

Agenda Item VIII: PBM Data Collection

Dionne Evans-Dean, MHA, Chief Data Programs Officer

Overview of data files collected by HPD

- Core files (collection began in 2022 and 2024*)
 - Member Eligibility
 - Provider
 - Medical Claims, Pharmacy Claims, and Dental Claims*
- Non-Claims Payments (begins July 2026)
 - Annual Payments
 - Annual Pharmacy Rebates
 - Capitation
- Pharmacy Benefit Manager (upcoming)

Pharmacy Benefit Manager (PBM) Data Collection Through HPD

- 2025 State Budget Omnibus Bill (Assembly Bill (AB) 116)
 - Adds Section [127673.05](#) to Health and Safety Code Chapter 8.5 Health Care Payments Data Program
 - Expands HPD data collection to include data from PBMs licensed by DMHC
 - Authority to collect from PBMs:
 - Drug pricing
 - Fees paid for pharmacy benefit management services
 - Payments or rebates to or from pharmacy benefits managers regarding drugs or services
 - Other information may be collected (13 additional data variables outlined in statute)

Source: [Pharmacy Benefit Manager Data Collection Fact Sheet](#)

Pharmacy Benefit Manager (PBM) Data Collection Through HPD (continued)

- Authorizes HCAI to promulgate regulations no later than January 1, 2028
 - Collect historical data for three years from effective date of regulations
- Adds a PBM representative to the HPD Advisory Committee (Health and Safety Code [Section 127672](#) (a)(1)(J))

Relationship between HCAI and DMHC

- DMHC required to license PBMs by January 1, 2027, or at a date when the department establishes licensure process
- As a condition of licensure, PBMs required to submit data to HPD program
- HCAI will work closely with DMHC to collaborate on data collected from PBMs and how the data may be used by DMHC in regulating PBMs

PBM Data Collection Roadmap

	2025				2026				2027				2028			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	4
Ongoing collaboration with DMHC																
Hire PBM SME vendor and HCAI staff																
Develop emergency regulations; workshop & engage with stakeholders																
Promulgate emergency regulations																
Register PBMs and test data file(s)																
Collect PBM historical data																
Begin collecting ongoing PBM data																

PBM Stakeholder Engagement and Regulation Development

- PBMs w/ $\geq 40,000$ California covered lives
- Health plans who maybe impacted by PBM data collection
- Pharmacy Industry Associations
- Public and Private Purchasers
- Provider organizations
- Academic experts
- DMHC
- Internal HCAI teams

Discussion

1. The PBM data collection intends to create transparency for drug pricing, payments, rebates, and fees among the manufacturers, plans, pharmacies, and PBMs. To that end, are you aware of any transactions HCAI should collect but has not mentioned?
2. Are there key persons or organizations that HCAI should interview while standing up the PBM data collection program?
3. Are you aware of similar data collection efforts and/or data collection standards HCAI can leverage when developing the PBM file format and regulations?