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Frequently Asked Questions

The Department of Managed Health Care (DMHC) has prepared frequently asked questions (FAQ) and responses based on stakeholder comments and questions regarding the compliance requirements with Senate Bill (SB) 306 (Becker, 2025), which added section 1367.025 to the California Health and Safety Code. These FAQs provide clarification regarding the first data call reporting template.

I. General FAQ Responses:

1. What NDC code should plans report, and how should the NDC code be reported and formatted?

National Drug Code (NDC) Reporting:

- The requested NDC is the NDC product code, not the NDC package code. Plans may use the FDA NDC Directory to access and verify NDC product codes.
- If a Plan processed a discontinued NDC code during the measurement period, that NDC code must be reported. If a discontinued product code is no longer available in the FDA NDC Directory, it may be located in the historical code within the NDC Excluded Drugs Database File in zip format.
- NDC product codes must be reported in the format associated with the applicable product code. This may include 5-4 digit, 5-3 digit, or 4-4 digit formats.
- Plans that have submitted NDC package codes will need to resubmit data using the appropriate NDC product codes.

2. **If a code was subject to prior authorization during the reporting period but no prior authorization request was submitted for that code, should the code still be reported?**

   Prior Authorization Reporting:
   - Yes. As directed on the First Data Call Reporting Template cover sheet, if a code was subject to prior authorization during the reporting period, the code must be recorded in the corresponding Prior Auth Data tab. This applies even if no prior authorization request was submitted for that code during the reporting period.

3. **Should plans report Generic Product Identifier (GPI), Revenue Codes, or other Data Elements when a corresponding Current Procedural Terminology (CPT), Healthcare Common Procedure Coding System (HCPCS), or National Drug Code (NDC) is not available?**

   GPI, Revenue Code, and Other Data Elements:
   - No. GPI and revenue codes are not included in the First Data Call Reporting Template and should not be reported as part of this submission. Data related to GPI, revenue codes, and other data elements may be requested in a future data call.

4. **What information should plans enter in the File Number ID field on the cover sheet of the first data call reporting template?**

   File Number ID Reporting:
   - The Health Plan License ID must be entered in the File Number ID field on the cover sheet of the First Data Call Reporting Template.