

### Health Care Payments Data Program: Non-Claims Payment (NCP) Data

The <u>Health Care Payments Data (HPD) Program</u>, California's All-Payer Claims Database (APCD), currently collects administrative data, including claims and encounters generated by transactions among payers and providers on behalf of insured individuals. This includes the following data files as specified in the All-Payer Claims Database Common Data Layout (APCD-CDL<sup>™</sup>), version 3.0.1: Member Eligibility, Medical Claims, Pharmacy Claims, Dental Claims, and Provider Data.

Among HPD's program goals are to inform policy decisions on topics including the provision of quality health care, improving public health, reducing disparities, advancing health coverage, reducing health care costs, and oversight of the health care system and health care companies. To further those goals, the HPD Program will begin to collect Non-Claims Payments (NCP) data.

As described in <u>Health and Safety Code section 127673</u>, health plans and submitters are required to submit NCP data to the HPD System. This will include monthly capitation files, annual non-claims payments, and annual pharmacy rebate and cost files. Collection of NCP data is critical, given the presence of managed care in California's market.

The HPD's proposed NCP regulations are under development and anticipated to be made available for review and public comment in Q3 of 2024 and finalized in Q1 of 2025. NCP data collection is expected to start in 2025. This document will continue to be updated until NCP regulations are adopted.



### **Submitter Frequently Asked Questions**

# What data format will be required for NCP file submission? Will submission follow a national standard, such as the APCD-CDL<sup>™</sup>?

Ensuring uniform data collection and providing consistent guidance for data submission is of high importance to us. In April 2024, the National Association of Health Data Organizations (NAHDO) and the APCD Council published the <u>NCP Data Layout</u><sup>TM</sup>, which is intended to collect non-claims payment data not captured by using the APCD Common Data Layout (APCD-CDL<sup>TM</sup>). It aims to harmonize NCP data collection efforts across states and reduce the burden of data submission. To that end, HCAI will be using the NCP Data Layout<sup>TM</sup> as the standard for NCP file submissions and it will be incorporated by reference as part of HCAI's proposed NCP regulations.

The NCP Data Layout<sup>™</sup> follows categories, codes and definitions as outlined in the <u>Expanded Non-Claims Payment Framework</u> (Expanded Framework). The Expanded Framework categories crosswalk to the <u>Health Care Payment Learning & Action</u> <u>Network</u> (HCP-LAN) Alternative Payment Model (APM) Framework, while offering a more detailed categorization that captures the breadth of California's various non-claims payments.

It is anticipated that the NCP Data Layout<sup>™</sup> will be adopted into the next version (Version 4) of the APCD-CDL<sup>™</sup>, scheduled to be published in 2025. This will add three NCP Layout<sup>™</sup> files to the existing five files of the APCD-CDL<sup>™</sup>.

## Will the Office of Health Care Affordability (OHCA) and HPD collect the same NCP data?

No. Health plans and submitters are required to submit separate files to both HPD and OHCA, using the same submission system, but the data submitted to each program is different. OHCA will collect aggregated NCP totals and will eventually include NCP subtotals for primary care and behavioral health spend. OHCA will collect data for a payer's full line of business. HPD will collect detailed contract-level, National Drug Code-level, and member-level NCP data in three file formats. HPD will collect data for a payer's commercial and Medicare Advantage lines of business.

OHCA and HPD will take a unified approach by using the same categories, codes and definitions in the <u>Expanded Framework</u>.

OHCA's non-claims data collection can be found in the <u>Total Health Care Expenditure</u> (<u>THCE</u>) emergency regulations and corresponding THCE Data Submission Guide.

#### What is the timeline for submitting NCP Data?

The HPD's proposed NCP regulations are under development and anticipated for review and public comment in Q3 of 2024 and finalized in Q1 of 2025. NCP data collection is expected to start in 2025.

OHCA's timeline for collecting non-claims data can be found in the <u>THCE emergency</u> regulations.

#### Will the HPD System collect historical data?

As described in <u>Health and Safety Code section 127673</u>,health plans and submitters are required to submit historical data to the HPD System, dating back to 2017. If for any reason historical files are not available for this period of time, submitters are encouraged to notify the HPD program as soon as possible.

Fact Sheet Updated: April 19, 2024