cindy, and I recognize and appreciate a lot of the our decisions and the trade-offs that you weigh together right as you come up with the application.

[CalHHS CDII] 14:03:20

Now for the second issue here about, you know, corporate governance structure, I think the comment that we really want to put on the record here about why many of us, and not just us as Ohio's but a lot of stakeholders that be historical assured

[CalHHS CDII] 14:03:38

you know, throughout the decades of being kind of homegrown nonprofit, regional.

[CalHHS CDII] 14:03:43

Or statewide California. Hios! Is that you know the guiding for North Star of the 81 3 p.

[CalHHS CDII] 14:03:53

Program. You know, a rate across the number of principles, equity advancing healthcare, confirmation, to, you know, a lot of people, ambitions of, and the healthy California for all vision writ large, and for that it really seems based off of not just in

[CalHHS CDII] 14:04:17

our own reflections. But a lot of our touch points with the stakeholders.

[CalHHS CDII] 14:04:22

Most care needs, providers, health plans, so forth.

[CalHHS CDII] 14:04:25

That you really need an organization that has a special bond.

[CalHHS CDII] 14:04:29

You know, with the local communities that can work through and advance these, you know, these shared goals from like a mission. Different perspective.

[CalHHS CDII] 14:04:42

And that's just not something that we believe can be.

[CalHHS CDII] 14:04:46

For what we found, especially in the nationwide, for profit.

[CalHHS CDII] 14:04:52

Version of these platforms. So it really is not just about having the technical and functional capabilities to deliver.

[CalHHS CDII] 14:05:02

Xyz. In terms of data, content or transaction patterns.

[CalHHS CDII] 14:05:05

It really is about a willingness to serve the underserved, to to fill in those white spaces, and to close that last mile right?

[CalHHS CDII] 14:05:15

That has kind of eluded us for so long.

[CalHHS CDII] 14:05:17

Which is why we're here today hammering on this policy.

[CalHHS CDII] 14:05:20

So, yeah, I think the nonprofit markers are real key factor in that.

[CalHHS CDII] 14:05:24

And I just, you know, I think, for the final version of this.

[CalHHS CDII] 14:05:44

Heck, yeah, I think I heck of what Felix is very eloquently stated, and this has been a long standing issue.

[CalHHS CDII] 14:05:44

I really employ you all, too. Take that account, Lori.

[CalHHS CDII] 14:05:47

Of talking about, not only equity, but just in terms of how the funding for California is going to support these areas.

[CalHHS CDII] 14:05:56

I'm in the state that the currentvengers have not addressed, because, looking at the governance structure of the for profit vendor who offers some technology services, you know.

[CalHHS CDII] 14:06:13

How do they pass the fail compared to the Qe.

[CalHHS CDII] 14:06:17

Chos or the Hios, who's been offering past 10 or 15 years here in California, and I just, I think, from the perspective, I hate to see the funding.

[CalHHS CDII] 14:06:31

It's available from brands being handed to an out of state vendor for profit.

[CalHHS CDII] 14:06:39

Vendor, which is of the Qe. China program.

[CalHHS CDII] 14:06:44

It's all about sending that money out to the Qhos and overlooking that historical data sharing for this community.

[CalHHS CDII] 14:06:56

Alright thanks, and one more. On this Morgan.

[Morgan Staines, DHCS (he)] 14:07:03

Thanks. I I just throw out. If if we consider any movement on this item to consider, not restricting to just 50.

[Morgan Staines, DHCS (he)] 14:07:14

One c. 3. There are other varieties of nonprofit that might meet most of this.

[Morgan Staines, DHCS (he)] 14:07:20

Of the intention here, like trade associations that may have a 501 c.

[Morgan Staines, DHCS (he)] 14:07:29

3 arm, but their main business is not 501 c.

[Morgan Staines, DHCS (he)] 14:07:32

3 yeah, for a different scenario is, you can accept charitable contributions.

[Morgan Staines, DHCS (he)] 14:07:36

Matt. It's a you know. It's a high standard.

[Morgan Staines, DHCS (he)] 14:07:40

It's also the hardest one to get approval from the tax authorities.

[CalHHS CDII] 14:07:46

Thank you.

[Cindy Bero] 14:07:53

Okay, thank you for that feedback. Move on to the section on privacy and security is that you might expect this received a lot of comments as well.

[Cindy Bero] 14:08:06

The security level that we had identified for the applicants to meet is high trust.

[Cindy Bero] 14:08:13

R. 2, which is a security standard that is developed for healthcare.

[Cindy Bero] 14:08:19

It is also one that is being used by Tefka for their Q.

[Cindy Bero] 14:08:23

Hens. It is the standard that we think best reflects the importance of the data being carried by the data exchange framework.

[Cindy Bero] 14:08:33

And so that is the level of security that was laid out.

[Cindy Bero] 14:08:37

We had some who were very supportive of this level of certification, and we had, you know, a slightly more than a sum who felt that it should be.

[Cindy Bero] 14:08:50

This was too high of all. Let me throw it out again for comment, or but rather than just, pure comment, if there's an alternative to high trust, R.

[Cindy Bero] 14:09:02

2 I'd be very interested in hearing what you think.

[Cindy Bero] 14:09:07

The alternative would be.

[CalHHS CDII] 14:09:12

And we have Morgan first.

[CalHHS CDII] 14:09:17

Okay. Thank you. And then Lori, Hi, so so I I feel bad because I think I was one of the initial people talking about my trust certification.

[CalHHS CDII] 14:09:32

So this is like my fault with it. I absolutely agree.

[CalHHS CDII] 14:09:37

That at some point high trust are 2, is probably the right path.

[CalHHS CDII] 14:09:42

I noticed in the once the original versions you also talked about enact certification.

[CalHHS CDII] 14:09:50

My comment is, having this requirement of R to be part of the past fail.

[CalHHS CDII] 14:10:00

Starting August to whenever this judgment is taking place, really isn't realistic if you're on that path because the high risk certifiers are working with you.

[CalHHS CDII] 14:10:15

But if that half is 18 months, and so to to really penalize organizations who spent their time and efforts in the community making sure that interfaces were making sure data secure rather than seeking an external certification that costs 30 to \$50,000, and

[CalHHS CDII] 14:10:39

making them lose their opportunity to continue business. In August.

[CalHHS CDII] 14:10:44

Because of this timing in this requirement. That's not what I was talking about when I so my concern isn't, you know ultimately our 2.

[CalHHS CDII] 14:10:56

That's fine, but really looking at, what is the organization doing?

[CalHHS CDII] 14:11:02

What is their path for certification rather than picking a random sort of level that needs to be effective when it's impossible to do so.

[CalHHS CDII] 14:11:12

It's like telling an 18 year old. If you don't have your driver's license, you can't vote in the paper when they have an Id that we work perfectly well as substitute.

[CalHHS CDII] 14:11:25

Good analogy.

[Michelle Brown] 14:11:32

I'm just wondering if you could elaborate on the distinction, or how you're gonna treat organizations 5013 c versus vendors.

[Michelle Brown] 14:11:44

Technology vendors.

[CalHHS CDII] 14:11:47

So for the previous conversation. Point not the high trust. R. 2.

[Michelle Brown] 14:11:53

Yes.

[Cindy Bero] 14:11:59

So with respect to the not for profit status, we are not going to require, not for profit, status to be a qhio.

[Cindy Bero] 14:12:11

We're instead. Gonna look at other capabilities, and we will look at their governance model.

[Cindy Bero] 14:12:19

And to make sure that there's a participatory governance model in place.

[Cindy Bero] 14:12:23

But it does not have to be a 501 c. 3.

[CalHHS CDII] 14:12:27

So shelly, I think, for your questions. What do you ask?

[CalHHS CDII] 14:12:31

But look at the application and ask for specific specific things about your organization.

[CalHHS CDII] 14:12:34

Name, contact, information. Are you structuring people, corporate United States and define organizational?

[CalHHS CDII] 14:12:45

Like the governance structure, but a certificate from the Secretary of State, Secretary Secular State, validated, good standing.

[CalHHS CDII] 14:12:53

I think those are the current requirements, at least in the draft that was up on the comment.

[CalHHS CDII] 14:13:00

So are you asking for about something else? Shelly?

[CalHHS CDII] 14:13:06

You're on mute. By the way.

[Michelle Brown] 14:13:12

Sorry. Yes, I'm also asking about the R. 2 certification.

[CalHHS CDII] 14:13:19

Okay. So I think we're pretty clear on the nonprofit part.

[CalHHS CDII] 14:13:25

So Jonah just covered some of the parts that are in the application.

[CalHHS CDII] 14:13:29

Cindy cover what we're looking at right now so hopefully that covers that.

[CalHHS CDII] 14:13:35

Then Shelly, are you able to share what your question is about?

[CalHHS CDII] 14:13:39

Our too, right now. It's whether the applicants has or their contract with a third party vendor at that has Hi trust, are 2 certifications at the time of application.

[CalHHS CDII] 14:13:55

Which is what Lori spoke to about saying good, good, ultimate goal but what about those that are in the process of?

[CalHHS CDII] 14:14:05

So that's we'll take back. And it's not a new contemplation.

[Michelle Brown] 14:14:16

Yeah, okay, I think I think I will look at that just a little closer and send my comment.

[Michelle Brown] 14:14:24

I think you covered it for today, though. Thank you.

[CalHHS CDII] 14:14:27

Thank you, Shelley. Alright. Then we have Dr. Kazi, Troy.

[Troy Kaji] 14:14:34

I would like to just emphasize from a security standpoint that this is like a critical infrastructure that we're gonna be relying on, the more value it has.

[Troy Kaji] 14:14:55

And therefore it really needs to be. This is like a minimum level of security.

[Troy Kaji] 14:15:01

I understand it's costly and labor intensive. I wish there were more support available for entities that have to go through this.

[Troy Kaji] 14:15:10

But, as you might be aware, there are certain cities and health systems that have been, you know, frozen by ransomware. Other attacks.

[Troy Kaji] 14:15:24

And it's just critical that this key infrastructure has a recognized level of security going forward.

[Troy Kaji] 14:15:35

It's a very threatening cybersecurity world we're moving into.

[Troy Kaji] 14:15:41

And the bigger this gets the bigger it target it becomes. So that's it. Thanks.

[CalHHS CDII] 14:15:47

Thank you. And then we have Jason Buckner.

[Jason Buckner] 14:15:53

Yeah. I'm just gonna pile on. I think the high trust R, 2. Requirement should stay.

[Cindy Bero] 14:15:55

Yeah.

[Jason Buckner] 14:16:00

I think the adjustment that you've made here in your proposed response, that you know, if your data's managed by third-party vendors, then their certification is acceptable, so the data is in a controlled environment there's a lot of Phi that's going to be

[Jason Buckner] 14:16:15

shared here and entrusted to folks, and having a rigorous certification like high trust, which is the gold standard for healthcare.

[Jason Buckner] 14:16:24

Just makes common sense here to protect the data. So we're fully fully supported that.

[CalHHS CDII] 14:16:31

Thank you. And then we have Aaron. So just really quickly.

[CalHHS CDII] 14:16:36

I agree. I trust it's way to go.

[CalHHS CDII] 14:16:40

But I wonder how both companies feel if that meant we only have 2 cute biops for one.

[CalHHS CDII] 14:16:49

And how would that change the conversation? If that was the case, that maybe we should not consider in between?

[CalHHS CDII] 14:16:57

A pass name on that.

[CalHHS CDII] 14:17:01

And if that's the case, then how do we get that answer?

[CalHHS CDII] 14:17:03

Now no worries, in the past. I think you have raised this issue here's the context of not necessarily the H.

[CalHHS CDII] 14:17:15

2 r. 2 certified at the onset, but there was a path.

[CalHHS CDII] 14:17:19

To get that certification, but then to pass it.

[CalHHS CDII] 14:17:26

The the application. Is that right? Yeah.

[CalHHS CDII] 14:17:33

I mean the process for the is assessment, the remediation, and then certification, the assessment alone takes 90 days, and then waiting for the high trust, certification, bus to get in their queue.

[CalHHS CDII] 14:17:48

Get on their calendar, get them to approve it, you know you can have all of the requirements in.

[CalHHS CDII] 14:17:55

Is it these? Hios, we've been doing this for the past 10 years, and we have not have a breach.

[CalHHS CDII] 14:18:04

I mean correctly. Hi, soon. So yeah, there's no question.

[CalHHS CDII] 14:18:08

That certification process should be part of it.

[CalHHS CDII] 14:18:12

But there needs to be a timing sequence, not only for this particular timeframe, but what happens next year?

[CalHHS CDII] 14:18:20

If the Qhio switches first switches the the process, they need some time to get well, because the old certification is not quite to be valid.

[CalHHS CDII] 14:18:35

So just thinking through the timing of this, I don't hear any disagreement, but it's a bad idea, and certified.

[CalHHS CDII] 14:18:44

It's just is that gonna be part of your past.

[CalHHS CDII] 14:18:48

Fail.

[CalHHS CDII] 14:18:53

And we hear Eric is going on collectively to contemplate.

[CalHHS CDII] 14:18:58

If this requirement renders only one or 2 applicants to Cdi agency, the lac all support that.

[CalHHS CDII] 14:19:11

So hear you on that, and have noted Kathy.

[Cathy Senderling-McDonald] 14:19:16

Yes, hi! This conversation makes me think about there's a parallel, I think.

[Cathy Senderling-McDonald] 14:19:23

For example, in the human services world, we created a new structure for licensing for our congregate care facilities, and there required to have accreditation.

[Cathy Senderling-McDonald] 14:19:36

But similar to how we're talking about this is a high-tech certification.

[Cathy Senderling-McDonald] 14:19:42

There is a process for that, and it's not a preclude. Organizations that wanted to go for that accreditation knew that they would need to go, for that accreditation knew that they would need to, but didn't yet have it.

[Cathy Senderling-McDonald] 14:19:56

They did build in some structures to sort of allow for that accreditation, knew that they would need to, but didn't yet have it. They did build in some structures to sort of allow for that.

[Cathy Senderling-McDonald] 14:19:59

But also have accountability. So you actually have to, you know, do it and accomplish it within a reasonable timeframe.

[Cathy Senderling-McDonald] 14:20:05

That seems that seems to make sense to me to allow for that kind of structure, especially in an area where yes, there are existing organizations.

[Cathy Senderling-McDonald] 14:20:18

But also there are people who are new to this, and so enabling that certification to be done within a reasonable timeframe, and having accountability on that, you know.

[Cathy Senderling-McDonald] 14:20:28

Seems to make sense to me if there are otherwise competitive or otherwise.

[Cathy Senderling-McDonald] 14:20:34

You know, good organizations that just need that as an accommodation.

[Cathy Senderling-McDonald] 14:20:37

So just 2 cents.

[CalHHS CDII] 14:20:40

Thank you. We're we do as you might have just seen the slide flying by.

[CalHHS CDII] 14:20:45

We have a lot more content we're close on time, but we're tracking slightly behind we'll go to Felix.

[CalHHS CDII] 14:20:52

I'm gonna ask for very briefly, please, and then, Ali, and then we'll go to the next couple of slides.

[CalHHS CDII] 14:21:05

Thank you. And then Ali!

[Ali Modaresi] 14:21:10

Yeah, thank you. I think, yeah, I trust is should be a requirement for the data intermediaries.

[Cindy Bero] 14:21:17

Yeah.

[Ali Modaressi] 14:21:19

And but I also think that there are some unintended consequences of this requirement here, that as some of the folks already Laurie and Aaron already mentioned, that they should be given some runways for some of the organizations to achieve this high trust, I think

[Ali Modaressi] 14:21:42

the fact that if the third party is high trust certified, I think that is good.

[Ali Modaressi] 14:21:47

That is a good measure there. But if you know, especially with the way that the application, the binary and scoring up the applications are set up, if this gonna require or eliminate some of the hio's, I think it would set kind of on your back many years so I think those

[Ali Modaressi] 14:22:13

are some of the things that needs to be considered. And I mean this type of requirements where it's it's I think, Cdia is asking for immediate compliance.

[Ali Modaressi] 14:22:25

And that somewhat is unrealistic for some of the hives and kind of coordinate.

[CalHHS CDII] 14:22:31

Thank you, Ali, and if anybody ever feels that I'm rushing you now that we do have the, we do have the chat log that we do read outside of the meeting.

[CalHHS CDII] 14:22:42

So that there's time to read an update so that there's time to read and absorb, connect some dots.

[CalHHS CDII] 14:22:47

And then there's also we ask for some comments to be emailed to us, or anything.

[CalHHS CDII] 14:22:50

After the meeting, so moving us forward. Some, but I hope no one feels rushed or cut off.

[CalHHS CDII] 14:22:55

Cindy back to you.

[Cindy Bero] 14:22:57

Thank you. So, continuing on into the functional capabilities area, we did have a number of folks noted that the social services information is not a type of information that is readily exchanged today, and that this is a new area for many Hio's and we understand that and we will

[Cindy Bero] 14:23:18

clarify the question. We are really just only going to be looking at the the information defined in the technical requirements for exchange, which is the Uscdi version. 2.

[Cindy Bero] 14:23:34

I believe that so I don't know that you will.

[Cindy Bero] 14:23:37

Did you know that the hio will be judged, or the criteria will be set around social services?

[Cindy Bero] 14:23:44

Information.

[Cindy Bero] 14:23:47

Second was a number of folks commented on the fact that we had suggested that Qh.

[Cindy Bero] 14:23:57

los receive adt feeds from acute care and emergency departments without charging a fee to those departments.

[Cindy Bero] 14:24:07

At this bee. You know they receive it as a sort of contribution to the exchange, and there was some some feedback on that, and it was very.

[Cindy Bero] 14:24:16

It was compelling. So I think we're decided that we will go ahead, and I've decided that we will go ahead and allow that you know in this program the Queuehos to assess a fee to the Cute care institutions and emergency departments who will send Adt

[Cindy Bero] 14:24:28

fees feeds. So that's that's a change in in posture. There.

[Cindy Bero] 14:24:35

I'm gonna move along just to keep us on track a little bit roster, sharing so as the adt messages arrive, you know the queue is expected to try to match the adt message to a patient on a roster and then notify the participant who get who who's

[Cindy Bero] 14:24:56

monitoring for that patient, and that there would be some qhio to Qhia roster sharing, so that on, you know, any participant.

[Cindy Bero] 14:25:08

Could you know, monitor for events across the State in essence for their patients of interest we know that that's gonna take a little bit of time.

[Cindy Bero] 14:25:19

So because of the need to create Qh, I/O cute qhio.

[Cindy Bero] 14:25:24

Agreements, so that will be a delayed implementation in not until July of 2024.

[Cindy Bero] 14:25:32

That is the proposed response to some of that feedback.

[Cindy Bero] 14:25:39

And then the last one on this section is the excuse me, is the number of people identified.

[Cindy Bero] 14:25:49

What I would define is future standards, that they would like to see required today and see Qhios assessed on today.

[Cindy Bero] 14:25:58

Fire, direct some of the connectivity to Tepco, Q.

[Cindy Bero] 14:26:03

Hands. I applaud all of these. I think we all do, but they aren't.

[Cindy Bero] 14:26:09

They aren't today's, you know, gonna be today's standards.

[Cindy Bero] 14:26:13

But we should anticipate these being standards of the future, but they will not be part of the criteria in twenty-twenty-three.

[Cindy Bero] 14:26:27

A number of folks and this I'd like to really seek some input on a number of people identified a shift in our thinking on this non-discrimination issue.

[Cindy Bero] 14:26:43

What we had originally proposed is that a qhio really should not discriminate against any signatory they should supply services to anyone who's, you know, seeking services from them.

[Cindy Bero] 14:26:58

We did receive some feedback, though that for some qhios they're approached by a mandatory signatory, and they don't have technology in place to support that kind of data or support that kind of organization.

[Cindy Bero] 14:27:13

That could be very burdensome to that particular Qhio to have to build out the infrastructure, to support that type of signatory.

[Cindy Bero] 14:27:24

So we adjusted our approach, and instead requested that at least there'd be some transparency around who you can serve and who you cannot serve the feedback we got on the draft.

[Cindy Bero] 14:27:40

Application was very. You know, very strong sense that the non-discrimination piece should return again. But my fear is that that may mean that organizations are forced into building out infrastructure for signatories that they had not.

[Cindy Bero] 14:28:01

They did just start. We're prepared for. So let me the hopefully I describe that clearly, and let me pause and see if there are some thoughts and comments on that.

[Cindy Bero] 14:28:15

Felix!

[CalHHS CDII] 14:28:15

Stephen Lane you just put down. Are you available?

[Steven Lane] 14:28:19

I'm available. But I was commenting on another topic.

[Steven Lane] 14:28:22

So I don't need to robust in here.

[Steven Lane] 14:28:25

I'll put the my comment on

[CalHHS CDII] 14:28:28

Thank you. Alright, Felix, on the non-discrimination topic.

[CalHHS CDII] 14:28:34

Yeah, so I would really kind of flip this question on its head. Right?

[CalHHS CDII] 14:28:42

We were talking about. I see also, not just in. Cindy is recap there, but also in the chat.

[CalHHS CDII] 14:28:47

You know, there's some finally thinking about, you know, not artificially excluding the pool of entities that could become, and thinking about their burdens to build up what it's security and privacy, safeguards or technical capabilities is that what really matters at the end of the

[CalHHS CDII] 14:29:05

burden of the stakeholders under the baby bond 33, or required to share data.

[CalHHS CDII] 14:29:11

We don't currently have the needs to do so. Don't have a ready partner, but it's able to aid them with that.

[CalHHS CDII] 14:29:16

But that seems to be that the crux of you know what's a dry decision to make here, and as you think of having, you know, self-sl, huge los that will take some types of entities, but not others at least it won't android

[CalHHS CDII] 14:29:33

categories seems to fly in the face of what the program it's meant to accomplish.

[CalHHS CDII] 14:29:38

So well, I understand, obviously, a lot of the, you know hold on, chrome concerns about you know whether certain entities are in a place to become Cjos by before the years end.

[CalHHS CDII] 14:29:52

Frankly, if they can at least meet this very basic very understandable expectation to serve every type of manitary signatory that they shouldn't be a so I don't need to be provocative.

[Cindy Bero] 14:30:02

Hmm!

[CalHHS CDII] 14:30:05

But I will just sort of put that out as sort of a mere way of looking at the issue.

[CalHHS CDII] 14:30:10

So just, I think this is the discussion we want to have today.

[CalHHS CDII] 14:30:16

But I think that we should, at least we've been having this conversation internally at Cdi.

[CalHHS CDII] 14:30:21

It is not the very basic. I mean, if somebody comes to you, I'm a social services organization.

[CalHHS CDII] 14:30:27

You must take me I'm an su d part 2 compliant organization must take paid.

[CalHHS CDII] 14:30:32

I'm a mental health organization that Lps supplies to must take me.

[CalHHS CDII] 14:30:38

You know I'm a home health organization. I signed.

[CalHHS CDII] 14:30:42

It must take me that there are some signatories that Q.

[CalHHS CDII] 14:30:46

A may not have the infrastructure team handle today.

[CalHHS CDII] 14:30:50

Do we want to restrict the field to a point where you have to be prepared for all of it? And that's what we struggle with internally.

[CalHHS CDII] 14:30:58

Why we want to have this discussion. But I would encourage us to think not about the mainstream.

[CalHHS CDII] 14:31:04

No, you have to take both hospitals, and ambulatory providers, but the edge cases that also apply here that may be particularly difficult, and because of the breadth of the data exchange framework potential signatories means it's a larger breadth than some hio's service today and so just think very

[CalHHS CDII] 14:31:26

broad here when we talk about. Thank you. And then we have Andrew Keeper.

[] 14:31:34

Thank you, appreciate it, and Rem, I appreciate those comments tonight.

[] 14:31:40

I could definitely understand a world where social services and the capacity to do that is treated would say, maybe not differently, but is on a different path.

[] 14:31:53

Since we're still working through so many of the complexity of associated with that.

[] 14:31:57

But set aside that piece of it. It seems to me what the direction of the application is going is basically to afford the creation of industry, specific qualified health information organization that become the niche for that or that type of organization right?

[] 14:32:15

If you're a hospital, there's a hio for you.

[] 14:32:18

I'm not sure that is the environment where we wanna go, where we're continuing to sort of silo out the sectors.

[] 14:32:26

And really, I think, drive variation between the capabilities of these high OS, especially in an environment where, as health plans, we are required to use health information organizations in various public programs and to the extent that now the rules are changing where, participants may not have to use

[] 14:32:52

Ohio, which we for Adp feeds.

[] 14:32:55

For example, it does create a universe that we think is sort of disaggregating this information, making more complex and it necessarily needs to be so.

[] 14:33:05

I would just, I would say, I think there's some rationality around the future state with social services, but it doesn't in our mind make any sense to change the stripes of it of the qualified health information organization by the constituent that they're serving because if you know, placates their needs

[] 14:33:23

or their legacy vendor, whether it's a nonprofit insider for profit out of state.

[] 14:33:30

Thank you.

[CalHHS CDII] 14:33:33

Thanks, and then we'll go to David Ford. Thank you.

[CalHHS CDII] 14:33:39

I I think we all have the same goal. But I'm gonna I'm gonna take a little exception here.

[CalHHS CDII] 14:33:47

It's less important to me. Participants in a particular qhio.

[CalHHS CDII] 14:33:53

Because let's be honest, what we're talking about here is a for profit entity that may say, Hey, look! I can bring it.

[CalHHS CDII] 14:33:59

All the integrated systems are all the integrated hospitals.

[CalHHS CDII] 14:34:01

With Brim's point in mind about social services. That conference a little down the road.

[CalHHS CDII] 14:34:05

We all sort of know what talk Turkey. We all know we're talking about.

[CalHHS CDII] 14:34:08

Get right. And it's less important to me than an entity can sign up every different kind of mandatory signatory.

[CalHHS CDII] 14:34:16

Then that entity agrees to play nice with everyone else as a right, because ultimately, when you think about it, what matters?

[CalHHS CDII] 14:34:25

At its base is when the physician is in the exam room with the patient.

[CalHHS CDII] 14:34:30

Do? They have all the information they need to treat the patient in front of them.

[CalHHS CDII] 14:34:35

So it's so. If if an entity came to us, it said, Well, I only want to work with the next.

[CalHHS CDII] 14:34:40

I want to work with hospitals or they only want to work with small practices. That's fine.

[CalHHS CDII] 14:34:44

As long as they can transfer data to the other entities that serve the other types of providers. So the data all can always get to where it needs to go.

[CalHHS CDII] 14:34:56

Thanks, and right now we have 2 more, Lori, and then Mark Savage, and then I'll have a comment before we go on.

[CalHHS CDII] 14:35:08

So my comments also related to the technical requirements.

[CalHHS CDII] 14:35:12

I find it interesting that there's no need to comply with fire, Api, or direct messaging, but you have to serve the mandatory participants.

[CalHHS CDII] 14:35:27

And yet so, for example, as would be.

[CalHHS CDII] 14:35:37

By the year. So if so, it's just, it confuses situation to say Yes, you must serve someone.

[CalHHS CDII] 14:35:46

Okay, regardless of their capabilities, are yours, and not to work out.

[CalHHS CDII] 14:35:52

As David mentioned. Really, there's a way to work out within the community some alternatives, if they're on sort of track that it's just difficult to provide Sut information or fire Api, except.

[CalHHS CDII] 14:36:12

Right? So that's specific, because there's like an interoperability for some clients that's but that exists for charity based special.

[CalHHS CDII] 14:36:33

So they're gonna have.

[CalHHS CDII] 14:36:42

Capability to actually share data with ours. Yeah, it's just a balance of the rule.

[CalHHS CDII] 14:36:48

Here. You have to serve somebody that you don't have to provide.

[CalHHS CDII] 14:36:56

Right? Yeah. But Mike, is this, why can't we list?

[CalHHS CDII] 14:37:00

What is your capability? And if it meets the minimum requirements, Andrew is saying, 80 feeds.

[CalHHS CDII] 14:37:07

But if you if there's a specialized section, but that should be just the to the participants to say I'm a mandatory person, but I'm a under management.

[CalHHS CDII] 14:37:26

Suppress certain things. Your technology doesn't do that, but manifest steps.

[CalHHS CDII] 14:37:32

So so that's suggest, like, how this would show myself.

[CalHHS CDII] 14:37:41

Materialized, I should say the Qh, a process edx says we can do fire, and others say they can't, so that account you can save well, I'm I can do fire.

[CalHHS CDII] 14:37:54

So I'm gonna go. Not necessarily make a requirement.

[CalHHS CDII] 14:38:00

Fire enable but least it's more transparent that some can set the yeah, they and they pick fire, because I feel most of the hios can fire.

[CalHHS CDII] 14:38:15

It's the technology. Okay? So yes, yeah. Tracking. Thank you.

[CalHHS CDII] 14:38:25

And then.

[Cindy Bero] 14:38:25

So can I introduce for a second? I think if Lori, if I understood you correctly, that's what the current version of the application requests is transparency about what you can and cannot do.

[Cindy Bero] 14:38:39

Not necessarily that a qi has to be able to do everything.

[Cindy Bero] 14:38:45

So did I. Let's hear your comment correctly. Then.

[CalHHS CDII] 14:38:54

I? Yes, but with regard to the non-discrimination, my input is similar.

[Cindy Bero] 14:38:59

Yes.

[CalHHS CDII] 14:39:03

You shouldn't be required to offer services that you don't provide.

[CalHHS CDII] 14:39:10

You're not good at.

[Cindy Bero] 14:39:10

Okay, got it. Thank you.

[CalHHS CDII] 14:39:15

Mark! Savage. Thanks. I wanna focus on the examples that brim gave which for me are drop down the road.

[CalHHS CDII] 14:39:27

But because of what the framework is supposed to do. I'm sorry.

[CalHHS CDII] 14:39:36

January 2024, and I would I take the question I would ask him about that is, if we can't say that everybody, every Ohio has to serve everybody.

[CalHHS CDII] 14:39:49

How does the State make sure it? All the participants, if those kind do have access to the service?

[CalHHS CDII] 14:39:59

So to system that not everybody could serve. There may be some present day reality, some of that.

[CalHHS CDII] 14:40:08

But how do we nonetheless make sure that all of the participants get the services they need in order to build state in the framework, and to make sure that that is met?

[CalHHS CDII] 14:40:19

Both in designing the requirements, and before we get to 2020.

[CalHHS CDII] 14:40:30

Alright, and then next one is Aaron, and then we'll move on just to echo points.

[CalHHS CDII] 14:40:40

I think the size and cell phone cube.

[CalHHS CDII] 14:40:48

I also talked to each other. It's more important than the completeness of each individual.

[CalHHS CDII] 14:40:54

And so, as long as the keypiles are transparent as they offer, they don't offer the participants.

[CalHHS CDII] 14:41:01

Then choose. They need a full feature cube file the one that has the full features.

[CalHHS CDII] 14:41:06

If they don't if we work in the Dimension market.

[CalHHS CDII] 14:41:13

That's okay. Thank you. And that to Cindy's point, where Cindy was bracing up that we changed it to tell us about this.

[CalHHS CDII] 14:41:26

Be transparent, my self-described to myself, reconciling this is changing it a bit more from the objective to subjective instead of like yes or no.

[CalHHS CDII] 14:41:38

We've said, tell us, give us the narrative, so we haven't completely ruled it out.

[CalHHS CDII] 14:41:43

Lots of good conversation and input. Thank you all. And what ever the next slide might be.

[Cindy Bero] 14:41:52

Alright, so just thank you for walking through those comments on the set.

[Cindy Bero] 14:41:59

4 sections of the application. Let me just take a step back for a moment and talk about the application and the process.

[Cindy Bero] 14:42:07

So, as we mentioned up Top that you know the application will get posted, applicants will be asked to download the application and review it.

[Cindy Bero] 14:42:17

We will have some sessions to sort of make sure that everyone understands what's being asked and what the requirements are for completing an application.

[Cindy Bero] 14:42:26

Then the application will be submitted by the whatever the published deadline is, and then Cdi will begin the assessment process, and as a result, you know, and in result coming out of that assessment process will be shared to sort of help us understand this process.

[Cindy Bero] 14:42:47

We did identify 2 organizations that tested some elements of this, and while we have not determined an outcome for these tests, we do have some feedback on the process itself.

[Cindy Bero] 14:43:02

That will, you know, factor into how we move forward. And I wanted to share some of that feedback.

[Cindy Bero] 14:43:08

First one is that the application appears to be something that can be completed in a 2 to 3 week timeframe without creating significant burden on the organization applying.

[Cindy Bero] 14:43:19

So I think that was gratifying. We don't want to create burden for organizations.

[Cindy Bero] 14:43:24

We want it to be fairly straightforward process to complete.

[Cindy Bero] 14:43:28

Again we heard that there were some areas of the application that could benefit from some rewarding or clarification to make sure that the right information is submitted, and that would will, along with public comment, will factor in we did work with Cdi to identify several resources that will be engaged in

[Cindy Bero] 14:43:50

the scoring and assessment process, and in designed a process that ensures some independent scoring.

[Cindy Bero] 14:43:58

You know, 2 independent teams looking at the same application, so that we have some sort of interrelator reliability, so that that was a very positive outcome from this.

[Cindy Bero] 14:44:10

This test test, and then we did note, and I think Dean just pointed out exactly that ability. So that was a very positive outcome from this test. And then we did know.

[Cindy Bero] 14:44:26

And I think Deanne just pointed out exactly that point that some of these require some subject matter expertise. It's not a purely objective assessment that can be done based on the application materials.

[Cindy Bero] 14:44:34

It is going to require somewhat subjective assessment by someone with some subject matter, expertise again, to independent subject matter.

[Cindy Bero] 14:44:39

Experts looking at the same application, so we can get some concordance there.

[Cindy Bero] 14:44:46

So those are additional pieces of input into the process overall.

[Cindy Bero] 14:44:51

We're marching towards this timeline. A lot of this is very dependent on being able to consolidate the input we get today.

[Cindy Bero] 14:45:01

Get the appropriate reviews conducted. But this is sort of the the rough outline of the timeline that we're that we're hoping to achieve to get the final application out.

[Cindy Bero] 14:45:13

And the Qhios, identified by end of summer.

[Cindy Bero] 14:45:21

Questions.

[CalHHS CDII] 14:45:23

Thanks, Cindy.

[CalHHS CDII] 14:45:26

Ali, you're muted!

[Ali Modaressi] 14:45:29

Thank you. Question is the I saw it. There's gonna be a policy, separate policy for Qhio that the Dsa.

[Ali Modaressi] 14:45:42

My question is that all the same, to be released before the application.

[Ali Modaressi] 14:45:50

Final application is released.

[CalHHS CDII] 14:45:53

We'll be covering that timing and that part of it in the policy and procedures section that follows.

[CalHHS CDII] 14:45:59

This follows, one or 2 other things before we get there.

[Ali Modaressi] 14:46:01

Alright. Thank you.

[CalHHS CDII] 14:46:02

Thanks.

[CalHHS CDII] 14:46:04

Alright, and one other note from on the test applicants.

[CalHHS CDII] 14:46:12

That was a test run. It was not a pilot. They need to apply just like everybody else.

[CalHHS CDII] 14:46:17

So their application. It's not being scored. Anything like that.

[CalHHS CDII] 14:46:21

We only use it just to highlight that they need to apply as though they're coming out of the starting date along with everybody else.

[CalHHS CDII] 14:46:28

It was, you had the opportunity, review the application that filled it in alright.

[CalHHS CDII] 14:46:34

I'm gonna ask Juliet from Annette to go pretty quickly on the Grant program.

[CalHHS CDII] 14:46:40

We've had Town Hall. We've gone all the way back to October we've had listening sessions.

[CalHHS CDII] 14:46:44

We've had town halls. We've had. We have current office hours so we're probably gonna fly through this, even if you don't speak to every slide.

[CalHHS CDII] 14:46:52

I don't know. Many slides we're checking about this, even if you don't speak to every slide. I don't know many slides. We're checking about 30 min behind with rowing. Everybody's billies for lunch, but that's okay.

[CalHHS CDII] 14:47:02

so, Juliet, go ahead with grant programs, and we'll keep moving forward.

[Juliette Mullin] 14:47:06

Great. We will go quickly. All right. We just wanted to provide a very brief update on implementation at the end, noted.

[Juliette Mullin] 14:47:14

We've already talked a fair amount about the guidance and the program structure in this forum.

[Juliette Mullin] 14:47:19

So just as a reminder for everyone in case that you are not aware round one of the Dsa signatory grants are open for applications as we speak, so we do encourage everyone on this call as well as anyone listening to share that information make sure their networks are aware that these grants are

[Juliette Mullin] 14:47:39

available and to refer to the information on the Cdi website about those grants.

[Juliette Mullin] 14:47:45

Just a note on timing round one applications will be accepted through Friday, June sixteenth, and that first round, as we've talked about many times in this forum is limited to mandatory dsa signatories in order to help them achieve the timeline that they may need to

[Juliette Mullin] 14:48:02

adhere to in order to begin exchanging data in accordance with the Dxf.

[Juliette Mullin] 14:48:05

I'm gonna power us through and just keep on moving.

[Juliette Mullin] 14:48:10

This is a reminder for folks about what the 2 Grant domains are.

[Juliette Mullin] 14:48:14

I'm not going to go into that. A ton of detail around this today other than to say that there are 2 Grant domains.

[Juliette Mullin] 14:48:20

Qhio onboarding grant and technical assistance Grants.

[Juliette Mullin] 14:48:24

Both of those are open for applications, as we speak and on the next slide I'll speak a little bit to the timing. So I noted round.

[Juliette Mullin] 14:48:32

One is currently open round 2 is expected to open in late June.

[Juliette Mullin] 14:48:39

We are doing 2 short application rounds for mandatory signatureies, and this is really intended to support signatories who may have to to signatories who may have to begin

exchangeingatories who may have to begin exchanging data by a specific date to achieve that date so

[Juliette Mullin] 14:48:53

Cdi wanted to support those those signatories in making applications available to them and getting funds available to them on an expedited timeframe.

[Juliette Mullin] 14:49:02

The Grant program is expected to open to a broader set of applicants in July of this year a core question that we get frequently that I will pause on is the question about qhio onboarding applications, which is very timely given.

[Juliette Mullin] 14:49:19

The discussion we just have the Qh. Onboarding grants are open for applicants.

[Juliette Mullin] 14:49:24

So applicants at this time signatories at this time can choose to apply for q-hio onboarding grants.

[Juliette Mullin] 14:49:31

Folks that have been listening for the past hour and change.

[Juliette Mullin] 14:49:34

Will be tracking that the qhos are not yet named, so as as we've outlined in a lot of detail in the Grant Guidance document, and I'll just highlight here.

[Juliette Mullin] 14:49:44

Briefly, the way that it will essentially work for an applicant is, if an applicant receives a grant award in the Q&A onboarding domain from Cdi, they will be able to select their qhio after they receive their award and a.

[Juliette Mullin] 14:49:59

Pon. Attestation of achieving milestone, one which is signing a contract with a Qhio.

[Juliette Mullin] 14:50:04

If for whatever reason, an applicant has a planned hio partner that they want to go with, and that partner either decides not to be qualified or does not achieve qualification, they have 2 choices.

[Juliette Mullin] 14:50:17

They can either proceed with that partner through a ta grant. And we explain the process for that in the guidance document, or they can select an alternate hio partner that is qualified at that point in time. So there are options for applicants based on whether their partner is qualified or not.

[Juliette Mullin] 14:50:34

That's the core piece. I wanted to highlight. There we have a few slides.

[Juliette Mullin] 14:50:37

On the application process. I'll just highlight 2 pieces for folks as you're communicating this out to your stakeholders and partners in the field.

[Juliette Mullin] 14:50:44

If you are applying for Qhio onboarding Grant Cdi has contracted with k-he to complete all of that application process.

[Juliette Mullin] 14:50:56

So this is the assisted pathway in which organizations get support with the application process and with the actual profits of managing Grant Fund.

[Juliette Mullin] 14:51:08

In this domain Kai will support them in applying for the grant, and if they receive a grant, the Qhio will be the recipient of the funding, and will support all of the grants, management and funds disbursement process on behalf of the applicant so this is

[Juliette Mullin] 14:51:23

really that the assisted pathway in the Ta Grant pathway.

[Juliette Mullin] 14:51:27

An applicant will submit the application themselves. It's a choose your own solution, option in which the funding will go directly to the grantee on this next slide.

[Juliette Mullin] 14:51:37

Here we have some additional details about the specific steps that I'm going to just breeze through here, but this is available for everyone's reference.

[Juliette Mullin] 14:51:44

We'll also note that the application template itself and the guidance document is available on the Cdi website, and both those documents taken together will answer a lot of questions.

[Juliette Mullin] 14:51:55

You are likely to have about the Grant program and then I'll just close by.

[Juliette Mullin] 14:52:00

Second, if you have questions, we have a number of different teams and individuals here to support you.

[Juliette Mullin] 14:52:04

That are listed here. I'm not going to read through them, but we are ready to accept any questions or support any organizations that are looking to apply with that very fast overview.

[Juliette Mullin] 14:52:16

I'm gonna take a look in the chat to answer any questions there and hand it back to DM.

[CalHHS CDII] 14:52:21

Thank you. And if if someone from Manhattan or the Grants team is able to drop some of those contacts into the chat while we move on, that would be fantastic.

[CalHHS CDII] 14:52:32

I see one hand raised. Let's go for it, Lori.

[CalHHS CDII] 14:52:35

I just wanna say for the folks who, if you are not short for joining the support or a qhio, if you contact K-high grant support kkhe.org.

[CalHHS CDII] 14:52:52

The team will want to, so you don't have to decide right then.

[CalHHS CDII] 14:52:56

Say you may end up at the end of your conversation about this being put back into the ta track.

[CalHHS CDII] 14:53:04

So you know, it's Julie I was mentioning really great folks at the other end of those contacts that will help walk you through whatever it is most appropriate for your organization.

[CalHHS CDII] 14:53:17

Mirroring the Cms. No wrong door. Come in. The door will help find your way.

[CalHHS CDII] 14:53:23

Yeah, so, and let us know if that door is not being answered, we'll jump on that.

[CalHHS CDII] 14:53:28

Thank you. Alrighty, thanks much. I feel like we now start.

[CalHHS CDII] 14:53:36

What believe it or not is probably the meat of the meeting.

[CalHHS CDII] 14:53:39

If it's policies and procedures, can we go to the next slide?

[CalHHS CDII] 14:53:43

Please.

[CalHHS CDII] 14:53:46

Alrighty. So I'm gonna bring in Courtney Handson with Cdi.

[CalHHS CDII] 14:53:54

Chair of the Dsa. Policy and Procedure Subcommittee Meeting.

[CalHHS CDII] 14:53:59

If that's for these to take next slide, please.

[] 14:54:05

Thanks. Dan, by all, I hope you're all doing very well.

[] 14:54:10

And as we move into the meet of this, here is a quick overview of where we're at on the policies and procedures.

[] 14:54:20

So we have 3 that have been finalized. We're going to give an update shortly on real time.

[] 14:54:29

Q-hio is being revised. Following public comments.

[] 14:54:34

And then we are going to have an in-depth discussion on both amendments to the privacy standards, and security safeguards.

[] 14:54:40

Cnn. And the process for amending the Dsa.

[] 14:54:44

Requirement to exchange. Hssi is being prepared for public comments.

[] 14:54:51

That's one we discussed the changes on last meeting.

[] 14:54:55

So be on the lookout for that, and then flagging that we are developing an amendment to the development and the development of and modifications to P.

[] 14:55:06

Andps pmp, and so I know I went through that pretty quickly.

[] 14:55:12

I think we're gonna spend a little bit of time on each of those things.

[] 14:55:15

But in the interest of time I'm going to pass it on to Cindy to discuss our new Dsa. Pmp. Gallery.

[Cindy Bero] 14:55:26

Thank you, Courtney, as the number of P.

[Cindy Bero] 14:55:30

And P's seems to grow, and the number of definitions referenced by each one of those P.

[Cindy Bero] 14:55:36

Nps grows it all of a sudden became apparent that maybe centralizing a glossary of terms would be very helpful way to reference.

[Cindy Bero] 14:55:49

You know, definitions as they are brought out, in each of these documents.

[Cindy Bero] 14:55:52

So over the last few weeks we've been going through the Dsa.

[Cindy Bero] 14:55:57

And each one of the policies and procedures, and creating a centralized glossary that will be shared with all of you in the coming weeks.

[Cindy Bero] 14:56:07

We still have a few more tweaks to apply to it.

[Cindy Bero] 14:56:12

But the glossary will have the term. It will have it.

[Cindy Bero] 14:56:15

Step, in, and it will reference each one of the documents in which the term appears.

[Cindy Bero] 14:56:22

It will also have the the date. That that term was most recently revised, and by providing this type of centralized glossary, we think it'll be a lot easier to track the some of these terms, and some of the policies and procedures and crosswalk them.

[Cindy Bero] 14:56:41

So having to share more in the coming weeks, but wanted to let you know that this was basically soon arriving.

[] 14:56:54

Thanks, Cindy.

[Cindy Bero] 14:56:55

Back to you, Courtney.

[] 14:56:57

Any questions on our Dsa. Pnd. Glossary.

[] 14:57:03

Not seeing any. Okay. So here are the finalized pnps that I alluded to earlier.

[] 14:57:11

So we have finalized the technical requirements for exchange.

[] 14:57:15

California information blocking prohibitions and urban exchange.

[] 14:57:19

All 3 of those policies and procedures will be posted on our website shortly, and I believe all members of both.

[] 14:57:26

The loc and the Dsa. Pmp. Subcommittee have received critical copies of those, so you can see what that final language was, and I just want to take a moment to thank all of you for your critical input on these.

[] 14:57:41

It's been a harrowing past few months, and we are very excited that we have these done.

[] 14:57:48

Thank you again for making it happen and making sure that we get it right, Mark.

[CalHHS CDII] 14:57:56

Thanks, yeah. On the technical requirements for exchange.

[CalHHS CDII] 14:58:01

Some members, this committee have raised the question about which exchange, and I didn't see that that if there have been any corporation of that I understand you're not presenting this is finalized.

[CalHHS CDII] 14:58:15

I just want to confirm. The exchange is not included.

[] 14:58:22

Ramkin.

[CalHHS CDII] 14:58:22

The information, delivery, in response to an order request. That's correct.

[CalHHS CDII] 14:58:27

And at this time, in response to public comment. That is what is included in this.

[CalHHS CDII] 14:58:35

Missed opportunity to build it correctly at the beginning.

[CalHHS CDII] 14:58:40

Instead of having to add on, thank you.

[] 14:58:45

Thank you. Mark any other comments on the finalized Gnps.

[] 14:58:53

Andrew, yeah, I'm just following back up on comments we've made in previous meetings about redefining.

[] 14:59:04

What a transfer is! So I I didn't see the final version of it, so I don't know where it landed.

[] 14:59:11

Just curious, based on the discussions that have been had since there was any change in the direction to redefine what it 80 is.

[] 14:59:23

Rem. Do you mind taking this one?

[CalHHS CDII] 14:59:26

Sure. So what the final language requires is still, admissions, discharges, that does not prevent trans.

[CalHHS CDII] 14:59:35

Cript transfers, for those organizations that are providing.

[CalHHS CDII] 14:59:38

Just send them as well, requiring transfers. Maybe in a future version.

[] 14:59:50

Thanks. Ben.

[] 14:59:53

Are there any other questions on the 3 finalized Pnps?

[] 15:00:00

Hey? Now I will turn it over to believe, to dance, to discuss real time, and where we're at in real time.

[CalHHS CDII] 15:00:07

Yeah.

[CalHHS CDII] 15:00:12

Yes, so one of those hurry up and wait. But we're not gonna wait forever.

[CalHHS CDII] 15:00:19

We were trying really hard to finalize the real exchange.

[CalHHS CDII] 15:00:24

Pmp. For today. But it just was not making sense.

[CalHHS CDII] 15:00:28

We've had basically 50% consensus on do it with high specificity.

[CalHHS CDII] 15:00:35

50% generally of stakeholders, and but saying, be less specific.

[CalHHS CDII] 15:00:42

So this is what we have come up with as an update for today.

[CalHHS CDII] 15:00:46

Reiterating what the goal is to establish a pmp that defines real time data exchange and the associated obligations of data exchange participants.

[CalHHS CDII] 15:00:57

And then the overview is that the public comment remains equally divided, which I just essentially opened with and for consideration.

[CalHHS CDII] 15:01:09

So focus on progression from current state match exchange to transactional.

[CalHHS CDII] 15:01:13

So so work towards moving the needle and evolving to measurable timely standards.

[CalHHS CDII] 15:01:19

We were trying to put this in a very contained box by basically today.

[CalHHS CDII] 15:01:24

And it wasn't feeling right. So we would like the subcommittee. The lac.

[CalHHS CDII] 15:01:31

To be to consider this type, and that we take this back your fee, your input and inform us, and that we use the next meeting in about 3 weeks.

[CalHHS CDII] 15:01:42

I don't even think it's 3 full week a subcommittee meeting, and get roll up our sleeves and get into the details and technical conversation.

[CalHHS CDII] 15:01:51

Of real time on June 20 seventh, so open for any questions or comments.

[CalHHS CDII] 15:02:06

And then with that just because we didn't talk enough about Qa.

[CalHHS CDII] 15:02:11

Jiao, we will be going to the Qhio policy and procedure that closed for public comment a few weeks ago.

[CalHHS CDII] 15:02:18

So this is the first recap of what the comments were received on that Pnp, and we'll be hearing from Helen Vister from.

[Helen Pfister] 15:02:27

Thanks, Diane, so just so, you know all of the public comments that were received on the Qhio pmp.

[Helen Pfister] 15:02:35

As well as on the Qhio. Application, are on Cdi's website.

[Helen Pfister] 15:02:38

So you're welcome to take a look at those, and who submitted them.

[Helen Pfister] 15:02:40

And what exactly they said with respect to specific to this.

[Helen Pfister] 15:02:45

Qh, tuper. Qh, I opm what we heard basically fell into 3 categories.

[Helen Pfister] 15:02:52

Commentators suggested that the Pmp. Allow for a remediation and probationary period as an option to correct minor deficiencies as opposed to immediate suspension or suspension or termination commenters suggested.

[Helen Pfister] 15:03:06

We'd heard this before in the previous meetings of the Dsa.

[Helen Pfister] 15:03:10

Pnp. Subcommittee, as well as I think the see meetings that the Qhio Pmp.

[Helen Pfister] 15:03:15

Should be more detailed, and should service be authoritative, document for the Qhio program.

[Helen Pfister] 15:03:20

And then we heard that the Qao Pmp.

[Helen Pfister] 15:03:24

Should be revised to make it more clear, the Ts are required to sign the Dsa.

[Helen Pfister] 15:03:29

So Cdi is considering the public comments that it received. But as we've discussed previously, Cdi has determined that it would be most effective to separate the requirements of the Qhio program from the Pmp.

[Helen Pfister] 15:03:45

Process to give, Cdi the flexibility it needs to be able to update the Qhi requirement requirements from time to time when necessary.

[Helen Pfister] 15:03:54

With respect to the comment about signatories signature, the attend always was the Q.

[Helen Pfister] 15:03:59

Which I always would sign the dsign and the Qhio Pmp.

[Helen Pfister] 15:04:02

Currently says we've got to compile with the psi, but we are going to revise it to make it very clear that qh, I must both sign and comply with the Vsa.

[Helen Pfister] 15:04:11

Any questions or comments on that.

[Helen Pfister] 15:04:18

Seeing none, I will turn it over to Courtney for the oh, Felix, I see, come and feel it's.

[CalHHS CDII] 15:04:24

Oh, yeah. Sorry about that, Helen. So I just wanted get a little more clarity here.

[CalHHS CDII] 15:04:31

So he recognized there's an acknowledgement about the request for more detail, I think, much as A. P.

[CalHHS CDII] 15:04:40

Mp, but maybe a separate set of Pmp's that to really how in on some of these issues that you outline here, you know, mediation an ongoing administration of key Hy program, you know, monitoring for you know obviously all of the terms of

[CalHHS CDII] 15:04:57

qualification, etcetera, is that being considered? Because that was, I think, a thrust of a number of our comments that just the application itself and the single pmp that's out there.

[CalHHS CDII] 15:05:11

For finalization by themselves. It's not enough to wrap around a program.

[CalHHS CDII] 15:05:16

That's as important as this.

[Helen Pfister] 15:05:19

So, yeah, that that is being considered. I'll let Diana or Cindy jump in if they want to give more details.

[Helen Pfister] 15:05:24

At this point. It's something that is being that's in process.

[Helen Pfister] 15:05:28

But it's not going to be a formal Pmp.

[Helen Pfister] 15:05:31

But there will be more information than just this high level. Pmp, and the application itself.

[CalHHS CDII] 15:05:36

Yes.

[Helen Pfister] 15:05:36

I know Deanna Cindy, if you I mean for that.

[CalHHS CDII] 15:05:39

That falls under most of it falls under program when we find that it's something, and with leak, Cdi, legal and agen legal, weighing in with on us, with building the program.

[CalHHS CDII] 15:05:50

Then they'll help guide us. Program side of the house, saying, no, this needs to be in something with more guard rails around it.

[CalHHS CDII] 15:05:59

Such as the P. And P. But right now we what the comments, commented on we see is all fitting into program.

[CalHHS CDII] 15:06:06

Guidance as opposed to in this Pmp.

[CalHHS CDII] 15:06:11

So it'll be like, not a pmp. But okay, I got a yeah, I mean, what?

[CalHHS CDII] 15:06:16

But comparable to the signatory Grant program. Guidance and comparable to other programs like with our some of our sister agencies.

[CalHHS CDII] 15:06:27

There's there's some programs out there, I mean what I spent 5 years on a lot of it was not in.

[CalHHS CDII] 15:06:34

It was in a more flexible stakeholder, contributed that people contributing and building a document that was our guide.

[CalHHS CDII] 15:06:41

So grab one and give. Say, it's gonna be a toolkit today.

[CalHHS CDII] 15:06:47

No. But yeah, I mean very last comment on that. Instead of I think you know, that could work for some parts of the nursery in the program.

[CalHHS CDII] 15:06:58

But when it comes to things like enforcement, and you know just kind of the brass tacks of making sure that she files are in compliance like that probably needs some.

[CalHHS CDII] 15:07:07

Right, so that we see and follow. Okay, David, just real quickly.

[CalHHS CDII] 15:07:16

Actually, the question still, just ask for something, and hadn't really considered before.

[CalHHS CDII] 15:07:19

It may be that as time goes on we need P.

[CalHHS CDII] 15:07:23

And piece that actually don't apply to all signatory equally, hey, have some problem with what you're suggesting.

[CalHHS CDII] 15:07:30

There is that a physician's looking for this thing? Well, I don't know. What does I?

[CalHHS CDII] 15:07:35

I don't. That's not my problem.

[CalHHS CDII] 15:07:37

And so if the document is said like, if your physician's saying this, don't worry about this.

[CalHHS CDII] 15:07:40

Pmp. Then it's not my members problem with the Qhio P. He says.

[CalHHS CDII] 15:07:49

Follow that. Okay, thank you.

[Helen Pfister] 15:07:57

Okay.

[CalHHS CDII] 15:07:57

There, Ali, Europe.

[Ali Modaressi] 15:07:59

Yeah, thank you. So is there a gonna be a pnp for qhos.

[Ali Modaressi] 15:08:07

Because I'm hearing pnp. For Qhios.

[Ali Modaressi] 15:08:09

I'm also hearing program guidance, and then there's application for Qq. I.

[Ali Modaressi] 15:08:14

USP. Could you delineate those, please?

[Helen Pfister] 15:08:18

So, yeah, so the pmp is the document that we're talking about right now, which is sort of a very high level overview of what the Qhio program will look like.

[Helen Pfister] 15:08:28

The application obviously, is what we talked about earlier, that Cindy reviewed, and then the program guidance is what what the average is referring to, which will be not global pmp, but we'll have guidance on just additional guidance on the program what it's going to

[Helen Pfister] 15:08:43

look like what the requirements are, etc etc. But that's meant to be a more flexible document that can evolve over time or easily.

[Helen Pfister] 15:08:48

And that's not an actual Pnp itself. Does that answer the question?

[Helen Pfister] 15:08:51

Or are you getting it? Something else?

[Ali Modaressi] 15:08:53

No, that it does, it does, and is the Pmp.

[Helen Pfister] 15:08:54

Okay.

[Ali Modaressi] 15:08:56

The Qh. Or Pnp gonna be released before that application.

[Helen Pfister] 15:09:01

Is it going to be? I'm sorry.

[CalHHS CDII] 15:09:03

Oh, like finalized.

[Helen Pfister] 15:09:05

Yes.

[Ali Modaressi] 15:09:07

Right is Pnp going to be finalized before you?

[Ali Modaressi] 15:09:12

Qhio, application is released.

[CalHHS CDII] 15:09:18

We think we're close.

[Helen Pfister] 15:09:18

Good. Yeah.

[Ali Modaressi] 15:09:23

Great. Thank you.

[CalHHS CDII] 15:09:25

Yeah, so that's under, basically our proposed next step finalize and publish the pnp, so we're tracking from the comments we've received that we've been reviewing.

[CalHHS CDII] 15:09:38

And what has been amended since on our internal draft.

[CalHHS CDII] 15:09:43

So right now we're thinking that the timing is not so far off.

[CalHHS CDII] 15:09:46

You know we thought that in February, when we talked about certain Pmps, and we might only be finalizing today.

[CalHHS CDII] 15:09:53

So these things. I'm not afraid of walking things back, because that means we're listening and taking engagement.

[CalHHS CDII] 15:10:00

We have, what are envision of next steps are, and we hope to get there.

[CalHHS CDII] 15:10:06

But if we have to undo that, we'll do that.

[CalHHS CDII] 15:10:09

But right now from what the comments we've received that there were a lot we feel like we can move forward pretty soon.

[CalHHS CDII] 15:10:17

We have hand raised from Dr. Troy. You're up.

[Troy Kaji] 15:10:22

Hi, just a commenting on your comment about the more flexible guidance that might be available with something like the State health information, guideline, or whatever this is, be an example of what you're talking about.

[CalHHS CDII] 15:10:48

And we do it like that's good. It's called the.

[CalHHS CDII] 15:10:52

That's one resource right now. More current would be the 41 page dxf.

[CalHHS CDII] 15:11:00

Dsa. Signatory grant guidance. So that's only about a month old.

[CalHHS CDII] 15:11:05

It's not perfect. We're willing to revising it during this round one open.

[CalHHS CDII] 15:11:12

We don't have significant substitutive things to correct in it.

[CalHHS CDII] 15:11:18

We're just making some clarifying points.

[CalHHS CDII] 15:11:20

So that document which is available and if there's a link anybody can drop in the chat would be a comparable to what I'm envisioning for a Qhio program and then to are we sure?

[Troy Kaji] 15:11:31

Thanks for clarifying.

[CalHHS CDII] 15:11:34

And then Toiley's question, when this Pmp.

[] 15:11:35

And.

[CalHHS CDII] 15:11:38

Was released for public comment. Recently it was called Qhio Program, and that seemed to be confusing.

[CalHHS CDII] 15:11:45

People. So I'm the one that said on the slides, let's call it the Qhio P.

[CalHHS CDII] 15:11:50

And P, because that's where people were saying we need more detail.

[CalHHS CDII] 15:11:54

We'll still leave this meeting and go back to see if there's something more missing on what we intend.

[CalHHS CDII] 15:12:01

Have shape the Qhio. But even what I knew as a Friday into business it's still sounds like everything is falling into the right place to be able to launch the application and then be awarding queues. Review and award. Come August.

[CalHHS CDII] 15:12:22

Courtney.

[] 15:12:23

Thanks, Dan, I was just going to jump in on the the.

[] 15:12:28

So the State health information, guidance is guidance.

[] 15:12:30

That. So it's non-binding, non-mandatory guidance from the State that Cdi also produces.

[] 15:12:36

That's a separate project that we do. If someone can drop the link in, it's we have several different volumes that talk about how different types of health information can be shared between different folks, it has scenarios, including a very relevant one to this and sharing for health information

[] 15:12:57

exchange in our volume one for Behavioral Health Information.

[] 15:13:02

It talks about how you can share part 2 information and lantern.

[] 15:13:07

Such a short information. So it's a very helpful document in how to lawfully exchange information.

[] 15:13:14

And when you need an authorization so just wanted to let folks know exactly what that is.

[] 15:13:19

If you don't already know and feel free to visit our website and take a look at it.

[] 15:13:25

The wonderful document.

[Helen Pfister] 15:13:27

So that's actually a great transition to the next stage of our discussion, which is Courtney's review of the privacy, standards, and security safeguards.

[] 15:13:28

And then.

[Helen Pfister] 15:13:35

Pmp. Proposed Members Courtney over to you.

[] 15:13:38

Thanks, Alan!

[] 15:13:43

All right.

[] 15:13:46

Alright! Someone made the mistake of giving me control of slides, so it feels like many months ago.

[] 15:13:57

At this point we want to make a minor edit to the private routine standards and security safeguards.

[] 15:14:04

Pnp. We posted it for public comments, and we've received a large number of comments all throughout the document, not just limited, not just limited to the small change that we were making.

[] 15:14:15

So we took this opportunity to take a look at all of the comments we received.

[] 15:14:21

Take a look at the document as a whole. Take a look at where we are now, and what we're envisioning for Dxs, and see, is it still working?

[] 15:14:28

Does it still make sense? And we've what we've done is create a new draft of it, bringing in a lot of the different ideas, but also bringing a bit more specificity to different points of it.

[] 15:14:46

And so members should have received a draft version of the document that you can also see.

[] 15:14:51

And so we'll walk through some of those different updates.

[] 15:14:54

So the first, thing that we took a look at after receiving comment is the application of the Pnp.

[] 15:15:03

So we received feedback that the at times the Pnp.

[] 15:15:10

Completed the requirements for covered entities and non-covered entities.

[] 15:15:12

It was Unclear, when, who was supposed to follow Tipa, and when we received additional feedback that the some of the standards which applied were, should only apply to Phi and vice versa, or to only apply that covered entities.

[] 15:15:34

First, all participants. And so we took a look at that, and are proposing different requirements for covered entities and non-covered entities to very specifically help participants identify what they need to follow.

[] 15:15:51

And make it clear what laws apply, or what they need to follow.

[] 15:15:57

For each of those things, and so we are requiring hipaa covered entities to follow, and business associates to follow.

[] 15:16:07

Hipaa, and any applicable law because, as we know, there's many different privacy laws out there that may also apply and for non-covered entities that they have to.

[] 15:16:19

So follow certain provisions of hipaa, and so, as well as certain provisions of the privacy role, as well as the security role.

[] 15:16:31

And so specifically.

[] 15:16:35

We have.

[] 15:16:43

Sorry. It's much easier for me to just walk through the document, but we have required all participants.

[] 15:16:54

So what, regardless of whether you are a hipaa, covered entity or not to noncovered entities are being held to certain hipaa standards, and one of which I wanna highlight is the identification because it was mentioned in the chat.

[] 15:17:09

So we're requiring all participants that are not the non-covered N entities.

[] 15:17:15

So, regardless of hipaa, applies to you.

[] 15:17:17

If you want to use the identified information, you must be identified.

[] 15:17:21

That information to the standards in hipaa.

[] 15:17:26

So either under safe harbor or with a an expert determination.

[] 15:17:33

So that will apply to all information, both chi npr.

[] 15:17:45

I'm not sure if folks had a chance to review or want to discuss in any more detail the the application of the Pnp.

[] 15:17:54

So who parts of hipaa applied to?

[] 15:18:10

In the chat some support Morgan.

[Morgan Staines, DHCS (he)] 15:18:15

Yeah, and match. Here's my concern, and maybe you've captured it somehow.

[Morgan Staines, DHCS (he)] 15:18:24

And and I just haven't spent enough time with it yet.

[Morgan Staines, DHCS (he)] 15:18:28

Yeah, and wide. Everything my department has is Phi, and other than employee stuff, right? Because we're a covered entity.

[Morgan Staines, DHCS (he)] 15:18:39

And we've not. Hibernized any part of our business when we share with.

[Morgan Staines, DHCS (he)] 15:18:47

Others, our usual expectation is to keep the information under the hipaa umbrella.

[Morgan Staines, DHCS (he)] 15:18:59

So sharing with 9 covered entities is, it slows us down.

[Morgan Staines, DHCS (he)] 15:19:05

Hmm, because we have. Yeah, we have to make sure we have a clear path to do that.

[Morgan Staines, DHCS (he)] 15:19:12

If we think that the data might leave the hipaa umbrella, is is that captured here?

[Morgan Staines, DHCS (he)] 15:19:18

Someplace, or.

[] 15:19:21

So, if a hipaa covered entity shares Phi with a non hipaa covered entity because folks are required to share for required purposes, and some of those require are to all participants.

[] 15:19:36

So you know folks may have that authorization share the information.

[] 15:19:41

The non hepa covered entity will have to hold that information and apply certain hipaa provisions so specifically limited ability to redisclose the information.

[] 15:19:55

So there's so the identification minimum necessary incidental use.

[] 15:20:06

So there's a few different provisions that from the hipaa privacy role that folks will have to follow and then provisions from the hipaa security role.

[] 15:20:14

So general security provisions, as well as administrative, physical, and technical safeguards.

[] 15:20:19

And so those parts of hipaa will be applied to non corporate entities.

[] 15:20:23

So whenever a non-covered entity receives information from a covered entity, or from a noncovered entity, they, those portions of hipaa, will apply to them.

[] 15:20:37

That's our intent.

[] 15:20:54

Can I move on to Cathy? I don't know.

[] 15:20:57

Morgan, if you had any, follow up.

[Cathy Senderling-McDonald] 15:21:01

Okay. Great thanks. Hi. Cathy. Sanderling as a county welfare directors.

[Cathy Senderling-McDonald] 15:21:06

So our organization members are typically, not hipaa covered for most of the work they do.

[Cathy Senderling-McDonald] 15:21:14

So we have been thinking that what we would need to do was generally aide by, I think, elsewhere in the materials that we've worked on with.

[Cathy Senderling-McDonald] 15:21:23

You are applicable privacy standards that govern our programs.

[Cathy Senderling-McDonald] 15:21:27

So this seems like it steps away from that. I wondered.

[Cathy Senderling-McDonald] 15:21:34

So 2 things, I mean, we're gonna have to have Pride County Council. Take a look at this.

[Cathy Senderling-McDonald] 15:21:39

So what is your timeline for the feedback to be provided?

[Cathy Senderling-McDonald] 15:21:46

And are there any provisions within this that make a difference between?

[Cathy Senderling-McDonald] 15:21:50

I mean, you know either your you know, kind of either that you're covered or not, so I I guess I have to read through it.

[Cathy Senderling-McDonald] 15:21:58

But this may cause some questions for us. I guess I'll just say.

[] 15:22:03

Thanks, Kathy, and you highlighted a particular thing that I failed to mention, which is for non-covered entities.

[] 15:22:10

We also allow for anything that's permitted under applicable law.

[] 15:22:14

So if you have other laws that apply to you, you can exchange the information within those laws.

[] 15:22:21

It's not meant to hinder what's already happening lawfully, but it is meant to fill a gap if there is a circumstance where there's no laws that apply.

[Cathy Senderling-McDonald] 15:22:33

That's helpful. Thank you. Do you know yet what the timeline is for?

[] 15:22:38

At!

[Cathy Senderling-McDonald] 15:22:38

For the comment.

[] 15:22:42

And Dean, or someone from speaking to the timeline. I apologize.

[] 15:22:49

I'm not sure.

[Helen Pfister] 15:22:54

Yeah, I mean, I think it should be relatively soon, I mean with the announcement that we're trying to get things.

[Helen Pfister] 15:23:00

Rights are always where we're always very careful that we're gonna take any comments we get in the course of this meeting, and then go back to the pizza to the Pm.

[Helen Pfister] 15:23:08

And make any provisions that are necessary, and then for public comment, hopefully, I would say, it's June fifth.

[Helen Pfister] 15:23:15

I don't know step out of bounds here.

[Helen Pfister] 15:23:18

Maybe later this month, I would hope again with the usual caveats. But.

[] 15:23:23

And with public comment, being another opportunity to bring to light any comments they have.

[] 15:23:29

We.

[Lee Tien] 15:23:31

Yeah, no, I just. I was just sort of repeating the concern, but I you know Kathy, sort of made the the concrete point, you know.

[Lee Tien] 15:23:41

Certainly there's a lot of of the city and the county level organizations who are going to be in the Sto age sort of of social services area area and and is there going to be an opportunity for them to really learn what you know because they've never had if

[Lee Tien] 15:24:06

they've never had to deal with these obligations that are hipaa like.

[Lee Tien] 15:24:11

Then they don't. They probably have not had training on it, or anything.

[Lee Tien] 15:24:16

And I'm wondering how the practical sort of and it's it's all good and well to have these in the Pmps, but I wanna make.

[Lee Tien] 15:24:24

But you know, really making sure that that everyone who's actually having to do it understands exactly what they're supposed to do.

[Lee Tien] 15:24:31

So, there aren't any accidents or mistakes in early on, because I think those are.

[Lee Tien] 15:24:37

They don't look good, and they're gonna make them.

[Lee Tien] 15:24:40

They're gonna make things look like problematic. So I just wanna make sure that that everyone who has to pick up these obligations is going to have.

[Lee Tien] 15:24:49

But you know the opportunity to act with what they're supposed to.

[Lee Tien] 15:24:53

Thanks.

[] 15:24:56

Thanks, we. We will keep that in mind as we move forward, and I do.

[] 15:25:04

Wanna point folks out that Ocr has a large number of supporting documents and questions at the answer on their website that help with guidance and understanding obligations under Hipaa, and that would be a great resource to start with Mark.

[CalHHS CDII] 15:25:26

Thanks. Then I just wanna agree with Lee's practical point.

[CalHHS CDII] 15:25:31

But my primary comment is about differentiating between hipaa nonpa covered entities and the way they ecosystem.

[CalHHS CDII] 15:25:40

Thanks about that. I found it very helpful thinking about that in July of last year, thinking about the way it was articulated that have a privacy and security.

[CalHHS CDII] 15:25:54

Rules may not apply to you, but they will by contract, and so, instead of talking about whether you are or not, a coverage entity, but to talk about these requirements apply to everybody one way or another.

[CalHHS CDII] 15:26:05

And I think that's more of a messaging comment.

[CalHHS CDII] 15:26:08

Good. That may be an important one, because we have to preserve trust, and we have to proceed, understanding.

[CalHHS CDII] 15:26:14

Thank you.

[] 15:26:17

Thank you. Mark.

[] 15:26:20

Okay, moving on to security safeguards, we received comments that security encompasses more than just accessing use of data.

[] 15:26:32

So we have expanded our P. And P. To address, protecting from unauthorized disclosure, access, youth, disruption for modification of both Phi and Pii.

[] 15:26:49

So that's a big point for security that we've added disruption or modification.

[] 15:26:58

And and then for training on training. We've received some questions about what kind of training is required, as well as how long like, how will you know essentially how folks have completed the training?

[] 15:27:16

And so we've revised our training requirement to specify that.

[] 15:27:21

You must do your annual training that addresses both all privacy laws that will apply to any of the data that you access user disclose as well as security, awareness, training.

[] 15:27:36

And then we're requiring that you what maintain training certificates for at least 3 years or longer, if required by applicable loss.

[] 15:27:47

And so that's was just to address for folks how to maintain that information and provide a little bit more specificity for folks to understand what type of training they should be offering.

[] 15:28:03

Any questions, comments?

[] 15:28:16

So for covered entities and businesses associates, we're clarifying that covered entities, business associates and cover components of hybrid entities are required to comply with hipaa and applicable law.

[] 15:28:28

So again. That's the reformatting we just discussed earlier.

[] 15:28:32

And then non covered entities. The slide I was looking for and talking about further.

[] 15:28:37

So here are the requirements that we've passed on to from hipaa to non-comfort entities.

[] 15:28:42

So that you that they may not use or dispose information.

[] 15:28:49

A. Established in 45 Cfr.

[] 15:28:54

One to 3, 4 dot 5, 2. That's where incidental disclosures with authorization, treatment, payment operations as well as.

[] 15:29:11

Blanking, making sure, listing them all.

[] 15:29:18

To the individual. Of course.

[] 15:29:23

And then pursuant to a business associate agreement.

[] 15:29:30

And then they must follow minimum, necessary standard as established under hipaa, and then you must verify identities in line with as well.

[] 15:29:45

And so, as I mentioned before, this also the usage and disclosure of the information is also, as peritted under applicable Law.

[] 15:29:59

So again, we are not looking to limits what already lawfully being exchanged, but to fill in gaps.

[] 15:30:13

Now that folks can actually see what I was talking about. Are there any additional questions or comments on?

[] 15:30:23

Kelly!

[Michelle Brown] 15:30:25

Yeah, I do. It kind of strikes me as being overly protective of information that's being allowed to be shared with social services.

[Michelle Brown] 15:30:34

Limiting used to strictly hipaa defined uses it kind of eliminates a lot of potential use cases where information may be disclosed to a social services agency, for example, shelly brown needs transportation.

[Michelle Brown] 15:30:51

She's got a you know. She's got an injury, and she can't.

[Michelle Brown] 15:30:55

You know, like a disability. And she needs assistance with transportation.

[Michelle Brown] 15:31:01

That's not listed in hipaa.

[Michelle Brown] 15:31:03

But this provision could curtail that kind of disclosure.

[Michelle Brown] 15:31:07

So I'm only concerned that we would feel we need to put these burdens on social services.

[Michelle Brown] 15:31:14

We have a process already under law that allows disclosures with an author.

[Michelle Brown] 15:31:18

ization, pretty much for any purpose that are individual wants that information to be shared for.

[Michelle Brown] 15:31:25

So I think maybe we should. We consider how strict we are with social services, disclosures.

[] 15:31:34

Thank you shelly. Under that example. Would it be otherwise permitted by applicable law?

[Michelle Brown] 15:31:42

I, if it's covered by an authorization. Yeah. But I think holding social services to this higher standard or limiting their use of information's gonna really adversely impact a lot of programs.

[Helen Pfister] 15:32:02

If I can just jump in quickly. So we're not if there's an authorization, we're not saying if there's an authorization that would authorize the social service organization to use that data to arrange transportation for Shelley Brown that's fine we're not saying

[Helen Pfister] 15:32:15

that we're saying that it has to comply with one of the provisions of 164.502 a 1, one through 4 and one of those provisions is with an authorization.

[Helen Pfister] 15:32:26

So at the example you're giving would be would be permitted, would be permitted and if you look at the policy in itself, it's a little bit clearer than this.

[Helen Pfister] 15:32:35

We tried to be shorthand on the slide, but.

[Michelle Brown] 15:32:38

Alright. Thank you.

[] 15:32:41

Mark.

[CalHHS CDII] 15:32:45

Thank you. I wanna go back to the covered Entities business associates case and raise a confidence provided before.

[CalHHS CDII] 15:32:55

If I read what it says on covered in existence, associates on page 2.

[CalHHS CDII] 15:33:01

If the participants is a business associate, the participants shall comply with precision.

[CalHHS CDII] 15:33:07

Provisions of its business, associate agreements, wondering about the situation where that Vaa.

[CalHHS CDII] 15:33:12

Is in conflict with the agreement with Paul's and procedures.

[CalHHS CDII] 15:33:19

This language seems to provide a pretty significant hey, that you? Get. You can just say, Well, I'm following my business associate.

[CalHHS CDII] 15:33:28

Agreement says, Hey, particular area of concern to me is around individual access.

[CalHHS CDII] 15:33:34

There are business associated agreements out there that say can't provide.

[CalHHS CDII] 15:33:39

Yeah, I, I shared information. I covered entity and shared information with you.

[CalHHS CDII] 15:33:45

The business associate, benefit individual comes to you, the business associate master, a copy of their.

[CalHHS CDII] 15:33:51

I'm telling you it's my business, so see you can't provide it.

[CalHHS CDII] 15:33:55

Yeah, that kind of conflict, that kind of all I wanted to confirm. But that's the attack here that the business associated agreement will trump where there's any conflict with the with the agreement and with the policies and procedures is that the case.

[] 15:34:16

A great point, we'll consider it. Thank you, Mark.

[CalHHS CDII] 15:34:20

Thanks. So I've raised it before. So I what I'm hearing is it's been considered in.

[CalHHS CDII] 15:34:27

Help you well, help you all concerned, because it is a really big issue.

[CalHHS CDII] 15:34:33

Thank you.

[] 15:34:37

Thank you, Cathy.

[Cathy Senderling-McDonald] 15:34:41

Thanks much. Just wanted to. We'll go back to the prior comment, where the answer was, well, if they have a sort of a separate authorization for use, and that would be okay.

[Cathy Senderling-McDonald] 15:34:57

It does seem to me that we set up a little bit of difficulty for social services entities, and I'm thinking more broadly than just my members here, but with other types which I think was a good example in the what from the prior Speaker, if I'm signed up as an entity to be able to

[Cathy Senderling-McDonald] 15:35:17

exchange, information, but I can't answer. Do anything with it unless I separately get assigned authorization.

[Cathy Senderling-McDonald] 15:35:26

That seems very bureaucratic, and maybe not so helpful to the work that I'm trying to do, especially as what might be smaller sort of entities, nonprofits, and that sort of thing.

[Cathy Senderling-McDonald] 15:35:39

Not to mention government agencies that might be working with others, so I wonder if there's a way to think through together, how someone or an entity that signs on to the agreement some of what your mandatory I mean my members are not but a lot of these other entities may be mandatory

[Cathy Senderling-McDonald] 15:35:58

signers and participants, and yet to be told. Thanks for signing and figuring all that out.

[Cathy Senderling-McDonald] 15:36:04

Now you're still going to have to go get an authorization from every single person you want to serve.

[Cathy Senderling-McDonald] 15:36:08

I feel like that's not necessarily what we're really striving for here.

[Cathy Senderling-McDonald] 15:36:12

And it would be great if we could think through how to avoid requiring that.

[] 15:36:18

Thank you, Kathy.

[] 15:36:21

Morgan.

[Morgan Staines, DHCS (he)] 15:36:23

Thanks, Courtney, for a little further to Cathy's comment, and Shelley's about about authorization.

[Morgan Staines, DHCS (he)] 15:36:31

Indeed, you know consent! Here's carries all sins, but if that's the if that's the path that we're rely on in order for it to be functional for it to be anywhere remotely here real time then our

[Morgan Staines, DHCS (he)] 15:36:52

qhio's and any of else we might use will also have to have the capability of of delivering consent.

[Morgan Staines, DHCS (he)] 15:36:58

Management. No, and I don't know whether that's been contemplated or not.

[CalHHS CDII] 15:37:00

Hmm!

[Morgan Staines, DHCS (he)] 15:37:04

We are. My department is working on that. We're in a pilot on that right now, and there are.

[Morgan Staines, DHCS (he)] 15:37:13

There are some really significant challenges there.

[] 15:37:18

Absolutely. Thank you, Morgan.

[] 15:37:22

Please.

[Lee Tien] 15:37:24

Yeah, Hi, so this is sort of a continuation of of the point that shelly raised, and then y'all responded to.

[Lee Tien] 15:37:34

And then also Cathy, which is, you know. So, for instance, with you know, we have a bunch of laws like 1242 that came into effect last year, and I can't remember all the bill numbers.

[Lee Tien] 15:37:47

But you know that have put that are trying to create a bit of a data sanctuary in in California.

[Lee Tien] 15:37:54

With respect to the the dissemination across State lines of information relating both to reproductive healthcare and to sensitive services, including gender of remaining care.

[Lee Tien] 15:38:06

And it's and for some of those often, you know, the patient's consent.

[Lee Tien] 15:38:13

Authorization isn't fee now, isn't the end all all, and I mean these are things that providers are supposed to do independently.

[Lee Tien] 15:38:22

And so I wanted to. And because the threat that we are are worried about is things like, Oh, you know.

[Lee Tien] 15:38:30

Gee! Somebody will send a request to a provider of transportation services and find out who has like travel to a planned parenthood, clinic, or something like that.

[Lee Tien] 15:38:43

Seems to me that location is actually really sensitive in many, many of in this kind of host row daubs. Context.

[Lee Tien] 15:38:55

And so we can't just rely on on sort of our prior instincts about what's sensitive and what's not, and I feel like the Cape California laws shifted, but not everyone understands how cosmonial love has shifted and is continuing to ship because there are there are

[Lee Tien] 15:39:13

more bills, and like from the Fab Council Point stuff that folks are working on right now.

[Lee Tien] 15:39:18

So I just I just am. I don't have a specific concern other than I am not sure how well the current sort of d identification and we identification guidance that we have based on a year or 2 ago actually works in the in how well, it works in a context, where we're

[Lee Tien] 15:39:40

not only transferring a lot of Ph. I. Under hipaa protocols, but a lot of Sdoh, that is, that may not be, and that will be treated differently, and how those things synergize in terms of react identification.

[Lee Tien] 15:39:57

Risk. And I, just, you know, want to just sort of put a a marker there, because I don't actually know what the answer to that is.

[Lee Tien] 15:40:05

And I'm not sure we have the the actual like a statistical answer on that. Maybe we do.

[Lee Tien] 15:40:09

And I'm just misinformed. But I wanted to raise that.

[] 15:40:14

Thank you. Lee.

[Troy Kaji] 15:40:21

I just wanted to reaffirm the prior comment about the friction that this may cause with the need to get individual authorizations every single time, and yet balanced against the other person's comment about how everything has changed post stops and actually you do what more granular control i'm

[Troy Kaji] 15:40:50

not sure how it's going to, how all the burdens are going to balance out and.

[Troy Kaji] 15:40:57

This well, could like make data sharing very difficult.

[Troy Kaji] 15:41:01

Aside from setting up this whole framework, that it's taken so much work to accomplish.

[Troy Kaji] 15:41:08

So I'm just, yeah. I just want throw into the mix that for pre-dovs for treatment purposes only, we had our H.

[Troy Kaji] 15:41:18

IM directors get together and workout institutional level information, sharing agreements which probably have to be looked at again.

[Troy Kaji] 15:41:29

Now, but that was to reduce the friction at the point of care.

[Troy Kaji] 15:41:35

But yeah, I'm just throwing that out. But it's not a solution for this situation.

[Troy Kaji] 15:41:43

Thanks, bye.

[] 15:41:44

Thanks. Chris, Ali.

[Ali Modaresi] 15:41:48

Thank you. I just wanna add my voice to the that you know.

[Ali Modaresi] 15:41:52

The challenge in this specific area area of the data exchange with non covid entities and I think there's a discussion about authorization.

[Ali Modaresi] 15:42:04

But how does Hios, or who receive that authorization?

[Ali Modaresi] 15:42:10

You know we did our entities or Emr systems can send us the consent, patient consent.

[Ali Modaresi] 15:42:16

So we can act accordingly to that. But with Ceos there's does not seem to be that those type of tool sets were Hios can receive the authorization electronically.

[Ali Modaresi] 15:42:31

One other thing that we were told by our Council, which may help here.

[Ali Modaresi] 15:42:37

I just wanna put it on the table is that if we receive a referral from cover d entity to us to support a non-covered entity or share data with non covered entity that is allowable under it.

[Ali Modaresi] 15:42:51

So that's something that Lance is going by right now. And but getting that referral is not a easy one also, but at least it's guess less challenging than getting authorization from the consumer.

[] 15:43:09

Thanks, Sally, and we'll do David, and then move on.

[CalHHS CDII] 15:43:17

Hmm, if you might come back, will be very, very fast.

[CalHHS CDII] 15:43:21

Okay.

[CalHHS CDII] 15:43:22

I throw out the idea that perhaps there needs to be a subcommittee specifically on privacy issues, that it seems very complex.

[CalHHS CDII] 15:43:32

It cuts across everything, and especially with regards to sensitive information, because I was noted by one of the commenters, we are in a post row work.

[CalHHS CDII] 15:43:42

Very true, Courtney. I'm going to step in for a second so, and it goes to a question earlier.

[CalHHS CDII] 15:43:49

A little bit about the timeline. This sounds like probably continued discussion on June 20 seventh, but there's a lot of feedback, and oh, you already had a lot.

[CalHHS CDII] 15:44:02

Lined up for where this was going. So right now, I'm feeling like it's part of the next meeting on June 27.

[CalHHS CDII] 15:44:13

But we'll see between now and then, hopefully have something to circulate to this subcommittee prior to that.

[CalHHS CDII] 15:44:19

Hopefully. I'm not speaking out a turn there, Courtney, and that I'd like to aim for 6 min from now going to public comment, which would mean giving Cordney a minute to wrap up and then pivoting to Helen for her Dsa amendment slides and then we would go to

[CalHHS CDII] 15:44:39

public comments, and then we can come back. If that's all right, to go to like conclusion, summary and wrap up stuff.

[CalHHS CDII] 15:44:46

But how's that sound in? Back to Courtney, then?

[CalHHS CDII] 15:44:49

Thanks.

[] 15:44:51

Thanks, Dan, and very briefly on David's comment, I do wanna acknowledge that the Dsa.

[] 15:44:59

Pmp. Subcommittee is actually made up of many privacy and security experts as well as some technical experts, as well.

[] 15:45:08

So we already have a a good amount of the right of great people in the room, and, as Dan said, we can discuss it more in more detail at the June 20 seventh meeting.

[] 15:45:19

If folks are able to take a look more closely at the new draft of the privacy and security safeguards, and submit us any comments, any kind of language revisions that you would want to see things like that that we can have a concrete thing to work off of in a very

[] 15:45:38

inde-depth discussion at that time, and oh, so there's as you can see, some additional things to the privacy and security, including the identification which I mentioned earlier as well as acknowledging.

[] 15:45:56

And this goes a bit to folks we're talking about with authorization.

[] 15:46:00

Some laws apply to the information, and we'll continue to apply to that information even or whenever it's disclosed.

[] 15:46:11

And so giving folks a heads up at what laws might that information that so that way they're able to adequately protect the information in line with the applicable Law.

[] 15:46:24

And so giving folks a kind of rundown on what that might look like.

[] 15:46:30

And.

[] 15:46:34

I think over to Helen to discuss process for mending Dsa.

[Helen Pfister] 15:46:39

Sure, yeah, so last summer, one of the initial Pmp's that we published was A. P.

[] 15:46:39

I think very quickly.

[Helen Pfister] 15:46:46

Np that separate the process for mending the Dsl.

[Helen Pfister] 15:46:47

And Cdi is now proposing to make 2 changes to that Pmp.

[Helen Pfister] 15:46:51

First Cbi is proposing to revise the Pmp.

[Helen Pfister] 15:46:56

To allow? Do we allow amendments that ensure administrative consistency across the Dsa.

[Helen Pfister] 15:47:01

And Pmps to be approved on an expedited timeline, and the Change they're talking about are changes that don't have a material impact on participants, such as changes to the definition of the Dsa so for example, as part of the Glossary that Cindy mentioned

[Helen Pfister] 15:47:14

earlier, we identified some inconsistencies among different Pmps and the Dsa.

[Helen Pfister] 15:47:19

That would need to be harmonized. So we would propose to permit those kinds of changes to be made without the more detailed process that is required for a more substantive change.

[Helen Pfister] 15:47:30

We are proposing that there would be a ten-day public comment period for any administrative change.

[Helen Pfister] 15:47:34

So the participants get a chance to look at that change and voice any objections that they might have.

[Helen Pfister] 15:47:39

But the Cdi wouldn't have to go through the much more detailed procedures for making changes like consulting with a task force that would otherwise otherwise be required.

[Helen Pfister] 15:47:46

So that's one and then the other. Change that CD is posing is to relate to the execution.

[Helen Pfister] 15:47:53

The Dsa. The current Pmp provides that each participant would have to actually execute any amendment to Thesa.

[Helen Pfister] 15:48:03

And you guys, the posing to remove that requirement for actual execution and just have the amendments be effective.

[Helen Pfister] 15:48:09

A certain defined time after published. So questions are comments on that.

[Helen Pfister] 15:48:14

I know we live a couple of minutes, but I just want to at least give you a high-level idea of what we're doing here. What we're thinking of doing here.

[Helen Pfister] 15:48:22

Erin.

[CalHHS CDII] 15:48:25

So for number 2, where, on the prompt do the participants get a chance to?

[CalHHS CDII] 15:48:31

Changes.

[Helen Pfister] 15:48:34

So, if it's sort of an administrative change, this attendee called the comment period, if it's a more substantive change, there is a whole process that specified in the Pmp.

[Helen Pfister] 15:48:44

For collecting input I don't have it in front of me, but there is a very detailed process.

[Helen Pfister] 15:48:50

If you look at the Pmp, you can see that it's very that it's all spelled out. As to how this, how it all works.

[CalHHS CDII] 15:48:56

Thank you.

[CalHHS CDII] 15:49:05

Very administrative in nature.

[Helen Pfister] 15:49:09

Yeah.

[CalHHS CDII] 15:49:13

Alright!

[Helen Pfister] 15:49:13

Any other questions. Okay, great. Alright, Dan, back to you.

[CalHHS CDII] 15:49:19

Thank you. I wanna check that Emma or someone with Manada is available and ready for us to do public comment right now.

[CalHHS CDII] 15:49:27

And then we will go on to like concluding and doing any wrap up, and, as always, material and everything is available.

[CalHHS CDII] 15:49:34

That's right.

[Emma P - Events] 15:49:37

Absolutely.

[CalHHS CDII] 15:49:39

That's where it is. Yeah, that's where I'll come back to that in the public comment is already 30 min full of behind schedule.

[CalHHS CDII] 15:49:47

So for members of the public who might be sitting logged on, waiting to submit comment or have their moment to have the floor.

[CalHHS CDII] 15:49:56

That's what I'm opening up right now.

[Emma P - Events] 15:50:02

Okay. First, we have L. John's. You should be able to unmute.

[CalHHS CDII] 15:50:03

Emma!

[L. Johns] 15:50:10

Yes, thank you. This is Lucy Johns. I'm a consumer of healthcare services here in California.

[L. Johns] 15:50:17

Hi! I raised a question in the in the concerning use of out of state services, and Qh.

[L. Johns] 15:50:27

los responding to that, I just want to verbalize that question with the hope that it would be addressed in a systematic fashion somewhere. Thank you.

[CalHHS CDII] 15:50:45

Thank you.

[Emma P - Events] 15:50:50

I do not see any additional hands raised at this time.

[CalHHS CDII] 15:50:58

Pause, for.

[Emma P - Events] 15:50:58

I do see one now. Dan should be able to unmute.

[Dan Chavez] 15:51:07

Dan Chavas serving community side information organization, Santa Cruz, California.

[Dan Chavez] 15:51:14

2 things, a request in a related question. I think we're far enough along now with our evolution on the data exchange framework to make a request to do a crosswalk between data exchange freeway requirements and requirements many of us in the ecosystem

[Dan Chavez] 15:51:38

are busy implementing and it'd be helpful to know that there are some synchronization between the requirements.

[Dan Chavez] 15:51:48

Secondly, and related, there are several references in to H. I.

[Dan Chavez] 15:51:56

E participation, and h, i. E. And the like, and of Cdi.

[Dan Chavez] 15:52:03

I would be so kind as to request whether these references to Ag make a request to Dhcs.

[Dan Chavez] 15:52:13

Whether these references will be changed. To Ajo or Qhio, and what the timeframe for those changes in that documentation will be.

[Dan Chavez] 15:52:25

Thank you.

[Emma P - Events] 15:52:33

Thank you for your comment. I do not see any additional hands raised at this time, and just as I say it, I now see Dr.

[Emma P - Events] 15:52:43

Adam Davis, you should be able to unmute.

[Davis, Adam, M.D.] 15:52:47

This is Dr. Adam Damson here, at my role at setter health, as a physician who helps with interoperability, issues the timing of this is becoming more and more challenged for healthcare centers.

[Davis, Adam, M.D.] 15:53:00

As you guys know, center health. That's one of the organizations did sign the Dsa.

[Davis, Adam, M.D.] 15:53:03

Our requirements to comply with it are are dated yet.

[Davis, Adam, M.D.] 15:53:09

We don't have finalization on many of the Pps, and it's very challenging to even strategize about how to go about complying with the document that we signed.

[Davis, Adam, M.D.] 15:53:20

And so I just really challenged this committee to accelerate the process.

[Davis, Adam, M.D.] 15:53:25

So we have some finality to what it is we are to comply with.

[Davis, Adam, M.D.] 15:53:27

In January of 2024. Thank you very much.

[CalHHS CDII] 15:53:32

Thank you.

[CalHHS CDII] 15:53:36

Thank you for that comment.

[Emma P - Events] 15:53:42

There are no additional hands raised at this time.

[CalHHS CDII] 15:53:47

Great. Thank you.

[CalHHS CDII] 15:53:51

Alrighty are we able to go back to slide 52.

[CalHHS CDII] 15:53:58

Which is probably content for the subcommittee meeting coming up June twenty-seventh.

[CalHHS CDII] 15:54:05

But acknowledging the slide when we get eyes on it.

[CalHHS CDII] 15:54:22

As directly to what Dr. Davis just said about you know.

[CalHHS CDII] 15:54:26

Like, let's finalize. We had a summary slide earlier, that has which P.

[CalHHS CDII] 15:54:32

Mps. We anticipate to be finalizing this week.

[CalHHS CDII] 15:54:36

After this meeting, which ones we're going to be talking about on June 20, seventh.

[CalHHS CDII] 15:54:41

And then what does anybody have their arms around for? What is still needed?

[CalHHS CDII] 15:54:46

So we've heard some comments through this meeting today.

[CalHHS CDII] 15:54:50

So this is talking about future P. And P's that we have heard commented over the past 18 months that could be coming.

[CalHHS CDII] 15:54:59

Let's go to Karen. See? A hand raised.

[Kiran Savage-Sangwan] 15:55:04

Yeah, thanks, Deanna. I appreciate this, and I'm not sure if this is the right place.

[Kiran Savage-Sangwan] 15:55:07

But I was looking back from one of the past meetings.

[Kiran Savage-Sangwan] 15:55:11

The list of Pmps that we're going to be developed and one of those was enforcement, which seems to have dropped off the list.

[Kiran Savage-Sangwan] 15:55:18

And I understand there's a lot of different perspectives around that.

[Kiran Savage-Sangwan] 15:55:22

And what's in the statute, etc.?

[Kiran Savage-Sangwan] 15:55:23

But I appreciate any update on that also, because while I do appreciate that, was it 1,400 entities have signed just some quick sort of back of the envelope.

[Kiran Savage-Sangwan] 15:55:35

I think that leaves at least a third of telephones who are with entities that haven't signed, and therefore are sort of not covered by this entire data exchange framework.

[Kiran Savage-Sangwan] 15:55:45

And so, in the absence of a mechanism to enforce having required entities sign, I guess I would love to understand what else Cdi is considering, particularly around making sure that consumers sort of are able to understand whether their providers are participating are compliant etc.

[Kiran Savage-Sangwan] 15:56:06

And I recognize that there's the list but honestly, it's very difficult to find on your website.

[Kiran Savage-Sangwan] 15:56:11

And it's a giant excel sheet.

[Kiran Savage-Sangwan] 15:56:12

So it's really not accessible for consumers.

[Kiran Savage-Sangwan] 15:56:15

So I. The question is, is there anything happening with that? Pnp, and is there anything else that Cdi is doing or thinking about?

[Kiran Savage-Sangwan] 15:56:22

Even with regards to transparency around compliance, if not enforcement.

[CalHHS CDII] 15:56:29

Thank you.

[CalHHS CDII] 15:56:31

But I don't know if I have anything to add other than what we've added.

[CalHHS CDII] 15:56:37

That last meetings is. It is something that we are looking at.

[CalHHS CDII] 15:56:42

But we are right now, moving through our departments in terms of areas where our departmentments can encourage slash Band-aid compliance with the data exchange framework, and more to come.

[CalHHS CDII] 15:56:56

I think the monitoring and auditing Pmp.

[CalHHS CDII] 15:57:00

Is what it is up there for a reason. But other than that, we are gently pushing everyone towards that finish line, I will say, with respect to the Pmps, it's definitely been coming up on a number of stakeholder calls this concept of a blank check.

[CalHHS CDII] 15:57:16

And so we have. We have landed where all the Pmps that are under development.

[CalHHS CDII] 15:57:22

We hope to have done by I've been told by the fall at the latest 2023, which would then be in effect in January 2024, and that future P.

[CalHHS CDII] 15:57:33

Mps. We would be rolling out future Pmps no more than twice a year, and giving folks 3 months after they are approved for compliance.

[CalHHS CDII] 15:57:45

That's where we're at as of right now.

[CalHHS CDII] 15:57:49

So thanks for that, Karen.

[CalHHS CDII] 15:57:53

Alright! Let's move to the next slide. Please. Okay, and Andrew's question.

[CalHHS CDII] 15:58:01

I have no line of sighted what the next slides were anyways.

[CalHHS CDII] 15:58:03

So that's good to see. Thank you. Oh, there!

[] 15:58:06

I think I'm off mute now.

[] 15:58:09

Yeah, sorry. Thank you. I thought I was all geared up and had my hand up, and I realized I didn't.

[] 15:58:14

So I would attach my comments to Karen.

[] 15:58:18

And I understand because we've had number of conversation about enforcement and some reticent reticence to do that.

[] 15:58:29

All that being said, I do think it would be valuable.

[] 15:58:34

I posted this earlier in the chat that there be an analysis done to crosswalk plans networks with compliance.

[] 15:58:46

I think you'll find significant gaps that will materialize.

[] 15:58:52

Come. January 30, first, 2014. If the path we're on continue.

[] 15:59:00

We think that the continued reticence or lack of desire, or whatever the rationale is, for not complying with the law is, it's significantly undermining the spirit of the Dsa.

[] 15:59:16

It will mean that the mission and the purpose of it by February first will not be achieved, and so to the extent that this, that the Department can up the attention associated with this and demonstrate the gravity of the failure to comply with the law

[] 15:59:42

is having, and the material consequence it'll have on consumers.

[] 15:59:44

We think of important. And then, secondly, I would ask that you look back, and I do appreciate that.

[] 15:59:51

Work that the Department of Healthcare Services has done in particular, their all Plan letter which requires plans to insurance, not only monitor, but ensure compliance.

[] 16:00:02

That same verbiage is carried across the State.

[] 16:00:07

In this thing. We think at this point in time the only a backstop. On compliance.

[] 16:00:14

If the if another mechanism is not put in place, is the power of the contracting process with the health clients.

[] 16:00:22

This is incredibly important, and we think that all the work that we've been doing over the course of last 18 months means nothing.

[] 16:00:28

If systems and major entities are viewing, this is optional.

[] 16:00:36

And so we really would just certainly welcome monitoring, auditing services, compliance, and frankly, we think that there should be greater enforcement power given to ensure that if you're a scoff law that you are penalized in a material way that reflects the consequence they're

[] 16:00:56

having, or will have, on everyday consumers and patients across the State.

[CalHHS CDII] 16:01:04

Thank you for your input and comments.

[CalHHS CDII] 16:01:12

Alright, Graham! A couple of minutes on a digital identities.

[CalHHS CDII] 16:01:17

Hey, bribe! We are over time. I'm gonna try to make this really quick.

[CalHHS CDII] 16:01:25

You have these slides members of the committee got them emailed to them, and they'll be post shortly.

[CalHHS CDII] 16:01:33

This one is just a reminder of what we were asked to do, and 81, 33.

[CalHHS CDII] 16:01:40

If we did publish strategy for digital identities in July of 2022 go on to the next slide.

[CalHHS CDII] 16:01:45

This is a remer of how we got to that strategy that we could be the number of focus groups is public meeting and discussed a number of different aspects to draft that final document submitted it for public commented etc.

[CalHHS CDII] 16:02:02

Before it was published. If you go onto the next slide, really the meet here that I wanted to make sure that people were aware of is that the recommendations in that strategy are now we're starting to move forward with them.

[CalHHS CDII] 16:02:18

So, for example, the first recommendations, the purpose of use case is what we're continuing to poll through web and content for attributes, for digital identities.

[CalHHS CDII] 16:02:30

What are listed here? This numbers 2, 3, 4, and 5 are all.

[CalHHS CDII] 16:02:34

Now within the technical requirements for exchange, policy, procedure, or and are therefore required organizations to get warm to those to go onto the next slide.

[CalHHS CDII] 16:02:46

Please. A few more items. Here is recommendations. 6 is a public transparent process to look at additional requirements.

[CalHHS CDII] 16:02:59

It's also in the technical requirements for exchange or requirement for the Governance Institute to develop such a process.

[CalHHS CDII] 16:03:06

And Number 9 aired privacy and security requirements around digital identities is captured in the privacy standards, security safeguards, Pnp, internally, we're working with departments now on a shared service for person matching and are including corrective service

[CalHHS CDII] 16:03:33

corrections initially in those discussions we will look at App after as we move that forward how we may be able to extend that into the private sector, as well if you go onto the next slide just real quickly and just summarizes that where we are in

[CalHHS CDII] 16:03:53

moving this, for we're publishing the technical requirements for exchange.

[CalHHS CDII] 16:03:56

In the next couple of weeks, and we'll continue to work with the partner corrections on the initial statewide person.

[CalHHS CDII] 16:04:05

Manage service. There's no action for the committee at this time.

[CalHHS CDII] 16:04:07

It was just a matter of making sure that you sorry to be so.

[CalHHS CDII] 16:04:12

Oh, thank you!

[CalHHS CDII] 16:04:16

I can touch on just perhaps one thing on Participants Directory.

[CalHHS CDII] 16:04:21

Very quickly we talked about this in the past. Our current focus is absolutely on phase one.

[CalHHS CDII] 16:04:30

But we need technical assistance here. I've had a number of organizations reach out.

[CalHHS CDII] 16:04:37

They've begun to look through the requirements that they will have under the P's.

[CalHHS CDII] 16:04:42

And are starting to identify what they need to know in a purchant Directory.

[CalHHS CDII] 16:04:49

So my ask of both the lec and the Dsa Subcommittees.

[CalHHS CDII] 16:04:52

If you have suggestions for who I can work with from a technical work group standpoint on the actual content of the Directory.

[CalHHS CDII] 16:05:04

That's what I'm really looking for at this time.

[CalHHS CDII] 16:05:07

Be aware we're talking about being way down in the weeds on technical context.

[CalHHS CDII] 16:05:12

So I'm looking not for people that are thinking about this at a high level.

[CalHHS CDII] 16:05:16

I'm looking for people that understand the details that you need to exchange data setup interfaces and how that need that information is managed and how we get to it.

[CalHHS CDII] 16:05:28

So number 4 on. Here is what I'm looking for is solicity input from those techical leaders and the bullets there give you a picture of what it is that I'm going to be asking those folks to do. I've reached out to a number of people but I wanna make sure that of a broader set of the stakeholders or

[CalHHS CDII] 16:05:47

representatives here and there are some parts of the industry where I don't have personal relationship.

[CalHHS CDII] 16:05:53

So I'm gonna need to reach out to you folks to help each suggestions.

[CalHHS CDII] 16:05:59

There you can either drop them to by email directly, or to cdi@chhs.ca.com.

[CalHHS CDII] 16:06:08

Thank you.

[CalHHS CDII] 16:06:13

Right so closing remarks, we're gonna do it quick. We will see you at our next meeting on June 20 seventh. That is a subcommittee meeting, and as a reminder, we'll confirm that in the next coming days.

[CalHHS CDII] 16:06:29

So you'll see that in our next lec meeting is on July twentieth of 9 30 to noon, and there's one final announcement, we have a webinar scheduled for June twenty-second one to on our next series in the webinar

[CalHHS CDII] 16:06:43



information is powered. Thank you. All. Wish you a good day.