



DSA Signatory Grants Management Guide

Updated January 2026

The Data Exchange Framework (DxF) was administered by the California Health & Human Services Agency (CalHHS) Center for Data Insights and Innovation (CDII) from July 2021 to July 2025. There are references to CDII throughout regarding historical activities completed by CDII. As of August 2025, administration of the DxF Program has transitioned to the California Department of Health Care Access and Information (HCAI).

This Data Sharing Agreement (DSA) Signatory Grants Management Guide (or the “Guide”) serves as a resource for organizations who have been awarded a DSA Signatory Grant beginning August 2023 through March 2026. DSA Signatory Grants were designed to help Signatories meet their DSA technical requirements and were used to support a range of permissible activities (e.g., onboarding to a Qualified Health Information Organization (QHIO); adjusting, upgrading, or adopting a certified EHR). The DSA Signatory Grants Program will end on March 31, 2026.

In this Guide, Grantees will find:

- Information on Progress Reporting requirements, Milestone achievement, and funds disbursement;
- Specific guidance for Technical Assistance (TA) and QHIO Onboarding Grantees, as well as entities responsible for managing large Umbrella Grants; and
- A reference sheet that outlines a timeline with all key deliverables, including Progress Report and Milestone achievement due dates.

Guide Sections

1. [Grant Management 101 \(Updated January 2026\)](#)
2. [DSA Signatory Grants \(Updated January 2026\)](#)
3. [TA Grants \(Updated October 2025\)](#)
4. [QHIO Onboarding Grants \(Updated January 2026 \)](#)
5. [Umbrella Grantee Guidance](#)
6. [Key Deliverable Due Dates](#)

Updated guidance may be disseminated in webinars, Guide updates, direct Grantee communications, or on the Grantee Center of the Data Exchange Framework (DxF) [webpage](#).

The DxF Program has partnered with Public Consulting Group (PCG) to provide hands-on support for Grantees. For questions, please contact DSAGrants@pcgus.com or call (866)698-6525.

DSA Signatory Grant Types

- **Technical Assistance Grants:** A “build-your-own-solution” pathway where Grantees identify a range of resources they will need to achieve their Outcome(s). Learn more on [page 6](#).
- **QHIO Onboarding Grants:** This is a pre-set, “assisted” pathway where Grantees can use funds to onboard to a QHIO. Learn more on [page 16](#).

What about Umbrella Grantees? If you are part of an Umbrella Grant, or managing one, please review the Umbrella Grantee Guidance section on [page 21](#) for additional guidance.

1. Grant Management 101

The DxF Program understands that Grantees have questions about their Grant. In addition to the section-specific guidance, you will find answers to a few common questions below:

DxF Grants Portal

- **What is the DxF Grants Portal?** The [DxF Grants Portal](#) is where Grantees can find documentation needed for managing their DSA Signatory Grant (e.g., application, Progress Report forms, Milestone attestation forms) and submitting all of their Progress Reports.
- **Is the DxF Grants Portal the same as the DSA Signing Portal?** No. The DxF Grants Portal is different from the [DSA Signing Portal](#). The DSA Signing Portal is used by organizations to sign the DSA and indicate their methods of exchange in the Participant Directory.

Receiving Grant Funds

- **How do QHIO Onboarding Grantees receive grant dollars?** Grantees chosen QHIO will receive their grant dollars directly after the achievement of a Milestone. Grantees do not need to submit banking information. Learn more about QHIO responsibilities on [page 16](#).
- **How do TA Grantees receive grant dollars?** Grantees must first submit their banking information through PCG's Billing and Claiming (BAC) System. Once a Grantee's banking information is submitted, they will be able to receive grant funds after the achievement of a Milestone. If a Grantee did not receive an email from HUSData@pcgus.com with a link to the BAC system, please reach out to the PCG Help desk for assistance (DSAGrants@pcgus.com or call (866) 698-6525). **Can Umbrella Grantees receive multiple partial payments for DSA Signatories that achieve Milestones at different timeframes?** All DSA Signatories under an Umbrella Grant must achieve a Milestone before grant funds can be disbursed. Grant funds will only be disbursed twice in a grant.

Progress Reports

- **When are Progress Reports Due?** Progress Reports are located in the DxF Grants Portal and are due before the end of every quarter, starting June 30, 2024. Grantees (or a chosen QHIO) must provide an update on the status of their Grant or attest to a Milestone (which would trigger a payment).
- **When can I stop providing a progress report?** Once a Grantee has received payment for Milestone 2, Progress Reports are no longer required.
- **(New January 2026) When is the last quarterly Progress Report to receive funding due?** The DSA Signatory Grants Program will end on March 31, 2026. All Progress Reports

indicating achievement of a Milestone must be submitted by March 31, 2026. If a Milestone is approved, payment will be disbursed by April 30, 2026, unless HCAI requests a revision. Grantees or their selected QHIO who do not submit all Milestone Progress Reports by this date will no longer be eligible to receive any undisbursed grant funds.

- **(New January 2026) What happens if a Grantee does not achieve Milestone 2 by March 31, 2026?** The DxF Program will terminate the grant award of all Grantees where the Grantee or their selected QHIO fails to submit a Progress Report indicating achievement of a Milestone by the end of the DSA Signatory Grants Program on March 31, 2026 or if the Grantee or their selected QHIO fails to submit a revised Progress Report that successfully demonstrates completion of a Milestone by May 15, 2026.

Milestones Achievement Requirements

- **How do I attest to a Milestone?** Grantees must sign and submit Milestone attestations and/or supporting documents to attest that they have either secured resources (Milestone 1) or achieved their Outcome(s) (Milestone 2). To attest to a Milestone, download the Milestone attestation form from the DxF Grants Portal, complete, and upload back onto the portal.
- **How do I know if my submission meets Milestone documentation requirements?** PCG reviews all submitted documentation and will contact Grantees if any of their submitted information requires correction or clarification.
- **Can I submit more than one Milestone attestation within a given quarter?** If a Grantee would like to attest to both Milestones within a single Progress Reporting period, please reach out to the PCG Help desk for assistance (DSAGrants@pcgus.com or call (866) 698-6525).

2. DSA Signatory Grants

DSA Signatory Grant Types

Technical Assistance Grants: A “build-your-own-solution” pathway.

- ❑ Grantees identify a range of Grant resources they will need to achieve their chosen Outcome(s).
- ❑ Grantees directly receive and manage Grant funds.

QHIO Onboarding Grants: This is a pre-set, “assisted” pathway.

- Grantees onboard to a QHIO in order to meet their DSA requirements.
- The Grantee’s chosen QHIO receives and manages Grant funds based upon an agreed use of funds between the Grantee and QHIO.

Progress Reporting Requirements

A Progress Report must be submitted on a quarterly basis on behalf of every DSA Signatory Grant. Progress Reports are accepted and reviewed by PCG on a quarterly basis starting the second calendar quarter of 2024. Each Progress Report will be brief, and collect one or more of the following pieces of information:

- ❑ **Demonstration of a Milestone completion**
Grantees will receive 50% of award amount upon the complete of a Milestone. Please see the TA or QHIO Onboarding Grant sections for specific Milestone guidance.
- ❑ **Brief update on ongoing work to achieve Milestone completion**
If a Grantee does not need to report a Milestone achievement, they will only be required to provide an update on ongoing work.
- ❑ **Reason for reaching the Milestone 1 deadline without achieving Milestone 1**
A Grantee must provide a reason for why they failed to achieve Milestone 1 by the deadline and their plans to achieve it.
- ❑ **Reason for reaching the Milestone 2 deadline without achieving Milestone 2**
A Grantees must provide a reason for why they failed to achieve Milestone 2 by the deadline
- ❑ **A change request for the TA Grant Outcome(s)**
A Grantee can request to change their chosen Outcomes.
- ❑ **A change request for QHIO Onboarding Grant**
A Grantee can request to change from a QHIO Onboarding Grant to a TA Grant, if they have not yet achieved Milestone 1. After receiving Milestone 1 payment, Grantees may switch QHIO, if both parties agree to the change and signed, written documentation is submitted to the DxF in a Progress Report within seven (7) business days of the agreement.

How are Funds Disbursed?

Milestone 1 = 50% of Award Amount
Milestone 2 = 50% of Award Amount

(New January 2026) 2026 Final Progress Reports to Receive Funding

The DSA Signatory Grants Program will end on March 31, 2026. All Progress Reports indicating achievement of a Milestone must be submitted by March 31, 2026. If a Milestone is approved,

payment will be disbursed by April 30, 2026, unless HCAI requests a revision. Grantees or their selected QHIO who do not submit all Milestone Progress Reports by this date will no longer be eligible to receive any undisbursed grant funds.

If the DxF Program requests a revision to a Milestone Progress Report, PCG will notify the Grantee or their selected QHIO to provide additional information or supporting documents. Grantees or their selected QHIO will have no later than May 15, 2026 to submit a revised Progress Report. If a Milestone is approved, payment will be disbursed no later than May 31, 2026. If the Grantee or their selected QHIO does not successfully demonstrate completion of a Milestone after submitting the revised Progress Report or does not submit a revised Progress Report within the requested timeframe, the Grantee will no longer be eligible to receive any undisbursed grant funds.

The DxF Program will terminate the grant award of all Grantees where the Grantee or their selected QHIO fails to submit a Progress Report indicating achievement of a Milestone by the end of the DSA Signatory Grants Program on March 31, 2026 or if the Grantee or their selected QHIO fails to submit a revised Progress Report that successfully demonstrates completion of a Milestone by May 15, 2026.

Funds Disbursement

If a Progress Report indicates that a Grantee has achieved a Milestone, **the DxF Program intends to disburse that Milestone's funding to Grantees or their QHIO within one month (30 or 31 days) of that specific Progress Report's due date.**

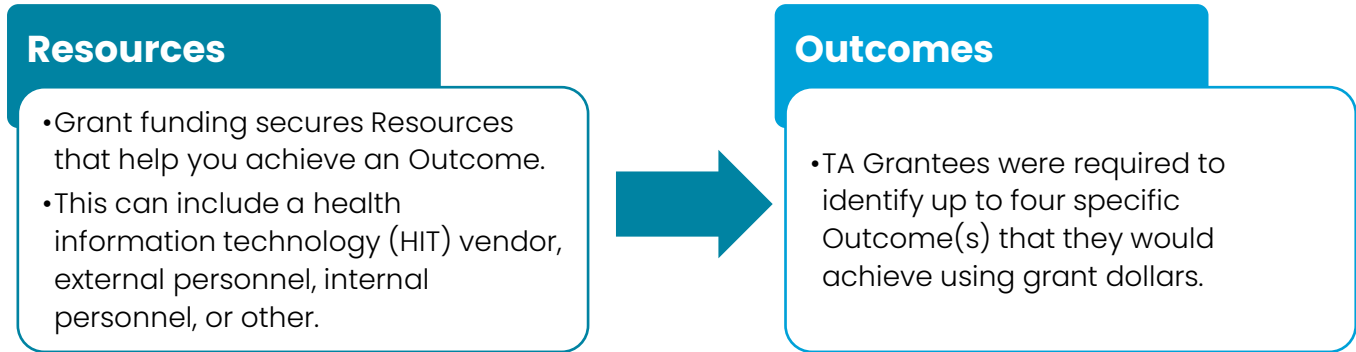
(New January 2026) Voluntary Termination

Grantees may choose to voluntarily terminate their grant award if they decide that they do not want to continue with the grant program. If a Grantee terminates their grant award, the Grantee must inform the DxF Program at DxFGrants@hcai.ca.gov of their termination decision. The DxF Program will provide the Grantee with the DSA Signatory Grants Notice of Termination to sign. Once signed, the DxF Program will terminate the grant application in the DxF Grants Portal and rescind the undisbursed funds. The Grantee will no longer be eligible to receive the previously awarded undisbursed funds and will not be required to complete the DSA Signatory Grants Program.

3. Technical Assistance Grants *(Updated October 2025)*

TA Grantees can use funding to subsidize a range of Resources needed to meet DSA requirements. Grantees were required to identify the types of **Resources** they would use grant funds towards in their grant application, and how it would achieve their chosen **Outcome(s)**.

Two key concepts in this section are:



TA Grant: Permissible Uses, Impermissible Uses, and Milestones

The TA Grant’s permissible funding categories are designed so that the permissible uses of **Resources align with each of the four TA Outcomes**. Grantees can use their grant dollars on a variety of Resources, as long as they support their selected Outcome(s). In order to meet Milestone 2, Grantees must achieve all of their chosen Outcome(s).

Impermissible Uses for TA Grant

Grantees **may not** use TA Grant Funding for activities that do not support Signatories in achieving their DSA requirements. They also cannot use funding for activities that do not establish data exchange with other health and social services organizations or for activities completed under other grant programs (e.g., CalHOP). Additionally, the funding cannot be used for activities other than those specified in their Application, nor for ongoing subscription or recurring costs associated with a previously acquired electronic documentation system, a QHIO, or other health information technology (IT) systems. However, the DxF Program will accept QHIO participation fees in association with an upgraded service and subscription fees indicating adoption of an EHR or other electronic records systems.

All TA Grantees are required to submit quarterly Progress Reports through the [DxF Grants Portal](#) under “My Applications.”

While most Progress Reports will provide the DxF Program with an update on a Grantee’s progress, Grantees can also attest to a Milestone achievement through their Progress Report. Milestone Attestation templates are available in the Progress Reports.

1. **Milestone 1:** Resources have been procured that will account for at least 50% of the budgets. To demonstrate this Milestone, Grantees will need to provide:

- ✓ Attestation confirming that a contract for Resources such as HIT vendors or external/internal personnel has been procured.

What does “procure” mean?

To acquire the necessary resources or services. This can mean that you already have a signed contract or agreement in place.

2. **Milestone 2: ALL** Outcomes chosen by the Grantee in their application have been

achieved. To demonstrate this Milestone, Grantees will need to provide:

- ✓ An attestation co-signed by the Grantee and the DSA Signatory(s) on the Grant (if different from the Grantee), confirming that all chosen Outcome(s) have been completed. The Grantee and DSA Signatory(s) signing the attestation must be the same individual(s) who signed the DSA or Grant Application. If the same individual(s) cannot sign the attestation, the DxP Program may consider an alternate representative acceptable, the Grantee can provide an explanation (not to exceed 100 words) for why the attestation cannot be signed by the same individual who signed the DSA. In addition, the explanation must provide confirmation that the alternate representative has authority to attest to the work completed on the form; **AND**
- ✓ The required attestations or supporting documentation as it relates to the Grantee's chosen Outcome(s). **See next section on TA Milestone 2 Outcome 1-4.**

If the DxP Program or PCG is unable to clearly determine that a submitted document meets an Outcome, they may contact the Grantee for a revision request. To respond to a revision request, a Grantee must resubmit a revised Progress Report with either new documentation or a narrative in the comment box explaining how the original documentation demonstrated evidence of the outcome's completion. Failure to respond to a revision request within the timeframe provided by the DxP Program or PCG may result in the termination of a Grantee's award.

If a revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone and the revised Progress report was submitted within 15 calendar days after the Progress Report's due date, the DxP Program intends to disburse that Milestone's funding by the Progress Report's original payment date in the [Progress Report Due Dates table](#). If the revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone, but the revised Progress Report was submitted after 15 calendar dates after the Progress Report's due date, then the DxP Program intends to disburse that Milestone's funding no later than the following quarterly Progress Report's payment date in the [Progress Report Due Dates table](#).

TA Grant Milestone 2 Outcome 1 (Updated October 2025)

Outcome 1 definition: Identifying and Contracting with a Technology Solution that Will Help Them Achieve Real-Time Data Exchange in Accordance with the DxF.

Permissible Uses: TA Grantees may use funds to pay for a Resource that will help them with any of the following:

- ✓ Conducting a gap analysis to identify the steps needed to meet DSA requirements;
- ✓ Assessing and selecting technology solutions that could address those gaps (which may include a QHIO or another HIE solution; it may also include an Electronic Record System if the Signatory does not already have a system that can be configured for real-time data exchange);
- ✓ Contracting with technology vendor(s) that would achieve some or all of a Signatory's DSA requirements; or
- ✓ Other activities associated with procuring a technology solution that would achieve some or all DSA requirements.

Proof of Outcome 1 Documents: Grantees shall submit **ONE** of the following supporting documents to demonstrate completion of Outcome 1:

- Copy of a signed contract with a HIT vendor and a narrative describing how this contract has helped the Grantee achieve real-time data exchange in accordance with the DxF; or
- Copy of completed technology solutions assessment.

TA Grant Milestone 2 Outcome 2 (Updated October 2025)

Outcome 2 definition: Implementing a Technology Solution Capable of Supporting Real-Time Data Exchange in Accordance with the DxF.

Permissible Uses: TA Grantees may use funding to pay for Resources to implement a technology solution that establishes real-time data exchange needed by the DSA. Solutions may include, but are not limited to, QHIOs or HIOs that have not been qualified by the DxF Program but will support the Grantee in achieving DSA requirements. Costs may include the following:

- ✓ Costs for the Signatory to retain a technology consultant or IT staff to onboard the technology;
- ✓ Costs paid to a technology vendor to fund implementation of a technology solution that enables real-time data exchange as required by the DSA; or
- ✓ Costs paid to the Signatory's existing Electronic Record System (i.e., an EHR for a health care organization) to interface with another technology solution.

Funding may not be used to pay for ongoing fees or subscriptions to previously acquired systems; except as noted in the Impermissible Uses of TA Grants section above.

Proof of Outcome 2 Documents: Grantees shall submit **ONE** of the following supporting documents to demonstrate completion of Outcome 2:

- DSA Signatory Grants Outcome 2 attestation form signed by the Grantee and HIT vendor. The Grantee and DSA Signatory(s) signing the attestation must be the same individual(s) who signed the DSA or Grant Application. If the same individual(s) cannot sign the attestation, the DxF Program may consider an alternate representative acceptable, the Grantee can provide an explanation (not to exceed 100 words) for why the attestation cannot be signed by the same individual who signed the DSA. In addition, the explanation must provide confirmation that the alternate representative has authority to attest to the work completed on the form;
- Attestation from a HIT vendor confirming completion of integration with EHR;
- An invoice with line-item description of subscription fee or maintenance and support, if the fee is associated with the first year of onboarding to a technology for real-time data exchange;

- Invoice, work or sales order, or order form demonstrating technology implementation. This document must include a line-item description demonstrating implementation of a solution (e.g., HIE Set Up Fee, Integration Fee, and ADT Fee) or procurement of new hardware and equipment (e.g., servers, desktops, and laptops) that supports exchange in accordance with the DxF;
 - Employment offer letter for DxF implementation (e.g., EHR Project Manager);
 - Audit log demonstrating data exchange transactions from the newly implemented technology solution including date and event type¹, or
 - Written documentation² – such as a screenshot or excerpt from a data file or database – demonstrating that the completion of a real-time data exchange transaction for each Instance included in the Grant, in a production (i.e., non-test) environment and a narrative of the screenshot or excerpt explaining which transaction it demonstrates and how it demonstrates a real-time data exchange transaction. Screenshots and excerpts must redact or remove ALL patient information (e.g., name, patient ID, date of birth, address, diagnosis, prescriptions or lab results). Screenshots may include, but are not limited to:
 - i. EHR or web-based portal demonstrating the result of the data being exchanged; and/or
 - ii. An audit log from your QHIO, HIO, EHR, or other record of the successful exchange.
- b. If your screenshot demonstrates that you are **sending data** to an entity, you must provide a narrative explaining the following in the comment box:
- i. Who are you sending the data to?
 - ii. How are you sending the data?
 - iii. What data is being sent? (e.g., patient health record, continuity of care document or summarization of episode note. Exclude all patient information.)
 - iv. Date the data was sent.
- c. If your screenshot demonstrates that you are **retrieving the data** from an entity, you must provide a narrative explaining the following in the comment box:
- i. Who are you retrieving the data from?
 - ii. How are you retrieving the data?
 - iii. What data is being retrieved? (e.g., patient health record, continuity of care document or summarization of episode note. Exclude all patient information.)
 - iv. Date the data was received.

¹ Do not include any health information, personally identifiable information, other otherwise confidential information.

² Do not include any health information, personally identifiable information, other otherwise confidential information.

The following are examples of supporting documents that may result in a revision request from the DxF Program or PCG:

- Incomplete DSA Signatory Grants Outcome 2 attestation form without required signatures;
- Attestation letter from the Grantee without the HIT vendor's signature;
- Invoice with line-item description for previously acquired systems' subscription fee or maintenance and support;
- Email from a HIT vendor describing the status of the implementation;
- Screenshot of a portal with patient information; or
- Screenshot which demonstrates access to the portal but does not show evidence of data exchange.

TA Grant Milestone 2 Outcome 3 (Updated October 2025)

Outcome 3 definition: Adjusting, Upgrading, or Adopting a Certified EHR or Other Electronic Record System Required to Enable Real-Time Data Exchange in Accordance with the DxF.

Permissible Uses: Some organizations will not have certified EHR technology or other Electronic Record Systems that can be configured for real-time data exchange needed by the DSA. For such Signatories, TA grant funding may be used to fund Resources that support the following activities:

- ✓ Updating the configuration of an Electronic Record System if doing so is required in order to establish real-time data exchange;
- ✓ Paying for the initial costs of adding new modules or functionality to an Electronic Record System if doing so is needed to establish real-time data exchange; or
- ✓ Adopting a new Electronic Record System if doing so is needed to support real-time data exchange.

Funding may not be used to pay for ongoing fees or subscriptions to previously acquired systems; except as noted in the Impermissible Uses for TA Grants section above.

Proof of Outcome 3 Documents: Grantees shall submit **ONE** of the following supporting documents to demonstrate completion of Outcome 3:

- DSA Signatory Grants Outcome 3 attestation form signed by the Grantee and a HIT vendor. The Grantee and DSA Signatory(s) signing the attestation must be the same individual(s) who signed the DSA or Grant Application. If the same individual(s) cannot sign the attestation, the DxF Program may consider an alternate representative acceptable, the Grantee can provide an explanation (not to exceed 100 words) for why the attestation cannot be signed by the same individual who signed the DSA. In addition, the explanation must provide confirmation that the alternate representative has authority to attest to the work completed on the form;
- Attestation from a HIT vendor confirming that the EHR was upgraded to a new version and established real-time data exchange;
- An invoice with line-item description of subscription fee or maintenance and support, if the fee is associated with the first year of onboarding to a technology for real-time data exchange;
- An invoice, work or sales order, or order form. This document must include a line-item description demonstrating adjustment, upgrade, or adoption of the EHR (e.g., HL7 FHIR API License, new ADT and CCDA outbound feature, or QHIO integration); or
- Contract with a HIT vendor demonstrating adoption of an EHR.

The following are examples of supporting documents that may result in a revision request from the DxF Program or PCG:

- ❑ Incomplete DSA Signatory Grants Outcome 3 attestation form without required signatures;
- ❑ An invoice with line-item description for previously acquired systems' subscription fee or maintenance and support;
- ❑ Order form with subscription fees as proof of adoption of a new EHR or other electronic records system unless Grantee demonstrates the subscription fee indicates adoption of EHR or other electronic records system; or
- ❑ Email from a HIT vendor describing the status of the implementation.

TA Grant Milestone 2 Outcome 4 (Updated October 2025)

Outcome 4 definition: Creating and Providing Training for New Operational and Clinical Workflows Required to Complete Real-Time Data Exchange in Accordance with the DxF.

Permissible Uses: Signatories may use TA funding for Resources that support workflow redesign and training activities to enable implementation and use of technologies for data exchange, including the following:

- ✓ Costs for a consultant or expert to develop and help implement workflows that support electronic health information exchange as needed by the DxF; or
- ✓ Other costs associated with creating such workflows and trainings.

Proof of Outcome 4 Documents: Grantees shall submit **ONE** of the following supporting documents to demonstrate completion of Outcome 4:

- Copy of final training and/or technical assistance materials. This material may be created by the Grantee or a HIT vendor (e.g., HIT vendor's User Guide, training manual, training video or workflows). Procedural workflow with screenshots of a portal should not include patient information. Please redact or remove ALL patient information before submitting;
- Agenda or outline of a training session required to complete real-time data exchange in accordance with the DxF;
- Attestation from a HIT vendor attesting that the Grantee has completed training to implement the technology;
- Invoices demonstrating a Grantee's staff have completed training for real-time data exchange; or
- Email confirmation from a HIT vendor that training has been completed.

The following are examples of supporting documents that may result in a revision request from the DxF Program or PCG:

- Email confirmation from a HIT vendor that training has been scheduled.

TA Grant: Progress Reports and Payments

A TA Grantee's Progress Report must be submitted on a quarterly basis. Required Progress Reports are accepted and reviewed by PCG on a quarterly basis starting the second calendar quarter of 2024. Each Progress Report will be brief, and collect one or more of the following pieces of information:

- Demonstration of a Milestone completion.**
- Brief update on ongoing work to achieve Milestone completion.**
- Reason for reaching the Milestone 1 deadline without achieving Milestone 1.**
- Reason for reaching the Milestone 2 deadline without achieving Milestone 2.**
- A change request for the TA Grant Outcome(s).**

What about Umbrella TA Grantees? If you are part of an Umbrella Grant, or managing one on behalf of multiple signatories, please review the Umbrella Grant section on [page 21](#) for additional guidance.

TA Funds Disbursement

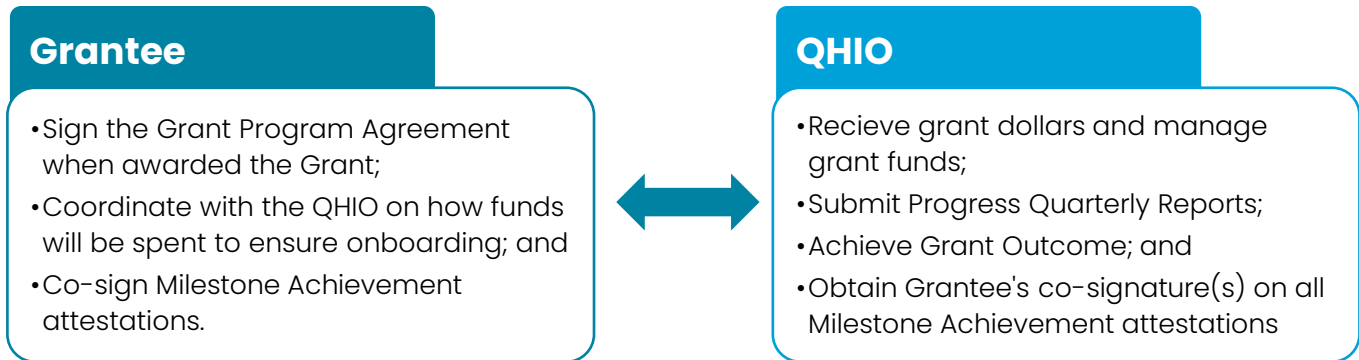
If a TA Grantee indicates in a Progress Report that they have achieved a Milestone, the DxF Program intends to disburse that Milestone's funding to Grantees within one month (30 or 31 days) of that specific Progress Report's due date.

If a revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone and the revised Progress report was submitted within 15 calendar days after the Progress Report's due date, the DxF Program intends to disburse that Milestone's funding by the Progress Report's original payment date in the [Progress Report Due Dates table](#). If the revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone, but the revised Progress Report was submitted after 15 calendar dates after the Progress Report's due date, then the DxF Program intends to disburse that Milestone's funding no later than the following quarterly Progress Report's payment date in the [Progress Report Due Dates table](#).

4. QHIO Onboarding Grants *(Updated October 2025)*

The QHIO Onboarding Grant is for the purpose of onboarding one or more Signatories to a QHIO. Funding goes **directly** to the Grantee's selected QHIO to manage on behalf of the Grantee. The Grantee's selected QHIO is responsible for submitting Progress Reports, and meeting their assigned grant Outcome: Successful completion of QHIO Onboarding and completion of a real-time data transaction through the QHIO.

Role of the Grantee vs. QHIO



QHIO Onboarding Grant: Permissible Uses, Impermissible Uses, and Milestones

The permissible funding categories for the QHIO Onboarding Grant are designed so that they match up with the Grant domain's intended Outcome: onboarding to a QHIO. The QHIO and the Grantee must mutually agree on how funds will be spent to ensure successful onboarding.

Impermissible Uses for QHIO Onboarding Grant

Grantees **may not** use QHIO Onboarding Grant Funding for ongoing HIE operations, onboarding to a non-qualified HIO, or connecting to multiple QHIOs..

Grantees may be permitted to switch from their originally selected QHIO to a different QHIO after achieving Milestone 1 but before reaching Milestone 2, provided both the Grantee and the originally selected QHIO both agree to the change. Written documentation of the agreement to allow a Grantee to switch to another QHIO must be signed and submitted to the DxF Program in a Progress Report within seven (7) calendar days of the agreement. Grantees who choose this path may only have half the award amount to onboard with a new QHIO.

1. **Milestone 1:** Grantee has signed a contract or contract amendment with a QHIO for all the Signatories included in the Grant. To demonstrate this Milestone, Grantees will need to provide:

- ✓ Attestation confirming that a contract or contract amendment has been signed.
2. **Milestone 2:** The QHIO has successfully onboarded all Signatories in the Grant and completed a real-time data exchange transaction. To demonstrate this Milestone, Grantees will need to provide:

QHIO Onboarding Grantees who have not yet indicated their chosen QHIO on the DxF Grants Portal have until their Milestone 1 deadline to notify PCG of their preferred QHIO and contract with a QHIO. Grantees will be responsible for completing their own Progress Reports until they have selected a QHIO.

- ✓ An attestation co-signed by the QHIO, the Grantee, and the DSA Signatory (s) on the Grant (if different from the Grantee) confirming that onboarding has been completed. The Grantee and DSA Signatory(s) signing the attestation must be the same individual(s) who signed the DSA or Grant Application. If the same individual(s) cannot sign the attestation, the DxF Program may consider an alternate representative acceptable, the Grantee can provide an explanation (not to exceed 100 words) for why the attestation cannot be signed by the same individual who signed the DSA. In addition, the explanation must provide confirmation that the alternate representative has authority to attest to the work completed on the form; **AND**
- ✓ Written documentation demonstrating the completion of a real-time data exchange transaction for each Instance³ included in the Grant, in a production (i.e., non-test) environment. **See next section on QHIO Onboarding Grant Milestone 2 Outcome.**

If the DxF Program or PCG is unable to clearly determine that a submitted document meets the outcome, they may contact the Grantee for a revision request. To respond to a revision request, a Grantee must resubmit the Progress Report with new documentation or a narrative in the comment box explaining how the original documentation demonstrated evidence of the outcome's completion. Failure to respond to a revision request within the timeframe provided by the DxF Program or PCG may result in the termination of a Grantee's award.

If a revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone and the revised Progress report was submitted within 15 calendar days after the Progress Report's due date, the DxF Program intends to disburse that Milestone's funding by the Progress Report's original payment date in the [Progress Report Due Dates table](#). If the revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone, but the revised Progress Report was submitted after 15 calendar dates after the Progress Report's due date, then the DxF Program intends to

³ Reminder: an instance represents a single and unique configuration for an EHR or otherwise - that may exist within and/or across multiple DSA Signatories under a Grant.

disburse that Milestone’s funding no later than the following quarterly Progress Report’s payment date in the [Progress Report Due Dates table](#).

QHIO Onboarding Grant Milestone 2 Outcome (Updated October 2025)

Outcome definition: The QHIO has successfully onboarded all Signatories in the Grant and completed a real-time data exchange transaction.

Permissible Uses: QHIOs and Grantees must mutually agree on how funds will be spent to ensure successful onboarding to the QHIO. QHIO Onboarding Grants may be used for one or more of the following:

- **Offset QHIO Costs:** Grant funding can be used to help cover QHIO fees and other QHIO costs associated with onboarding, which may include:
 - ✓ The QHIO's costs to connect to a DSA Signatory's EHR or other Electronic Record System (i.e., initial QHIO fees); or
 - ✓ The QHIO's costs to develop capabilities to perform the health information exchange (HIE) capabilities outlined in the DSA and its P&Ps.
- **Offset Signatory Costs:** Grant funding can be used to cover Signatory costs associated with onboarding, which may include:
 - ✓ Configuration costs for the DSA Signatory's EHR or other electronic documentation system to enable their connection to the QHIO (i.e., fees paid to the EHR vendor); or
 - ✓ The DSA Signatory's cost to retain an IT personnel resource for onboarding.

Proof of Outcome Documents:

- Written documentation— such as a screenshot or excerpt from a data file or database⁴— demonstrating the completion of a real-time data exchange transaction for each Instance included in the Grant, in a production (i.e., non-test) environment⁵ and a narrative of the screenshot or excerpt explaining which transaction it demonstrates and how it demonstrates the real-time data exchange transaction. Screenshots and excerpts must redact or remove ALL patient information (e.g., name, patient ID, date of birth, address, diagnosis, prescriptions or lab results). Screenshots may include, but are not limited to:
 - i. Portal interface demonstrating the result of the data being exchanged; and/or
 - ii. An audit log or other record of the successful exchange.
- a. If your screenshot demonstrates that you are **sending data** to an entity, you must provide a narrative explaining the following in the comment box:
 - i. Who are you sending the data to?
 - ii. How are you sending the data?
 - iii. What data is being sent? (e.g., patient health record, continuity of care document or summarization of episode note. Exclude all patient information.)
 - iv. Date the data was sent.
- b. If your screenshot demonstrates that you are **retrieving the data** from an entity, you must provide a narrative explaining the following in the comment box:
 - i. Who are you retrieving the data from?
 - ii. How are you retrieving the data?
 - iii. What data is being retrieved? (e.g., patient health record, continuity of care document or summarization of episode note. Exclude all patient information.)
 - iv. Date the data was received.

QHIO Onboarding Grant: Progress Reports & Payments

QHIOs are required to take on all grant-related administrative tasks, including the submission of quarterly Progress Reports through the [DxF Grants Portal](#), found under “My Applications.”

Designated QHIO staff should create DxF Grants Portal accounts. These accounts will be linked to all Applications for whom the QHIO is the vendor selected by the relevant Grantee.

⁴ The submission of proof for real-time output must not include ANY patient information.

⁵ The DxF Program understands that there may be situations in which it is impossible to onboard a Signatory included in the original Application. For example, a Signatory may shut down operations during the grant period. The DxF Program and PCG will provide an opportunity for QHIOs to explain situations in which they were unable to onboard all Signatories originally included in the grant.

Grantees should reach out to PCG if they have questions on how to utilize the Manage Applicants features. Once QHIO staff are added, they may navigate the DxF Grants Portal as any other Grantee would, though they should anticipate having access to multiple applications to manage.

While most Progress Reports will simply provide the DxF Program with an update on a Grantee's progress, QHIOS and Grantees can also attest to a Milestone achievement through their Progress Report. Milestone Attestation templates are available in the Progress Reports.

A QHIO Onboarding Grantee's Progress Report must be submitted on a quarterly basis by their chosen QHIO. Required Progress Reports are accepted and reviewed by PCG on a quarterly basis starting the second calendar quarter of 2024. Each Progress Report will be brief, and collect one or more of the following pieces of information:

- Demonstration of a Milestone completion.**
- Brief update on ongoing work to achieve Milestone completion.**
- Reason for reaching the Milestone 1 deadline without achieving Milestone 1.**
- Reason for reaching the Milestone 2 deadline without achieving Milestone 2.**
- A change request to convert from a QHIO Onboarding Grant to a TA Grant (only available prior to Milestone 2 achievement).**
- A change request to switch selected QHIO (only available prior to Milestone 2 achievement).**

What about Umbrella QHIO Onboarding Grantees? If you are part of an Umbrella Grant, or managing one on behalf of multiple signatories, please review the Umbrella Grant section on [page 21](#) for additional guidance.

QHIO Onboarding Grant Funds Disbursement

If a QHIO and Grantee indicates in a Progress Report that they have achieved a Milestone, the DxF Program intends to disburse the Milestone funding to the QHIO within one month (30 or 31 days) of that specific Progress Report's due date. It is the responsibility of the Grantee to determine how the QHIO will use these dollars to meet DSA requirements.

If a revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone and the revised Progress report was submitted within 15 calendar days after the Progress Report's due date, the DxF Program intends to disburse that Milestone's funding by the Progress Report's original payment date in the [Progress Report Due Dates table](#). If the revised Progress Report successfully demonstrates that a Grantee has achieved a Milestone, but the revised Progress Report was submitted after 15 calendar dates after the Progress Report's due date, then the DxF Program intends to disburse that Milestone's funding no later than the following quarterly Progress Report's payment date in the [Progress Report Due Dates table](#).

5. Umbrella Grantee Guidance

This section provides specific guidance for Umbrella Grantees that represent multiple DSA Signatories. These Grantees could be the primary DSA Signatory on the Grant representing multiple subordinate signatories (e.g., large hospital system), or a third-party representative (e.g., an association, HIT vendor, or HIO) who applied on behalf of DSA Signatories and is tasked with managing all grant administration for either their chosen TA or QHIO Onboarding Grant.

In the event that an Umbrella Grantee representing multiple signatories has one or more Signatories drop out or fail to complete Milestones, the Grantee should notify PCG before submitting their Progress Report. The DxF Program will review the Grantee’s progress on a case-by-case basis and reserves the right to reduce the overall award amount or recoup the Milestone funds already disbursed to the Grantee accordingly.

Umbrella Grant Implications on Grant Requirements

Grant Requirements	TA Grant	QHIO Onboarding Grant
Progress Reports	<ul style="list-style-type: none"> All Signatories must have chosen the same grant Outcome(s). 	<ul style="list-style-type: none"> All Signatories must onboard to the same QHIO.
Milestone 1	<ul style="list-style-type: none"> All Signatories on the grant must achieve Milestone 1 before it is considered complete. Grantee must procure resources that account for 50% of the global grant budget to reach Milestone 1. 	<ul style="list-style-type: none"> All Signatories must have a contract or contract amendment in place with the same QHIO. Grantee may develop multiple contracts for Signatories on the Grant, but they must all be with the same QHIO, and they must cover all Signatories in order to reach Milestones 1.
Milestone 2	<ul style="list-style-type: none"> All Signatories must achieve the chosen Outcome(s) Documentation of Milestone 2 must be provided for all Signatories on the grant. 	<ul style="list-style-type: none"> All Signatories must successfully completed onboarding to the same QHIO. Documented proof of onboarding must be provided for all Signatories on the grant.

Milestone Attestation Form Requirements for Umbrella Grantees

Type of Progress Report	TA Grantee	QHIO Grantee
Progress Report for Non-Milestones <i>No attestation form required.</i>	<ul style="list-style-type: none"> Progress Report signed and submitted by TA Grantee Only 	<ul style="list-style-type: none"> Progress Report signed and submitted by Grantee or QHIO Only
Progress Report for ANY Milestone <i>Attestation form required.</i>	<ul style="list-style-type: none"> Milestone attestation signed and Progress Report submitted by TA Grantee Milestone attestation Co-signed by all DSA Signatory(s) Milestone 2 Outcomes 2 and 3 also require attestation to be signed by the HIT vendor. 	<ul style="list-style-type: none"> Milestone attestation signed and Progress Report submitted by QHIO Milestone attestation signed by QHIO Onboarding Grantee Milestone attestation co-signed by all DSA Signatory(s)

6. DSA Signatory Grants: Key Deliverable Due Dates

Progress Report Due Dates

Progress Report Due Date	Estimated Payment Date for Reports Attesting to a Milestone
June 30, 2024	July 31, 2024
September 30, 2024	October 31, 2024
December 31, 2024	January 31, 2025
March 31, 2025	April 30, 2025
June 30, 2025	July 31, 2025
September 30, 2025	October 31, 2025
December 31, 2025	January 31, 2026
March 31, 2026	April 30, 2026

Milestone Achievement Deadlines (By Grant Cohort)

Grant Cohort	Application Submission Period	Milestone 1 Deadline	Milestone 2 Deadline
Round 1 Grantees	May 16, 2023 – June 16, 2023	December 31, 2024	December 31, 2025
Round 2 Grantees	June 30, 2023 – September 1, 2023	December 31, 2024	December 31, 2025
Round 3 Grantees	October 16, 2023 – December 20, 2023	March 31, 2025	March 31, 2026

Grantees can determine their grant cohort and Milestone deadline by referencing the date in which their grant application was submitted, and the application submission period of each Round found on the DxF Grants Portal.

Questions?

- Questions on billing, claiming, and Progress Reports can be sent to DSAGrants@pcgus.com or call (866)698-6525.
- Questions on the DxF more broadly can be provided to DxF@hcai.ca.gov
- DxF-DSA Signatory Grants Landing Page: <https://dxf-dsagrants.com/>
- DxF Grants Log-in Portal: <https://apply.yourcausegrants.com/apply/auth/signin>