



Data Exchange Framework Standard Operating Procedure: Non-Required Signatory Attestation

Last Updated: August 3, 2026

1. Introduction

California law requires that certain health care entities execute the Data Exchange Framework (DxF) Data Sharing Agreement (DSA).¹ The statute was first established in Assembly Bill (AB) 133 (2021) with additional **DxF Accountability Measures** provisioned in Senate Bill (SB) 660 (2025).

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.²

Entities may attest that they are specifically excluded from the entities required to execute the DSA.³ **Note:** more information on specific exclusions is available on the **DxF FAQ**. HCAI may then remove an entity from the published DxF Non-Compliant List.

Submitting an attestation that an entity is excluded from the entities required to execute the DSA does not prohibit an entity's ability to voluntarily sign the DSA.

¹ Cal. Health & Saf. Code § 130290(f).

² Cal. Health & Saf. Code § 130290(h)(2).

³ Cal. Health & Saf. Code § 130290(f).

To maintain up-to-date information on an entity's status, an entity who attests that it does not maintain electronic health records shall resubmit the DxF Non-Required Signatory Attestation annually.

This document outlines the HCAI Standard Operating Procedure (SOP) for processing DxF Non-Required Signatory Attestations submitted by entities stating that they are not required to execute the DxF DSA.

2. Procedure

- a. An entity submits a DxF Non-Required Signatory Attestation using the form on the DxF website.
- b. HCAI reviews the entity-submitted DxF Non-Required Signatory Attestation.
 - i. HCAI may request additional information and/or documentation from the entity, as needed.
 - ii. HCAI may verify the entity's licensure, status and details, as needed.
- c. After reviewing the attestation, HCAI shall determine whether the entity is required to execute the DSA.
 - i. If HCAI determines that the entity is not required to execute the DSA, HCAI shall remove them from the DxF Non-Compliant List, if applicable.
 - ii. If HCAI determines that the entity is still required to execute the DSA, the entity shall remain on DxF Non-Compliant List, if applicable.
- d. HCAI shall send notice to the entity of its determination within 10 business days of completing Section 2.c.
- e. Questions about the DxF Non-Required Signatory Attestation can be sent to: dxfsupport@hcai.ca.gov