



**California Health & Human Services Agency
Data Exchange Framework Technical Advisory Committee Meeting
Public Comment Log (12:00 PM – 1:00 PM PT, August 21, 2025)**

The table below shows public comments that were made verbally during the August 21, 2025, TAC meeting. Additional public comments can be found in the meeting's "Q&A Log" posted on the CalHHS Data Exchange Framework [webpage](#).

| Count | Name | Comment |
|-------|-------------------|---|
| 1 | Lucy Johns | Thank you. David McCann's comment opened the door for me to stress what I wrote in the Q&A -- namely, where is consent in this discussion? It seems to me that it would be really helpful if DXS and DXF would state as a principle that patient consent must be present for anything we're talking about. And that consent needs to be informed and of appropriate scope. I'm willing to share that I was admitted to a hospital, but I'm not willing to share why. That gets really complicated. But it's not at all clear to me that when discussing rosters as a technical solution for interoperability, that patient consent is in there. And it needs to be a principle. Every technical solution needs to be mapped to that principle. Thank you. |
| 2 | Jennifer Hardwick | I've sat in on many, many of these calls, and I'm really pleased today to have the conversation around consent and privacy and HIPAA. Even the QHIO model is not great from a payer perspective, as it does not follow strictly the HIPAA requirements, and so that's been of great concern to a lot of the payers in California on the DXF models. I'm really pleased today to hear the concern for consent and HIPAA and privacy. In the QIO model, just as an example, it would be considered our data that's being shared through the QHIO, but we can't guarantee the safety of it because we are not in charge of the QHIO's security of that data. So, just as background for you. |

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| 3 | Rita Torkzadeh | Hi, I was also a part of the previous consent task force, and my question relates to what Jacob Parkinson had posted. I want to remind everyone of the technical requirements for exchange that indicate participants making requests for notification of ADT events must submit a roster identifying the individuals for whom notifications are requested, consistent with the attributes of person matching or using some other method acceptable to the sending participant. My question in relation to that-- knowing that it's part of your PMPs is whether that assumes a minimum necessary data type scenario, assuming this is going to be the ongoing model for any kind of request or roster sharing, or if it's going to be specifically aligned with whatever is considered appropriate for person matching. |
| 4 | Lucy Johns | I wanted to respond to Hans in the chat and ask him if privacy by design could be a principle for constructing rosters. In other words, on the one hand, we construct a roster, and on the other hand, we assume that senders and receivers know what they're doing about privacy consent when they meet at the roster. Can the roster, by design, ensure that consent—at least—is assured for a particular notification? |
| 5 | Hans Buitendijk | Just generally, rosters are one concept, and consent and privacy rules are another. They're clearly related. Whether that means it's most appropriate to maintain that relationship within the roster, or whether it's something evaluated separately, my inclination at this point is that they're related but separate. But they need to be considered together to determine whether you can actually share data or not. |

Total Count of public comments: 5