

## CalHHS Data Exchange Framework Frequently Asked Questions (FAQ)

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### Introduction

The CalHHS Health and Human Services Data Exchange Framework (DxF) comprises a single Data Sharing Agreement (DSA) and common set of Policies and Procedures (P&Ps) that will govern the exchange of health and social services information among health care entities and government agencies beginning January 31, 2024.

Finalized on July 1, 2022, the DxF was developed with input from a broad set of stakeholders, including a Stakeholder Advisory Group as required by [AB 133](#). The legislation mandates that a broad spectrum of health care organizations execute the Framework's DSA by January 31, 2023, and exchange or provide access to health information with other mandated organizations by January 31, 2024.

This FAQ provides up-to-date information about DxF implementation and may be updated from time to time. More information is available on the [CalHHS DxF website](#).

Please submit questions about the DxF to: [cdii@chhs.ca.gov](mailto:cdii@chhs.ca.gov)

### Frequently Asked Questions

#### 1. Who is required to sign the Data Exchange Framework (DxF) Data Sharing Agreement (DSA) on or before January 31, 2023?

Entities required to sign the DxF DSA are listed below, as defined in [Health and Safety Code section 130290\(f\)](#).

1. General Acute Care Hospitals, as defined by [Health and Safety Code Section 1250](#).
2. Physician Organizations (e.g., Independent Practice Associations that exchange health information) and Medical Groups.
3. Skilled Nursing Facilities, as defined in [Health and Safety Code Section 1250](#).
4. Health Plans

- a. Health Care Service Plans and Disability Insurers providing hospital, medical, or surgical coverage that are regulated by the California Department of Managed Healthcare or the California Department of Insurance.
  - b. Medi-Cal Managed Care Plans that have signed a comprehensive risk contract with the Department of Healthcare Services pursuant to the Medi-Cal Act<sup>1</sup> or the Waxman-Duffy Prepaid Health Plan Act<sup>2</sup>, and that are not regulated by the California Department of Managed Healthcare or the California Department of Insurance.
5. Clinical Laboratories, as defined in [Business and Professions Code Section 1265](#) and that are licensed by the California Department of Public Health.
  6. Acute Psychiatric Hospitals, as defined in [Health and Safety Code Section 1250](#).

## 2. What are my obligations after I sign?

After signing, DxF DSA signatories will be required to exchange health and social services information or provide access to health information to and from every other signatory in real time as specified in the DSA and its Policies and Procedures (P&Ps).

Most entities required to sign the DSA will be required to begin exchanging health and social services information on or before January 31, 2024.

Some organizations will have until January 31, 2026 to begin exchanging this information. These organizations are as follows: physician practices of fewer than 25 physicians, rehabilitation hospitals, long-term acute care hospitals, acute psychiatric hospitals, critical access hospitals, and rural general acute care hospitals with fewer than 100 acute care beds, state-run acute psychiatric hospitals, and any nonprofit clinic with fewer than 10 health care providers.

CalHHS is working with stakeholders to develop processes to support signatories in meeting DxF DSA requirements, including by establishing a program to qualify eligible health information organizations (HIOs) to facilitate data exchange between signatories. More information on the program will be available soon.

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<sup>1</sup> Cal. Welfare and Institutions Code sections 14000, et seq.

<sup>2</sup> Cal. Welfare and Institutions Code section 14200, et seq.

### 3. How will I sign?

CalHHS is developing a process to collect and manage DSA signatures. More information as well as a signable version of the DSA will be shared with stakeholders and made available on the [CalHHS DxF website](#) later this year.

### 4. What should one do prior to signing the Data Sharing Agreement?

1. Review the Data Sharing Agreement (DSA) and its policies and procedures [available on the CDII website](#) so you are aware of your organization's obligations once you sign the DSA. The DSA and its policies and procedures are final drafts that were developed alongside a wide variety of stakeholders and were previously available for public comment. Neither the DSA nor the policies and procedures are open for negotiation.
2. Determine who at your organization is authorized to sign the DSA on behalf of the organization.
3. Determine if there are subordinate entities or facilities for which the authorized person would like to sign.

[What is a subordinate organization?](#)

4. Gather necessary information in order to register in the CalHHS Data Sharing Agreement Signing Portal and request a copy of the DSA to be signed.

[What information will I need to register for the CalHHS Data Sharing Agreement Signing Portal?](#)

### 5. What information should you collect before registering in the CalHHS Data Sharing Agreement Signing Portal?

For your organization, you will need:

- legal name of the organization
- mailing address

For the person signing the DSA, you will need:

- name
- title within the organization
- phone number
- email address

If your organization does not have subordinate entities or facilities, in addition to other information for your organization you will need:

- type of organization, one of:
  - general acute care hospital
  - physician organization or medical group
  - health care service plan or disability insurer, including risk-based organizations, Medi-Cal managed care plan services, and other health care service plans or disability insurers
  - skilled nursing facility
  - clinical laboratory
  - acute psychiatric hospital
  - other, voluntary signatory

[How do I know if what type of organization I am?](#)

- California license number for general acute care hospitals, health care service plans or disability insurers, skilled nursing facilities, clinical laboratories, or acute psychiatric hospitals.

[How do I know which license number to use?](#)

- Employer Identification Number (EIN) for physician organizations, medical groups, or other, voluntary signatories.

*If you don't have an EIN, you can [apply for an EIN online](#).*

If your organization has subordinate entities or facilities for which the individual would like to sign, you will need the following for each subordinate organization:

- legal name
- mailing address
- type of subordinate entity or facility, as described above in the information you will need for your organization
- California license number or EIN, as described above in the information you will need for your organization

[What is a subordinate organization?](#)

If your organization or one of your subordinate entities or facilities has multiple license numbers for multiple organization types (e.g., a licensed general acute care hospital with a licensed clinical laboratory), they should be listed separately

as separate subordinate entities using the appropriate legal name, organization type, and license number or EIN.

**6. The CalHHS Data Sharing Agreement Signing Portal asks for California license numbers for some organization types. What is the license number being requested?**

For general acute care hospitals, skilled nursing facilities, or psychiatric hospitals, use the license number issued by the California Department of Public Health (CDPH).

For health care service plans or disability insurers, including Medi-Cal managed care plans, use the license number issued by the Department of Managed Health Care (DMHC) or the California Department of Insurance (CDI), or the risk-bearing organization (RBO) number.

For Medi-Cal managed care plans that are not licensed by the DMHC or the CDI, use the contract number issued by the Department of Health Care Services (DHCS).

For clinical laboratories, use the laboratory license number issued by the California Department of Public Health (CDPH). Do not the federally-issued Clinical Laboratory Improvement Amendments (CLIA) number.

**7. The CalHHS Data Sharing Agreement Signing Portal asks me whether my organization has subordinate organizations. What is a subordinate organization?**

Your health system, health plan, laboratory system, etc., may have multiple entities or facilities that are licensed separately by the State of California but belong to a single parent company. If you have identified an individual at your organization that is authorized to sign on behalf of more than one entity or facility, the authorized person to sign the DSA can list these organizations in the signing portal and on the DSA as “subordinate organizations”. This will allow the authorized person to sign one DSA on behalf of a number of organizations within one organization.

Subordinate organizations may be part of the same physical facility. For example, a general acute care hospital may have a licensed clinical laboratory within the hospital. In this case, if one person is authorized to sign on behalf of both the general acute care hospital and the clinical laboratory, the general acute care hospital and the clinical laboratory could both be listed as “subordinate organizations.”