Data Exchange Framework

DxF Required Signatory Methodology

Introduction

California legislation mandates that certain health care entities execute the Data Exchange Framework (DxF) Data Sharing Agreement (DSA). The statute was first established in AB 133 (2021) with additional DxF Accountability Measures provisioned in SB 660 (2025).

The DxF Required Signatory Methodology for identifying entities required to participate relies upon public sources, California licensing and regulatory data, and stakeholder feedback. HCAI utilizes outlined data parameters to determine required signatories by entity type as defined in Health and Safety Code (HSC) section 130290, subdivision (f).

Beginning January 1, 2027, HCAI is required to publish and maintain on its website the names of any known entities it deems to be not in compliance with the requirement to execute the DxF DSA.[1] The DxF Required Signatory Methodology provides the foundation for how HCAI will determine who is required to sign the DxF DSA and which of those entities are not in compliance with the requirement to sign the DxF DSA.

More information on required signatories is available on the DxF FAQ. Please submit questions to: DxF@hcai.ca.gov

[1] Health & Safe. Code § 130290(h)(2).

Methodology

The DxF Required Signatory Methodology utilizes open data sources and data requested from California licensing and/or regulating entities to help HCAI determine who is required to sign the DxF DSA. Variables are listed in the Parameters column when the data set is derived from a single publicly available source. Narrative descriptions are provided when the underlying data are obtained from non-public sources or when multiple sources are integrated through custom aggregation methods.

The data sources outlined in this methodology are updated annually.

Data Sources

Organization Type	Data Source	Parameters
General Acute Care Hospital, as defined in Health and Safety Code section 1250[2]	Licensed and Certified Healthcare Facility Locations [Data set], CalHHS Open Data Portal, **https://data.ca.gov/dataset/licensed-and-certified-healthcare-facility-listing**	• LICENSED_CERTIFIED = "LICENSED OR CERTIFIED" or "LICENSED ONLY" • FAC_STATUS_TYPE_CODE = "OPEN" • FAC_TYPE_CODE = "GACH"

[2] Health and Safe. Code § 130290(f)(1).

Organization Type	Data Source	Parameters
Skilled Nursing Facilities, as defined in Health and Safety Code section 1250 that maintain electronic health records[3]	Licensed and Certified Healthcare Facility Services [Data set], CalHHS Open Data Portal, https://data.ca.gov/dataset/licensed-and-certified-healthcare-facility-services	• LICENSED_CERTIFIED = "LICENSED OR CERTIFIED" or "LICENSED ONLY" • FAC_STATUS_TYPE_CODE = "OPEN" • FAC_TYPE_CODE = "SNF" • Exclude skilled nursing facilities that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they do not currently maintain electronic health records
Acute Psychiatric Hospitals, as defined in Health and Safety Code section 1250[4]	Licensed and Certified Healthcare Facility Services [Data set], CalHHS Open Data Portal, https://data.ca.gov/dataset/licensed-and-certified-healthcare-facility-services	• LICENSED_CERTIFIED = "LICENSED OR CERTIFIED" or "LICENSED ONLY" • FAC_STATUS_TYPE_CODE = "OPEN" • FAC_TYPE_CODE = "APH"
Clinical Laboratories, as defined in Business and Professions Code section 1265 and that are regulated by the California Department of Public Health[5]	Laboratory Testing Sites and Personnel Lists [Data set], Department of Public Health Laboratory Field Services, https://www.cdph.ca.gov/Programs/OSPH	• Exclude municipal and county laboratories[6] • Exclude clinical labs operated by clinics specified in Health and Safe. Code § 130290(f)(D) until July 1, 2027

[3] Health and Safe. Code § 130290(f)(3).
[4] Health and Safe. Code § 130290(f)(6).
[5] Health and Safe. Code § 130290(f)(5).
[6] Health and Safe. Code § 101150.

Organization Type	Data Source	Parameters
	LD/LFS/Pages/LaboratoryandPersonnelLists.aspx	• Exclude non-health care organizations that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they are not a health care organization • License Type = "License"
Health Plans,[7] as follows: 1. Health care service plans and disability insurers providing hospital, medical, or surgical coverage that are regulated by the California Department of Managed Healthcare or the California Department of Insurance. 2. Medi-Cal managed care plans under a comprehensive risk contract with the Department of Healthcare Services pursuant to the Medi-Cal Act[8] or the Waxman-Duffy Prepaid	• DMHC-Regulated Health Plan Listing [Data set], Department of Managed Health Care (data set provided to HCAI by Department) • List of Insurers Providing Health Insurance Coverage, California Department of Insurance, https://www.insurance.ca.gov/01-consumers/110-health/20-look/hcpcarriers.cfm • DHCS-Regulated Medi-Cal Managed Care Plan Listing [Data set], Department of Health Care Services	• Exclude health care service plans and disability insurers that do not provide hospital, medical, or surgical coverage that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they do not provide hospital, medical, or surgical coverage[10] • Exclude specialized health plans that are not full-service plans, such as Employee Assistance Program (EAP) Plans[11]

[7] Health and Safe. Code § 130290(f)(4).
[8] Cal. Welfare and Institutions Code section 14000, et seq.
[10] Information provided by DMHC and CDI Lines of Insurance Search company profile https://interactive.web.insurance.ca.gov/apex_extprd/f?p=144:10
[11] Health Plan Dashboard, Department of Managed Health Care, https://wpso.dmhc.ca.gov/dashboard/SearchHealthPlan.aspx

Organization Type	Data Source	Parameters
Health Plan Act,[9] and that are not regulated by the California Department of Managed Healthcare or the California Department of Insurance.	(data set provided to HCAI by Department)	
Emergency medical services, as defined in Health and Safety Code section 1797.72[12]	• California Emergency Medical Services Information System (CEMSIS) Active Provider Listing [Data set], Emergency Medical Services Authority (data set provided to HCAI by Department) • Local EMS Agencies, California Emergency Medical Services Authority, https://www.emsa.ca.gov/caemsa?id=lemsa_info	• Exclude Local Emergency Medical Services Agencies[13] that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they do not maintain health and social services information
Physician organizations and medical groups[14]	1. List of Capitated Providers and RBOs [Data set], Department of Managed Health Care, https://www.dmhc.ca.gov/LicensingReporting/RiskBearingOrganizations.aspx	• For physician organizations and medical groups, data is combined from multiple sources, as no single source is currently publicly available

[9] Cal. Welfare and Institutions Code section 14200, et seq.
[12] Health and Safe. Code § 130290(f)(7).
[13] Health and Safe. Code § 1797.94.
[14] Health and Safe. Code § 130290(f)(2)(A) & (B); *Id.* at § 130290(f)(2)(D)-(F).

Organization Type	Data Source	Parameters
	2. RBO Statement of Organization [Data set], Department of Managed Health Care, https://wpso.dmhc.ca.gov/ProviderReports/statorg.aspx 3. Medi Cal FFS Provider Listing [Data set], Department of Health Care Services, https://gis.dhcs.ca.gov/datasets/CADHCS::medi-cal-ffs-provider-listing/explore?location=42.175373%2C-114.892360%2C3 4. California Health Care Quality Report Cards [Data set], https://reportcard.opa.ca.gov/rc/MedicareMGCounty.aspx#ChooseLetter 5. NPPES NPI Registry [Data set], Centers for Medicare & Medicaid Services, https://npiregistry.cms.hhs.gov/search 6. Licensed and Certified Healthcare Facility Services [Data set], CalHHS Open Data Portal, https://data.ca.gov/dataset/licensed-	• Exclude non-physician health providers, so long as they are not otherwise part of a medical group practice, a professional medical corporation, or a medical partnership that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they are a non-physician health provider • Exclude independent practice associations that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they do not currently maintain electronic health information on behalf of their participating physicians • Exclude medical foundations that have submitted the DxF Non-Required Signatory Attestation to HCAI attesting that they are not a medical foundation exempt from licensure pursuant to subdivision (*l*) of section 1206[15]

[15] Health and Safe. Code § 1206(l).

Organization Type	Data Source	Parameters
	and-certified-healthcare-facility-services 7. Health Center Program Uniform Data System [Data set], HRSA Data Warehouse, https://data.hrsa.gov/topics/healthcenters/uds/overview?type=AWARDEE&state=CA 8. Outpatient Surgery Setting Database [Data set], The Medical Board of California, https://www2.mbc.ca.gov/OSSDPublic/ 9. Medicare Fee-For-Service Public Provider Enrollment [Data set], CMS, https://data.cms.gov/provider-characteristics/medicare-provider-supplier-enrollment/medicare-fee-for-service-public-provider-enrollment 10. Compendium of U.S. Health Systems Group Practice Linkage File [Data set],	• Exclude solo practitioners who are physicians and surgeons that provide, deliver, furnish, or otherwise arrange for health care services, so long as they are not otherwise part of a medical group practice, a professional medical corporation, or a medical partnership • Exclude Community Clinics[16] : Source #6, FAC_FDR = "PRIMARY CARE CLINIC" and FAC_TYPE_CODE contains "COMTYC", or FAC_FDR contains = "PRIMARY CARE CLINIC" and FAC_TYPE_CODE contains "FREEC", Intermittent Clinics[17]: Source #6, FAC_FDR = "PRIMARY CARE CLINIC" and FAC_TYPE_CODE contains "COMTYC", or FAC_FDR contains = "PRIMARY CARE CLINIC" and FAC_TYPE_CODE contains "FREEC", Rural Health Clinics[18]: Source

[16] Health and Safe. Code § 1204(a).
[17] Health and Safe. Code § 1206(h).
[18] 42 U.S.C. § 1396d(*l*)(1).

Organization Type	Data Source	Parameters
	AHRQ, https://www.ahrq.gov/chsp/data-resources/compendium-2022.html	#7, State = "CA" and "Site Type" = "Rural Health Clinic" until July 1, 2027[19] • Medical group practices: Source #3, parameter is FI_PROVIDER_TYPE = "PHYSICIANS GROUP"; Source #5, PROVIDER ORGANIZATION NAME (LEGAL BUSINESS NAME) contains "MEDICAL GROUP", ENTITY TYPE CODE = "2" • Independent practice associations: Source #1, NAME contains "IPA"; Source #2, MODEL LEGAL OWNERSHIP contains "IPA"; Source #4, NAME contains "IPA" • Specialty Clinic: Source #6, FAC_FDR = "SURGICAL CLINIC", "CHRONIC DIALYSIS CLINIC", or "REHABILITATION CLINIC" • Ambulatory Surgical Center: Source #6, FAC_TYPE_CODE contains "ASC" • Accredited Outpatient Setting: Source #8, AccreditationStatusDescription = "Accreditation Renewed", "Full Accreditation Survey" or "Initial Accreditation Survey"

[19] Health and Safe. Code § 130290(b)(5).