

CalHHS Data Exchange Framework Policy and Procedure

Subject: Technical Requirements for Exchange	
Status: Draft	Policy: OPP-9
Publication Date: January 21, 2026	Version: 1.1

I. Purpose

California Health and Safety Code § 130290 establishes that the California Health and Human Services Data Exchange Framework (“Data Exchange Framework”) will create a “common set of policies and procedures that will leverage and advance national standards for information exchange and data content, and that will govern and require the exchange of health information” among Participants. The purpose of this policy is to define recommended and required exchanges of Health and Social Services Information among Participants and the technical standards to be used in those exchanges.

II. Policy

This policy establishes minimum technical requirements for the Access, Exchange, and Use of Health and Social Services Information. To comply with this policy, Participants must Exchange Health and Social Services Information for a Required Purpose between Participant systems in such a way that the receiving Participant’s system can Use the Health and Social Services Information without special effort on the part of the user.

This policy shall be effective August 1, 2026.

1. Request for Information

a. Requesting Participants

i. Any Participant may make a Request for Information for a Permitted or Required Purpose.

ii. A Participant that makes a Request for Information must be permitted under the Permitted, Required, and Prohibited Purposes Policy and Procedure to make the request and must be permitted under Applicable Law to receive the Health and Social Services Information requested.

iii. Participants are strongly discouraged from making a Request for Information to a large or unbounded number of Participants (a.k.a., broadcast query) except if, in the professional judgment of the Participant, receipt of the information is urgent or constitutes an emergency impacting patient safety and when potential sources of Health and Social Services Information for the Individual are not known. To the extent practicable, Participants are encouraged to follow health information technology industry best practices in using health information exchange, health information networks, and health information frameworks when making Requests for Information from a large number of Participants, for example, by directing requests only to Participants within a geographic region.

b. Responding Participants

i. Every Participant that Maintains Health and Social Services Information must accept and respond to an electronic Request for Information from another Participant.

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ii. A Participant must respond to a Request for Information with an appropriate null response or error message if required by the technical exchange standard in use and in compliance with this policy if the Participant receiving the Request for Information cannot fulfill the request for any of the following reasons:

(a) The Participant cannot determine a matching Individual for the person attributes and identifiers supplied in the request,

(b) The Participant determines that multiple persons may match the person attributes and identifiers supplied in the request,

(c) The Participant does not Maintain Health and Social Services Information for the Individual, or

(d) The Participant determines that the Health and Social Services Information for the Individual cannot lawfully be shared under Applicable Law or otherwise meets an exception in the California Information Blocking Prohibitions Policy and Procedure.

c. All Participants

i. A Participant that makes a Request for Information or responds to a Request for Information using a point-to-point interface may use any open technical standard compliant with the Privacy Standards and Security Safeguards Policy and Procedure and supported by both the Participants.

ii. Participants are encouraged to support Requests for Information using *Health Level Seven (HL7) Fast Healthcare Interoperability Resources (FHIR) Release 4* conforming to the *US Core Implementation Guide*. This request and response standard may be required in future revisions of this policy.

2. Information Delivery

a. Sending Participants

i. A Participant that creates Health and Social Services Information regarding a specific Individual in conjunction with an Order or Referral must send that Health and Social Services Information to the ordering Participant electronically via Information Delivery if the ordering Participant is technically capable of electronic receipt.

(a) A sending Participant is strongly encouraged to include only that information in Information Delivery created specifically in fulfillment of the Order or Referral (only that information necessary to communicate the diagnostic, assessment, evaluation, or consultation results produced by the sending Participant).

(b) A sending Participant must communicate via Information Delivery a change in status of a previous result for the same Order or Referral, such as a transition from a preliminary result to a final result.

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(c) A sending Participant is not required to send Health and Social Services Information that is not associated with the Order or Referral, or to continue delivering diagnostic, assessments, evaluations, or consultations results after the Order or Referral is complete.

ii. A sending Participant may use the *Applicability Statement for Secure Health Transport (a.k.a., Direct Secure Messaging)* for Information Delivery if supported by both Participants.

iii. A sending Participant using a point-to-point interface for Information Delivery may use any open technical standard compliant with the Privacy Standards and Security Safeguards Policy and Procedure and supported by both Participants.

iv. A sending Participant is encouraged to support delivery using *HL7 Fast Healthcare Interoperability Resources (FHIR) Release 4* conforming to the *US Core Implementation Guide* for Information Delivery. This delivery standard may be required in future revisions of this policy.

b. Receiving Participants

i. A receiving Participant may use the *Applicability Statement for Secure Health Transport (a.k.a., Direct Secure Messaging)* for Information Delivery if supported by both Participants.

ii. A receiving Participant is encouraged to support receipt using *HL7 Fast Healthcare Interoperability Resources (FHIR) Release 4* conforming to the *US Core Implementation Guide* for Information Delivery. This delivery standard may be required in future revisions of this policy.

c. All Participants

i. Nothing in this policy requires or prohibits that an Order or Referral be sent electronically.

ii. Nothing in this policy limits the delivery of Health and Social Services Information only to those Participants that create Health and Social Services Information in response to an Order or Referral.

iii. Nothing in this policy alters or limits the obligations of a Participant regarding public health reporting, technical standards for public health reporting, or other requirements for public health reporting as specified by Applicable Law.

3. Event Notification

a. Requesting Participants

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i. Any Participant may make a request for Event Notifications for a Required Purpose.

ii. A Participant that makes a request for Event Notifications must submit a Roster identifying the Individuals for whom the Participant is requesting Event Notifications or use some other method acceptable to both the requesting Participant and sending Participant.

(a) A Participant that makes a request for Event Notifications must include in the request person attributes and identifiers for each Individual for whom Event Notifications are requested consistent with the person attributes and identifiers established for Person Matching.

(b) A Participant that makes a request for Event Notifications must be permitted under the Permitted, Required, and Prohibited Purposes Policy and Procedure to make the request and must be permitted under Applicable Law to receive the Event Notifications requested.

(c) A Participant that makes a request for Event Notifications, or an Intermediary that submits a request for Event Notifications on behalf of a Participant, must include the following information with or in the request:

(i) the Required Purpose, consistent with the Permitted, Required, and Prohibited Purposes Policy and Procedure, for which the Participant is requesting Event Notifications for each Individual included in the request; and

(ii) the name of the Participant requesting Event Notifications for each Individual included in the request.

b. Sending Participants

i. A Participant that is a Hospital or Emergency Department must accept requests for Event Notifications for Admissions and Discharges from any other Participant for a Required Purpose and send Event Notifications for all Admissions and Discharges for Individuals as requested for a Required Purpose.

ii. A Participant that is a Skilled Nursing Facility is encouraged to accept requests for Event Notifications for Admissions and Discharges from other Participants and send Event Notifications for Admissions and Discharges for Individuals requested. Skilled Nursing Facilities may be required to accept requests and send Event Notifications in future revisions of this policy.

iii. A Participant that is a Hospital or Emergency Department must send Event Notifications for Admissions and Discharges unless prohibited by Applicable Law.

iv. A Participant is required to send Event Notifications to a requesting Participant only if requested by the Participant in advance of the Event. This policy does not require

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that a Participant, or its Intermediary, send Event Notifications for historical Events that took place prior to a request for Event Notifications by the requesting Participant.

v. A Participant that sends Event Notifications must use a National and Federally Adopted Standard to communicate the Event Notification and Exchange Health and Social Services Information securely as required by the Privacy Standards and Security Safeguards Policy and Procedure.

vi. A Participant that sends Event Notifications is strongly encouraged to include only that information in the Event Notification necessary to make the receiving Participant aware of the Event and enable the receiving Participant to request more information regarding the Event, for example using Request for Information. Notwithstanding, Event Notifications shall include at minimum the required information in subparagraphs II.3.a.ii(c)(ii).viii and II.3.a.ii(c)(ii).ix below.

vii. When sending an Event Notification for an Admission or Discharge, the sending Participant must use a *HL7 Messaging Standard Version 2.5.1* admit, discharge, and transfer (ADT) message, or later compatible version.

viii. When sending an Event Notification for an Admission, the sending Participant must include the following information in the Event Notification:

(a) The date and time the Event Notification was sent, which may be different than the date and time of the Admission.

(b) The name of the organization sending the Event Notification, which may be an Intermediary sending an Event Notification on behalf of a Participant.

(c) The date and time of the Admission.

(d) The type of Event, which is an Admission.

(e) The name of the facility at which the Admission took place and the National Provider Identifier (NPI) for the facility if the facility has an NPI.

(f) All person attributes and identifiers related to health Maintained by the facility for the Individual to which the Admission applies and consistent with the requirements for Person Matching in subparagraph II.4 below.

(g) The type of Admission, if known.

(h) The reason for the Admission, if known.

(i) The health professional associated with the Admission at the time of the Admission, such as the admitting physician, if known, that might be contacted for more information concerning the Admission.

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ix. When sending an Event Notification for a Discharge, the sending Participant must include the following information in the Event Notification:

- (a) The date and time the Event Notification was sent, which may be different than the date and time of the Discharge.
- (b) The name of the organization sending the Event Notification, which may be an Intermediary sending an Event Notification on behalf of a Participant.
- (c) The date and time of the Discharge.
- (d) The type of Event, which is a Discharge.
- (e) The name of the facility at which the Discharge took place and the NPI for the facility if the facility has an NPI.
- (f) All person attributes and identifiers related to health Maintained by the facility for the Individual to which the Discharge applies and consistent with the requirements for Person Matching in subparagraph II.4 below.
- (g) The type of Admission to which the Discharge applies, if known.
- (h) The reason for the Admission to which the Discharge applies, if known.
- (i) The health professional associated with the Discharge at the time of the Discharge, such as the discharge coordinator, if known, that might be contacted for more information concerning the Discharge.
- (j) The discharge diagnosis code(s) and description(s) at Discharge, if known.
- (k) The discharge disposition at Discharge, if known.

c. All Participants

- i. Nothing in this policy limits the responsibility of a Participant to send Event Notifications that are required by Applicable Law.

4. Person Matching

- a. Participants must send the following person attributes for Person Matching if Maintained by the Participant and supported by the technical exchange standard in use when specifying an Individual to match in a Request for Information or a Roster for Event Notifications, or identifying an Individual in Information Delivery or Event Notifications:

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- i. Name, including family name, given name(s), and middle name or initial, and including other names previously or currently used by the individual, including aliases if documented by the Participant.
- ii. Date of birth
- iii. Home and/or mailing address(es), including previous address(es) if known
- iv. Phone number(s)
- v. Email address(es)

- b. Unless noted otherwise in this policy or in the Data Elements to Be Exchanged Policy and Procedure, person attributes for Person Matching must follow the guidelines and standards established by the currently effective version of the *United States Core Data for Interoperability (USCDI)* as established by the Data Elements to Be Exchanged Policy and Procedure.
- c. Sex, administrative sex, sex determined at birth, gender, administrative gender, gender identity, or any other sex-related or gender-related person attribute must not be included among person attributes for Person Matching unless required by the technical exchange standard or by the Nationwide Network or Framework in use.
 - i. If sex, administrative sex, sex determined at birth, gender, administrative gender, gender identity, or any other sex-related or gender-related person attribute is required by the technical exchange standard in use, the attribute must likewise follow the guidelines and standards established by the currently effective version of USCDI unless the Data Elements to Be Exchanged Policy and Procedure or the technical standard requires otherwise.
 - ii. If sex, administrative sex, sex determined at birth, gender, administrative gender, gender identity, or any other sex-related or gender-related person attribute is included among the person attributes for Person Matching because it was required by the technical exchange standard, the recipient of the attribute may choose whether to use the attribute in Person Matching.
- d. Format and content of home and mailing addresses must conform to the Project US@ Technical Workgroup's *Technical Specification for Patient Addresses: Domestic and Military* published by the Office of the National Coordinator for Health Information Technology.
- e. Participants must also send specific identifiers related to health if Maintained by the Participant and only as permitted by Applicable Law when specifying an Individual to match in a Request for Information or a Roster for Event Notifications, or identifying an Individual in Information Delivery or Event Notifications if supported by the technical exchange standard in use, including but not limited to:
 - i. State or federal identifiers related to health (e.g., Medi-Cal or Medicare ID).

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ii. Local identifiers related to health (e.g., medical record number or plan member identification number).

f. Participants are not required to use every person attribute sent by another Participant in a Request for Information, Information Delivery, Roster, or Event Notification when performing Person Matching.

g. Participants may retain and use specific identifiers related to health and Exchange them as an aid in Person Matching, as permitted by Applicable Law.

h. Nothing in this policy prohibits the Exchange of sex, administrative sex, sex determined at birth, gender, administrative gender, gender identity, or any other sex-related or gender-related data element, or any data element that may be required by the Data Elements to Be Exchanged Policy and Procedure, if requested by a Participant in a Request for Information and as permitted by Applicable Law.

5. Common procedures for Request for Information, Information Delivery, Event Notification, and Person Matching

a. A Participant may Access, Maintain, Use, and further Disclose Health and Social Services Information only as permitted by Applicable Law, valid Authorization if any, and the Privacy Standards and Security Safeguards Policy and Procedure, including but not limited to Section III.1.c of the Privacy Standards and Security Safeguards Policy and Procedure.

b. Nothing in this policy permits a Participant to request Health and Social Services Information or requires a Participant to send Health and Social Services Information other than as permitted and required in the Permitted, Required and Prohibited Purposes Policy and Procedure.

c. A Participant may use one or more Nationwide Network or Framework or Intermediary to provide Access to or Exchange Health and Social Services Information to meet some or all of its obligations under this Policy and Procedure.

i. The Participant providing Access to or Exchange of Health and Social Services Information using a Nationwide Network or Framework or Intermediary shall remain responsible for compliance with all Applicable Law in the Exchange of Health and Social Services Information with another Participant.

ii. Nothing in this policy limits the responsibility of a Participant to execute agreements, such as a Business Associate Agreement, as required by Applicable Law prior to providing Access to or Exchange of Health and Social Services Information using a Nationwide Network or Framework or Intermediary.

d. Secure Exchange of Health and Social Services Information

i. Participants that use a Nationwide Network or Framework to Exchange Health and Social Services Information must conform to the security model and security standards for exchanging information established by the Nationwide Network or Framework.

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ii. Participants that use an Intermediary to Exchange Health and Social Services Information must conform to the security standards for exchanging information required by the Intermediary and in conformance with the Privacy Standards and Security Safeguards Policy and Procedure.

iii. Participants that Exchange Health and Social Services Information using point-to-point connections must mutually agree to security standards that conform to the Privacy Standards and Security Safeguards Policy and Procedure.

6. **Technology Updates.** The California Department of Health Care Access and Information shall create an open and transparent process to review and consider new and maturing National and Federally Adopted Standards for potential inclusion in the Data Exchange Framework.

a. The process must be put in place no later than July 1, 2024.

b. The process must consider both data content standards and data exchange standards to be adopted as amendments to the Data Elements to Be Exchanged Policy and Procedure and to this policy, respectively.

c. The process must establish a regular review cadence, no less than annually.

d. The process must align with requirements of the Development of and Modifications to Policies and Procedures Policy and Procedure.

III. **Definitions**

All capitalized terms shall have the meaning set forth in the Data Exchange Framework Glossary of Defined Terms.

IV. **References**

[Applicability Statement for Secure Health Transport, Version 1.2 \(a.k.a., Direct Secure Messaging\)](#) or later

[California Health and Human Services, Data Exchange Framework, Strategy for Digital Identities](#)

California Information Blocking Prohibitions Policy and Procedure

Data Elements to Be Exchanged Policy and Procedure

Development of and Modifications to Policies and Procedures Policy and Procedure

[HL7 Fast Health Information Resources \(FHIR\) Release 4 Version 4.0.1](#) or later

[HL7 Messaging Standard Version 2.5.1](#) or later

Permitted, Required, and Prohibited Purposes Policy and Procedure

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Privacy Standards and Security Safeguards Policy and Procedure

[Technical Specification for Patient Addresses: Domestic and Military](#)

[United States Core Data for Interoperability \(USCDI\)](#)

[US Core Implementation Guide Version 5.0.1 - STU5 Release US](#) or later

V. Version History

No.	Date	Author	Comment
1.0	June 26, 2023	CalHHS CDII	Initial version
1.0.1	April 12, 2024	CalHHS CDII	Limited requirement to respond to Request for Information to Participants that Maintain Health and Social Services Information and updated effective date statement.
1.1	January 21, 2026	HCAI	Removed standards specified by Nationwide Networks or Frameworks; generalized Notifications of ADT Events to Event Notification; added content requirements and technical standards to Rosters, events, and Event Notifications; prohibited use of sex, administrative sex, sex determined at birth, gender, administrative gender, gender identity, or related terms for Person Matching.