

DRAFT - California Data Exchange Framework

Qualified Health Information Organization (QHIO) Application 2023

Introduction. The QHIO Application 2023 has been designed to gather information to assist California's Center for Data Insights and Innovation (CDII) in determining if an organization has the structure and capabilities to function as a Qualified Health Information Organization (QHIO) in California's Data Exchange Framework (DxF). QHIOs will be identified for Data Sharing Agreement (DSA) signatories who are seeking assistance to meet their DSA obligations. Organizations interested in serving as QHIOs are encouraged to complete this application for consideration.

General Instructions. Please respond to the questions in each of the following sections:

- A. Organization Information
- B. Privacy and Security
- C. Functional Capabilities
- D. Operations

Please keep your responses brief and responsive to the question, following specific instructions with respect to the format of the response. If the response requests an attachment, please submit the attachment as a PDF file unless otherwise specified. Label the attachment with your organization name/nickname and the section/number of the question. For example, the attachment describing the corporate history of fictional applicant HealthyExchange might be labeled HealthyXChg A3. For more information, please refer to the *QHIO Application Guide 2023*.

Please note:

- All information collected by CDII as part of the QHIO Application is considered public information under the California's Public Records Act.
- Failure to respond to a question or to misrepresent the organization's capabilities will be cause for failure to receive (or subsequent removal of) Qualified status.

2023 Timeline. 2023 QHIO applications are due on or before **4:30pm PST on XXXXX XX, 2023**.

Applications received after that date and time will not be considered for review in this first cycle of the 2023 program. The next application cycle will be announced at a future date.

CDII will review the 2023 applications in **April 2023**, reaching out to applicants as needed for questions and clarification. Qualified HIOs will be announced in **May 2023**.

A. Organization Information

1. Please complete the chart below with details regarding the organization:

Question	Response
Organization name	
Alternative names/nicknames	
Address of principal place of business	
Primary telephone number	
Primary website URL	
State/jurisdiction where incorporated	
Date of incorporation	

2. QHIOs must be registered corporations in United States. Please submit a brief letter, certificate or other form of documentation from the state where the organization is incorporated that reflects its current status (e.g., good standing). For example, organizations incorporated in California should submit a letter of good standing from the California Secretary of State. E
3. QHIOs must have current business with health and/or social services organizations in California. Please submit a brief description (not to exceed 500 words) of the corporation’s history, current products and services, clients, regions served, etc. Please attach a list of current clients delivering health and/or social services in California.
4. QHIOs must demonstrate the organizational infrastructure to responsibly serve DSA signatories, including a multi-stakeholder, participatory governance function that incorporates consumer perspectives. Please submit relevant documentation and a description (not to exceed 1,000 words) of this governance function including:
 - a. Corporate documentation that provides authority to the governing body
 - b. Details on eligibility to serve on the governing body and how representatives are selected
 - c. Details describing how often the governing body convenes
 - d. Description of the scope of decisions that the governing body is charged with
 - e. Details describing how the governing body’s actions are communicated to DSA signatories
5. As Participants in the DxF, QHIOs must sign the Data Sharing Agreement and attest that the agreements with current clients do not conflict with the terms of the DSA and its Policies and Procedures. Please submit an attestation indicating that the organization has signed the DSA and does not have client agreements in place that conflict with the terms of the DSA or its Policies and Procedures.
6. QHIOs who leverage the services of third parties to transmit and/or manage health and social services information must have agreements in place with these vendors that are consistent with and

do not conflict with the DSA including its Policies and Procedures. If the organization leverages the services of third parties to transmit and/or manage health and social services information, please submit an attestation to indicate a valid and enforceable written agreement with that party exists that is consistent with the DSA and its Policies and Procedures. Please attach to this attestation, a list (not to exceed one page) of these third parties including their corporate name, location and the nature of the services they provide to the organization.

7. QHIOs must be financially viable companies, capable of serving DSA signatories for several years. Please provide documentation that reflects the financial health of the organization. This may include one or more of the following documents:
 - a. Internal Revenue Service Form 990 for the most recent year
 - b. Audited financial statements financial statements for the most recent year
 - c. An auditor’s attestation that indicates the organization is financially stable with fiscal resources to support operating as a QHIO without placing financial strain on the rest of the organization and available cash (or cash equivalents) equal to at least six months of operating expense.

8. QHIOs must be insured up to \$2M per incident and \$5M per annum to address general liability, errors and omissions, and cyber risks. Please submit documentation of insurance coverage.

9. Please complete the chart below with the name, title, phone and email of the organization’s contacts. In the first column, please flag the primary contact for communication regarding this application.

*	Contact	Response
	Executive <i>(name, title, phone, email)</i>	
	Technical <i>(name, title, phone, email)</i>	
	Operations <i>(name, title, phone, email)</i>	

B. Privacy and Security

QHIOs will play an important role in establishing and maintaining trust in the DxF. Thus, each QHIO must have robust structures and processes in place to protect the privacy and security of health and social services information. Please submit the following documentation on the organization's privacy and security practices:

1. A brief summary (not to exceed 500 words) of the organization's information security program.
2. An organizational chart that reflects the structure of the information security team, including the Chief Information Security Officer (CISO) and his/her reporting relationships. Please indicate if the CISO is a full-time or part-time role.
3. A one-page list of the information security policies and procedures maintained by the organization, including the date each policy was last reviewed or updated.
4. A list of nationally recognized security certifications received by the organization. (If the organization's technical infrastructure is managed by a third party, please include that party's security certifications.) If HITRUST r2 certification has not been achieved at the time of this application, please submit a brief description (not to exceed 500 words) of the efforts underway to achieve this recognition by October 31, 2024.
5. An attestation that indicates no Protected Health Information (PHI) or Personally Identifiable Information (PII) managed by the organization, or its subcontractors, is transmitted or stored outside of the United States. This is inclusive of data archives and backups.
6. A one-page summary of reportable breaches involving 500 or more individuals' data during the past three years including the nature of the breach, the number of individuals affected by the breach, the remediation measures taken, and the amount of any fines or penalties.
7. A one-page summary of the organization's approach to security risk assessments including the frequency with which third-party security risk assessments are conducted. Please note such assessments must be conducted by independent organizations with expertise in conducting security risk assessments. Please attach documentation (e.g., an invoice, a dated assessment cover page) of the most recent such assessment and a brief summary (not to exceed 500 words) describing actions taken to address any vulnerabilities identified.
8. A one-page summary of the organization's approach to penetration testing including the frequency with which third-party penetration testing is conducted. As with the risk assessments above, penetration testing must be conducted by an independent organization with expertise in conducting such tests. Please also attach documentation (e.g., an invoice, a dated report cover page) of the most recent such test and a brief summary (not to exceed 500 words) describing actions taken to address any vulnerabilities identified.
9. The organization's current privacy policy including the most recent date it was reviewed and updated.
10. A brief summary (not to exceed 500 words) of the organization's business continuity and disaster recovery plans. Please attach the table of contents, revision history and management approvals for the plan(s).

C. Functional Capabilities

QHIOs must be capable of executing the transaction patterns using the technical standards described in the DSA Policy and Procedures. Briefly describe the organization's ability to meet these requirements:

1. Managing Identities. QHIOs must be capable of managing large databases of individual identities. These databases will hold several identifiers and attributes for each person. Please summarize the number of databases fitting this definition that the organization currently manages. Please indicate the size of each database as measured by the number of individual identities it holds.

QHIOs must establish and apply algorithms that attempt to match the individual's attributes on an incoming query or record to a person in these databases. Please provide a brief description (not to exceed 500 words) of the organization's person-matching algorithms. Please include in this description the processes the organization follows to test, validate and improve the person-matching algorithms.

2. Managing Participants. QHIOs must be capable of managing a directory of DxF participants, including descriptive information and endpoint identifiers for each participant. Each QHIO must be capable of exporting participant data from this directory in an easily consumable format (e.g., CSV) for import into a potential statewide participant repository. Each QHIO must also be capable of importing participant data received in .CSV format from a potential statewide registry into its local directory.

Please provide a brief description (not to exceed 500 words) of the organization's current participant registries including the number of entries in each. Please include details on the organization's ability to import and export data from these registries.

3. Nationwide Network or Framework. To facilitate data exchange, QHIOs must participate in one or more vendor-agnostic health information networks or health information exchange frameworks with nationwide scope. These may include one of the following: eHealthExchange, CommonWell Health Alliance, Carequality, DirectTrust or Trusted Exchange Framework. Please submit a list of national networks or exchanges in which the organization participates, including documentation of approval or acceptance into that network.

4. Request for Information. QHIOs must be capable of generating requests for information and responding to requests for information:

- a. Requests. QHIOs must be capable of constructing a query consistent with the DxF technical standards that contains the attributes associated with a person along with the endpoint(s) associated with query recipient(s) who will be expected to formulate a reply.

Please attest to the organization's ability to construct a transaction that contains person attributes with a request for health and social services information from a specified recipient(s). Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the Request for Information standards.

- b. Response. QHIOs must be capable of receiving a query sent in accordance with the DxF technical standards and attempting a match to a person in the QHIO's person database. If a unique match is found and the QHIO is authorized to send information, the QHIO must be able to craft a response consistent with DxF technical standards. If a match is not found or the QHIO is not authorized to respond, the QHIO must be capable of crafting a response indicating no information is available.

Please submit an attestation indicating the organization's ability to receive a request for information, match the request to a person in the database, and send an appropriate response in reply. Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the response standards.

5. Information Delivery. QHIOs must be capable of delivering health and social services information electronically to a participant. The QHIO must be able to construct transactions consistent with the DxF technical standards, including person attributes, the relevant health and social services information and the intended recipient(s) of the transaction.

Please attest to the organization's ability to construct and transmit information consistent with the DxF technical standards. Please identify at least three organizations (including contact information) who can confirm the organization's ability to meet the information delivery transaction standards.

6. Requested Notification. QHIOs must be capable of managing Admit, Discharge, Transfer (ADT) events from acute care facilities. These ADT event capabilities will be introduced over time. In order to achieve qualification in 2023, HIOs must describe their current capabilities and commit to a series of future developments:

- a. Receive. QHIOs must be capable of receiving acute care ADT events from California-based acute care facilities. Please submit an attestation that the organization is currently capable of receiving ADT events from acute care facilities. Also, please include a statement indicating that the organization is prepared to receive events on or before January 31, 2024 without assessing a fee to the sending facility.
- b. Manage Rosters. By April 30, 2024, QHIOs must be capable of receiving and maintaining rosters of persons from DxF participants who have an interest in monitoring for ADT events for these persons. Please describe the organization's current ability to receive and manage person rosters. If this is not a current capability, please describe the organization's plans to manage rosters by April 30, 2024.
- c. Match. By July 31, 2024, QHIOs must be capable of matching incoming ADT events to a person found on one of its participant's rosters and deleting the transactions that do not match to an entry. Please describe the organization's current ability to match incoming ADT events to persons on a roster. If this is not a current capability, please describe the organization's plans to implement this matching capability by July 31, 2024. Please also attest to readiness to delete ADT events where there is no match or authorization to store the information.
- d. Notify. By July 31, 2024, QHIOs must be capable of notifying a participant when an event matches one of the persons listed on their roster. Please describe the organization's readiness to notify participants of the events associated with a person found on a roster.
- e. Share. By October 31, 2024, each QHIO must share the ADT events it receives with all other DxF QHIOs. Please describe the organization's readiness to securely share the ADT transactions it receives with all DxF QHIOs who will follow the Match and Notify processes described above.

In late 2024, CDII may conduct an audit of the Requested Notification transaction pattern to confirm that QHIOs are supporting these processes. If a QHIO is not able to manage these processes, the QHIO may be subject to loss of its Qualified status effective March 31, 2025. Signatories will be granted an additional ten months (i.e., until January 31, 2026) to transition to other QHIO services as necessary.

D. Operations

1. QHIOs must reliably communicate DxF news and information. Please submit a brief statement committing the organization to the following communication activities:
 - a. Follow CDII guidelines with respect to communicating QHIO status, role and responsibilities.
 - b. As directed by CDII, communicate DSA news and updates to its clients.
 - c. Notify CDII if the organization experiences a change in ownership or anticipates a delay in meeting program deadlines (e.g., phases of Event Notification, security certifications).
2. QHIOs must fully cooperate with CDII and other QHIOs in DxF operations. Cooperation may include engaging in complaint investigation, troubleshooting exchange errors, providing details related to data format and transformation issues, etc. Please submit an attestation indicating the organization's agreement to cooperate with CDII and other QHIOs to resolve operational issues.
3. QHIOs should not limit or restrict their services to signatories on the basis of organization size, type (e.g., plan, hospital, physician group, community health center), or geography. Please submit an attestation indicating the organization is open to serving all DSA signatories who are technically capable of receiving and paying for the organization's services.
4. QHIOs must be prepared to submit onboarding progress reports to CDII for signatories who have received a QHIO Onboarding Grant and manage the receipt of onboarding grant payments on behalf of signatories who choose the QHIO and receive grant funding. Please submit an attestation indicating the organization will submit progress reports and administer grant funds according to the terms of the grant and its agreement with the signatory.
5. QHIOs must proactively manage system performance and reliability. Please provide a brief statement (not to exceed 500 words) to describe how the organization schedules and communicates system maintenance. Please also include how the organization manages and communicates unscheduled downtimes. Please share a history of scheduled and unscheduled downtimes over the past 12 months, including dates, duration and root cause.
6. QHIOs must maintain an audit trail and/or log of DxF transactions and system activity. Please submit a brief statement (not to exceed 500 words) of the organization's approach to maintaining audit trails and logging transaction activity. Please include a description of audit log retention policies.
7. QHIOs must be prepared to support the growth of the DxF. Please share a current summary of the daily transactions by type of transaction type handled by the organization. Also, please submit a brief statement (not to exceed 500 words) to describe how the organization will adapt to growth in the number and type of transactions.
8. QHIOs may be required to submit monthly reports of activity to CDII. These reports are expected to include details on active, named participants, transaction volumes by type, and unscheduled downtimes. Please submit an attestation indicating that the organization is prepared to submit monthly reports of activity.
9. QHIOs must complete an annual attestation confirming that no significant changes in business or operations have occurred in the prior 12 months and the information on the initial application for qualification remains accurate. Please submit a statement confirming the organization's willingness to submit annual attestations.