

**California Health & Human Services Agency
Center for Data Insights and Innovation
Joint Implementation Advisory Committee and Data Sharing Agreement Policies
and Procedures Subcommittee Meeting
Meeting Summary
Wednesday, January 24, 2024, 9:00 a.m. to 11:00 a.m.**

Attendance

Presenters: Rim Cothren (Independent Consultant to CDII), Jonah Frohlich (Manatt Health Strategies), Courtney Hansen (CalHHS/CDII), DeeAnne McCallin (CalHHS/CDII), John Ohanian (CalHHS/CDII)

Attendees: approximately 54 public attendees joined this meeting via Zoom video conference or through call-in functionality.

See Appendices for Data Exchange Framework (DxF) Implementation Advisory Committee (IAC) and Data Sharing Agreement Policies and Procures Subcommittee (DSA P&P) member attendance.

Meeting Notes

Notes aim to elevate major points made by presenters, DxF Advisory Committee members, and public commenters during the meeting, and may not be a comprehensive accounting of all points made. Meeting materials, full video recording, transcription, and public comments may be found on the [Data Exchange Framework webpage](#).

Welcome and Roll Call

John Ohanian, Director, Center for Data Insights and Innovation (CDII), welcomed attendees to the joint meeting of the Data Exchange Framework IAC and DSA P&P Subcommittee. He reviewed the meeting agenda and conducted a roll call of IAC Members.

DeeAnne McCallin, Deputy Director, Data Exchange Framework, CDII, conducted a roll call of DSA P&P Subcommittee Members.

Vision and Meeting Objectives

John Ohanian reviewed the vision for data exchange in California. John welcomed new members of the IAC and the DSA P&P Subcommittee, reminded attendees of the purpose of DxF Advisory Committees, and reviewed meeting norms.

John shared the following meeting objectives:

- Discuss the implementation of the Qualified Health Information Organization (QHIO) Program;
- Provide an update on DSA Signatory Grants in 2024;

- Review status of and next steps for DxF Policies and Procedures (P&Ps); and
- Discuss implementation of the DxF Participant Directory.

John noted that January 31, 2024 - the date on which many P&Ps become effective and the date by which many entities must begin exchanging under the DSA - was approaching. John noted that mandatory signatories were required to execute the DSA by January 31, 2023, and encouraged mandatory signatories who have not yet signed the DSA to do so as soon as possible.

Qualified Health Information Organization (QHIO) Program Updates

DeeAnne provided an update on the status of several QHIO program elements under development, including QHIO FAQs and fact sheets (intended for use by DxF Participants) as well as a QHIO Handbook (for use by QHIOs). She emphasized the importance of measuring the impact of the QHIO Program and solicited input from the group regarding:

- Recommendations on expectations of the QHIO Program
- How to measure the impact of the QHIO Program as a contributor to the success of the DxF

Member comments included:

- Partnering with a QHIO does not guarantee that a Participant is compliant with all DxF requirements.
- QHIOs should support their customers in maintaining compliance with DxF requirements to the maximum extent possible.
- Ability to match individual Participants to their respective QHIOs (e.g., via use of tax IDs or other unique identifiers) would support efforts to measure the impact of the QHIO Program.
- It would be helpful if an easy-to-understand resource describing the benefits of the QHIO program to lay audiences were made available.
- CDII should work with other CalHHS departments to assess QHIO measurement priorities that span across individual departments.
- CDII should ensure that measurement priorities be developed in alignment with the DxF's Guiding Principles.

DxF Grant Program Update

DeeAnne provided an update on the DxF Grant Program and thanked the DxF Educational Grantees for their work providing DxF education and training in 2023. DeeAnne stated that as of January 19, 2024, CDII had received funding requests from 806 Signatories totaling nearly \$43 million. DeeAnne reviewed the DxF grant disbursement and milestone timeline.

Policies & Procedures (P&P) Development

DeeAnne provided an overview of the various P&Ps in development, noting the following five P&Ps that had been recently finalized and published to the DxF webpage:

- Participant Directory
- Fees
- Data Elements to Be Exchanged (amendment)
- Individual Access Services (amendment – administrative modifications only)
- Permitted, Required, and Prohibited Purposes (amendment – administrative modifications only)

Member comments included:

- Assembly Bill (AB) 352 necessitates updates to DxF P&Ps.
 - AB 352 contains provisions related to abortion and gender affirming care information.
 - *CDII noted that updates had been recently made to P&Ps to align with AB 352 provisions on abortion-related information.*
- It would be helpful for CDII to release guidance on how DxF Participants should comply with laws governing the use and exchange of sensitive data, including AB 352.
- P&Ps could go beyond the safeguards described in state and federal law to require additional protections for use and exchange of sensitive data under the DxF.
- A coalition of organizations including Health Gorilla is working to develop a public value set of codes that reflect abortion and other reproductive health care.
- Management of sensitive data is both a technical and operational issue.

Participant Directory P&P

Rim Cothren, Independent Consultant to CDII, reviewed a summary of public comments received and changes made to the recently finalized Participant Directory P&P.

Member comments included:

- CDII should consider modifying the DxF Participant Directory in the future to include fields for Participants to note their preferred methods for receiving information.
- CDII should consider development of a DxF implementation guide.
- Situations in which two entities cannot agree on an exchange method will cause delays in exchange and may hinder compliance with DxF requirements.
- The design of the Participant Directory should be consistent with the requirements described in the Technical Requirements for Exchange P&P.
- There may be opportunities to align the DxF Participant Directory with other directories (e.g., the NPPES NPI Registry).

Fees P&P

DeeAnne reviewed a summary of public comments received and changes made to the recently finalized Fees P&P.

Member comments included:

- Participants sending information may need to charge fees if they are not currently able to send information in the format the receiver is asking for.
 - *CDII noted that a decision was made in the P&P development process to prohibit charging of fees for any required DxF exchange purpose .*

California Information Blocking Prohibitions P&P

DeeAnne noted the recently released notice of intended administrative changes to the California Information Blocking Prohibitions P&P. Participants that object to CDII's determination that proposed changes to the P&P are administrative may submit an objection through an online form available on the DxF webpage by 8am PT on February 19, 2024.

Member comments included:

- The California Information Blocking Prohibitions P&P may require revisions in the future to be in alignment with the HTI-1 final rule.

Participant Directory Updates

Rim shared updates on the DxF Participant Directory describing its purpose and the choices that Participants must enter into the Directory. Rim noted that Participants will have 10 business days upon the Participant Directory P&P's effective date of January 31, 2024, to enter their choices into the Directory.

Member comments included:

- Once the DxF Participant Directory includes the option to list individual providers, there may be opportunities to work with provider boards to make updates to the Directory at time of licensure or certification.

Public Comment

DeeAnne opened the meeting to public comment. Public comment included:

- CDII should clarify the procedure for an individual to opt out of having their information exchanged under the DxF.

Next Steps and Closing Remarks

DeeAnne reviewed next steps to close the meeting. DeeAnne noted the next IAC meeting on March 19, 2024 (12pm-2:30pm) and stated that future DSA P&P Subcommittee meetings were being scheduled with meeting information to be published to the DxF webpage by early February.

Appendix 1. Data Exchange Framework Implementation Advisory Committee Members - Meeting Attendance (January 24, 2024)

Last Name	First Name	Title	Organization	Present
Chavez	Dan	Executive Director	Serving Communities Health Information Organization	Yes
Diaz	Joe	Senior Policy Director	California Association of Health Facilities	Yes
Ford	David	Vice President, Health Information Technology	California Medical Association	Yes
Goodale	Aaron	Vice President, Health Information Technology	MedPoint Management	Yes
Hack	Lori	Interim Executive Director	California Association of Health Information Exchanges	No
Kaiser	Cameron	Deputy Public Health Officer	County of Solano	Yes
Kaji	Troy	Associate Chief Medical Informatics Officer	Contra Costa Regional Medical Center and Health Centers	Yes
Kiefer	Andrew	Vice President, State Government Affairs	Blue Shield of California	Yes
Legé	Matt	Government Relations Advocate	SEIU California	No
Miller	Amie	Executive Director	California Mental Health Services Authority	No
Modaressi	Ali	CEO	Los Angeles Network for Enhanced Services	Yes
Saenz	Lucy	Assistant Director of Data Informatics	California Primary Care Association	Yes



Savage-Sangwan	Kiran	Executive Director	California Pan-Ethnic Health Network	No
Su	Felix	Director, Health Policy	Manifest MedEx	Yes
Willis	Jim	Systems Informatics Leader	CommonSpirit Health	No

**Appendix 2. Data Exchange Framework Data Sharing Agreement and Policies & Procedures Subcommittee -
Meeting Attendance (January 24, 2024)**

Last Name	First Name	Title	Organization	Present
Barcellona	William	Executive Vice President for Government Affairs	America's Physician Groups	No
Brown	Michelle (Shelley)	Attorney	Private Practice	Yes
Buckner	Jason	Chief Information Officer & Chief Technology Officer	Manifest Medex	Yes
Cretaro	Louis	Lead County Consultant	County Welfare Directors Association of California	Yes
Eisenberg	Matthew	Associate Chief Medical Informatics Officer	Stanford Health	Yes
Helvey	John	Executive Director	SacValley MedShare	Yes
Jain	Sanjay	Manager, Data Analytics	Health Net	Yes
Kaempfer-Tong	Diana	Attorney	California Department of Public Health	No
Lane	Steven	Chief Medical Officer	Health Gorilla	Yes
Lind	Kelby	Vice President of Regulatory Affairs	Planned Parenthood Affiliates of California	Yes
Lowell	Sunny	Acting Chief Privacy Officer	California Department of State Hospitals	Yes

Luu	Belinda	Senior Counsel	Kaiser Permanente	Yes
Nordhoff	Jackie	Director of Regulatory Affairs	PointClickCare	Yes
Savage	Mark	Managing Director, Digital Health Strategy and Policy	Savage & Savage LLC	Yes
Schwaninger	Tom	Senior Executive Advisor, Digital Ecosystem Interoperability	LA Care	No
Steffen	Elizabeth	Chief Information Officer	Plumas District Hospital	No
Tien	Lee	Legislative Director and Adams Chair for Internet Rights	Electronic Frontier Foundation	Yes
Waltman	Belinda	Director of Analytics Integration	Los Angeles County Department of Health Services	Yes