



**California Health & Human Services Agency  
Center for Data Insights and Innovation  
Data Exchange Framework Implementation Advisory Committee  
Meeting #11 Chat Log (9:00 AM – 11:00 AM PT, November 16, 2023)**

**The following comments were made in the Zoom chat log by Members of the Implementation Advisory Committee and staff during the November 16, 2023 meeting:**

12:22:35 From Rim Cothren, CDII CalHHS To Everyone:

We can hear Felix fine.

12:23:01 From DeeAnne McCallin To Everyone:

[Thumbs up symbol]

12:33:31 From Felix Su To Everyone:

We would CDII to consider, as part of the QHIO Program, a dedicated set of P&Ps for QHIO data exchange requirements that are above and beyond the general requirements for other DSA participants (and what is in the existing P&Ps).

12:35:25 From Felix Su To Everyone:

(These types of ongoing requirements also cannot be adequately captured in the QHIO application.)

12:41:53 From Lori Hack To Everyone:

I am unclear why Manifest is requesting more P and P requirements than the rest of the technology vendors must meet Felix? Is it to clarify areas that are not clear?

12:49:12 From Troy Kaji To Everyone:

My understanding of Felix's point was to make visible what the QHIO application asked outside of the QHIO application itself. Perhaps a link to the application might work

12:49:19 From Juliette Mullin To Everyone:

Click here to access the detailed DSA Signatory Grant guidance document:  
[https://www.cdii.ca.gov/wp-content/uploads/2023/07/DSA-Signatory-Grants-Applicant-Guidance-Document-07.11.23\\_UPDATE\\_FINAL-1.pdf](https://www.cdii.ca.gov/wp-content/uploads/2023/07/DSA-Signatory-Grants-Applicant-Guidance-Document-07.11.23_UPDATE_FINAL-1.pdf)

12:50:03 From Juliette Mullin To Everyone:

For folks looking for a short grant summary, here's our new "Grants 101" overview:  
[https://www.cdii.ca.gov/wp-content/uploads/2023/11/DSA-Signatory-Grants-101\\_FINAL.pdf](https://www.cdii.ca.gov/wp-content/uploads/2023/11/DSA-Signatory-Grants-101_FINAL.pdf)

12:50:27 From Troy Kaji To Everyone:

So consider including the link in the QHIO program guide

12:50:42 From Juliette Mullin To Everyone:

And finally, here is a copy of the DSA Signatory Grant application template itself:  
[https://www.cdii.ca.gov/wp-content/uploads/2023/07/DSA-Signatory-Grants\\_Application-Template\\_Updated-July-2023\\_FINAL.pdf](https://www.cdii.ca.gov/wp-content/uploads/2023/07/DSA-Signatory-Grants_Application-Template_Updated-July-2023_FINAL.pdf)

12:54:22 From Felix Su To Everyone:

@Lori it is to organize in one place and make clear to the broader DSA Signatory community, on an ongoing basis, what the obligations of QHIOs (as intermediaries whose qualified status is designated by the State) are to their participants in supporting Dx/F exchange.

12:55:17 From Lori Hack To Everyone:

@Felix, so not more, just publishing what they are. got it!

12:57:05 From Aaron Goodale To Everyone:

To clarify my statements...The 3 QHIO demonstrations I've attended have all presented themselves as the pathway to compliance with the DSA (as expected). If the QHIO program guide could confirm in plain language that the compliance pathway is a goal of the program that would be helpful. Even better would be a description, policy by policy, as to how a QHIO would provide compliance would be ideal. As Rim stated, full implementation by the participant would be necessary to be truly compliant.

12:57:53 From Rim Cothren, CDII CalHHS To Everyone:

Thanks, Aaron.

12:58:11 From Troy Kaji To Everyone:

+1 @Aaron

12:59:41 From Felix Su To Everyone:

@Lori Yes. There are existing requirements on QHIOs that we know do not apply to other DSA Signatories or other non-qualified intermediaries (ex: ADT functionality, including panel sharing across QHIOs, and participation in national networks). These should be documented in P&Ps so the broader Dx/F Signatory/stakeholder community is aware.

13:00:08 From Felix Su To Everyone:

+1 @Aaron

13:01:42 From Troy Kaji To Everyone:

RE: Privacy P&P, AB 352 has prohibitions broader than reproductive care, and includes gender affirming care. Am understanding Privacy P&P differently than "not required to share" but instead as prohibited from sharing per AB 352. Will be technically difficult to implement

13:07:31 From Rim Cothren, CDII CalHHS To Everyone:

For those interested, the draft language presented to and discussed with the DSA and P&P Subcommittee on 10/31 is available on our website at [https://www.cdii.ca.gov/wp-content/uploads/2023/10/CalHHS\\_Participant-Directory-PP\\_Draft\\_10.22.23.pdf](https://www.cdii.ca.gov/wp-content/uploads/2023/10/CalHHS_Participant-Directory-PP_Draft_10.22.23.pdf).

13:07:58 From Rim Cothren, CDII CalHHS To Everyone:

The version for public comment will be available on the website shortly, likely in the next few days.

13:11:15 From Lori Hack To Everyone:

can you post the link to the Fees P and P?

13:12:04 From DeeAnne McCallin To Everyone:

Lori, it is not yet posted

13:12:14 From Lori Hack To Everyone:

thanks

13:12:42 From Courtney Hansen To Everyone:

@Troy: AB 352 has several components. Three DxP P&Ps (Privacy and Security P&P; Permitted, Required, and Prohibited Purposes P&P; Data Elements to be Exchanged P&P) have been or are being amended to address Health and Safety Code section 130290(b)(3), which states that the DxP requirement to exchange health information in real time "shall not apply to the exchange of health information related to abortion and abortion-related services."