



# Maintaining Qualified Status

October 2024

**QHIO Program Compliance Reviews.** CDII may perform a compliance review on a QHIO at any time to assess compliance with the QHIO program requirements.

CDII may, at any time, request documentation from a QHIO to verify compliance with QHIO Program requirements. CDII may request additional documentation or information from a QHIO to inform its review. A QHIO shall provide the requested documentation to CDII within 30 calendar days or propose a revised timeline and rationale for the delay to CDII for its consideration. CDII may approve or disapprove the proposed timeline and rationale, and work with the QHIO to reach an alternate acceptable timeline and rationale if necessary.

CDII will communicate the findings from its QHIO compliance review within 30 calendar days of receipt of all requested documentation or information from the QHIO or provide the QHIO a revised timeline for this communication within the 30-day period.

Based on a compliance review, if a QHIO is found to be:

- Compliant, CDII will notify the QHIO's primary contact(s) of the determination and no further action is required.
- Non-compliant, CDII will notify the QHIO's primary contact(s) of the determination and will provide an opportunity to appeal the determination.

If a QHIO receives a notification of non-compliance they may appeal that determination by submitting a written justification within 10 calendar days, with supporting documentation if applicable. CDII will inform the QHIO if it approves or denies the appeal. If denied, CDII may initiate Corrective Action, as described herein.

**QHIO Compliance Alerts.** If a QHIO becomes aware that it is no longer meeting one or more of the QHIO Program requirements, the QHIO must notify CDII of its compliance deficiencies in writing no later than 7 calendar days after the deficiencies are identified. CDII will acknowledge receipt and may initiate technical assistance and/or Corrective Action as described herein.

**QHIO Compliance Feedback.** Organizations and individuals may share feedback with CDII on the exchange of health and social services information under the DxF via the DxF Feedback Form found on the DxF webpage. If the feedback received reflects concern that a QHIO is not compliant with QHIO Program requirements, CDII may initiate a Compliance Review.

**Corrective Action.** A QHIO may be subject to Corrective Action if it:

- Self-reports non-compliance with QHIO Program requirements (i.e., a QHIO Compliance Alert); or
- Is found non-compliant with QHIO Program requirements following a CDII Compliance Review.

If CDII determines that a QHIO is non-compliant with QHIO Program requirements, and the QHIO has chosen not to appeal or received an appeal denial, CDII may request the development of a Corrective Action Plan (“CAP”) by the QHIO to remediate compliance deficiencies. If a CAP is requested, CDII will inform the QHIO of the unmet requirements and the deadline for when compliance must be re-established.

The QHIO will have 5 calendar days to review the deadline and respond, either by:

- Confirming that it will develop and execute a CAP that will bring it back into compliance by the specified deadline; or
- Requesting modifications to the specified deadline with a rationale for the requested deadline modifications.

CDII will inform the QHIO if it accepts the requested deadline modification.

CAPs must be completed and returned to CDII within 15 calendar days of the notice from CDII of deficiencies. All draft CAPs are subject to CDII approval and modification.

The QHIO must provide CDII with documentation of the deficiency resolution by the deadline provided by CDII. CDII will acknowledge receipt and provide notice of compliance satisfaction, continued compliance deficiencies, or the need for additional review time within 10 calendar days.

If compliance is not achieved by the deadline or if compliance is not confirmed through the CAP process, CDII may provide notice to the QHIO of its intent to remove the QHIO’s

qualification under the QHIO Program, resulting in the QHIO exiting the Program (see “Exiting the QHIO Program”).

**CAP Appeals.** A QHIO that has been informed by CDII that it no longer complies with QHIO Program requirements and must exit the QHIO Program may appeal CDII’s decision. If the QHIO wishes to appeal the determination, it must notify CDII of the intent to appeal within 3 business days of receipt of CDII’s decision. CDII will reply via email to confirm receipt of the applicant’s “intent to appeal.”

Next, the appellant must submit the formal appeal via email to CDII within 10 business days of the date the applicant was first notified by CDII of its decision. The QHIO appeal must state the grounds for the appeal and include supporting documents, if any. Appeals received after the timeframe will be denied. CDII will reply via email to confirm receipt of the applicant’s appeal.

QHIO Corrective Assessment Appeals will be reviewed by an individual identified by California’s Health and Human Services Agency (CalHHS) within 30 calendar days of its receipt by CDII. This individual will review the evidence and render a decision of compliance or non-compliance; this individual may also offer a new timeline, not to exceed 30 calendar days, for the QHIO to offer new evidence to CDII of its compliance, failure of which will not qualify for appeal. This individual’s decision will be final; no further appeals will be available.

During the appeals process, the QHIO will continue to serve as a Qualified HIO unless there are other circumstances that necessitate removing the status consistent with other CDII processes.

**Voluntarily Withdraws from the QHIO Program.** A QHIO may choose to voluntarily withdraw from the QHIO Program. To withdraw, the QHIO must communicate this decision to CDII, providing at least 30 calendar days notice before the effective date of withdrawal. CDII will acknowledge receipt of this notice and remove the entity from the QHIO Program by the date of withdrawal.

Refer to “Exiting the QHIO Program” for more details.

**Exiting the QHIO Program.** Once CDII issues a decision that a QHIO will exit the Program or a QHIO voluntarily withdraws, the QHIO has 7 calendar days to remove any public-facing references to its current role as a QHIO and suspend use of the DxF QHIO seal. Additionally, the QHIO will forfeit all not-yet-disbursed QHIO Onboarding grant payments. Recoupment of

disbursed grant funds may be pursued if warranted per the DSA Signatory Grants Guidance Document.

Although the organization is no longer a QHIO, the organization remains a DSA Signatory subject to DSA Policies and Procedures and may continue to provide Intermediary services to Participants.

The former QHIO may re-apply for QHIO designation in future application cycles.