



DSA Signatory Grant Management Guide

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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. 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).

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](#)
2. [DSA Signatory Grants](#)
3. [TA Grants](#)
4. [QHIO Onboarding Grants](#)
5. [Umbrella Grantee Guidance](#)
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Updated guidance may be disseminated in webinars, Guide updates, direct Grantee communications, or on the Grant Program section of the Center for Data Insights and Innovation (CDII) Data Exchange Framework (DxF) [webpage](#).

CDII 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 5](#).
- **QHIO Onboarding Grants:** This is a pre-set, “assisted” pathway where Grantees can use funds to onboard to a QHIO. Learn more on [page 8](#).

What about Umbrella Grantees? If you are part of an Umbrella Grant, or managing one, please review the Umbrella Grantee Guidance section on [page 11](#) for additional guidance.

1. Grant Management 101

CDII 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 9](#).
- **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.

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 outcomes.
- 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 and their plans to achieve it.
- 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, or request to change QHIOs if they have not yet achieved Milestone 1.

How are Funds Disbursed?

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

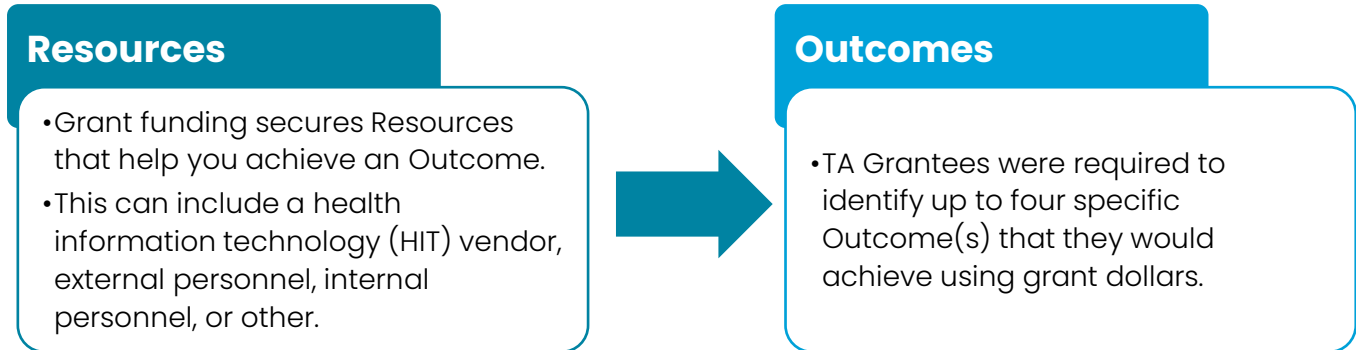
Funds Disbursement

If a Progress Report indicates that a Grantee has achieved a Milestone, CDII 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.

3. Technical Assistance Grants

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 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).

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. Additionally, the funding cannot be used for activities other than those specified in their Application, nor for ongoing subscription or recurring costs associated with an electronic documentation system, a QHIO, or other health information technology (IT) 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 CDII with an update on a Grantees 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:
- ✓ Attestation confirming that all Outcome(s) have been completed; **AND**
 - ✓ The required Attestations or supporting documentation as it relates to the Grantee's chosen Outcome(s)

TA Milestone 2 Outcomes	Permissible Uses and Examples	Proof of Outcome for Milestone 2
1. Identifying and Contracting with a Technology Solution	<p>Assessing needs to meet DSA requirements, finding and implementing technology solutions, or other activities to fulfill DSA requirements.</p> <p><i>Example: Hiring someone to conduct a gap analysis to identify steps needed to meet the DSA requirements.</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Copy of contract with HIT vendor; or <input type="checkbox"/> Copy of completed technology solutions assessment.
2. Implementing a Technology Solution Capable of Supporting Real-Time Data Exchange	<p>Connecting with QHIOs or technology vendors, covering costs to integrate with existing EHR systems, or enabling real-time data exchange. Funding cannot be used for ongoing fees or subscriptions.</p> <p><i>Example: Costs paid to vendor to fund implementation of technology solution.</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Screenshot of test demonstrating a real-time data exchange transaction in a production ready environment; or <input type="checkbox"/> Final invoice or attestation signed by vendor demonstrating completion of technology implementation.
3. Adjusting, Upgrading, or Adopting a Certified EHR or Other Electronic Documentation System	<p>Updating or expanding EHR systems to enable real-time data exchange or adopting new EHR systems.</p> <p><i>Example: Adopting a new EHR system or updating an existing EHR's configuration.</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Final invoice or attestation signed by EHR/electronic record system vendor demonstrating completion of adjustments, upgrades, or adoption.
4. Creating and Providing Training for New Workflows	<p>Costs associated with creating workflows and trainings that support electronic health information exchange.</p> <p><i>Example: Costs for a consultant or internal personnel to develop and help implement workflows.</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Copy of final training and/or technical assistance materials.

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 11](#) for additional guidance.

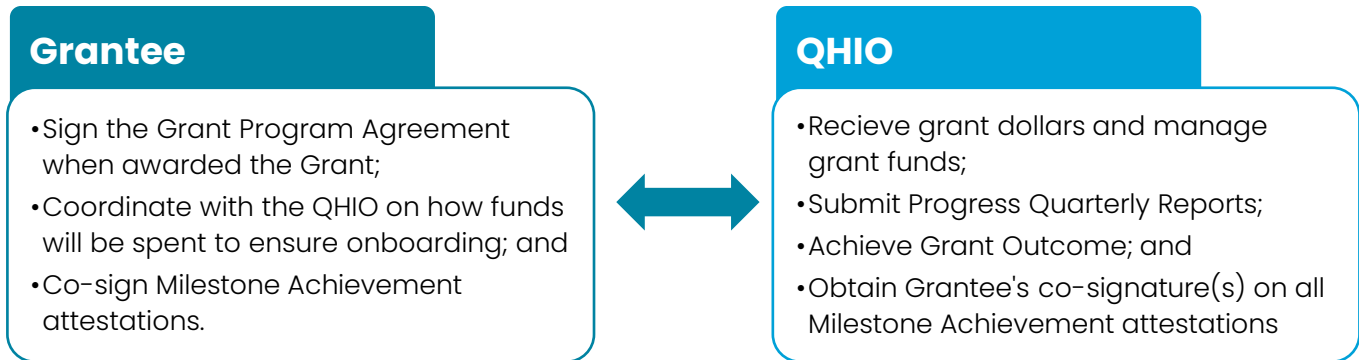
TA Funds Disbursement

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

4. QHIO Onboarding Grants

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 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.

Grantees **may not** use QHIO Onboarding Grant Funding for ongoing HIE operations, onboarding to a non-qualified HIO, or for changing from one QHIO to another. **Once a Grantee achieves Milestone 1 with a QHIO, it must continue to work with that QHIO and may not switch to a different QHIO using grant funding.**

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:
 - ✓ Attestation confirming that onboarding has been completed; **AND**

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.

- ✓ Document(s) – such as a screenshot or data output – demonstrating that the completion of a real-time data exchange transaction for each Instance¹ included in the Grant, in a production (i.e., non-test) environment. This documentation must not include PHI.

QHIO Onboarding Milestone 2 Outcome	Permissible Uses and Examples	Proof of Outcome for Milestone 2
1. Successful completion of QHIO Onboarding and Real-time Data Exchange through the QHIO.	<p>Offset QHIO Costs: Grant funding can be used to help cover QHIO fees and other QHIO costs associated with onboarding.</p> <ul style="list-style-type: none"> • Example: <ul style="list-style-type: none"> ○ 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. <p>Offset Signatory Costs: Grant funding can be used to cover Signatory costs associated with onboarding.</p> <ul style="list-style-type: none"> • Example: <ul style="list-style-type: none"> ○ 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 ○ Costs related to retaining IT personnel for onboarding. 	<ul style="list-style-type: none"> <input type="checkbox"/> An attestation co-signed by the QHIO, the Grantee, and the DSA Signatory(s) on the Grant, stating that onboarding has been completed; AND <input type="checkbox"/> Document(s) – such as a screenshot or data output – 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.

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. Grantees should reach out to PCG if they have questions on how to utilize the Manage

¹ 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.

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 CDII with an update on a Grantees 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.**
- A change request to switch selected QHIO (only available prior to Milestone 1 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 11](#) for additional guidance.

QHIO Onboarding Grant Funds Disbursement

If a QHIO and Grantee indicates in a Progress Report that they have achieved a Milestone, CDII 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.

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. CDII 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
<p>Progress Report for Non-Milestones <i>No attestation form required.</i></p>	<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
<p>Progress Report for ANY Milestone <i>Attestation form required.</i></p>	<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 technology 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 dxp@chhs.ca.gov
- DxF-DSA Signatory Grants Landing Page: <https://dxp-dsagrants.com/>
- DxF Grants Log-in Portal: <https://apply.yourcausegrants.com/apply/auth/signin>