

California Data Exchange Framework Senate Bill 660 Implementation

Background

Assembly Bill 133 (Committee on Budget, Chapter 143, Statutes of 2021), put California on the path to building a statewide Health and Human Services Data Exchange Framework: building on years of health electronic records adoption and the efforts of local communities by creating the first state mandate to integrate health and social services information exchange to better serve all Californians. Today, over 4,400 organizations across California are participating in the Data Exchange Framework, sharing health and social services information securely and in real-time with other participating organizations across the state.

Senate Bill (SB) 660, signed into law by Governor Gavin Newsom in October 2025, recognizes the progress that has been made and expands the Data Exchange Framework Program by establishing new provisions for transparency, accountability, and enforcement of the Data Sharing Agreement, while also strengthening the program's stakeholder governance.

The CalHHS Center for Data Insights and Innovation started development and implementation of the Data Exchange Framework in 2021. Beginning August 1, 2025, operation of the Data Exchange Framework was administratively transitioned to HCAI; Senate Bill 660 effectuates this transition in statute.

Program Expansion

SB 660, effective 2026, expands the Data Exchange Framework in several ways, including:

- Making HCAI the administrator of the Data Exchange Framework program;
- Providing more precise definitions for “physician organizations and medical groups” and requiring Emergency Medical Services to execute the Data Sharing Agreement and begin exchanging information;
- Codifying the process to designate qualified health information organizations into

state law¹;

- Making execution of the Data Sharing Agreement required as a condition of contracting for health care services with the Department of Health Care Services, the Public Employees' Retirement System, and the California Health Benefit Exchange (Covered California);
- Requiring HCAI to publish a list of entities that may be out of compliance with the requirements of the Data Sharing Agreement and to update the list on a regular basis; HCAI may refer non-compliant entities to the relevant state licensing agency
- Pending input from the stakeholder advisory committee, and upon appropriation from the Legislature, allowing HCAI to develop further enforcement actions; and
- Expanding and strengthening Data Exchange Framework stakeholder governance by adding members to the advisory committee and adding obligations under the advisory committee's purview.

Stakeholder Advisory Committee

SB 660 revises the operation of the Data Exchange Framework stakeholder advisory committee by making the HCAI director responsible for appointing members and by specifying the stakeholder groups that should be represented on the committee, among other changes.

Given this revision to the operation of the committee, HCAI intends to reconstitute the stakeholder advisory committee and to appoint the new members.

In addition to advising on data sharing policies and procedures and issues of health and social services information technology and data, SB 660 establishes two new specific obligations for the advisory committee:

1. Develop recommendations by January 1, 2027 for statutory changes, training and technical assistance, and best practices to require Data Exchange Framework participants to collect individual-level demographic and health-related social needs data about Californians served [HSC 130290(c)(6)]

¹ In October of 2023, the Data Exchange Framework designated nine organizations as Qualified Health Information Organizations (QHIOs), launching the QHIO program to support an accessible path to data exchange for many data exchange participants by endorsing intermediaries that can help with meeting the data exchange requirements. With Senate Bill 660's addition of this program into state law, HCAI would intend to evaluate the effectiveness of the program and elicit feedback from the stakeholder advisory committee.

2. Collaborate with HCAI in submitting a report to the Legislature by July 1, 2027 that includes: [HSC 130290(k)(4)]
 - a. A list of all entities deemed to be required signatories to the Data Exchange Framework data sharing agreement;
 - b. The status of each entity's execution of the data sharing agreement;
 - c. The compliance pathway or pathways utilized to meet its contractual requirements under the data sharing agreement, and, if the signatory has a contract in place;
 - d. An evaluation as to the need for an independent governing board for the Data Exchange Framework;
 - e. An evaluation of the need for technical assistance and other grant programs to support signatories' legal requirements under the data sharing requirement;
 - f. An evaluation of other categories of entities for participation in the Data Exchange Framework;
 - g. An evaluation of the need for a framework for enforcement and investigation and resolution of disputes between Data Exchange Framework participants regarding the data sharing agreement and its policies and procedures; and
 - h. An assessment of consumer experiences with health and social services information exchange.

Upcoming Activities

HCAI will use a phased approach to allow sufficient time for stakeholder engagement. This approach is based on HCAI's successful implementation of other public programs. Time periods and activities will be updated and revised as necessary as program implementation is underway.

Time Period	Project Period Program Activities
January 1, 2026	- Senate Bill 660 takes effect. - New entities are required to execute the Data Sharing Agreement, including certain medical groups, independent practice associations, clinics, and surgical centers. [HSC 130290(f)]²
January to March 2026	Appoint the stakeholder advisory committee members.
April to June 2026	Begin conducting regular meetings with the stakeholder advisory committee; the meetings will focus on the development of recommendations for demographic and health-related social needs data collection and for the report to the Legislature.
July 1, 2026	- New entities are required to execute the Data Sharing Agreement, including medical foundations and emergency medical services entities. [HSC 130290(f)] - Execution of the Data Sharing Agreement is required as a condition of contracting for health care services with the Department of Health Care Services, the Public Employees' Retirement System, and the California Health Benefit Exchange. - Establish a process to designate qualified health information organizations by evaluating the existing program, in collaboration with the stakeholder advisory committee.

² Existing law requires certain small provider groups and facilities to begin exchanging data by January 31, 2026 [HSC 130290(b)]

July to December 2026	Continue conducting regular meetings with the stakeholder advisory committee.
January 1, 2027	- Publish names of entities that may be out of compliance with the requirements of the Data Sharing Agreement; the list will be updated on a regular basis. - The stakeholder advisory committee releases recommendations for collecting demographic and health-related social needs data.
January to June, 2027	Develop the report to the Legislature, based on input from the stakeholder advisory committee.
July 1, 2027	- Release the report to the Legislature. - Pending input from the stakeholder advisory committee, and upon appropriation from the Legislature, begin to develop any indicated enforcement actions.
January 31, 2029	State hospitals are required to begin exchanging data. [HSC 130290(b)]
Ongoing	- Administer the Data Exchange Framework. - Regularly convene the stakeholder advisory committee to consider policies and procedures and other areas to advise HCAI on the ongoing administration of the Data Exchange Framework.

For more information, please contact HCAI Public Affairs at HCAIPress@hcai.ca.gov.