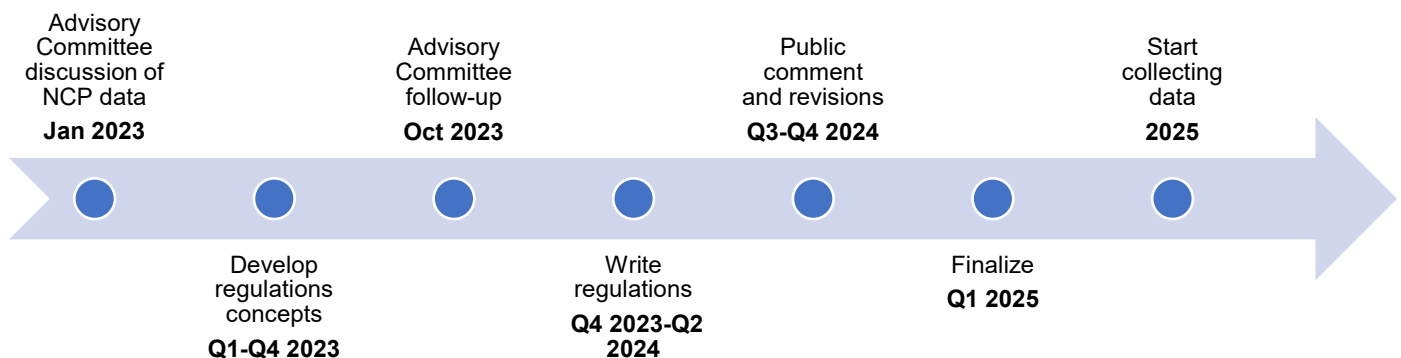# Health Care Payments Data Program:
Non-Claims Payment (NCP) Data

The Health Care Payments Data (HPD) Program, 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 core claims data files as specified in the All-Payer Claims Database Common Data Layout (APCD-CDL), 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 Health and Safety Code section 127673, 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.

Advisory Committee discussion of NCP data **Jan 2023**		Advisory Committee follow-up **Oct 2023**		Public comment and revisions **Q3-Q4 2024**		Start collecting data **2025**
	Develop regulations concepts **Q1-Q4 2023**		Write regulations **Q4 2023-Q2 2024**		Finalize **Q1 2025**	

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^{TM}?

Ensuring uniform data collection and providing consistent guidance for data submission is of high importance to us. To that end, HCAI is working closely with the APCD Council to develop a Non-Claims Payment Data Layout, which follows categories, codes and definitions as outlined in the [Expanded Non-Claims Payment Framework](#) (Expanded Framework). The Expanded Framework categories crosswalk to the [Health Care Payment Learning & Action Network](#) (HCP-LAN) Alternative Payment Model (APM) Framework, while offering a more detailed categorization that captures the breadth of California's various non-claims payments.

While the proposed NCP data layout is still under review and approval. HPD expects the National Association of Health Data Organizations (NAHDO) to publish this standalone NCP guidance in May 2024. Once the NCP data layout is approved by NAHDO, it will be incorporated by reference as part of HCAI's NCP regulations.

HPD anticipates that the NCP data layout will be adopted into the next version (Version 4) of the APCD-CDL^{TM}, scheduled to be published in 2025. As part of the APCD-CDL^{TM}, the Expanded Framework will add three supplemental files to the existing five files of the APCD-CDL^{TM}. If published by NAHDO and/or added to the APCD-CDL™, the NCP data layout will serve as a national standard for NCP data submission that other states can use.

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 book 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 book of business.

OHCA and HPD will take a unified approach by using the same categories, codes and definitions in the [Expanded Non-Claims Payment Framework](#) (Expanded Framework).

OHCA's non-claims data collection can be found in the [Total Health Care Expenditure (THCE) 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 [THCE emergency regulations](#).

Will the HPD System collect historical data?

As described in [Health and Safety Code section 127673](#),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: March 7, 2024