

## **California Data Exchange Framework Qualified Health Information Organization Application 2023 August 2023**

This Qualified Health Information Organization Application 2023 provides the Center for Data Insights and Innovation (CDII) with the information needed to determine if an organization has the structure and capabilities to function as a Qualified Health Information Organization (QHIO) in the California Health & Human Services (CalHHS) Data Exchange Framework (DxF). Organizations interested in being named a DxF QHIO will need to prepare and submit this application.

Before preparing an application, applicants are strongly encouraged to review the QHIO Application Guide 2023. The QHIO Application Guide 2023 contains important details on the application's preparation, submission, review, and appeals processes.

Applicants are also strongly encouraged to read the application in its entirety before preparing a submission. The application is organized into three sections. Each section contains a series of QHIO requirements that are described, followed by a statement where the applicant must attest that their organization meets the requirement. The scoring related to that requirement is also provided. The final page of the application requests information on the individual who is authorized to sign these requested attestations on behalf of the applicant.

By submitting this application, applicant agrees that CDII may, at any time, request documentation to confirm the accuracy of applicant's attestations. Failure to respond to a question or misrepresenting the applicant's capabilities may be cause for failure to receive or subsequent removal of qualified status.

**NOTE: This QHIO Application and all information collected as part of the QHIO Application process are public records subject to the California Public Records Act. Do not submit confidential information.**

## A. Organization

1. Enter the information requested below to identify the applicant:

Organization Name: \_\_\_\_\_

Alternative and former names, nicknames and DBAs: \_\_\_\_\_

Mailing address: \_\_\_\_\_

Telephone number: \_\_\_\_\_

Website URL: \_\_\_\_\_

State/jurisdiction where incorporated: \_\_\_\_\_

Date(s) of incorporation and founding: \_\_\_\_\_

**Requirement:** QHIOs must be registered corporations in the United States and/or subject to the laws of the United States and the state(s) in which it operates.

**Attestation:** The applicant is a registered corporation in the United States and/or subject to the laws of the United States and the state(s) in which it operates. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

2. Enter the information requested below to identify the applicant's primary contact:

Name: \_\_\_\_\_

Organization: \_\_\_\_\_

Title: \_\_\_\_\_

Email Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Requirement:** The applicant must provide a primary contact for application-related correspondence.

**Attestation:** The primary contact listed above will act as the primary point of contact for application-related correspondence on behalf of the applicant. \_\_\_\_\_

**Scoring:** If the applicant provides all of the requested details on their primary contact and initials the attestation, the applicant meets this requirement. If the applicant fails to identify a primary contact or initial the attestation, the applicant is not eligible for qualification.

3. **Requirement:** QHIOs must be corporations / organizations of good standing.

**Attestation:** The applicant's license to operate its business is active and not restricted by any disciplinary actions. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

4. **Requirement:** QHIOs must be eligible to conduct business with the State of California.

**Attestation:** The applicant has not defaulted on any contract with the State of California or breached any material provision in a contract with the State of California. The applicant has returned any overpayments made by the State of California or reimbursed the State of California for any moneys paid in advance for work that was not completed. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

5. **Requirement:** Applicants must have current health and/or social services information exchange business with health and/or social services organizations in California.

**Attestation:** The applicant has current health and/or social services information exchange business with California-based health and/or social service organizations. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

6. **Requirement:** QHIOs must have a governance function that will responsibly serve DxF Participants.

**Attestation:** The applicant's governance function includes the following: *(Initial each item that applies.)*

- Applicant is a 501(c)(3) organization \_\_\_\_\_
- Applicant's clients are eligible to serve as members of the governing body \_\_\_\_\_
- Applicant's governing body convenes at least once per calendar quarter \_\_\_\_\_
- Applicant's governing body's decisions are routinely communicated to stakeholders \_\_\_\_\_

**Scoring:** If the applicant attests to being a 501(c)(3) organization, the applicant meets this requirement. If the applicant is not a 501(c)(3) organization, but attests to at least two of the other elements, the applicant meets this criteria. Applicants who are not 501(c)(3) organizations and do not attest to two or more of the other elements, are not eligible for qualification.

7. **Requirement:** QHIOS must sign the Data Sharing Agreement (DSA) and abide by the DSA and its Policies and Procedures.

**Attestation:** The applicant has signed the DSA or will sign the DSA upon notification of qualification and prior to the CDII public announcement of QHIOS. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

8. **Requirement:** QHIOS must have participant agreements that do not conflict with the DSA and its Policies and Procedures.

**Attestation:** The applicant will ensure that all agreements with participants who are DSA signatories either: (1) do not conflict with the terms of the DSA and its Policies and Procedures; or (2) will be amended to address all conflicts with the terms of the DSA and its Policies and Procedures before January 31, 2024 if the Participant is required to begin exchange by this date, or before January 31, 2026 if the Participant is allowed to begin exchange by this date, or by the date when DxF Participants will begin using QHIO services to exchange Health and Social Services Information (HSSI) under the DSA, whichever is sooner. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

9. **Requirement:** QHIOS who contract with third parties to transmit and/or manage HSSI to share data under the DxF must have valid and enforceable written service agreements in place with these third parties before January 31, 2024. These agreements must not conflict with the terms of the DSA and its Policies and Procedures.

**Attestation:** On or before January 31, 2024, the applicant will have valid and enforceable written agreements in place with each third party that transmits and/or manages data under the DxF, and these agreements will not conflict with the DSA and its Policies and Procedures. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

10. **Requirement:** QHIOS must have sufficient cash or cash equivalents available to support ongoing operations.

**Attestation:** The applicant's most recent financial statement lists one month or more than one month's operating expenses as cash (or cash equivalents). \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

11. **Requirement:** QHIOs and any of their subcontractors engaged in data management activities must each carry insurance with at least \$2 million per incident and \$5 million per annum coverage to address general liability, errors and omissions, and cyber risks prior to January 31, 2024.

**Attestation:** The applicant and its data management subcontractors each carry, or agree to carry if qualified, insurance with coverage of at least \$2 million per incident and \$5 million per annum to address general liability, errors and omissions, and cyber risks prior to January 31, 2024. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

12. **Requirement:** QHIOs must fully cooperate with CDII and all other DxF Participants (including other QHIOs) to support DxF operations. Cooperation may include, but is not limited to, engaging in complaint investigation, providing documentation that supports applicant's qualification, troubleshooting exchange errors, forwarding DxF communications, providing details regarding data formats and transformations, and participating in other activities as requested by CDII.

**Attestation:** The applicant will fully cooperate with CDII and DxF Participants, including other QHIOs, to support DxF operations. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

13. **Requirement:** If named by a DSA Signatory Grant QHIO Onboarding Grantee, QHIOs must submit QHIO Onboarding Grant progress reports and work with CDII and CDII's third party administrator (TPA) Public Consulting Group to receive and manage grant funds on behalf of the awarded DSA Signatory, in accordance with the terms of the awardee's grant acknowledgement agreement.

**Attestation:** The applicant will submit QHIO Onboarding Grant progress reports and work with CDII and the TPA to receive and manage grant funds awarded to DSA Signatory grantee in accordance with the terms of the awardee's grant acknowledgement agreement. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

## B. Privacy and Security

1. **Requirement:** QHIOs or the vendor(s) and subcontractor(s) with which they contract for data management services must achieve and maintain HITRUST r2 certification to protect the privacy and security of Health and Social Services Information.

**Attestation:** The applicant must attest to one of the three statements that follow:

a. The applicant has achieved HITRUST r2 certification. \_\_\_\_\_

b. The applicant contracts for data management services, and each of the vendor(s) or subcontractor(s) (listed below) providing these data management services has achieved HITRUST r2 certification. \_\_\_\_\_

Vendor/subcontractor Name: \_\_\_\_\_

Vendor/subcontractor Name: \_\_\_\_\_

Vendor/subcontractor Name: \_\_\_\_\_

*(if more than three vendors or subcontractors are involved in data management, send the names of these other vendors with an initialed attestation as an attachment to the application)*

c. The applicant has engaged a HITRUST External Assessor and expects to achieve HITRUST r2 certification on or before 12/31/2024. \_\_\_\_\_

**Scoring:** If the applicant initials one of these attestations, the applicant meets this requirement. If the applicant fails to initial one of these three attestations, the applicant is not eligible for qualification.

2. **Requirement:** QHIOs and their subcontractors must not store the Protected Health Information (PHI) and Personally Identifiable Information (PII) managed on behalf of DxF Participants outside of the continental United States. This includes data archives and backups.

**Attestation:** The applicant or its vendors and subcontractors involved in data management do not store PHI or PII (inclusive of archives and backups) maintained on behalf of DxF Participants outside of the continental United States. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

3. **Requirement:** Applicants must not have had more than two legally reportable breaches involving 500 or more individuals' data in the last three years.

**Attestation:** The applicant has not had more than two legally reportable breaches involving 500 or more individuals' data from July 2020 through July 2023. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

4. **Requirement:** QHIOs must have, publish, and annually review a Privacy Policy.

**Attestation:** The applicant has a Privacy Policy that is published, available to its participants, and reviewed at least every year. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

5. **Requirement:** QHIOs must have privacy and security policies that are consistent with the DSA and its Policies and Procedures regarding the uses and disclosures of data.

**Attestation:** The applicant's privacy and security policies regarding the uses and disclosures of data are consistent with the DSA and its Policies and Procedures. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

6. **Requirement:** QHIOs must maintain an audit trail and/or log of DxF transactions, for a minimum of six years.

**Attestation:** The applicant will maintain audit trails and/or logs of DxF transactions for a minimum of six years. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

## C. Functional Capabilities

1. **Requirement:** QHIOs must manage digital identities consistent with the Person Matching section of the Technical Requirements for Exchange Policy and Procedure. QHIOs must have established processes to assess and continually improve person matching accuracy.

**Attestation:** The applicant will manage digital identities in a manner consistent with the Person Matching section of the Technical Requirements for Exchange Policy and Procedure and has established processes to continually improve person matching accuracy. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

- Requirement:** QHIOS must be capable of collecting and managing DxF Participant information. This information may include the parent organization name, facility name, facility address, endpoint information, technical contacts. QHIOS must be capable of exporting this Participant data in a documented format for secure transfer and import into a statewide DxF Participant directory. QHIOS must also be capable of securely receiving and importing DxF Participant data from a statewide DxF Participant directory.

**Attestation:** The applicant does or will collect and manage DxF Participant data, will work with CDII to develop DxF Participant data standards and the import and export capabilities associated with a Participant directory, and will import/export Participant data as required by the resulting standards.

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**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

- Requirement:** QHIOS must participate in at least one of the following nationwide networks or frameworks: Carequality, CommonWell Health Alliance, or eHealth Exchange. If the QHIO participates in a nationwide network or framework other than Carequality, it must activate the connection to Carequality such that information flows not only to the national network(s) or framework(s) with which it participates, but also to other networks/frameworks through Carequality.

**Attestation:** The applicant participates in Carequality, CommonWell Health Alliance, or eHealth Exchange and, if not Carequality, has the connection to Carequality activated.

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**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

- Requirement:** QHIOS must be able to construct Requests for Information on behalf of its participants that comply with DSA Policies and Procedures, including the Technical Requirements for Exchange Policy and Procedure.

**Attestation:** The applicant can construct and send a Request for Information consistent with the Technical Requirements for Exchange Policy and Procedure.

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**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.



5. **Requirement:** QHIOs must be able to receive Requests for Information and craft a response from the targeted Participant in a manner consistent with all applicable Policies and Procedures. When data is not available for sharing, the QHIO must be capable of crafting a response consistent with the Technical Requirements for Exchange Policy and Procedure.

**Attestation:** The applicant can construct and send a response to a request for HSSI in a manner consistent with DxF Policies and Procedures as well as the Technical Requirements for Exchange Policy and Procedure. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

6. **Requirement:** QHIOs must be able to send and receive information on behalf of their participants conforming to the profiles defined in the Technical Requirements for Exchange Policy and Procedure to support their DxF Participants.

**Attestation:** The applicant can send and receive information conforming to the profiles defined in the Technical Requirements for Exchange Policy and Procedure to support their DxF Participants. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

7. **Requirement:** To support their DxF Participants' information needs, QHIOs are required to exchange information with other QHIOs and via the nationwide network(s) and framework(s) in which they participate (i.e., Carequality, CommonWell Health Alliance or eHealth Exchange). This requirement includes:

- Forwarding Requests for Information and Information Delivery to any or all QHIOs and/or any or all nationwide networks or frameworks in which they participate as appropriate on behalf of their participants who are DxF Participants.
- Receiving and responding to Requests for Information from any other QHIO or any nationwide network or framework in which they participate on behalf of their participants who are DxF Participants.
- Receiving and forwarding to the intended participant(s) Information Delivery from any other QHIO or any nationwide network or framework in which they participate on behalf of their participants who are DxF Participants.

**Attestation:** The applicant will exchange information for Requests for Information and Information Delivery with other QHIOs and nationwide networks and frameworks on behalf of its DxF Participants as appropriate. \_\_\_\_\_

**Scoring:** If the applicant initials the attestation, the applicant meets this requirement. If the applicant fails to initial the attestation, the applicant is not eligible for qualification.

8. **Requirement.** QHIOs must receive, process, and forward Admit, Discharge, Transfer (ADT) event notifications from acute care facilities and emergency departments. These ADT capabilities will be introduced over time and gradually expand to include more events and broader notification. In order to achieve qualification in 2023, an applicant must commit to a series of future developments.

**Attestations:** The applicant will

- a. Receive HL7 Version v2.5.1 ADT messages (or a later, compatible version) from California-based acute care facilities and emergency departments no later than January 31, 2024. \_\_\_\_\_
- b. Receive and maintain a roster of persons from DxF Participants who seek to monitor ADT events from California-based acute care facilities and emergency departments for these persons no later than April 30, 2024. \_\_\_\_\_
- c. Determine whether an incoming ADT message from a California-based acute care facility or emergency department is associated with a person found on an ADT roster no later than July 31, 2024. \_\_\_\_\_
- d. Notify DxF Participants when an event matches a person listed on the Participant's ADT roster and is an event of interest to the Participant no later than July 31, 2024. \_\_\_\_\_
- e. Securely share the digital identities of the individuals on their ADT rosters with other QHIOs so that these other QHIOs can also monitor for events on these individuals. If an event is found for an individual on a shared roster, the QHIO receiving the event will securely forward the event to the QHIO holding the original roster to enable delivery of the event to the DxF Participant. QHIOs must be able to share a roster with other QHIOs, match incoming events to the individuals on the roster, and notify the originating QHIO of matched events no later than July 31, 2024. \_\_\_\_\_

**Scoring:** If the applicant initials all of the attestations, the applicant meets this requirement. If the applicant fails to initial any of the attestations, the applicant is not eligible for qualification.

Complete this form to identify the individual who initialed the attestations and is authorized to make these attestations on behalf of the applicant.

I am the authorized representative of the applicant and have the authority to sign this application and the attestations herein on behalf of the applicant.

Applicant : \_\_\_\_\_

Authorized Representative: \_\_\_\_\_

Title of Authorized Representative: \_\_\_\_\_

Email Address of Authorized Representative: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_