



DATE: April 7, 2026

Behavioral Health Information Notice No: 26-016

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 Program
California Association of Mental Health Peer Run Organizations
California Association of Social Rehabilitation Agencies
California Consortium of Addiction Programs and Professional
California Behavioral Health Association
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: Removal of Mental Health Services Act (MHSA) County Data Collection Reporting (DCR) Requirement

PURPOSE: To notify counties and their network providers that the Department of Health Care Services (DHCS) is eliminating the requirement that counties report on MHSA Full-Service Partnership (FSP) outcomes via the DCR system.

REFERENCE: [California Welfare and Institutions \(W&I\) Code § 5898](#); [California Code of Regulations \(CCR\) Title 9 § 3620.10](#) and [CCR Title 9 § 3530.30](#)



BACKGROUND:

Under the Mental Health Services Act (MHSA), counties established and operate Full-Service Partnership (FSP) programs which provide comprehensive mental health services to eligible individuals, referred to as FSP partners.

Under the authority of [California W&I Code § 5898](#), regulations at Title 9, CCR Section 3620.10 and 3530.30 were promulgated in 2006 to implement the MHSA. These regulations require counties to conduct a Partnership Assessment of the client at the time of the FSP agreement that is created between the County and the client, collect key event data, and review and update client information through a quarterly assessment. Counties are required to submit collected data to DHCS through the DCR system within 90 days of collection.

In March 2024, California voters passed Proposition 1 to implement the statutory changes in Senate Bill 326 (Chapter 790, Statutes of 2023), renaming the MHSA to the Behavioral Health Services Act (BHSA) and modernizing and reforming the public behavioral health care system. As part of BHSA implementation, FSP programs are undergoing changes effective July 1, 2026, intended to standardize service requirements, expand access to integrated care, and strengthen statewide quality and accountability.

POLICY:

DHCS is removing the requirement that counties report FSP data via the DCR system. Effective July 1, 2026, counties will no longer be required to submit data on newly completed partner assessments. Counties shall continue to submit data for MHSA FSP partner assessments performed through June 30, 2026, by a final deadline of October 1, 2026.

This change is intended to reduce county reporting burden and implement updates to FSP programs as required under the BHSA. As counties implement BHSA FSP requirements, DHCS will utilize alternative data sources - including individual-service level (ISL) encounters for county-delivered behavioral health services - to support program oversight.

Pursuant to applicable DHCS guidance (W&I §§ 5610(b), (d), 5664(a)), effective January 1, 2027, all counties and cities are required to submit ISL encounters for all in-scope services, including FSP, delivered on and after January 1, 2027. All encounters must be submitted within 90 days of the date of service. Beginning July 1, 2026, counties may, at county option, begin submitting ISL encounters to DHCS for services delivered between July 1 and December 31, 2026. The ISL encounter reporting requirement is included in the County Performance Contract effective July 1, 2026. DHCS will issue additional guidance on ISL encounter reporting requirements - including encounter specifications, validation rules, and service codes - in Spring 2026.

The regulatory provisions requiring DCR submission (CCR Title 9, Sections 3620.10 and 3530.30) will be repealed through forthcoming rulemaking. The DCR system will be formally decommissioned following the October 1, 2026, reporting deadline. Historical DCR data will be retained in accordance with applicable legal and record-retention requirements.

Table 1. Timeline for Sunsetting MHSA FSP Reporting to DCR

Step	Date
Revised policy eliminating DCR reporting for newly completed MHSA FSP partner assessments takes effect	July 1, 2026
Counties may begin submitting ISL encounters to DHCS (Note: ISL encounters are optional for counties between July 1, 2026 and December 31, 2026)	July 1, 2026
Counties submit all outstanding MHSA FSP data to DCR for FSP partner assessments performed through June 30, 2026	October 1, 2026 (or earlier)
DCR system decommissioned	October 2, 2026
All counties are required to submit ISL encounters to DHCS	January 1, 2027

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Questions may be submitted to MHSA@dhcs.ca.gov.

Sincerely,

Marlies Perez, Chief
Community Services Division