

Qualified Health Information Organization Application Frequently Asked Questions 2023

September 15, 2023

Introduction

Organizations that have current health and/or social services information exchange business with health and/or social service organizations in California are invited to apply to become a Qualified Health Information Organization (QHIO) by completing the QHIO Application 2023. The application will provide 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 QHIO on behalf of Participants in the California Health & Human Services (CalHHS) Data Exchange Framework (DxF). CDII will publish a final list of QHIOs on its DxF website. This list will be a resource for DxF Participants that choose to seek assistance in meeting their Data Sharing Agreement (DSA) obligations through a QHIO.

Organizations interested in serving as a QHIO are required to complete an application for consideration of qualification. The application window opened August 28, 2023, and closes at 5 p.m. September 21, 2023.

These QHIO Application Frequently Asked Questions 2023 have been designed as a companion to the QHIO Application 2023 and the QHIO Application Guide 2023. These Frequently Asked Questions clarify the application and application submission process.

Frequently Asked Questions

1. What form does CDII require when attesting to a requirement or signing the application? Are signatures, initials, or dates required? What should an applicant do for attestations that do not apply?

To complete an attestation, the applicant must initial or sign the attestation in the space provided. These attestations may be made by adding an electronic signature or electronic initials in the application document, saving as a PDF file, and submitting to CDII via email before the application deadline. Alternatively, the applicant may print the application, initial or sign each attestation in ink, scan the signed document into a PDF file, and submit via email to CDII before the application deadline.

Note: The application contains two questions where the applicant is presented with several options and must attest at least to one of those options. These are questions A6 and B1. For these questions, the applicant should attest to the applicable option, leaving the other attestation options blank or entering NA for 'not applicable'.

Note: The attestations throughout the application must be signed or initialed by an individual who is authorized to make these attestations on the applicant's behalf. This authorized representative must be identified on Page 10 of the application. An electronic signature or a scanned image of a wet-ink signature may be used for this signature as well.

2. Will QHIOs offer advisory services or is the requirement to offer technical services for exchanging health and social services information? Will QHIOs have to provide ongoing advisory or technical support services?

As described in the [Data Exchange Framework Glossary of Defined Terms](#), QHIOs are state-designated data exchange health information exchange networks, health information organizations, or technology vendors that facilitate the exchange of health and social services information between DxF Participants. QHIOs will adhere to the standards and policies established by the Data Sharing Agreement and its Policies and Procedures. The QHIO application details the QHIO requirements for being designated as qualified. Applicants should read each question and requirement carefully and determine if they can meet these requirements. These requirements focus on the applicant's organization, readiness to manage data privacy and security, and functional capabilities including the ability to meet the standards specified in the DSA's Technical Requirements for Exchange Policy and Procedures.

3. How does CDII plan to verify attestations from QHIO applicants? Will applicants need to provide supporting documentation?

The QHIO application details the requirements to be named a DxF Qualified Health Information Organization. Applicants will attest to each of these requirements by attesting to each of the application numbered questions. By submitting this application, the applicant agrees that CDII may, at any time, request documentation to confirm the accuracy of the applicant's attestation, as indicated on Page 1 of the application. If documentation is requested by CDII, not providing supporting documentation or providing insufficient documentation is grounds for failing a question on assessment and may be cause for failure to earn qualified status.

Note: 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.

4. There is a requirement for QHIOs to participate in at least one of the following nationwide networks or frameworks: Carequality, CommonWell Health Alliance or eHealth Exchange. If an applicant participates in CommWell or eHealth Exchange, does the requirement to have a connection to Carequality activated have to be currently activated to attest?

This question relates to question C3 in the application. The applicant must attest that it participates in one of the specified nationwide networks or frameworks at the time of submitting the application.

The C3 attestation also requires that if the applicant participates in CommonWell Health Alliance or eHealth Exchange, and not Carequality, then the applicant must activate the connection to Carequality (via their CommonWell or eHealth Exchange participation). If an applicant who uses CommonWell Health Alliance or eHealth Exchange does not have the connection to Carequality activated at the time of application submission, the applicant must enable its connection to Carequality no later than upon notification of qualification and prior to the public announcement of QHIOs. Therefore, the applicant can attest to this requirement if the applicant is prepared to activate the Carequality connection upon notification of qualified status and prior to the public announcement of QHIOs.

5. Does the attestation to the requirement that "QHIOs must have participant agreements that do not conflict with the DSA and its P&Ps" entail the applicant's representation that their participant agreements do not, to their knowledge, conflict with the DSA and its P&Ps?

This question relates to question A8 in the application. Yes. As a signatory to the DSA, QHIOs are required to comply with the DSA and with its P&Ps. If a QHIO becomes aware of a conflict in its

agreements with their participants, it should consider an amendment to comply with its obligations as a DSA signatory and as a QHIO by the dates indicated in the application.

6. Can CDII clarify expectations, in the application question C7, for QHIOs to exchange information for Request for Information and Information Delivery with other QHIOs and nationwide networks and frameworks on behalf of their participants who are DxF Participants?

CDII requires that all QHIOs (1) participate in a nationwide network or framework named in the application, and (2) agree to forward Requests for Information, respond to Requests for Information, forward Information Delivery, and receive Information Delivery on behalf of their DxF Participant clients using the QHIO's chosen nationwide network or framework or any other QHIO as necessary. QHIOs may use a nationwide network or framework to exchange with other QHIOs or do so through point-to-point connections as they choose. CDII does not dictate how a QHIO responds to a request on behalf of a DxF Participant client, and the QHIO may do so in any lawful way and using any method and/or open technical standard acceptable to both the QHIO and the client.

7. Does the requirement in application question C8e apply only to rosters in which the requesting Participant has an existing professional relationship between the Participant and the Individual?

The intent of this requirement is that rosters name only Individuals for which the Participant who is making the request for notifications has a professional relationship at the time of the request. CDII will work with stakeholders, including QHIOs, to clarify Policies and Procedures if necessary.