

**From:** Kathleen Soriano <sorianok@usc.edu>  
**Sent:** Tuesday, February 14, 2023 2:04 PM  
**To:** CHHS CDII <CDII@chhs.ca.gov>; Ohanian, John@CDII <John.Ohanian@chhs.ca.gov>  
**Cc:** Cothren, Robert@CDII <robert.cothren@CHHS.CA.GOV>  
**Subject:** USC Comments on Draft DxF P&P's - 2.14.23

Dear Mr. Ohanian & CDII,

As you know from USC's prior discussions with you and your colleagues, USC supports a statewide health information exchange framework in California that will advance seamless care transitions, improve quality, and reduce disparities in care. We believe additional work is needed to ensure that California's Data Exchange Framework (DxF) is successfully implemented and contributes to our shared goals.

To that end, and in the spirit of our mutual objectives, we attach our comments to the following draft policies and procedures in the requested comment template: Technical Requirements for Exchange, Early Exchange, California Information Blocking Prohibitions, and Real-Time Exchange. Our comments are intended to better align the DxF with current federal interoperability standards, reduce complexity and ensure that DxF requirements are technically feasible, efficient and actionable for participants.

To be solution-oriented, we also attach the policies and procedures with specific line-item edits and comments. We believe our comments are clearer in that format.

We look forward to working with you to achieve the vision of a statewide health information exchange framework. Please let us know if you have questions about our comments.

Sincerely,  
Kathleen Soriano

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