

DHCS All Plan Letter Summary

To: Medi-Cal network participants

September 2026

Subject: All Plan Letter 26-004: Medi-Cal Managed Care Plan Responsibilities for Behavioral Health Data-Sharing

The Department of Health Care Services (DHCS) recently issued [All Plan Letter \(APL\) 26-004](#), "Medi-Cal Managed Care Plan Responsibilities for Behavioral Health Data-Sharing." We are sharing a summary of this APL with you to ensure you are aware of the information, and you can apply the information to your practice or facility operations, where appropriate.

APL 26-004 summarizes and clarifies guidance for managed care plans (MCPs) such as Blue Shield of California Promise Health Plan with regards to behavioral health data sharing, particularly about protecting member's data privacy and security, in alignment with state and federal laws and MCP contract requirements.

APL summary

- MCPs must share member data with County Behavioral Health Plans (BHPs), Drug Medi-Cal (DMC) Counties, and Medi-Cal Third Party Entities in real time for the purposes of care coordination, referrals, service delivery, ensuring non-duplication of services, population health management, quality improvement, and to comply with the Data Exchange Framework (DxF) and other required reporting obligations.
- Existing MCP data-sharing responsibilities described in APL 26-004 include:
 - Bidirectionally sharing minimum necessary member data with BHPs and DMC Counties for care coordination in real time (including updating member rosters monthly, at minimum)
 - Executing Memoranda of Understanding (MOUs) with BHPs and DMC Counties that contain the processes necessary to facilitate the required timely and frequent exchange of member information, including Admission, Discharge, and Transfer (ADT) event notifications
 - Using a "consent to share information" form when consent is needed, in compliance with applicable federal and state data privacy regulations
 - Sharing all necessary member and encounter data with BHPs to meet required state and federal quality and monitoring and reporting obligations
- NEW – APL 26-004 advises MCPs of their responsibility to adopt the **Authorization to Share Confidential Medi-Cal Information (ASCMCI) form**, as a statewide standardized "consent to share information" form, to collect member consent to share protected health information when necessary.
 - Find the form and additional information on the [CalAIM ASCMI Initiative web page](#).

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- Beginning on January 1, 2027, DHCS will implement focused monitoring and enforcement of these requirements.

This summary is only meant as a brief description of the APL. Please see the APL itself for additional background and the complete requirements. The full text of APL 26-004 may be found at this URL:
<https://www.dhcs.ca.gov/wp-content/uploads/2026/05/APL26-004.pdf>.

(Links to the websites above will take you off the Blue Shield Promise website.)

Additional information will be forthcoming from Blue Shield Promise regarding our implementation of the data-sharing requirements stated in this APL.

If you have questions about sharing behavioral health data, please contact our Provider Services team at **(800) 468-9935** from 6 a.m. to 6:30 p.m., Monday through Friday.