

Memo

Date: June 24, 2026

To: All Alameda County Behavioral Health Department (ACBHD) Substance Use Disorder Treatment Providers

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Subject: Reminder - CalOMS “Private Pay” Patient Data Collection Requirements

Purpose

This memo is a reminder to providers of substance use disorder treatment services under contract with ACBHD to report CalOMS data for all service recipients, regardless of funding source.

Definition of Private Pay Patient

Throughout this document, “private pay patient” refers to any individual receiving substance use disorder (SUD) treatment at an ACBHD-contracted program whose services are not funded under the ACBHD contract—regardless of their actual payment method.

Data Reporting Requirements

ACBHD captures CalOMS data through the billing system enrollments and discharges. For programs that are required to submit CalOMS data, data is required for all recipients of services regardless of the funding source. Per the DHCS CalOMS Data Collection Guide:

Data must be collected on all service recipients, by all providers that receive funding from DHCS, regardless of the source of funds used for the service recipient. For example, if a provider receives DHCS funding, but provides services to a person using only county funds, or provides services to a private-pay client, the provider must still collect and submit CalOMS Tx data for that individual.

Private Pay Data Collection

To meet these requirements, ACBHD has created “private pay” programs within its billing system. These programs have PRIVATE, PRIVT, or PRIV in the name of the program.

An agency's private pay program is solely for agencies to enroll and discharge private pay patients to collect CalOMS data. No additional information about these patients should be entered into ACBHD’s systems, including clinical information in ACBHD’s electronic health record (EHR). Private pay programs will no longer show up as options in ACBHD’s SUD EHR.

As these individuals are not Medi-Cal clients, timeliness data collection is not required. For individuals who switch between Medi-Cal and other payment options, if services are continuous, Medi-Cal timely access data is only required once at the onset of DMC-ODS services.

Privacy Considerations

Per DHCS, States receiving Substance Use Block Grant (SUBG) funding must report Treatment Episode Data Set (TEDS) information to Substance Abuse and Mental Health Services Administration (SAMHSA). Client consent is not needed for TEDS reporting because TEDS reporting is a federal audit and evaluation requirement. Under [42 CFR § 2.53](#), SUD programs may disclose patient information without consent when the disclosure is for:

- Federal or state program oversight
- Audit or evaluation of a program
- Compliance with federal grant requirements

TEDS reporting falls within these categories as a mandatory federal oversight activity tied to SUBG funding.

Resources

- [DHCS CalOMS Data Collection Guide](#)
- [ACBHD FAQ #7 CalOMS](#)
- [42 CFR, Part 2 § 2.53 Management audits, financial audits, and program evaluation.](#)

Support

For questions about this memo please contact QATA@acgov.org. For additional CalOMS-related questions, please refer to the [ACBHD CalOMS/DATAR site](#).