

**California Health & Human Services Agency**  
**Center for Data Insights and Innovation**  
**Data Exchange Framework Implementation Advisory Committee**  
**Meeting 2 Public Comment Log (10:00AM – 1:00PM PT, November 3, 2022)**

The table below shows public comments that were made verbally during the November 3rd meeting. Additional public comments can be found in the meeting’s “Q&A Log” posted on the CalHHS Data Exchange Framework [website](#).

Count	Name	Comment
1	Lucy Johns	<p>Hello, Thank you. This is Lucy Johns. Um. I have a couple of comments. Um, I would like first to refer to the QHIO conversation a long time ago, and I hope people will remember at least a little bit of it. I would like to propose that the principles that were listed could potentially include the word and concept of trust. As I read what's going on, confidence in a QHIO is not the same as the trust which is the absolute foundation for interoperability. So the design there needs to be a trust by design. Whenever thinking about all of the components and elements and inter-relationships of the QHIOs. So that's my first thought. Um. Somebody, commenting on those principles, mentioned the idea of quality of data being a principal. This made me realize that maybe I'm not understanding what a QHIO is from my point of view, and my experience for the last decade with interoperability is the QHIOs are transmitters of data. They are not vetting data for the quality of the data. From my experience HIOs don't actually see the data. They pass it along to be between, and participants who need it, and responders who may have it. So that's my thought about quality of data.</p> <p>Um. I also have a comment about the Grants. The TA and QHIO onboarding grants. When I first read about this and heard about it, my thought was that the State was providing, if you will, investment capital to lift up our entire ecosystem to enable interoperability. That they were not in the business of ongoing subsidy operations, which in effect would be enabling subsidized pricing. So if I'm wrong about that, I hope that somebody will correct me. Um that may be discussed in the original appropriation, which, of course, I haven't seen my final comment about components of digital identity. I always appreciate listening to Rim. He has a vast experience with this, and uh, so I hope that it's in order for me to suggest Rim,</p>

Count	Name	Comment
		that whenever we're ultimately talking about state policy respecting level of confidence we need to be talking about. IL2 or higher. We can't leave the notion of level of confidence up to every individual. See QHIO or its subscribers. There needs to be state policy about well, what level of confidence is, and we have now a pretty well-defined, and certainly um much discussed, uh levels of confidence from this and IL2 uh, from my point of view as a consumer is the absolute baseline. Thank you. Thank you very much.

**Total Count of public comments: 1**