



QHIO Program Guide

September 2025

Purpose

This document provides a high-level overview of the Qualified HIO Program, or "QHIO Program", and describes the requirements of Qualified Health Information Organizations (Qualified HIOs or QHIOs). The QHIO Program may reference additional details found in the QHIO Program section of the [DxF Resource Library](#). In the event of a conflict between this document and other QHIO Program requirements specified by the DxF Program, this document shall control unless explicitly stated otherwise. All capitalized terms shall have the same meaning as the [DxF Glossary of Defined Terms](#).

Becoming a QHIO

The QHIOs are organizations that were qualified through an attestation application process via a public [2023 QHIO Application opportunity](#). To maintain qualified status, each QHIO must meet and continue to meet the requirements attested to in each QHIO's submitted 2023 application as well as any additional QHIO Program requirements referenced within this document. In future years, California Department of Health Care Access and Information (HCAI) may open new application opportunities that may result in new QHIOs being named.

QHIO Requirements

The QHIO requirements are described below. When applicable, the corresponding [2023 QHIO Application](#) question number has been included for reference. Readers should refer to the 2023 QHIO Application for further details on a requirement or the [DxF FAQs](#) for clarifications on QHIO requirements.

DSA & Participant Directory Participation

- Maintain an executed DxF Data Sharing Agreement (DSA) and comply with the DSA and its Policies and Procedures (P&Ps). (QHIO Application A.7)

- Maintain participant agreements that do not conflict with the DSA or its P&Ps. (QHIO Application A.8)
- QHIOs who contract with third parties to transmit and/or manage HSSI to share data under the DxF must have valid and enforceable written service agreements that do not conflict with the DSA or its P&Ps. (QHIO Application A.9)
- Complete the Participant Directory and assist HCAI in outreach and education to their clients who may require Participant Directory support.
 - *Note: For information on how to complete the Participant Directory please see the [Participant Directory P&P](#), the [Participant Directory How to Guide](#), or the [Participant Directory Quick Start How to Guide](#). Otherwise, reach out to dxf@chhs.ca.gov for additional assistance.*

Collaboration with HCAI and Communication Practices

- Cooperate with HCAI on DxF communications, education, and outreach.
- Cooperate with HCAI and other DxF Participants to support DxF operations. (QHIO Application A.12)
- Promptly inform HCAI and the technical point-of-contact for each QHIO of outages, downtime, or delays in QHIO-to-QHIO connections. For unscheduled outages, include the subsequent outage resolution and measures implemented to prevent future occurrences.
- Report metrics to HCAI on a regular cadence to support measurement of the impact of the DxF, as per reporting requirements provided by HCAI.
- Follow HCAI guidance when communicating qualified status and affiliation with HCAI and the DxF.
- Comply with HCAI's requests for information, compliance reviews, corrective action plans, and other HCAI oversight efforts as found in The Qualified HIO Program section of [DxF Resource Library](#).

Onboarding Grants Administration

- Manage QHIO Onboarding Grants if selected as a Grantee's QHIO, including, but not limited to, submitting progress reports, and adhering to milestone timelines. (QHIO Application A.13). For 2023 DSA Signatory Grant Program, see the [Grants Management Guide](#) or the [Grant Guidance Document](#), both available on the [DxF Resource Library](#) under the DxF Grant Resources section.

Privacy and Security

- Achieve and maintain [HITRUST r2 certification](#) (QHIO Application B.1).
- Do not store DxF Participants' Protected Health Information (PHI) or Personally Identifiable Information (PII) outside the Continental United States. (QHIO Application B.2)
- Applicants must not have more than two legally reportable breaches involving 500 or more individuals' data in the last three years. (QHIO Application B.3)
- QHIOs must have, publish, and annually review a Privacy Policy. (QHIO Application B.4)
- Maintain privacy and security policies consistent with the DSA and its P&Ps. (QHIO Application B.5)
- Maintain an audit trail and/or transaction logs for a minimum of six years. (QHIO Application B.6)

Technical Capabilities

- Remain capable of managing individual identities consistent with the Person Matching section of the [Technical Requirements for Exchange P&P](#). (QHIO Application C.1)
- Maintain an active connection to one of the national networks or frameworks identified in the QHIO Application: Carequality, CommonWell Health Alliance, or eHealth Exchange. (QHIO Application C.3)
- Requests for Information (QHIO Application C.4 – C.5)
 - Remain capable of constructing and sending Requests for Information in a manner consistent with DxF P&Ps. (QHIO Application C.4)
 - Remain capable of constructing and sending a response to Requests for Information in a manner consistent with DxF P&Ps. (QHIO Application C.5)
- Information Delivery (QHIO Application C.6)
 - Remain capable of sending and receiving information on behalf of their clients who are DxF Participants in a manner consistent with DxF P&Ps (QHIO Application C.6)
- QHIO-to-QHIO Exchange: Each QHIO is to exchange information for Requests for Information and Information Delivery with other QHIOs and nationwide networks and frameworks on behalf of their own clients who are DxF Participants, as appropriate. (QHIO Application C.7)
- Admit, Discharge, Transfer (ADT) Events: Achieve and subsequently maintain the following capabilities with respect to Notification of ADT Events from California-based Hospitals or Emergency Departments following the prescribed timelines:

- Receive HL7 Version v2.5.1 ADT messages (or a later, compatible version), as of January 31, 2024. (QHIO Application C.8.a)
- Receive and maintain a roster of Individuals from DxF Participants who seek to monitor ADT Events for these Individuals no later than April 30, 2024. (QHIO Application C.8.b)
- Determine whether an incoming ADT Event is associated with a person found on an ADT roster no later than July 31, 2024. (QHIO Application C.8.c)
- Notify DxF Participants when an ADT Event matches an Individual listed on the Participant's ADT roster no later than July 31, 2024. (QHIO Application C.8.d)
- Share a roster with other QHIOs, match incoming ADT Events to the Individuals on the roster, and notify the originating QHIO of matched ADT Events no later than July 31, 2024. (QHIO Application C.8.e)

General Organization Requirements

- QHIOs must be registered corporations in the United States and/or subject to the laws of the United States and the state(s) in which it operates. (QHIO Application A.1)
- QHIOs must be corporations / organizations of good standing (i.e., have an active license to operate a business and are not restricted by disciplinary actions). (QHIO Application A.3)
- QHIOs must be eligible to conduct business with the State of California (i.e., have not defaulted on or breached a contract with the State of California, have returned overpayments with the State, or reimbursed the State for moneys paid in advance of work not completed). (QHIO Application A.4)
- QHIOs must have current health and/or social services information Exchange business with health and/or social services organizations in California. (QHIO Application A.5)
- QHIOs must have a governance function that will responsibly serve DxF Participants (i.e., is a 501(c)(3), or has two of: a governing body that convenes once per calendar quarter, a governing body that routinely communicates decisions to stakeholders, or a governing body that allows clients to serve as members). (QHIO Application A.6)
- QHIOs must have sufficient cash or cash equivalents available to support ongoing operations (i.e., their most recent financial statement lists one month or more than one month's operating expenses as cash (or cash equivalents)). (QHIO Application A.10)
- QHIOs and any of their subcontractors engaged in data management activities must each carry insurance with at least \$2 million per incident and \$5 million per annum coverage to address general liability, errors and omissions, and cyber risks. (QHIO Application A.11)

Change Management

The DxF and the QHIO program are expected to evolve over time. The requirements outlined in this document are subject to change. Changes to the program will follow the [QHIO Program Change Management Process](#).