

## CommonWell Health Alliance Commentary on California HHS Data Exchange Framework

January 8, 2024 – Released in July 2022, the California Health and Human Services Data Exchange Framework (DxF) is a statewide data sharing agreement meant to expand exchange of health information among health care entities, government agencies, and social service programs beginning this year, 2024. Click here to learn more about the [Data Exchange Framework](#).

According to the [Data Exchange Framework FAQ](#),

*Participants may use "any health information exchange network, health information organization, or technology that adheres to [DxF] standards and policies" as stated in HSC 130290(a)(2). Nationwide networks and frameworks, including the Trusted Exchange Framework when it becomes operational, may be applicable to meet some or all exchange obligations under the DSA. CDII encourages DxF Participants to fully utilize the capabilities of exchange options already available to them or in use by them today.*

*Depending upon the Participant, a nationwide network or framework may not be able to meet all of a Participant's obligations and the Participant may be required to supplement their use of a nationwide network or framework with other methods. It is the responsibility of the Participant to determine what obligations a nationwide network or framework can meet, how to ensure the Participant's proper use of the network or framework to comply with the [DSA](#) and P&Ps (including but not limited to the [Requirement to Exchange Health and Social Services Information P&P](#), the [Permitted, Required, and Prohibited Purposes P&P](#), the [California Information Blocking Prohibitions P&P](#), the [Privacy Standards and Security Safeguards P&P](#), [Data Elements to Be Exchanged P&P](#), [Technical Requirements for Exchange P&P](#), and [Real-Time Exchange P&P](#)), and how to supplement the nationwide network or framework if required. See also the [QHIO P&P](#), that states CDII will create a QHIO Program as an option that may help a Participant meet all of their DxF exchange obligations. QHIOs could be used to supplement participation in a nationwide network or framework when needed.*

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Following a review of the DxF by the CommonWell Health Alliance leadership and the member-driven Government Affairs Committee, CommonWell notes the following:

CommonWell offers bi-directional data exchange services and a nationwide network, where the most up-to-date metrics related to the size and scope of the network may be found on the [CommonWell website](#). CommonWell core services help enable health care providers to manage their patients by matching and linking patients across care settings and facilitating trusted exchange beyond one's own system or community.

CommonWell has a broad and diverse group of exchange partners including:

- [Service Adopters](#) that technically connect their solutions and their clients to the network
- Support for other exchange frameworks such as Carequality and eHealth Exchange, which connect their group of exchange partners

Based on the above, we believe that CommonWell may be used to help California providers meet the DxF requirements as long as the providers are connected and actively exchanging data. However, it is imperative that all providers review their own obligations to comply with the DSA and P&Ps previously stated and note that CommonWell might be one part of their overarching solution to meet the full DxF requirements.