



Data Exchange Framework Standard Operating Procedure: Statement of Extenuating Circumstances

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1. Introduction

California Assembly Bill (AB) 133 (2021) mandated that certain health care entities execute the Data Exchange Framework (DxF) Data Sharing Agreement (DSA).¹ HCAI is required to publish and keep current on its website the names of any known entities it deems to not be in compliance with the requirement to execute the DxF DSA.²

Entities may submit to HCAI a statement of extenuating circumstances which may impact the entity's ability to come into compliance. HCAI must publish these statements on the DxF website.³

This document outlines the HCAI Standard Operating Procedure (SOP) for processing the DxF Statement of Extenuating Circumstances submitted by entities.

¹ Cal. Health & Saf. § 130290(f).

² Cal. Health & Saf. § 130290(k)(2).

³ *Id.*

2. Procedure

- a. An entity submits a DxF Statement of Extenuating Circumstances using the form on the DxF website.
- b. HCAI reviews the entity-submitted DxF Statement of Extenuating Circumstances.
 - i. HCAI may review the statement to ensure no confidential patient information is included. If HCAI believes confidential patient information is included, HCAI will request that the entity revise the statement to remove such information.
 - ii. HCAI shall verify that the entity is required to execute the DSA based on the DxF Required Signatory Methodology and that the entity is out of compliance with the DxF requirement to execute the DxF DSA.
- c. Commencing January 1, 2027, HCAI shall publish the entity-submitted DxF Statement of Extenuating Circumstances, as is.
- d. Questions about the DxF Statement of Extenuating Circumstances can be sent to: [**dxfsupport@hcai.ca.gov**](mailto:dxfsupport@hcai.ca.gov)