



DATE: November 2, 2023

Behavioral Health Information Notice No: 23-060  
Supersedes MHSUDS IN [20-062](#) and BHIN [20-062E](#)

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 Social Rehabilitation Agencies  
California Consortium of Addiction Programs and Professionals  
California Council of Community Behavioral Health Agencies  
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: Timely Access Submission Requirements for Mental Health Plans

PURPOSE: To update the Mental Health Plans (MHPs) about requirements for data submissions for network adequacy compliance and the transition from the Client and Services Information (CSI) Assessment Record (CSI Record Type = A) data submission to the Timely Access Data Tool (TADT).

REFERENCE: 42 CFR § 438.206; Welfare & Institutions Code § 14197; [BHIN 23-041](#)

**BACKGROUND:**

In May 2016, the Centers for Medicare and Medicaid Services published the Medicaid and Children’s Health Insurance Program Managed Care Final Rule (Managed Care Rule), which revised Title 42 of the Code of Federal Regulations (CFR). These changes align Medicaid managed care regulations with requirements of other major sources of coverage. MHPs operate as a Prepaid Inpatient Health Plan (PIHP), a type of managed care program as defined in 42 CFR part 438.2, and therefore must comply with the federal managed care requirements applicable to PIHPs. The Managed Care Rule directs states to develop and enforce network adequacy standards that meet federal requirements. The network adequacy standards are set forth in 42 CFR Part 438.68, 438.206, and 438.207.

Welfare and Institutions Code (WIC) section 14197 includes time or distance and timely access standards as network adequacy standards for MHPs. Subdivision (j) of WIC section 14197 authorizes the Department of Health Care Services (DHCS) to interpret and implement the standards of that section by information notice.

In March 2019, DHCS issued guidance instructing MHPs to submit assessment records for new patients through new data elements added to the CSI for the purpose of submitting timely access data. MHPs were instructed to provide the data in two phases. MHPs began reporting Phase One data in August 2019. In November 2020, and January 2021, DHCS issued guidance to MHPs about requirements for data submission and the transition from Phase One to Phase Two of the CSI Assessment Record data submission.

DHCS developed the TADT to standardize data submissions until updates to the CSI system allowed data submissions directly through electronic health record extracts. In July 2020, DHCS offered MHPs the opportunity to submit timely access data utilizing the TADT and made submission of the TADT mandatory in April 2021. MHPs were required to submit timely access data via the TADT during subsequent annual network certification periods, and MHPs that did not meet the timely access standards were placed on corrective action plans. MHPs were also required to continue submitting their timely access data through the CSI Assessment Record.

**POLICY:**

Effective August 30, 2023, MHPs shall no longer be required to submit timely access data through the CSI Assessment Record, specifically CSI Record Type = A. MHPs shall solely submit timely access data via the TADT. Future timely access data submission requirements will be published in network certification requirements BHINs. Please note, counties are still required to submit CSI data no later than 60 days after the end of the month in which the services were provided. (California Code of Regulations, Title 9, Division 1, Section 3530.10)

For questions regarding network adequacy requirements, contact the Medi-Cal Behavioral Health – Oversight and Monitoring Division at [NAOS@dhcs.ca.gov](mailto:NAOS@dhcs.ca.gov). For questions related to all other CSI data submissions, contact [BHData@dhcs.ca.gov](mailto:BHData@dhcs.ca.gov).

Sincerely,

Original signed by

Michele Wong, Chief  
Medi-Cal Behavioral Health – Oversight and Monitoring Division