EHN Data Vendor - Q & A

April 16, 2026 – Version # 1.2

1. Is CRISP open to proposals from firms that use a US-incorporated prime contractor with a specialist offshore delivery partner, provided all PHI-handling infrastructure is US-hosted and all PHI access is restricted to US-based personnel per the MSA security addendum?

   Response: The CRISP MSA does not permit offshoring PHI. Any response with any offshore vendors (prime or subcontractors) accessing PHI will not be considered during CRISP's RFP response review process. CRISP must clearly understand the vendor relationships in any RFP response. If any vendor (prime or subcontractors) is offshore, the RPF response must clearly articulate the organizational, data structures, and processes to restrict PHI access from the offshore vendor(s).

2. Are vendors required to hold an existing HITRUST certification, or is demonstrated HITRUST-aligned controls and a roadmap to certification acceptable for Phase 1?

   Response: CRISP did not specify HITRUST certification as a vendor requirement. However, HITURST certification (or a vendor's planned pathway to HITRUST certification) may be taken into consideration when evaluating vendor responses. Additionally, CRISP will work with a vendor to conduct a vendor security assessment in absence of an organization level security audits and/or certificate.

3. What is the expected data volume in terms of number of 837P/837I transactions per day/month across the 15 EHNs?

   Response: CRISP does not have an estimate of volume. Instead, we have provided data points on pages 5 and 6 of the RFP to help vendors estimate the volume of transactions. Vendors are welcome to justify their volume estimate in the proposal or in the budget narrative to demonstrate the vendor's understanding of volume.

4. Is the extract format to CRISP pre-defined (e.g., flat file, HL7 FHIR, API), or will this be defined collaboratively in Phase 1?

   Response: While CRISP will likely request a flat file format, CRISP and the vendor will work to develop the format for the extract and process for data transfer.

5. Submitter engagement
    a. EHN readiness and escalation:
    Does CRISP have visibility into the current technical readiness of the ~15 MHCC-certified EHNs, and how does CRISP expect responsibilities to be shared between CRISP and the vendor if one or more EHNs are unresponsive or unable to meet submission requirements?

    Response: CRISP does not have visibility into the current technical readiness of the EHNs. Per MHCC regulations, ENHs have 18 months after the publication of the Technical Submission Guidance (therefore, September 2027) to comply with the submission requirements. However, MHCC has stressed the importance of collecting these data and has requested that EHNs move swiftly to begin submitting. CRISP does not anticipate that all EHNs will be ready to submit data when the vendor's system is initially implemented.

    CRISP expects the vendor to regularly report updates on EHN engagement and connectivity status to CRISP. If one or more EHNs are unresponsive or unable to meet submission requirements, CRISP will assist the vendor in outreach and escalation to MHCC.

    b. Data quality/validations:
    Should the vendor be responsible for direct communication and issue resolution with Electronic Health Networks (EHNs) related to data quality findings (e.g., validation errors, missing fields, or non-conformant submissions), or does CRISP expect to retain primary responsibility for EHN engagement, with the vendor providing technical findings and support as needed?

    Response: The vendor will be responsible for direct communication and issue resolution with the EHNs related to data quality findings. The vendor will provide CRISP with routine updates on issues. If the vendor requires escalation, CRISP will assist with communication to the EHN.

6. Technical Submission Guidance changes: When updates are made to the Technical Submission Guidance, what level of advance notice should vendors expect, and are changes expected to apply prospectively only, or could they require reprocessing of previously submitted data?

    Response: CRISP is required by regulation to review the Technical Submission Guidance annually (required to be completed in March each year). We expect to have an approximate six-month lead time from publishing the updated

guidance to the implementation of the updates (~September of each year). Note that CRISP may require more urgent updates to correct major issues or deficits.

We do not expect the vendor to reprocess previously submitted data. Changes to the Technical Submission Guidance may, however, result in changes to the data extract layouts or may require some normalization to the data provided in the extracts to CRISP.

7. Production acceptance criteria: What criteria will CRISP use to approve the first production data extract and consider the solution "implemented" for milestone payment purposes (e.g., completeness thresholds, validation outcomes, number of EHNs live)?

   Response: CRISP understands that all EHNs may not be ready to submit data when the vendor's system is initially implemented. To achieve the production data milestone, CRISP expects that—at a minimum—one EHN must be live with production data that has passed the vendor's data validation requirements.

8. Normalization expectations: Beyond requirements explicitly stated in the Technical Submission Guidance, does CRISP anticipate additional normalization or standardization (e.g., payer identifiers, code harmonization) to support downstream analytics, or should vendors limit normalization strictly to the guidance?

   Response: CRISP will look to the vendor's expertise to define areas in which normalization and standardization will assist CRISP in our downstream analytics and use case efforts. Vendors may showcase this knowledge in their RFP responses.

Change Log:

Version Number	Date	Summary of Change
1.0	4/14/26	Document Created
1.1	4/16/26	Question 1 Updated to reflect restriction of offshoring PHI
1.2	4/16/26	Change Log Added