

CalHHS Data Exchange Framework Policy and Procedure

Subject: Requirement to Exchange Health and Social Services Information	
Status:	Policy: OPP-5
Publication Date:	Version:

I. Purpose

California Health and Safety Code § 130290 was enacted in 2021 and establishes the creation of the California Health and Human Services Data Exchange Framework (“Data Exchange Framework”), which requires certain data sharing among Participants. The purpose of this policy is to set forth the responsibilities of Participants to respond to requests for Health and Social Services Information pursuant to the Data Exchange Framework.

II. Policy

This policy requires all Participants to exchange Health and Social Services Information in accordance with this policy.

This policy shall be effective as of January 31, 2024.

III. Procedures

1. DUTY TO RESPOND

a. All Participants shall respond to requests for Health and Social Services Information made by other Participants and shall share Health and Social Services Information when required under the Permitted, Required and Prohibited Purposes Policy and Procedure. A Participant shall fulfill its duty to respond by either providing the requested Health and Social Services Information in accordance with the Data Sharing Agreement (the “DSA”) and Applicable Law; or in the following circumstances, providing an appropriate error message or null response as specified by the technical standard in use and in accordance with the Technical Requirements for Exchange Policy and Procedure:

i. Required Purposes

a. If the request for Health and Social Services Information is for Required Purpose and the Participant cannot fulfill the request because the Participant either: 1) determines that the requested Health and Social Services Information cannot lawfully be shared under Applicable Law; 2) determines that an exception in the California Information Blocking Prohibitions Policy and Procedure applies; 3) does not Maintain the requested Health and Social Services Information; or 4) is unable to match a request to an Individual’s identity through Person Matching consistent with the Technical Requirements for Exchange Policy and Procedure.

ii. Permitted Purposes

a. If the request for Health and Social Services Information is for a Permitted Purpose and the Participant cannot fulfill the request

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because the Participant either: 1) determines that the requested Health and Social Services Information cannot lawfully be shared under Applicable Law; 2) determines that an exception in the California Information Blocking Prohibitions Policy and Procedure applies; 3) does not Maintain the requested Health and Social Services Information; or 4) is unable to match a request to an Individual's identity through Person Matching consistent with the Technical Requirements for Exchange Policy and Procedure.

b. If the request for Health and Social Services Information is for a Permitted Purpose and the Participant does not wish to fulfill the request.

iii. Prohibited Purposes

a. If the request for Health and Social Services Information is for a Prohibited Purpose.

b. All responses to requests for Health and Social Services Information shall comply with the DSA, the Policies and Procedures, and Applicable Law.

2. REQUIREMENT TO EXCHANGE DATA

a. Starting January 31, 2024, the following Participants shall exchange Health and Social Services Information in accordance with the DSA and Policies and Procedures:

i. Healthcare organizations listed in Health and Safety Code section 130290(f), except for physician practices of fewer than 25 physicians, rehabilitation hospitals, long-term acute care hospitals, acute psychiatric hospitals, critical access hospitals, rural general acute care hospitals with fewer than 100 acute care beds, state-run acute psychiatric hospitals, and any nonprofit clinic with fewer than 10 health care providers.

b. Starting January 31, 2026, the following Participants shall exchange Health and Social Services Information in accordance with the DSA and Policies and Procedures:

i. Physician practices of fewer than 25 physicians, rehabilitation hospitals, long term acute care hospitals, acute psychiatric hospitals, critical access hospitals, rural general acute care hospitals with fewer than 100 acute care beds, state-run acute psychiatric hospitals, and any nonprofit clinic with fewer than 10 health care providers;

ii. Governmental Participants who are Voluntary Signatories;

iii. Social Services Organizations; and

iv. All other Voluntary Signatories that are not listed in this Section.

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c. Participants listed in Section 2(B) above may Exchange Health and Social Services Information with other Participants prior to January 31, 2026 provided that all Participants engaged in the Exchange have executed the DSA and comply with the Policies and Procedures.

3. MISCELLANEOUS

a. This policy does not override or supersede a restriction placed by an Individual or their Personal Representative on Access, Use, or Disclosure of their Health and Social Services Information by a Participant pursuant to Applicable Law.

IV. Definitions

All capitalized terms shall have the meaning set forth in the Data Exchange Framework Glossary of Defined Terms.

V. References

California Health and Safety Code § 130290

California Information Blocking Prohibitions Policy and Procedure

Permitted, Required and Prohibited Purposes Policy and Procedure

Technical Requirements for Exchange Policy and Procedure

VI. Version History

No.	Date	Author	Comment
1.0	July 1, 2022	CalHHS CDII	Final
	August 17, 2023	CalHHS CDII	Amended draft for public comment