



Data Exchange Framework

Standard Operating Procedure: Participant Verification

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I. Introduction

The Data Exchange Framework (DxF) Data Sharing Agreement (DSA) enables the exchange of health and social services information (HSSI) among all DxF Participants. The exchange of HSSI is a critical step in being able to provide whole-person care to individuals.

In order to help ensure that DxF Participants are legitimate health- or social services-related organizations, governmental agencies, or vendors who provide services to one of those organizations with a legitimate need to receive HSSI, HCAI has created a process to conduct participant verification of all new DSA Signatories. HCAI may also conduct additional verification of existing DxF Participants outlined below. This Standard Operating Procedure (SOP) establishes when and how HCAI staff will conduct verification of a new DSA Signatory or an existing DxF Participant.

The goals of this SOP are:

- A. To help ensure that organizations signing the DSA are legitimate health- or social services-related organizations, governmental agencies, or vendors who provide services to these organizations; and
- B. To help ensure the confidentiality, security, and integrity of HSSI exchanged under the DSA.

II. Procedure

A. For all new DSA Signatories:

- I. When a new Signatory signs the DSA, HCAI shall verify that the organization is either: 1) an organization HCAI has deemed a required signatory under subdivision (f) of section 130290 of the Health and Safety Code; or 2) a legitimate health- or social services-related organization, a government agency, or a vendor who provides services to one of these organizations.

1. If the new DSA Signatory is an organization that has been deemed a required signatory by HCAI, HCAI shall consider the new DSA Signatory verified unless Additional DxF Participant Verification is Triggered pursuant to Section II(b) below.
 2. If the new DSA Signatory is an organization that has not been deemed a required signatory by HCAI, HCAI shall conduct verification pursuant to Sections II(c) and (d), below.
- II. HCAI shall not publish a new DSA Signatory in the DSA Signatory List or in the Participant Directory until HCAI considers the new DSA Signatory verified.
- B. Additional DxF Participant Verification Triggers
- I. HCAI shall initiate additional DxF Participant Verification Review if it becomes aware of the following regarding any DxF Participant:
 1. DxF Signatory Name or Contact Information is Suspicious: Based on the name and/or contact information provided, either 1) the DxF Participant does not appear to be an organization that is health- or social services-related, a government agency, or a vendor who provides services to one of these organizations; or 2) the individual signing the DSA does not appear to properly represent the organization for which they are signing the DSA. This includes contacts who are using personal email addresses for what appears to be a large organization.
 2. Complaint Received: HCAI receives a complaint that alleges a DxF Participant:
 - A. Is not an organization that is health- or social services-related, a government agency, or a vendor who provides services to one of these organizations;
 - B. Is misusing HSSI or otherwise compromising the privacy, security, or integrity of HSSI; or
 - C. Has signed the DSA in order to access HSSI in a way that compromises the privacy, security, or integrity of HSSI.
 3. DxF Participant Changes their Name or Organization Structure, or Amends their DSA: HCAI is notified or learns that a DxF Participant changes their name, their organizational structure, amends their

DSA, merges with or acquires another organization, or undergoes other similar changes.

4. Legal Action Filed, or Judgment Entered, Against a DxF Participant: HCAI learns that legal action has been filed, or judgment has been entered, against a DxF Participant alleging the misuse of HSSI or actions otherwise compromising the privacy, security, or integrity of HSSI.
5. Other Concerns Reported by HCAI Staff, DxF or HCAI Stakeholders, or other DxF Participants: HCAI staff have both:
 - A. Identified, or been notified by a stakeholder or other DxF Participant, of unusual communications or mismatched representations that suggest the DxF Participant:
 - I. Is not an organization that is health- or social services-related, a government agency, or a vendor who provides services to one of these organizations;
 - II. Is misusing HSSI or is otherwise compromising the privacy, security, or integrity of HSSI; or
 - III. Has signed the DSA in order to access HSSI in a way that compromises the privacy, security, or integrity of HSSI; and
 - B. Received approval from an HCAI Supervisor to trigger verification under Section II(c).
6. Other Federal or State Investigation or Enforcement Action: HCAI learns that one or more federal or state oversight agencies have either 1) opened an investigation or enforcement action alleging a DxF Participant has misused HSSI or otherwise compromised the privacy, security, or integrity of HSSI; or 2) concluded an investigation or enforcement action finding a DxF Participant has misused HSSI or otherwise compromised the privacy, security, or integrity of HSSI.
7. Other Publicly Available Information: HCAI learns of news articles, press releases, public reports, public meeting materials, or other similar publicly available information alleging a DxF Participant has misused HSSI or otherwise compromised the privacy, security, or integrity of HSSI.

C. New DSA Signatory or DxF Participant Verification

- I. When a review is triggered, HCAI staff shall attempt to verify that:
 1. The new DSA Signatory or DxF Participant is a legitimate health- or social services-related organization, a legitimate government agency, or a legitimate vendor who provides services to one of these organizations. To do so, they may perform any of the following:
 - A. Check Organization Website: Review organization website and any content included on the website.
 - I. Read the business description to see if it is related to health or social services based upon, among other things, the services offered.
 - II. Confirm the name, role, and contact information for the individual signing the DSA through the organization's publicly available pages.
 1. If an organizational chart or leadership team description is available, determine if they match the contact information provided in the DSA Signatory Portal, the DSA, or other documents or information provided to HCAI.
 2. For government organizations, determine in the individual is listed on any available government staff directory.
 - III. Ensure links are active or determine if there exist other indicators that the site may not be maintained by an ongoing or viable business.
 - B. Verify Public License Numbers: Check the new DSA Signatory or DxF Participant name and license number against publicly available resources. This includes verifying ongoing licensure and certification through healthcare oversight agencies, health care boards, and other licensing or certification agencies.
 - I. State Oversight

1. Health facilities and clinical labs: California Department of Public Health (CDPH)
 2. Health plans: California Department of Managed Health Care (DMHC) and California Department of Insurance (CDI)
 3. Doctors (MDs and DOs): Medical Board of California
 4. Managed care plans: reach out to the California Department of Health Care Services (DHCS) to verify contract number
- II. Open Data Portal
1. Datasets often list known facilities who might be named on a DSA rather than the licensed parent organization.
- III. National Provider Identifier (NPI)
1. If the provider is a health provider, check the provider's NPI.
- IV. If out-of-state, research out-of-state license numbers.
- C. Check Business Address: Check public records to see whether the address provided matches the new DSA Signatory or DxF Participant.
- I. Search their business address to see whether public records are associated with the new DSA Signatory or DxF Participant, including an image search to see whether there is a sign on the building and the building is a business rather than a personal residence.
- D. Check Public Business Records: Check public business records to determine whether the organization is a legitimate business.
- I. Secretary of State business searches
 - II. Dun and Bradstreet [Company D-U-N-S Lookup Tool](#)

- E. Confirm Public Presence: Check the internet for publicly available references to the new DSA Signatory or DxF Participant.
 - I. Search for publicly available references (press releases, public reports, public meeting materials).
 - 2. The DxF Participant has not engaged in the misuse of HSSI or otherwise compromised the privacy, security, or integrity of HSSI.
 - A. HCAI shall document all public allegations and determinations of misuse of HSSI or actions compromising the privacy, security, or integrity of HSSI.
 - B. To the extent possible, HCAI shall review the veracity of any allegations using publicly found information.
- D. Review Process
- I. Initial Review
 - 1. HCAI staff shall complete the verification attempts pursuant to Section II(c) above. HCAI staff shall:
 - A. Document their verification attempts, including confirmed information, unverifiable information, and concerns.
 - B. Consult with subject matter experts, as necessary.
 - C. If there is no reasonable belief that the new DSA Signatory or DxF Participant should be considered unverified, HCAI shall consider the new DSA Signatory or DxF Participant verified and no further action is needed; or
 - D. If there are **any** abnormal findings, submit findings and recommended action to a DxF Supervisor for review.
 - II. Supervisor Review
 - 1. Supervisor shall assess completeness, verifications, and determine whether further checks are needed.
 - 2. Supervisor shall then forward recommendation to DxF Program Director.
 - III. DxF Program Director Review

1. DxF Program Director shall assess completeness, verifications, and determine whether further checks are needed and/or whether clarification should be requested from the new DSA Signatory or DxF Participant.
 - A. Clarification: If some but not all details can be verified, the DxF Program Director, or delegate, may decide to request additional non-sensitive documentation (e.g., link to staff directory, confirmation email from a supervisor).
2. Legal Review: DxF Program Director shall consult with Legal in developing their recommendations.
3. Final Recommendation:
 - A. Based on the recommendations and documentation, the DxF Program Director shall do the following:
 - I. If there is a reasonable belief the new DSA Signatory or DxF Participant is verified using the above methods, HCAI shall consider the new DSA Signatory or DxF Participant verified and no further action is needed; or
 - II. If there is a reasonable belief that the new DSA Signatory or DxF Participant cannot be verified using the above methods, recommend to the HCAI Director, or their delegate, that HCAI Restrict Access to HSSI under the DSA for the new DSA Signatory or DxF Participant pursuant to Section II(e) below.
- IV. HCAI Director Review of Recommendation to Restrict Access to HSSI under the DSA
 1. Based on the recommendations and documentation from the Review Process, the HCAI Director, or their delegate, shall make a final determination on whether to Restrict Access to HSSI under the DSA pursuant to Section II(e) for the new DSA Signatory or DxF Participant.
- E. Restrict Access to HSSI under the DSA
 - I. Ending DxF Participation
 1. Void the DSA

- A. For new DSA Signatories and DxF Participants that HCAI reasonably believes are not legitimate health- or social services-related organizations, a government agencies, or vendors who provide services to one of these organizations, HCAI shall:
 - I. Notify the new DSA Signatory or DxF Participant pursuant to Section II(f) within five (5) business days of starting Section II(e);
 - II. Void the new DSA Signatory or DxF Participant's DSA; and
 - III. Terminate the new DSA Signatory or DxF Participant's access to the DSA signing portal by deactivating their account.
 - IV. If the DxF Participant has an active Participant Directory Listing and appears on the DSA Signatory List, HCAI shall also:
 - 1. Remove the DxF Participant from the DSA Signatory List and Participant Directory Listing;
 - 2. Update the Unverified DxF Participant List to add the DxF Participant and reflect that their DSA has been voided; and
 - 3. Notify the DxF Community pursuant to Section II(e)(iii).

2. Terminate the DSA

- A. For DxF Participants that are Voluntary Signatories that HCAI reasonably believes has misused HSSI or otherwise compromised the privacy, security, or integrity of HSSI, HCAI shall:
 - I. Notify the DxF Participant pursuant to Section II(f) within five (5) business days of starting Section II(e);
 - II. Terminate the DxF Participant's DSA;
 - III. Terminate the DxF Participant's access to the DSA signing portal by deactivating their account;

- IV. Add the date the DSA was terminated to the “Date DSA Terminated” section of the DxF Participant’s Participant Directory Listing and on the DSA Signatory List;
- V. Update the Unverified DxF Participant List to add the DxF Participant and reflect that their DSA has been terminated; and
- VI. Notify the DxF Community pursuant to Section II(e)(iii).

II. Revoking Access to HSSI under the DSA

- 1. For DxF Participants who are Required Signatories that HCAI reasonably believes has misused HSSI or otherwise compromised the privacy, security, or integrity of HSSI, HCAI shall revoke the DxF Participant’s access to HSSI under the DSA by informing the DxF Community that DxF Participants should no longer provide access to HSSI under the DSA by:
 - A. Updating the Participant Directory Listing to reflect that the DxF Participant is now considered an Unverified DxF Participant whose access to HSSI through the DSA has been revoked;
 - B. Update the DSA Signatory List to reflect that the DxF Participant is now considered an Unverified DxF Participant whose access to HSSI through the DSA has been revoked;
 - C. Update the Unverified DxF Participant List to add the DxF Participant and reflect that their access to HSSI under the DSA has been revoked; and
 - D. Notify the DxF Community pursuant to Section II(e)(iii).
- 2. Notify the DxF Participant pursuant to Section II(f) within five (5) business days of starting Section II(e).

III. Notify the DxF Community

- 1. HCAI shall publicly post a list of Unverified DxF Participants which shall be updated whenever a DxF Participant has access to HSSI under the DSA restricted.
- 2. When the Unverified DxF Participants List is updated, HCAI shall send an email to the account holders and signatories as entered

into the DxF DSA Signing Portal the same day that the Unverified DxF Participant List has been updated.

3. HCAI shall update the Unverified DxF Participants List if the status of an Unverified DxF Participant changes based on an appeal.

F. Notification of Determination and Opportunity to Request an Administrative Hearing

- I. HCAI shall send a notice of the final determination restricting access to HSSI under the DSA to the new DSA Signatory or DxF Participant by US mail to the name and address of the new DSA Signatory or DxF Participant and by email to the email addresses of the account holder and new DSA Signatory or DxF Participant as entered into the DxF DSA Signing Portal and provide them with:
 1. The Request for Administrative Hearing—DxF Participant Verification Form; and
 2. The DxF Participant Verification Administrative Hearing Procedures.

II. Filing an Appeal

1. A new DSA Signatory or DxF Participant that has received notice that their access to HSS under the DSA has been restricted pursuant to Section II(e) may appeal the determination by filing a Request for Administrative Hearing—DxF Participant Verification Form with the HCAI Hearing Officer no later than 30 calendar days after the date the notice was sent. The request shall be filed with the Department's hearing officer using the contact information in Section II(f)(iii) below.
2. HCAI shall update the Unverified DxF Participants List to reflect that an appeal is pending for the new DSA Signatory or DxF Participant. An Unverified DxF Participant's restricted access to HSSI under the DSA remains in place during the appeal process and through the deadline to appeal.
3. A new DSA Signatory or DxF Participant filing an appeal shall follow the procedures in the DxF Participant Verification Administrative Hearing Procedures.

III. Hearing Officer's Contact Information

1. Hearing requests shall be addressed to the Department's hearing officer either by mail or by email as follows:
 - A. Mail shall be sent to the hearing officer at the Legal Office of the Department of Health Care Access and Information in Sacramento.
 - B. Email shall be sent to the following email address:
HearingOfficer@hcai.ca.gov.