

DATE: November 24, 2025

CCS N.L.: 05-1125
Index: Administration

TO: All California Children's Services Program Administrators

SUBJECT: California Children's Services Program Medical Documentation

I. POLICY

This Numbered Letter (NL) is to reiterate an existing policy due to ongoing inconsistencies in compliance across counties. The Department of Health Care Services (DHCS) has long required, and continues to require, all documentation supporting medical decision-making to be uploaded into Children's Medical Services (CMS) Net or Provider Electronic Data Exchange (PEDI), in accordance with longstanding state law, regulation, and state guidance. However, DHCS has observed inconsistent compliance among County CCS Programs in uploading the required medical documentation into CMS Net that supports medical decisions. This documentation is essential for supporting medical eligibility determinations, service authorizations, and claims processing.

II. BACKGROUND

DHCS is responsible for overseeing the overall administration of the CCS Program. Welfare & Institutions (W&I) Code article 5.51, section 14184.600 (b) of the California Advancing and Innovating Medi-Cal (CalAIM) initiative authorized DHCS to enhance oversight and monitoring of county administration of the CCS program. Further, W&I Code section 14184.102 (d): "Notwithstanding Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, the department may implement, interpret, or make specific this article or the CalAIM Terms and Conditions, in whole or in part, by means of all-county letters, plan letters, provider bulletins, information notices, or other similar instructions, without taking any further regulatory action.

III. EXISTING LAW, REGULATION, AND POLICY

This requirement is supported by:

- » CCS Administrative Case Management Manual – Directs County CCS Programs to upload medical documentation into CMS Net to support medical eligibility and service authorization decisions¹

¹ [CCS Administrative Case Management Manual](#)

- » Cal. Code Regs., title 22, section 41511 – County CCS programs must submit reports of services rendered and associated costs to DHCS²
- » Health & Saf. Code section 123810 – DHCS is responsible for processing, auditing, and paying CCS claims³
- » Health & Saf. Code section 123815 – DHCS is authorized to possess and control all records necessary for claims processing⁴

These provisions collectively require maintaining and submitting documentation supporting CCS medical decisions in a manner accessible to DHCS.

IV. REITERATION OF COUNTY OBLIGATIONS

Counties must upload supporting documents for claims into CMS Net to avoid any risk of the claims being denied.

To reiterate, the following requirements continue to apply:

A. County Responsibilities

County CCS Programs must upload the following types of documentation into CMS Net:

- » Medical records (e.g., diagnostic reports, clinical notes)
- » Plan of treatment
- » Any other documentation used to support medical decisions

B. Electronic Health Record (EHR) Integration

If a County CCS Program has direct access to provider EHR systems through existing agreements, the county may:

- » Require providers to upload documentation directly into CMS Net
- » Update EHR contracts to include submission of medical records into CMS Net or PEDI

If you have any questions regarding this N.L., contact CCSProgram@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Joseph Billingsley

² [Cal. Code Regs., title 22, § 41511](#)

³ [Health & Saf. Code § 123810](#)

⁴ [Health & Saf. Code § 123815](#)

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