

## Data Exchange Framework Support Services

August 2023

### Supporting Data Exchange Framework (DxF) Work

With the goal of providing effective whole-person care, California's Health and Human Services Agency (CalHHS) Center for Data Insights and Innovation (CDII) has established the Data Exchange Framework (DxF). Beginning in 2024, the DxF sets the rules of the road for the secure, real-time exchange of health and social services information (HSSI) among health care entities, government agencies (i.e., counties), and social service organizations throughout the state.

Intrepid Ascent has significant experience supporting organizations and communities in the exchange of HSSI. We engage with and listen to the people at the center of systems of care to make sure that solutions serve all project stakeholders. Our consulting service offerings listed in the table below empower organizations to build both governance and technology infrastructure needed for data exchange specified in the DxF data sharing agreement (DSA) and policies and procedures (P&Ps), as well as to engage and train diverse user organizations in workflows needed to complete data exchange. We offer either comprehensive services or more targeted support depending on your existing assets, strengths, and progress. Phasing of services may vary based on where you are in your data exchange planning and implementation process. Recognizing that the path to sharing HSSI can be complex, we've listed our services below in a way to shape discussions. Your unique needs might require a singular set or a mix of the services defined below.

Reach out to Danielle Carter, Vice President, Community Change, at [danielle@intrepidascend.com](mailto:danielle@intrepidascend.com) to discuss our service options in more detail.

## Intrepid Ascent Summary of DxF Consulting Services

Please click on “Learn More” in each service area for additional detail on service options.

Service Area	Service Options
<b>DxF Education</b>	<p>Our team can support your organization and/or stakeholders in understanding the DxF, readiness for implementation, and strategies to accelerate adoption and data exchange. We utilize adult learning, stakeholder engagement, change management, and human-centered design principles to facilitate knowledge transfer and understanding.</p> <p>Support may include:</p> <ul style="list-style-type: none"> <li>• Webinar-based Educational Series (<a href="#">learn more</a>)</li> <li>• Coaching and/or Office Hours (<a href="#">learn more</a>)</li> </ul>
<b>DxF Readiness Assessment and Implementation Planning</b>	<p>Understanding whether your organization is ready to implement the DxF and what next steps are to move towards data sharing is complicated. This process involves reviewing and understanding your current technology system as well as policies, procedures, and practices affiliated with data sharing. Our team can conduct an analysis of your organization’s current data exchange assets / infrastructure and create a plan to resolve any identified gaps, leading you towards DxF implementation.</p> <p>Support may include:</p> <ul style="list-style-type: none"> <li>• DxF Readiness: Gap Assessment &amp; Recommendations (<a href="#">learn more</a>)</li> <li>• DxF Implementation Plan (<a href="#">learn more</a>)</li> </ul>
<b>Technology Strategy</b>	<p>Our team can help your organization understand the different technology options that meet some or all DxF requirements. This support can include procuring a new technology (e.g., EHR, data interface / API engine, care coordination platform, etc.), implementing a new technology once it is identified, reviewing qualified health information organizations (QHIOs, state designated intermediaries to exchange data through the DxF) to understand which one might be the best match for your organizational and technical circumstances, and working with you to optimize your EHR for meaningful data exchange.</p> <p>Support may include:</p> <ul style="list-style-type: none"> <li>• Technology Vendor Procurement (<a href="#">learn more</a>)</li> <li>• Technology Vendor Implementation Support (<a href="#">learn more</a>)</li> <li>• Third Party Vendor or QHIO Match Review and Recommendations (<a href="#">learn more</a>)</li> <li>• EHR Optimization (<a href="#">learn more</a>)</li> </ul>
<b>Data Governance</b>	<p>Given the complex legal, regulatory, and policy considerations involved with the exchange of health and social service information required under the DxF, standards about what data may be shared across sectors and for what purposes are difficult to interpret and can vary widely. Intrepid Ascent can support your organization in implementing, growing, and maintaining a robust data sharing ecosystem.</p> <p>Support may include:</p> <ul style="list-style-type: none"> <li>• Privacy and Security Assessment for Health Care Organizations (<a href="#">learn more</a>)</li> <li>• Privacy and Security Assessment for Community-Based Organizations (CBOs) and Other Non-HIPAA Covered Entities (<a href="#">learn more</a>)</li> <li>• Legal and Policy Training (<a href="#">learn more</a>)</li> </ul>
<b>Technology Onboarding</b>	<p>Our team has experience developing and conducting all phases of onboarding to new technology tools: from multi-stakeholder leadership engagement and readiness assessment,</p>

to training, to helping teams build the new resources into their daily work. People are the center of our human-driven onboarding methodology. Below we describe some services we offer to help service providers work together and build the operational and clinical workflows needed to complete real-time data exchange.

Support may include:

- User Onboarding and Engagement ([learn more](#))

## What is the DxF?

California's DxF is a policy framework designed to promote the secure, real-time exchange of health and social services information. Comprised of a single DSA and set of P&Ps, the DxF provides the rules of the road to govern data sharing among health care entities, government agencies, and social service organizations. It enables and requires exchange through any network, qualified health information organization (QHIO - a state designated intermediary for data exchange), or other technology solution that adheres to DxF standards and policies.

The following health care organizations were required to have signed the DSA by January 2023: general acute care hospitals, physician organizations / medical groups, skilled nursing facilities, health plans, clinical laboratories, and acute psychiatric hospitals. Other types of health care organizations, government agencies (i.e., counties), and social service organizations (e.g., food banks, housing providers, etc.) are highly encouraged – but not required – to sign the DSA. Most required health care entities must implement the DxF starting in January 2024, though a subset have until January 2026. Encouraged signatories can sign the DSA and implement the DxF at any point.

As one avenue for funding to support DxF implementation, CDII has launched its DxF DSA Signatory Grant program, through which DxF Signatories can apply for and receive funding. The two types of DSA Signatory grants are: 1) Technical Assistance (TA) and 2) QHIO Onboarding. For detailed information on the DSA Signatory Grants, please refer to [the Applicant Guidance Document](#).

## About Us

**Intrepid Ascent helps people use data to collaborate in the development of healthy communities.** We have a proud history of working with health care providers, local governments, and community-based organizations (CBOs) to identify and implement technology solutions that support cross-sector service models. Since 2014, we have successfully enabled California communities to draw a more complete picture of health across their populations through health information exchange, integrating health and social data, adopting care management and analytics systems, developing data governance frameworks, and onboarding users to new technology. We have provided guidance to two DxF Education Initiative Grants, six Whole Person Care pilots, five additional CIE networks, several behavioral health and public health improvement initiatives, and a growing number of CalAIM implementations, in addition to multiple California state agencies.

## Service Options Appendix

**1) Webinar-based Educational Series:** By facilitating a series of webinars, our team will support your organization and/or partners in understanding DxF-related topics relevant to different stakeholder groups. Topics may include (but are not limited to): DxF 101, DxF P&Ps and Key Privacy Laws, Health Information Exchange (HIE) 101, Best Practices for Engaging with a QHIO, Implementing HIE: The People Side of Data Exchange Implementation. This project includes:

- Hosting and facilitating each webinar. Products we develop: Slide deck and recording for each webinar conducted
- Follow-up support for questions asked during the webinar registration and session

**2) Coaching and/or Office Hours:** This project is designed to support organizations who have additional questions. In coaching sessions, we provide more targeted, customized DxF support. These hours may include 1:1 coaching sessions, attending recurring collaboratives, or other venues to provide proactive support to the highest need groups. Office hours are designed for larger groups who may not need as tailored support, and organizations can drop in to have DxF-related questions answered. For this project we will facilitate a set number (to be determined before project initiation) of:

- Coaching hours and/or
- Office hours

**3) DxF Readiness: Gap Assessment & Recommendations:** This project is recommended for organizations who are asking themselves where to start. A gap assessment of existing data exchange assets and infrastructure will highlight a given organization's needs, clarifying where an organization is today compared to where it needs to be to meet DxF DSA and P&P requirements. In partnership with your organization, we analyze information and develop recommendations for policy alignment, technology tools and processes, and phases of development. A gap assessment usually involves the following steps:

**Develop Assessment Strategy:** Develop data collection plan and review with implementation partners. Strategies may include reviewing existing materials and conducting surveys, key informant interviews, focus groups, and community convenings. Interview guides are adapted for different stakeholder groups. Products we develop: Assessment and data collection plan and materials

**Summarize Findings:** Collect and review quantitative survey data, analyze themes from interviews and focus groups. Summarize findings and present to stakeholders in appropriate format (e.g., written report, slide deck, facilitated presentation and discussion). Products we develop: DxF readiness: gap assessment report and presentation

**Make Recommendations:** For a collaboration and technology approach to support priority programs, stakeholders, and workflows. We often propose 2-3 viable options and present them to implementation

partners. We facilitate consensus building on a path forward. Products we develop: Implementation options presentation for organization discussion

**4) DxF Implementation Plan:** The DxF Implementation Plan is designed to follow a strategic assessment of your organization’s approach of existing data exchange assets and infrastructure (see DxF Readiness: Gap Assessment & Recommendations, above). This plan establishes clearly defined recommendations for organizations to operationalize solutions identified in the gap assessment. It also provides concrete action steps to align organizational practices with the DxF’s objectives and requirements, with consideration of other statewide data exchange initiatives (e.g., California Advancing and Innovating Medi-Cal (CalAIM)).

**Recommended workplan:** Clear steps and timeline to improve on gaps identified in DxF Readiness: Gap Assessment & Recommendation. Products we develop: project plan for implementing the DxF

*Note: In most cases a readiness assessment (project 1) is a pre-requisite to creating an implementation plan.*

**5) Technology Vendor Procurement:** Signatories may identify a technology solution needed to achieve real-time data exchange in accordance with the DxF. Our team documents technology requirements and specifications and writes a request for proposals (RFP) or another appropriate procurement vehicle to help find the right technology provider(s). We often manage the entire procurement process or can act as an advisor as you assess vendors. We have extensive experience with community and health technology vendors (including health information exchange, community health information exchange, referral management, case management, and others) and use a structured, detailed, and transparent approach to soliciting and assessing proposals.

**Develop Business and Technical Requirements for Procurement:** Using findings from the gap assessment or other sources, develop business and technical requirements based on industry best-practices and DxF requirements, drawing on our extensive experience in the health information exchange (HIE) and health information management industries, including years of experience helping communities to share sensitive data types such as behavioral and social health data. Products we develop: Business requirements summary; technical requirements tables

**Develop RFP (or other procurement content) and Proposal Review Process:** Depending on the level of support your organization needs, we will develop the structure of the vendor procurement and collaborate with your organization stakeholders on programmatic content and timeline. Our team structures the procurement to your organization’s requirements (along with those outlined in the DxF DSA and P&Ps), from a very broad, public review linked to an official government procurement process, to a targeted, fast, internal review or sole-source justification. Products we develop: Request for Proposal document; proposal review process, timelines and materials; training for selection committee

**Procurement Facilitation:** Our team can lead your procurement process or provide analysis and guidance at key steps. Full facilitation includes: screening proposals, reviewing all proposal content,

analyzing structured technical and budget forms responses, summarizing strengths and gaps of each tool, scheduling and assessing demos, conducting reference interviews, and facilitating review committee meetings to determine finalists and to make the final vendor selection. We work with your selection committee to develop a plan that meets your needs. Products we develop: Procurement process materials including scoring template and instructions; summary presentation for decision-making meeting assessing proposal strengths and gaps, including assessment of vendor differentiators; and capability vs. cost tables

**Contract Review and Advising:** Review based on DxF requirements and best practices for technical and privacy standards, a clear and fair scope of work that serves your organization's needs, a clear budget and payment model, and consistency with proposal promises. Particular areas of concern in vendor contracts include privacy and security controls, service-level agreement details such as system up-time and update rollouts, and structures for ensuring that scope of work and product functionality promises can be enforced. Products we develop: recommendations for vendor scope and contracting, including red-line edits to draft contracts, including red-line edits to draft contracts

**6) Technology Vendor Implementation Support:** Once a technology vendor or vendors are chosen, we revisit and refine priority use cases as needed to shape the technology implementation phase and meet DxF requirements. Our team works as an experienced intermediary between your organization's stakeholders who may not have technical experience and vendors who may not have experience sharing both health *and* social services information (but have relevant experience in health care or other industry settings). We facilitate discovery for client workflows and work with you to translate build requirements and user acceptance testing (UAT) back to the vendor.

**Use Case Alignment for Implementation Planning** based on DxF requirements, organization goals, and defined service model: If not already defined in previous phases of work, we develop a defined business case for the overall project. In many cases, we help our clients align the scope of work or services a vendor may already have with organizational goals. We also help early adopters of the technology define their initial use cases and workflows for the tool. Products we develop: detailed use cases and workflows for early adopters

**Support Vendor Requirements Definition and Build Process:** Each vendor has their own discovery and build process. Our team can support your implementation staff to develop plans for client enrollment workflows, consent management, assessments, user management, and UAT strategies. Products we develop: Documented procedures

**Support Development of Integration Requirements:** Many implementations require connecting two or more systems to enable needed data aggregation and/or streamline user workflow. Our team has the technical expertise to help you determine which systems should be connected, how they can exchange information, and what information should flow between them. We also have the project management experience to facilitate conversations between technology vendors and program staff, document requirements, and keep integration projects on time and budget. Products we develop: Integration specifications

**Vendor Relationship/Scope of Work (SOW) Management:** Our team can augment local project management resources to conduct regular, informed scope of work review/milestone meetings with vendors and status reports back to clients on progress, barriers, risks, etc. Products we develop: Project charter, project plan, meeting minutes, status reports

**7) Third Party Vendor or QHIO Match Review and Recommendations:** Each third party vendor and QHIO has different additional functionality, cost structure, and other features. We will help you determine the third party vendor or QHIO that is best matched to your organization, considering your unique use cases, governance structure, geographic location, technical configuration, and other considerations.

**Understanding Third Party Vendor / QHIO Needs:** Meeting with key organization staff to understand key data sharing use cases and third party vendor / QHIO needs.

**Third Party Vendor / QHIO Match Review and Recommendations:** Based on your organization's use cases, geographic location, and other considerations, we can validate an existing third party vendor or QHIO preference and/or review potential partners. Products we develop: Review of up to 5 third party vendors / QHIOs and development of summary document detailing pros / cons of each as they relate to your organization

**8) EHR Optimization:** EHRs are key components of DxF implementation for many organizations. Through this project, we will help you optimize your existing EHR for a new data-exchange environment. This involves two primary components: interoperability and workflow. Interoperability refers to the capabilities of the EHR to seamlessly exchange data with other systems - both inbound and outbound. Workflow refers to use of the EHR. Optimizing your EHR's interoperability capabilities for the DxF depends on the vendor's capabilities, community data exchange options, and priority use cases. Optimizing your EHR workflows to take advantage of greater data access depends on organizational processes, individual roles, user experience, and the EHR's configuration. Our team works as an experienced intermediary with your organization's stakeholders and your EHR vendor to identify go-forward approaches for both interoperability and workflow improvement in alignment with DxF requirements and organizational goals. Benefits to optimizing your EHR include: enhanced data access, improved workflows, updated configurations, cost reductions, strengthened patient safety, more accessible data, and better reports. Our EHR optimization plan follows these steps:

**Develop Workflow and EHR Assessment Strategy:** Develop data collection plan and review with organization staff. Strategies may include reviewing existing organization / EHR materials and conducting surveys, key informant interviews, workflow assessments, and/or focus groups with organization staff to understand staff members' experience with using your EHR. Products we develop: Workflow and EHR assessment, data collection plan and materials

**Summarize Findings:** Collect and review quantitative survey data, analyze themes from interviews, focus groups, and workflow analysis. Summarize findings and present to organization (and EHR vendor, if appropriate) stakeholders in appropriate format (e.g., written report, slide deck, facilitated



presentation and discussion). Products we develop: Workflow and EHR assessment report and presentation

**Make Recommendations:** We will propose several viable avenues to optimize your EHR and present them to organization and EHR partners. We facilitate consensus building between your organization and your EHR vendor on a path forward. Products we develop: EHR optimization presentation for organization discussion

**Vendor Relationship/Scope of Work (SOW) Management:** Our team can augment local project management resources to conduct regular, informed scope of work review/milestone meetings with vendors and status reports back to clients on progress, barriers, risks, etc. Products we develop: Project charter, project plan, meeting minutes, status reports

**9) Privacy and Security Assessment for Health Care Organizations:** This project is designed to ensure health care organizations have the appropriate privacy and security safeguards in place to support the exchange of health and social care information. Our privacy and security assessment focuses on risk identification through the lens of Health Insurance Portability and Accountability Act (HIPAA) and other relevant federal and state laws, regulations, and policies, and will provide your organization with actionable insights into compliance gaps and security vulnerabilities, including an easy-to-understand risk rating and a prioritized roadmap to enable rapid decision-making for risk/gap remediation. Tailored specifically for HIPAA Covered Entities, this assessment includes:

- Comprehensive review of policies, procedures, business practices, technology infrastructure, and workplace environment to analyze current business practices against privacy and security requirements;
- Privacy and security gap assessment of your organization's risk posture, including a risk score and dashboard to support leadership engagement and decision-making; and
- Roadmap with prioritized action steps for remediation of identified risks with recommendations on all aspects of compliance in a cross-sector data sharing environment.

Products we develop: Executive summary report, management summary report, full report (for information security professionals), action plan (including recommendations to address identified risks), and HIPAA gap report (lists all controls addressed by the HIPAA gap assessment with a crosswalk to relevant recommendations)

**10) Privacy and Security Assessment for CBOs and Other Non-HIPAA Covered Entities:** This project is designed to ensure CBOs and other non-HIPAA Covered Entities have the appropriate privacy and security safeguards in place to support the exchange of health and social service information. Our privacy and security assessment focuses on risk identification through the lens of HIPAA and other relevant federal and state laws, regulations, and policies, while also readying non-health care organizations to receive, use, and protect clinical information through education, awareness, and a culture of compliance. Your organization will receive actionable insights into compliance gaps and



security vulnerabilities, including an easy-to-understand risk rating and a roadmap to enable rapid decision-making for risk/gap remediation. This assessment includes:

- Orientation to health care data and the requirements for protecting the privacy and security of identifiable information;
- Comprehensive review of policies, procedures, business practices, technology infrastructure, and workplace environment to analyze current business practices against privacy and security requirements;
- Privacy and security gap assessment of your organization's risk posture, including a risk score and dashboard to support leadership engagement and decision-making; and
- Roadmap with prioritized action steps for remediation of identified risks with recommendations on all aspects of compliance in a cross-sector data sharing environment.

Products we develop: Executive summary report, management summary report, full report (for information security professionals), and action plan (including recommendations to address identified risks)

**11) Legal and Policy Training:** Education on key legal and policy topics as they relate to the DxF.

**HIPAA Privacy & Security:** Tailored for CBOs, but appropriate for small clinical practices as well, this module will orient your organization to the foundations of HIPAA privacy and security. The course will cover all required components of HIPAA awareness including uses and disclosures, authorizations, risk management, and administrative, physical, technical safeguards. This training delivers practical, useful, and detailed knowledge about HIPAA in a brief and engaging format. Products we develop: Live session with Q&A

**Legal and Regulatory Landscape:** Comprehensive education on the legal and regulatory landscape for data sharing in the context of the DxF and cross-sector collaboration. We provide an overview of key state and federal privacy laws and regulations - e.g., HIPAA, 42 CFR Part 2, Confidentiality of Medical Information Act (CMIA), Lanterman-Petris-Short Act - highlighting requirements for obtaining individual permission (consent) to share information. We also discuss the implications of these laws and regulations on different types of entities and use cases for how each have impacted data sharing at the community level. Products we develop: Live session with Q&A, fact sheets / explainers, issue briefs

**12) User Onboarding and Engagement:** Our team has experience developing and conducting all phases of onboarding to new technology tools: from multi-stakeholder leadership engagement and readiness assessment, to training, to helping teams build the new resources into their daily work. People are the center of our human-driven onboarding methodology. Below we describe some of the services we offer to help service providers work together and build the operational and clinical workflows needed to complete real-time data exchange.

**Develop Metrics for Success:** We will help your organization identify measures to track onboarding success. This plan will include defining metrics, defining a data collection plan, and creating an evaluation plan to guide implementation. Products we develop: Metrics and data collection plan

**Develop or Adapt Materials:** We translate out-of-the-box vendor training materials into training that includes your program requirements, priority workflows, and customized collaboration tips. Materials often include facilitators' agendas, training content (slides, videos, demos), tip sheets on specific functions or workflows. We provide training live, live online, or via self-paced recorded trainings. Products we develop: Customized training content and strategies

**Training Delivery or Support:** If needed, we can develop and facilitate training to support onboarding your team to new technology tools. Our team uses adult learning methodology to create participatory training, aimed at grounding technology implementation and onboarding in real-life scenarios and speaking directly to daily workflows. Our team can either "train the trainer" to allow your team to deliver ongoing instruction or create and deliver ongoing training for all end users. Products we develop: Training procedure and sessions

**Leadership Engagement and Readiness Assessment:** Organizational leaders must understand the benefits of participation and be ready to communicate this value to their staff. The organization must also be ready for adoption. We have developed materials and processes to engage leaders, assess readiness, and help them communicate with their team. Products we develop: Readiness assessment and engagement procedure and sessions

**Operational, Clinical, and/or Cross-Sector Workflow Assessment and Post-training Support:** We have also developed processes for mapping current and future workflows with program teams within each organization, to illustrate where and how they can integrate data sharing tools into their current work. Engaging with the team after training, when they're ready to apply their learning, helps adoption. Products we develop: Workflow assessment and post-training support procedure and sessions

**Quality Improvement Coaching to Achieve Community-Defined Goals:** Our team is trained in the Model for Improvement quality improvement methodology and can support Plan-Do-Study-Act (PDSA) cycles to improve or enhance technology use and/or clinical/organizational workflow, and to promote efficient use of data once data sharing is in progress. Products we develop: PDSA plan and documentation