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SAPC INFORMATION NOTICE 26-11

June 29, 2026

TO: Los Angeles County Substance Use Disorder
Contracted Treatment Providers

FROM: Gary Tsai, M.D., Bureau Director 
Substance Abuse Prevention and Control Bureau

SUBJECT: **INTEROPERABILITY AND PATIENT ACCESS FINAL RULE – SAPC
PATIENT ACCESS SYSTEM PROCESSES**

The County of Los Angeles Department of Public Health’s (Public Health) Bureau of Substance Abuse Prevention and Control (SAPC) is issuing Information Notice (IN) 26-11 to inform SAPC’s Treatment provider agencies, both Primary and Secondary Sage Electronic Health Record (EHR) users, about the Interoperability and Patient Access Final Rule and the requirement to notify and assist clients in accessing the SAPC Patient Access System.

Background

In May 2020, Centers for Medicare and Medicaid Services (CMS) finalized the Interoperability and Patient Access final rule, which establishes clients as the owners of their health information with the right to direct the transmission of their data to third-party applications.

In January 2024, CMS published the Interoperability and Prior Authorization Final Rule (CMS-0057-F) with the aim of advancing interoperability and improving prior authorization processes by requiring impacted payors to implement and maintain Health Level 7 (HL7) Fast Healthcare Interoperability Resources (FHIR) Application Programming Interfaces (APIs). CMS requires that certain operational provisions and API enhancements are implemented beginning January 1, 2026. Additional API implementation, including enhancements to the Patient Access API, need to be implemented by January 2027.

For more information about the CMS Interoperability Rule and detailed requirements, refer to the State's Behavioral Health Information Notice (BHIN): [BHIN No: 26-008 \(supersedes 22-068\)](#).

Interoperability Final Rule Requirements

Requirement 1 – Patient Access API: DHCS BHIN No: 26-008 requires Behavioral Health Plans (BHPs), including DMC-ODS specialty SUD plans such as SAPC, to implement and maintain a secure FHIR standards-based API that provides clients with the means to access their own SUD record.

To meet this requirement, SAPC is making the Patient Access System available to allow SAPC clients to access their SUD data directly. The Patient Access System is populated by information present in Sage Provider Connect NX (PCNX). This includes information related to client demographics, eligibility, claims and diagnosis, which are data elements required for both Primary and Secondary Sage Users to enter directly into Sage-PCNX. To meet State and federal client access regulations, SAPC is requiring provider agencies to notify and assist interested clients with accessing their SUD health information via SAPC's Patient Access System.

Requirement 2 – Provider Directory API: SAPC must implement and maintain a publicly accessible standards-based Provider Directory API. The Provider Directory API must meet the same technical standards as the Patient Access API, excluding the security protocols related to user authentication and authorization. The online provider directory must be updated by SAPC no later than 30 calendar days after a reported change. SAPC must ensure processes are in place that allow provider agencies to promptly verify and submit changes to the information required to be in the directory. Refer to [BHIN 25-026](#) for updated provider directory information requirements.

To meet this requirement, SAPC has deployed a Provider Directory API. The Provider Directory API lists all active SAPC provider agency sites and is populated with the information from the Service and Bed Availability Tool (SBAT). For more information on Provider Agency SBAT requirements, refer to the [SAPC Provider Manual](#).

Requirement 3 – Prior Authorization: Communicating a Reason for Denial: SAPC must communicate a reason for denial when denying a prior authorization request, no later than 14 calendar days and publicly report a list of all items and services that require prior authorizations as well as key metrics. Prior Authorizations that require communication are Levels of Care (LOCs): 3.1, 3.3, and 3.5.

To meet this requirement, SAPC Utilization Management (UM) communicates denials through Provider Connect NX (PCNX). For more information on the Prior Authorization process and timeframes, refer to the [SAPC Provider Manual](#). SAPC reports Prior Authorization metrics for the above LOCs on the SAPC website and can be found on the [Metrics page](#).

SAPC Patient Access System

SAPC developed the Patient Access System to meet the requirements in BHIN No: 26-008 as described above. The Patient Access System is a patient portal platform to facilitate patient access to their health information in a manner that meets the above requirements. SAPC contracted SUD treatment provider agencies are required to share instructions on how to access SAPC's Patient Access System with all SAPC clients and collect the client's acknowledgement as described below.

Instructions for SUD Treatment Providers

SAPC's Treatment provider agencies are required to discuss and facilitate access to the SAPC Patient Access System with each client. This requirement applies to both provider agencies that use SAPC's Sage system as their EHR (Primary Sage Users) as well as provider agencies who have their own EHR systems (Secondary Sage Users). Clients are required to acknowledge receipt of SAPC Patient Access System information as follows:

1. **One-time acknowledgement by client.**
 - a. Complete the Patient Acknowledgement form (formally the Patient Handbook and Orientation Video Acknowledgement form) in Sage (new section for the SAPC Patient Access System).
 - b. All current clients will need to be informed about the Patient Access System and complete the acknowledgement.
2. **Post the SAPC Patient Access System poster at sites.** Poster must be posted where it is visible to clients. At initial implementation, one (1) poster will be provided by SAPC for each provider site. Additional posters will need to be printed by provider agencies using the [SAPC templates provided](#).
3. **Provide the client with SAPC Patient Access System postcard or flyer.** At initial implementation, SAPC will provide each provider agency with 100 postcards. Additional postcards or flyers will need to be printed by provider agencies using the SAPC templates provided.

SAPC drafted resources for Treatment provider agencies and clients. The following resources are available on the SAPC website:

1. Patient Access System – Member Guide
2. Patient Access System FAQ
3. Training Video designed for clients and provider staff (available on the SAPC Member Information and Resource page and the SAPC [Learning & Network Connection](#) Platform)
4. SAPC Patient Access System poster, postcard, and flyer are available electronically on the [Manuals, Bulletins, and Forms](#) page. Provider agencies are required to print any additional or replacement materials.

5. Educational Resources - General guidance on actions clients may take to protect the privacy and security of their health information. SAPC has educational resources available on the Member Information and Resources page on the SAPC website.

The most up-to-date information on Interoperability Requirements can be found on the SAPC website at

<http://publichealth.lacounty.gov/sapc/providers/sage/data-exchange.htm>

SAPC Patient Access System resources can be found at

<http://publichealth.lacounty.gov/sapc/PatientPublic.htm?hl> or at

<https://pax.sapc.ph.lacounty.gov/>

If you have any questions or need additional information, please email

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GT:dh