



INTERIM INSTRUCTION NOTICE #26-001

June 30, 2026

SUBJECT: Removal of Mental Health Services Act (MHSA) County Data Collection Reporting (DCR) Requirement

**DISTRIBUTION: Department
of Behavioral Health (DBH),
Contract Agencies and
Fee for Service Providers**

OBSOLETE: January 1, 2027

Effective Date July 1, 2026

From DBH Behavioral Health Services Act Administration (BHSA)

Introduction The purpose of this Interim Instruction Notice is to inform San Bernardino County (County) Department of Behavioral Health (DBH) staff, contract agencies and Fee For Service (FFS) providers of the removal of the Mental Health Services Act (MHSA) County Data Collection Reporting (DCR) Requirement and introduce new Behavioral Health Services Act (BHSA) reporting data source Individual Service Level (ISL).

Background Effective July 1, 2026, the Department of Health Care Services (DHCS) issued Behavioral Health Information No. 26-016, eliminating the requirement that counties report Full-Service Partnership (FSP) Outcomes via the DCR system.

- 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.
- As counties implement Behavioral Health Service Act (BHSA) FSP requirements, DHCS will utilize alternative data sources – including ISL encounters for county-delivered behavioral health services - to support program oversight.

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Individual Service Level (ISL) Requirement

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.

- Counties must submit ISL encounters to DHCS annually, no later than 90 days after the close of the fiscal year (FY) in which services were rendered.
 - Under the BHSA, Department of Health Care Services (DHCS) has a mandate to collect non-Medi-Cal person level encounter data.
 - Currently, with only Medi-Cal claims data, DHCS sees a fraction of the investments counties make to serve their communities.
 - ISL will capture the gap between what is claimed in Medi-Cal and other county investments.
 - Counties will begin submitting ISL services to DHCS starting January 1, 2027.
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ISL Reporting

DBH is currently exploring incorporating ISL into myAvatar (Electronic Health Record). ISL encounter data collection begins January 1, 2027. More guidance forthcoming.

Timeline for Sunsetting MHSA Full-Service Partner (FSP) Reporting to DCR

Step	Date
Counties sunset FSP partner assessments	June 30, 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 for all programs (Mental Health and Substance Use)	January 1, 2027

Reference(s)

- Behavioral Health Information Notice No: 26-016 Removal of Mental Health Services Act (MHSA) County Data Collection Reporting (DCR) Requirement [BHIN 26-016](#)
 - Individual Service Level Video [Individual Service Level Data - ISL | Videos & Movies on Vimeo](#)
 - [CalMHSA ISL Resources for Counties](#)
 - [DHCS ISL encounter reporting guidance 6/11/26](#)
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Questions

For questions regarding this Interim Instruction Notice, please contact DBH BHSA Administration at (909) 252-4021 or mhsa@dbh.sbcounty.gov
