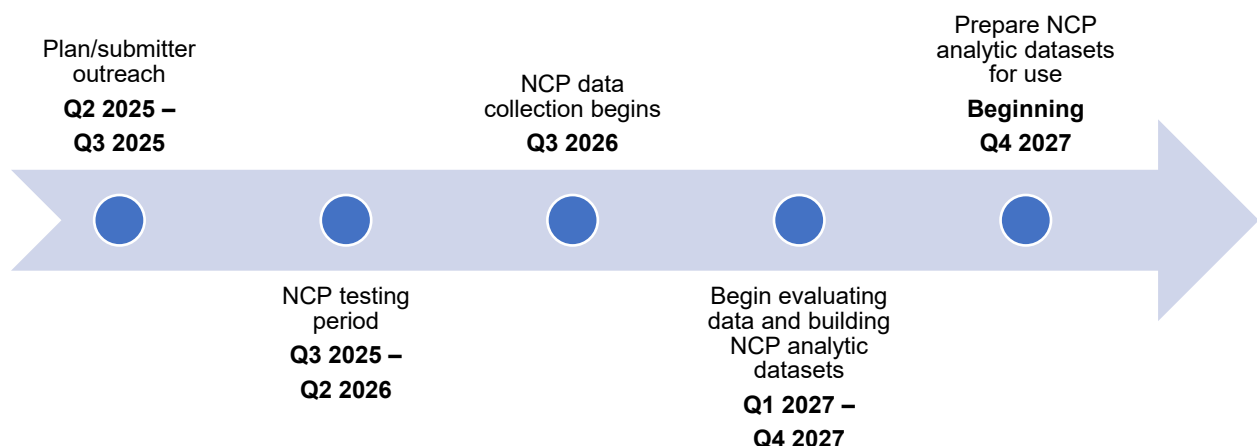# Healthcare Payments Data Program:
Non-Claims Payment (NCP) Data

The Healthcare Payments Data Program (HPD), California's All-Payer Claims Database (APCD), is intended to support greater health care cost transparency, inform policy decisions supporting quality health care, and reduce health care costs and disparities across the state.

HPD 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^{TM}) Version 3.0.1: Member Eligibility, Medical Claims, Pharmacy Claims, Dental Claims, and Provider data.

To further expand on HPD's data collection efforts as required under Health and Safety Code section 127673, the Department of Health Care Access and Information (HCAI) adopted regulations on March 25, 2025, for the collection of non-claims payment (NCP) data. NCP data includes the following data files as specified in the NCP Data Layout^{TM} Version 1.0: Annual Payment Files, Pharmacy Rebate Files, and Capitation Files. Health plans and submitters will be required to submit NCP data to the HPD, beginning with test file submissions on July 1, 2025, to be completed by June 30, 2026. Please refer to the HCAI Laws & Regulations to review all rulemaking documents.

NCP Roadmap

Plan/submitter outreach
Q2 2025 – Q3 2025

NCP data collection begins
Q3 2026

Prepare NCP analytic datasets for use
Beginning Q4 2027

NCP testing period
Q3 2025 – Q2 2026

Begin evaluating data and building NCP analytic datasets
Q1 2027 – Q4 2027

NCP Data Submitter Frequently Asked Questions

What types of NCP data files and in what data format will submitters be required to submit to HPD?

Submitters are required to submit the following NCP data files: Annual Payment Files, Pharmacy Rebate Files, and Capitation Files.

Submitters will use the [NCP Data Layout^{TM} Version 1.0](#), released April 2024, as developed by the APCD Council, National Association of Health Data Organizations (NAHDO), and University of New Hampshire, to submit the NCP data files. This document is available through the [NAHDO website](#). The NCP Data Layout^{TM} follows categories, codes, and definitions as outlined in the [Expanded Non-Claims Payment Framework (Expanded Framework)](#). The Expanded Framework categories are similar to the [Health Care Payment Learning & Action Network (HCP-LAN) Alternative Payment model (APM) Framework](#) and offers a more detailed categorization that captures the breadth of California's various NCP data.

HCAI is in the process of updating the HPD regulations to incorporate the [APCD-CDL^{TM} version 4.0.1](#), released February 2025, as a required data format which integrates the NCP Data Layout^{TM}. Updated regulations are anticipated by early 2026.

When will submitters need to start submitting NCP data?

Each entity that is required to submit data to HPD will be required to register via the HPD data portal following guidance in the [HPD Data Submission Guide version 3.0](#).

For Annual Payment Files and Pharmacy Rebate Files:
- Submitters will be required to submit at least one historical test Annual Payment File and at least one historical test Pharmacy Rebate File by September 1, 2025.
- Submitters will be required to submit historical Annual Payment Files and historical Pharmacy Rebate Files from June 29, 2017, through December 31, 2024, by July 31, 2026.
- Regular annual reporting of these data files will begin for the calendar year of 2025, to be submitted by September 30, 2026.

For Capitation Files:
- Submitters will be required to submit at least one historical test Capitation File by September 1, 2025.
- Submitters will be required to submit historical Capitation Files from June 29, 2017, through July 31, 2026, by September 1, 2026.
- Submitters will send production 2026 monthly Capitation Files beginning with the month of August by October 1, 2026.

How often will submitters need to submit NCP data?

Ongoing data submission for Annual Payment Files and Pharmacy Rebate Files is on an annual basis beginning in September 2026.

Ongoing data submission for Capitation Files is on a monthly basis beginning in October 2026.

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 sub-totals for primary care and behavioral health spend. OHCA will collect data for a payer's full line of business. Beginning on March 25, 2025, 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 Expanded Framework.

OHCA's non-claims data collection can be found in the Total Health Care Expenditure (THCE) emergency regulations along with the corresponding THCE Data Submission Guide.

For additional questions and information, please reach out to hpd@hcai.ca.gov.

Fact Sheet Updated: July 18, 2025