



April 28, 2022

RE: DxF Comment Request

Please clarify the following question about DxF 6. P&P-Permitted, Required & Prohibited Purposes

[Policy and Procedure: Permitted Required and Prohibited Purposes Draft 4.21.22 \(ca.gov\)](#)

1. REQUIRED PURPOSES a. Subject to the provisions of the DSA and the Policies and Procedures, Participants are required to exchange Health and Social Services Information and/or provide access to Health **and Social Services Information** pursuant to the Data Exchange Framework for Treatment, Payment, Health Care Operations, and Public Health Activities as those terms are defined herein.

2. PERMITTED PURPOSES a. Subject to the provisions of the DSA and the Policies and Procedures, Participants are permitted to exchange or provide access to Health **and Social Services Information** for any other purpose, provided appropriate Authorizations are made, if necessary, and the disclosure or use of Health and Social Services Information is permissible under Applicable Law. Such purposes, include, but are not limited to Social Services Activities and Research activities.

We ask that DxF clarify whether the required Social Services Information is limited to information within the HIPAA defined Designated Record Set. The Designated Record Set definition is also central to the Information Blocking Rule. We are concerned that the language is broader than the Designated Record Set.

Sincerely,
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Contra Costa Health Services

