

DATE: January 27, 2026

Behavioral Health Information Notice No: 26-003

TO: California Alliance of Child and Family Services
California Association for Alcohol/Drug Educators
California Association of Alcohol & Drug Program Executives, Inc.
California Association of DUI Treatment Programs
California Association of Mental Health Peer Run Organizations
California Association of Social Rehabilitation Agencies
California Consortium of Addiction Programs and Professionals
California Hospital Association
California Opioid Maintenance Providers
California State Association of Counties
Coalition of Alcohol and Drug Associations
County Behavioral Health Directors
County Behavioral Health Directors Association of California
County Drug & Alcohol Administrators

SUBJECT: Lanterman-Petris-Short (LPS) Act Quarterly Data Collection: Senate Bill (SB)1184 Data Reporting Requirements

PURPOSE: To notify stakeholders of expanded LPS Act data reporting and collection requirements under SB1184 (Eggman, Stats. 2024, Chapter 643).

REFERENCE: Welfare and Institutions (W&I) Code [Section 5336](#) and [BHIN 23-015](#); [BHIN 24-011](#); [BHIN 24-013](#); [BHIN 24-043](#); [BHIN 25-030](#)

BACKGROUND:

In 2022, the Governor signed SB 929 (Eggman, Chapter 539), which amended W&I Code section 5402 to require the Department of Health Care Services (DHCS) to collect expanded quarterly data on treatment provided pursuant to the LPS Act and publish that data in a report by May 1 of each year. W&I Code section 5402 was further

amended by Assembly Bill (AB) 118 (Committee on Budget, Chapter 42) and SB 43 (Eggman, Chapter 637) in 2023. In 2024, SB 1184 (Eggman, Chapter 643) further amended W&I Code section 5402. SB 1184 requires DHCS to collect and report the data enumerated in W&I Code section 5336(b)(3) regarding exigent circumstances to continue court orders for involuntary administration of antipsychotic medication into a subsequent detention period under W&I Code section 5260, 5270.15, or 5270.70 (W&I Code § 5402(a)(19)).

W&I Code section 5332 sets forth the right of a person detained under the LPS Act to refuse treatment with antipsychotic medication, which may be overridden absent an emergency only if they are found incapable of refusing treatment in a capacity hearing. A court order for involuntary antipsychotic medication expires at the end of a detention period under section 5150 or 5250 of the W&I Code, or at the end of both detention periods together (W&I Code § 5336(a)(1), (a)(3)(C)). SB 1184 added that to prevent an order from expiring at the end of these detention periods, a treating physician may request a new capacity hearing at any time in the 48 hours prior to the end of the current detention period (W&I Code § 5336(a)(2)). However, SB 1184 also provides that a court order for involuntary antipsychotic medication may remain in effect at the beginning of a detention period described in W&I Code section 5260, 5270.15, or 5270.70 upon documentation of exigent circumstances, as defined, as long as a petition for a new capacity hearing was filed prior to the expiration of the current order, as specified (W&I Code § 5336(b)(1), (b)(6)). A hearing, pursuant to W&I Code section 5336, must be held on an expedited basis to determine the person's capacity to refuse treatment with antipsychotic medication as soon as reasonably practicable and within 24 hours (W&I Code § 5336(b)(2)).

County behavioral health directors are responsible for collecting the data enumerated in W&I Code section [5336\(b\)\(3\)\(A\)-\(E\)](#) from a designated facility that documents exigent circumstances to continue a court order for involuntary antipsychotic medication into a detention period described in W&I Code section 5260, 5270.15, or 5270.70 and reporting it to DHCS (W&I Code § 5336(b)(4)(A)).

DHCS collected Phase I, Phase II and Phase III data using the "Nintex" platform. On July 1, 2025, DHCS introduced a new "LPS Data Reporting Platform" to replace Nintex. County behavioral health directors and their designees shall continue to submit data

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onto the new LPS Data Reporting Platform, please see [BHIN 25-030](#) for more information. For guidance on how to assign designees, please see [BHIN 24-035](#).

POLICY:

This BHIN introduces and implements the expanded data collection requirements specified in SB 1184. SB 1184 requires designated facilities that document exigent circumstances to continue a court order for involuntary antipsychotic medication into a detention period described in section 5260, 5270.15, or 5270.70 of the W&I Code to report the data enumerated in W&I Code section [5336\(b\)\(3\)\(A\)-\(E\)](#) to the county behavioral health director in the county in which they operate.

Each county behavioral health director or their designees shall submit accurate and complete data they receive from each designated and approved facility that admits, detains, or provides services to persons pursuant to this part and Part 1.5 (commencing with Section 5585) for the period beginning Quarter 3 (January 1, 2026 – March 31, 2026) via the new LPS Data Reporting Platform until further notice (W&I Code § 5402(b)(1)(A) and (C)). DHCS will provide counties with adequate time to submit Quarter 3 data through the new LPS Data Reporting Platform. Facilities are expected to begin collecting SB 1184 data elements during the January 2026 – March 2026 reporting period and counties shall submit this data in April 2026. A county may establish and require designated and approved facilities to follow policies and procedures to ensure compliance with data reporting obligations (W&I Code § 5402(b)(2)(B)).

SB 1184 Designated Facility Reporting Requirements

As instructed by the county behavioral health director in the county in which it operates, a designated facility shall provide the SB 1184 data specified in [Attachment A](#) to the county behavioral health director for reporting to DHCS (W&I Code § 5336(b)(3)).

For additional information, please review the [Data Element Dictionary](#). If you have any questions regarding this BHIN, please contact the Mental Health Licensing and Certification Branch at MHData@dhcs.ca.gov or (916) 323-1864.

Sincerely,

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Original signed by

Janelle Ito-Orille, Chief
Licensing and Certification Division

Enclosures

Data Element Dictionary

Attachment A