

**California Health & Human Services Agency  
Center for Data Insights and Innovation  
Data Exchange Framework Implementation Advisory Committee  
Meeting Summary  
Thursday, November 3, 2022 10:00 a.m. to 1:00 p.m.**

**Attendance**

**Implementation Advisory Committee Members in attendance:** Joe Diaz, David Ford, Aaron Goodale, Cameron Kaiser, Troy Kaji, Andrew Kiefer, Paul Kimsey, Linnea Koopmans, Matt Lege, DeeAnne McCallin, Amie Miller, Ali Modaresi, Jonathan Russell, Cary Sanders, Ryan Stewart, Felix Su

**Implementation Advisory Committee Staff and Presenters in attendance:**

Cynthia Bero (Manatt Health Strategies), Rim Cothren (Independent HIE Consultant to CDII), Jonah Frohlich (Manatt Health Strategies), Kevin McAvey (Manatt Health Strategies), Juliette Mullin (Manatt Health Strategies), John Ohanian (CalHHS/CDII), Helen Pfister (Manatt Health Strategies), Elaine Scordakis (CalHHS/CDII), Jocelyn Torrez (CalHHS/CDII), Cheron Vail (Health Plan of San Joaquin)

**Public in attendance:** approximately 45 public attendees joined this meeting via Zoom video conference or through call-in functionality.

**Meeting Notes**

Meeting notes elevate points made by presenters, Committee Members, and public commenters during the Data Exchange Framework (DxF) Implementation Advisory Committee (IAC) meeting. Notes may be revised to reflect public comment received in advance of the next IAC meeting. Meeting materials, full video recording, transcription, and public comments may be found on the [Data Exchange Framework website](#).

**Welcome and Roll Call**

John Ohanian, Chief Data Officer, California Health & Human Services, welcomed attendees to the second IAC meeting. John reviewed the meeting agenda and conducted a roll call of the IAC Members.

**Vision and Meeting Objectives**

John thanked IAC Members for their engagement in the DxF development process. He reviewed the vision for data exchange in California and shared his reflections on the development of the DxF.

Charon Vail, Chief Information Officer at the Health Plan of San Joaquin (HPSJ), shared her thoughts on the importance of an HIE for health care. Cheron has been involved with the development and management of the San Joaquin Community HIE, a three county HIE HIO that leverages Manifest MedEx's platform. Earlier in the COVID-19 pandemic, HPSJ partnered with Manifest Medex to identify San Joaquin's vulnerable

and unvaccinated medical Medi-Cal members. HPSJ was then able to quickly develop an outreach program to assist people to obtain their vaccinations, which was critical for managing the spread of COVID-19 in two of the most under-vaccinated counties in the state.

John reviewed the IAC meeting #2 meeting objectives.

### **Data Exchange Framework Implementation Timeline and IAC Meeting Topic Roadmap**

John provided an overview of the DxF Implementation Timeline and called attention to key milestones such as the release of the DxF Educational Grants (9/2022), the DSA Signature Portal launch (11/2022), and the release of the RFP for TA & QHIO Onboarding Grants (12/2022).

John reviewed the IAC Meeting Topic Roadmap, detailing the Data Exchange Framework implementation topics that that CDII anticipates covering during each of the remaining meetings.

### **Data Sharing Agreement and Policies & Procedures**

Courtney Hansen, Assistant Chief Counsel, CDII, provided an overview of the first set of eight published P&Ps released in July 2022. Courtney reviewed five additional in-development P&Ps that will support DxF implementation, including:

1. Monitoring and Auditing
2. Information Blocking
3. Required Transaction Patterns and Technical Requirements for Exchange
4. Real-Time Data Exchange
5. Qualified HIO Designation Process

Helen Pfister, Partner, Manatt Health Strategies, provided an update on the development of the Information Blocking P&P, noting several revisions that CDII is planning to make based on feedback from the DSA P&P Subcommittee. Helen then reviewed the draft Monitoring and Auditing P&P and the process for its release for public comment.

Member feedback on the Information Blocking P&P included:

- Appreciation for the approach of adhering to the Federal Information Blocking final rule, whenever possible.
- Suggestion to rename the Information Blocking P&P to avoid confusion with the Federal Information Blocking rule.
- Recommendation that the future governance entity should consider the resources and time that providers will need to invest in compliance training for any future updates to the Information Blocking P&P and ensure there is adequate opportunity for public comment and time for implementation.

Member feedback on the Monitoring and Auditing P&P included:

- Recommendation that audits are conducted remotely rather than via site visits to reduce burden on providers.
- Mixed perspectives on whether signatories should be required attest to complying with the DSA on an annual basis. Some Members supported annual attestation, noting that it would serve as a helpful reminder of the DSA’s provisions, while others felt annual attestation would not be necessary since they would be expected to comply with the DSA whether or not they attested annually.
- Requests for additional details on the scope, process, and timelines for the audit, the auditing entity, and the potential actions taken by the governance entity if deficiencies are identified during the audit.
  - Consideration for conducting audits following a following a complaint to a complaint or an issue that is flagged for the governance entity rather than on a random basis.
  - Consideration for issuing warning letters for deficiencies identified during the first year of implementation, similar to the enforcement mechanism during the first year of implementation for the federal Information Blocking final rule.
- Request to consider allowing a QHIO to attest compliance on behalf of signatories, especially for smaller providers.

Courtney Hansen described a change to the Data Exchange Framework DSA, removing California Health and Human Services Agency as a signatory.

Dr. Robert Cothren, Independent HIE Consultant to CDII, provided an overview of the self-service electronic signature portal for participants to sign the DSA.

Member feedback on the DSA Signature Portal included:

- Recommendation that CDII develop an instructional document that details all information organizations will need to collect prior to logging into the signature portal.
- Recommendation that CDII post a list of organizations that have signed the DSA.
- Request for more education and outreach around the difference between AB 133’s deadline to sign the DSA (January 31, 2023) signature compliance and the deadline to begin sharing data under the DSA (January 31, 2024 or 2026, depending on signatory type) .

### **Qualified Health Information Organization Program**

Cynthia Bero, Senior Advisor, Manatt Health Strategies, provided an overview of the Qualified Health Information Organization Program, its guiding principles, and details on the QHIO application, attestation, and probationary processes.

Member feedback on the QHIO Program guiding principles included:

- In addition to fairness, suggested consideration of whether adding a guiding principle of equity and accessibility to acknowledge those organizations who will require significant assistance from a QHIO.

- Recommendation to publicly display guiding principles to aid organizations in evaluating QHIOs based on how they measure up to each principle.

Member feedback on the QHIO application process included:

- Suggestion consideration of whether an mHealth App could become a QHIO in light of federal rules promoting consumer-mediated exchange.
- Suggested consideration of whether incorporating HIO participation in the Office of the National Coordinator (ONC) for HIT's Trusted Exchange Framework and Common Agreement (TEFCA) should be a QHIO certification criterion.

Member feedback on the QHIO Attestation and Monitoring structure included:

- Suggestion that the remediation timeline be extended from six months to one year to ensure there is adequate time to fix issues that are identified.
- Suggestion that adding mitigation strategies for when a QHIO may not be fully functional, for example in the event of a natural disaster.

Member feedback on the QHIO Transactions and Standards included:

- There could be a contractor or partner organization that would give expertise on evolving technology and data exchange standards.

### **DxF Grant Program**

Elaine Scordakis, Deputy Director, CDII, presented an overview of the DxF Grant program and provided updates on the Educational Initiative, Technical Assistance, and QHIO Onboarding Grant Domains.

Juliette Mullin, Senior Manager, Manatt Health Strategies summarized the findings from the DxF Grant Listening Sessions.

Member feedback on the DxF Grant Listening Sessions included:

- Recommendation to allow other entity types to serve as the facilitator or aggregator of application information on behalf of the signatories

Member feedback on the QHIO Onboarding & TA Grant criteria included:

- Consideration for allowing the funds for the QHIO onboarding grants to flow through QHIOs to providers, similar to the funds flows in the California HIO Onboarding Program (Cal-HOP).
- Mixed perspectives were shared on whether DxF QHIO Onboarding and TA Grant funding should prioritize mandatory signatories. Some Members favored allowing voluntary signatories to be eligible for funding to facilitate their participation while other Members favored prioritizing mandatory signatories.
- Requests for clarification on the applicable uses of QHIO Onboarding and TA Grant Program funds (e.g., for costs associated with integrating QHIO data feeds within an EHR and ongoing costs of QHIO participation).

### **Strategy for Digital Identities**

Dr. Rim Cothren, Independent HIE, CDII Consultant, presented an overview of the components of Digital Identity, the strategy for digital identity, and the potential to expand the strategy for Digital Identity. Rim described the attributes selected as “Patient Demographics,” additional selected identifiers, and standard formats and datasets. Given that person matching will only be used for social services information, CDII is exploring a Statewide Person Index for CalHHS Departments that leverages DHCS/CDPH/other activities, as well as expansion of the cross-Department person index to Broader Statewide Access/Applicability.

Member feedback on the Strategy for Digital Identities included:

- Support for the Strategy for Digital Identities and its potential to save resources among organizations trying to do this locally as well as to raise the floor for how digital identity assurance is done.
- Suggested consideration for collaborating with HIOs when designing the person matching strategy since HIOs have experience doing person matching.

### **Public Comment**

- John Ohanian opened the meeting to public comment. Lucy Johns provided public comment, suggesting including the concepts of trust and data quality in the QHIO program principles. She requested that both TA and QHIO onboarding grants be used as an investment to enable interoperability of the entire DxF ecosystem. She also suggested there should be state policy on “levels of confidence”.

### **Closing Remarks and Next Steps**

John Ohanian reviewed the project's next steps. John noted the following upcoming meetings:

- November 22, 2022, 11:30 AM to 12:30 PM for DxF Webinar #3
- December 15, 2022, 9:00 AM to 11:30 AM for DSA P&P SC Meeting #2
- December 20, 2022, 10:00 AM to 12:30 PM for our next IAC meeting (#3)

**Appendix 1. Data Exchange Framework Implementation Advisory Group Member - Meeting Attendance  
(November 3, 2022)**

<b>Last Name</b>	<b>First Name</b>	<b>Title</b>	<b>Organization</b>	<b>Designee For</b>	<b>Present</b>
Asprec	Norlyn	Executive Director	County Health Executive Association of California	N/A	No
Diaz	Joe	Director of Government Affairs	California Association of Health Facilities	N/A	Yes
Ford	David	Vice President, Health Information Technology	California Medical Association	N/A	Yes
Goodale	Aaron	Vice President, Health Information Technology	MedPoint Management	N/A	Yes
Hack	Lori	Interim Executive Director	California Association of Health Information Exchanges	N/A	No
Kaiser	Cameron	Deputy Public Health Officer	County of San Diego	N/A	Yes
Kaji	Troy	Associate Chief Medical Informatics Officer	Contra Costa Regional Medical Center and Health Centers	N/A	Yes
Kiefer	Andrew	Vice President, State Government Affairs	Blue Shield of California	N/A	Yes
Kimsey	Paul	Deputy Director	California Department of Public Health	N/A	Yes
Koopmans	Linnea	CEO	Local Health Plans of California	N/A	Yes
Legé	Matt	Government Relations Advocate	SEIU California	N/A	Yes
McCallin	DeeAnne	Director of Health Information Technology	California Primary Care Association	N/A	Yes
Miller	Amie	Executive Director	California Primary Care Association	N/A	Yes
Modaresi	Ali	CEO	Los Angeles Network for Enhanced Services	N/A	Yes
Russell	Jonathan	Chief Strategy and Impact Officer	Bay Area Community Services	N/A	Yes

Last Name	First Name	Title	Organization	Designee For	Present
Sanders	Cary	Senior Policy Director	California Pan-Ethnic Health Network	Savage-Sangwan	Yes
Savage-Sangwan	Kiran	Executive Director	California Pan-Ethnic Health Network	N/A	No
Senderling-McDonald	Cathy	Executive Director	County Welfare Directors Association	N/A	No
Stewart	Ryan	System Vice President, Data Interoperability and Compliance	CommonSpirit Health	N/A	Yes
Su	Felix	Director, Health Policy	Manifest MedEx	N/A	Yes