

CalHHS Data Exchange Framework
Draft Policy and Procedure for Public Comment
(November 2023)
Draft Fees P&P
Questions for Public Input

Background and Instructions

The CalHHS Center for Data Insights and Innovation (CDII) has [released](#) a new **draft Policy and Procedure (P&P)** for the Data Exchange Framework's (DxF) Data Sharing Agreement (DSA) for public comment:

- [New] Fees

Concepts for this P&P were discussed during CalHHS DxF Implementation Advisory Committee (IAC) and DSA P&P Subcommittee meetings, where feedback was received and incorporated from committee members and the public. **CDII is now seeking broader public comment on the draft P&P by 8AM PT Thursday, December 21, 2023.**

CDII is seeking public comment on all aspects of the P&P as drafted, with particular interest in the topics and areas highlighted in this document.

CDII requests comment submission in the [DxF Comment Template](#) though other formats will also be accepted.¹ To assist CDII with processing of your comments, please name your completed comment file as follows: [Your Organization Name]_[Your Last Name]_[Date Prepared] and transmit the file attached in an email to CDII@chhs.ca.gov with the subject line 'DxF P&P: Fees Public Comment'. Additional details with guidance on how to prepare and transmit comments are available in the Public Comment section of the CalHHS [DxF webpage](#).

Questions for Public Input

1. Should a Social Services Organization who is a DxF Participant be prohibited from charging fees for providing Health and Social Services Information (HSSI) to another DxF Participant who is either a Health Care or Social Service Organization for a Permitted Purpose, as defined in the &P?
 - a. For example, should a DxF Participant that is a housing supports organization be prohibited from charging fees to a DxF Participant that is a

¹ CDII asks that comments delivered in alternative formats meet Web Content Accessibility Guidelines. Specifically, CDII requests that commenters refrain from submitting comments in tracked-changes format or as a document with in-text comments. The California Department of Rehabilitation has created [Web Accessibility Toolkit](#) to serve as a resource for meeting accessibility guidelines.

- medically tailored meal organization for providing HSSI in connection with the referral of a patient between the two organizations?
- b. Should a DxF Participant that is a housing supports organization be prohibited from charging fees to a DxF Participant that is a managed care plan (MCP) for providing HSSI if the MCP requests HSSI from the housing supports organization?
2. Should a DxF Participant that is not a Social Services Organization be prohibited from charging fees for providing HSSI to a DxF Participant that is a Social Services Organization for a Permitted Purpose?
 - a. For example, should a hospital be prohibited from charging fees to a medically tailored meal organization for providing HSSI in connection with the referral of a patient between the two organizations?