

# Navigating California's QHIOs to QHIO Data Sharing

The data sharing between Qualified Health Information Organizations (QHIOs) plays a critical role in improving patient care and outcomes across California. As the QHIOs become increasingly interconnected, it is essential for healthcare and social service organizations to have a clear understanding of the types of data they can expect to receive from the California QHIOs.

While QHIO-to-QHIO data sharing marks a significant step forward in achieving interoperability, certain regulatory and technical challenges may limit the types of data that can be shared through QHIOs. These limitations can affect the completeness and quality of the data compared to directly connecting with the source QHIO.

This document outlines the specific types of information that LANES is currently unable to share due to these regulatory restrictions and other constraints.

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## Data Shared by LANES with Other QHIOs in California:

- **Roster-Based ADT Forwarding:** LANES routes ADT messages from acute care hospitals, emergency departments, and SNFs within its network when a patient's name matches any QHIO rosters.
- **Patient Information Query and Response:** QHIOs and organizations connected to National Networks (eHealth Exchange and Carequality) can initiate patient queries for treatment purposes. LANES returns a CCD document if a matching patient record is found.

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## LANES Data Exclusions in QHIO Sharing:

### Privacy Restrictions:

Any clinical, mental health, or SDoH data with a privacy flag (consent) set by the data source will be excluded from the CCD file.

### Data Limitations:

Mental health notes and patient affiliations will not be included in CCDs due to policy and technology restrictions.

### Regulatory Compliance:

Due to HIPAA and other regulations, LANES does not share Restricted Information and Prohibited Information listed on the next page.

### Patient Matching Challenges:

Technology limitations may result in a lower patient matching rate for roster-based ADT forwarding.

## LANES Data Governance: Sensitive Data Categories

LANES distinguishes between two categories of sensitive data:

- **Restricted Information:**

Restricted Information refers to data that requires individual authorization for LANES HIE participants to disclose for treatment, care coordination, case management, or payment under federal or California law. This includes:

- Substance use information
- Mental health information under the Lanterman-Petris-Short (LPS) Act
- Outpatient treatment information with a psychotherapist
- HIV test results
- Developmental disability information from regional or state developmental centers
- Genetic information held by health plans

- **Prohibited Information:**

Prohibited Information, as defined by California AB 352, includes medical data related to:

- Gender-affirming care
- Abortion and abortion-related services
- Contraception

Specifically, LANES is prohibited from facilitating “the disclosure, access, transfer, transmission or processing of such information to any person or entity outside of California.”

