



COMMONWEALTH of VIRGINIA

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Dear CSBs:

As of July 1, 2025, all CSBs have transitioned from the legacy CCS3 data exchange process to the new HL7 data exchange process. This has been a tremendous step for our system but has also presented implementation challenges, including the need to recreate certain measures, metrics, benchmarks, and dashboards using the new data. DBHDS staff, vendor partners, and CSB data leaders have been working to complete this process. While much progress has been made there continues to be additional work needed.

A concern has been raised by CSB leadership regarding liability for performance contract non-compliance when discrepancies exist between the CSB-calculated measures or metrics (from their EHR or BI tool) and the newly developed (or still under development) calculation using new data. DBHDS is working through established processes to communicate all measures and metrics it is collecting, including data sources and the data fields for numerator and denominator.

Importantly, CSBs are responsible for providing quality services to clients in accordance with the performance contract regardless of the availability of DBHDS-produced dashboards demonstrating compliance with measures or metrics. The absence or malfunction of such a dashboard does not absolve CSBs from their obligations to collect, track and work to remedy instances where performance falls below standards established under the contract.

Our goal is to act in good faith and to have transparent processes established through collaboration with our partners while recognizing the refinement process to achieve high-quality, reliable and valid measures is ongoing. DBHDS will continue to work with data SMEs to ensure transparency and high-quality data.

Given the above, DBHDS will work in collaboration with CSBs to review data jointly determine whether a CSB is or is not out of compliance with the performance contract as it pertains to various measures and metrics for service delivery or quality during FY 2026. DBHDS reserves the right to exercise all remedies available to it under the performance contract if, through mutually agreed upon review, the CSB is found to be not meeting standards. Lastly, contract provisions requiring CSBs to brief their boards of directors on measures and metrics shall remain in effect, but should be considered in the context of this memo.

DBHDS anticipates completing all measure/metric refinement by the end of FY 2026.

DocuSigned by:
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