

All Treatment Provider Meeting – Opening

- Preparing for Medicaid Changes – Through the Provider Lens
- AB 2473 – Preparing for Launch in Jan 2026

September 18, 2025

Preparing for Medicaid Changes – Through the Provider Lens



SUD Impacts of the Federal H.R. 1 (“One Big Beautiful Bill”)

- **Medicaid redetermination (January 2027)**
 - Every 6 months instead of every 12 months
- **Shortened period for retroactive billing for Medicaid enrollment (January 2027)**
 - From 90 days to one month for expansion enrollees and two months for traditional enrollees
- **Providers will need to:**
 - Optimize their Medi-Cal enrollment and renewal processes
 - Be VERY proactive about supporting client enrollment in benefits (e.g., consider dedicated benefits enrollment specialists)
 - Track your revenue on a monthly basis very closely
 - SAPC anticipates reductions in DMC revenue; DHCS is projecting a 20-30% drop in Medi-Cal enrollment
 - It will be important for agencies to track revenue closely to adapt accordingly

SUD Impacts of the Federal H.R. 1 (“One Big Beautiful Bill”) – cont’d

- **Work requirements (January 2027)**

- SUD clients are exempt, but anticipate indirect adverse effects
- Providers will need to provide documentation to verify client participation in SUD treatment;
- States will be required to conduct additional data matching to confirm eligibility for these exemptions

- **Prepared providers will:**

- Establish processes to communicate this SUD exemption to clients (remember, your clients communicate with your future clients), those you outreach to, and the community at-large
- Establish processes to communicate participation in SUD treatment

- **Cost sharing (co-pays) (October 2028)**

- SUD services are exempt, but anticipate indirect adverse effects

- **Prepared providers will:**

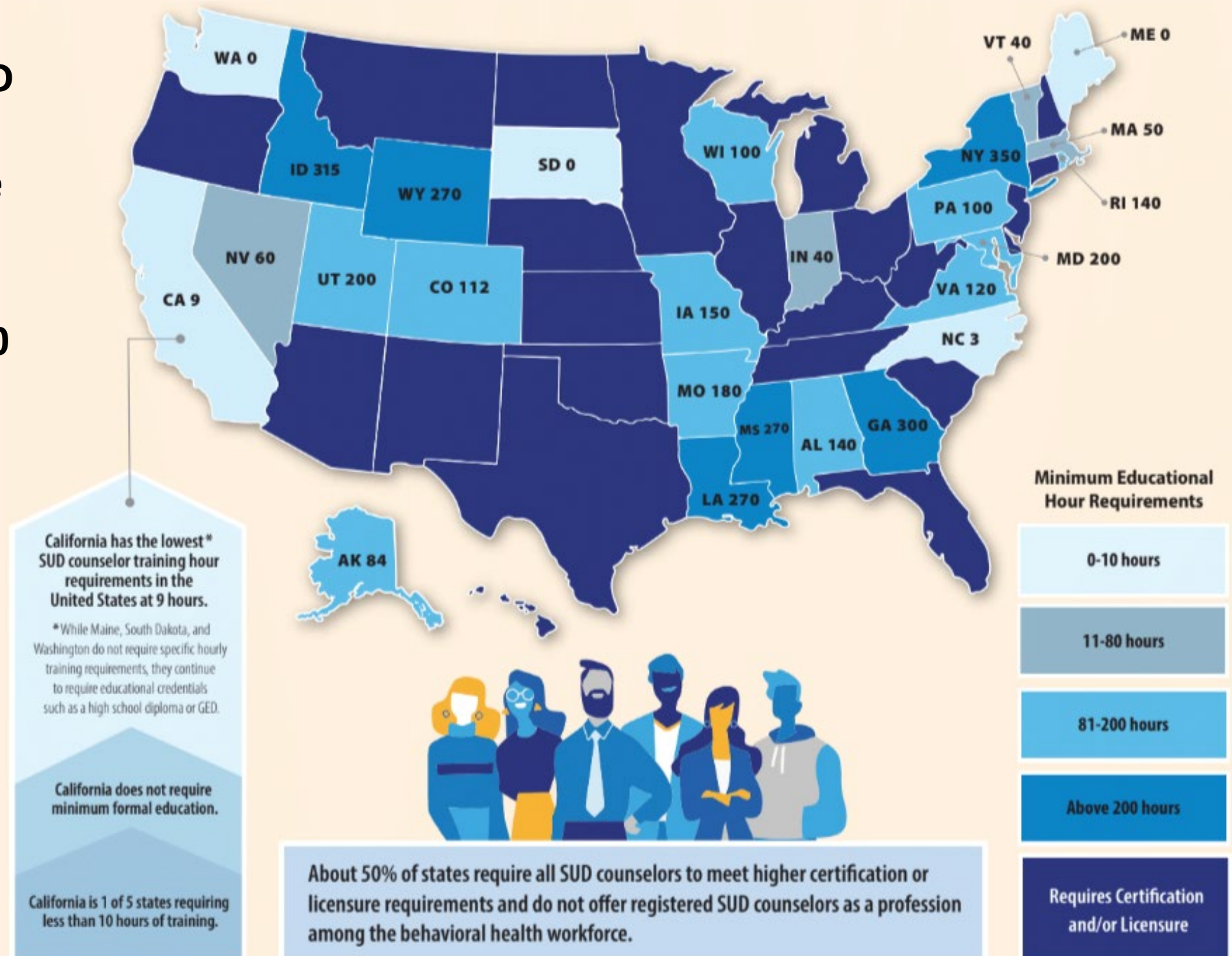
- Establish processes to communicate this SUD exemption to clients (remember, your clients communicate with your future clients), those you outreach to, and the community at-large

AB 2473 – Preparing for Launch in Jan 2026

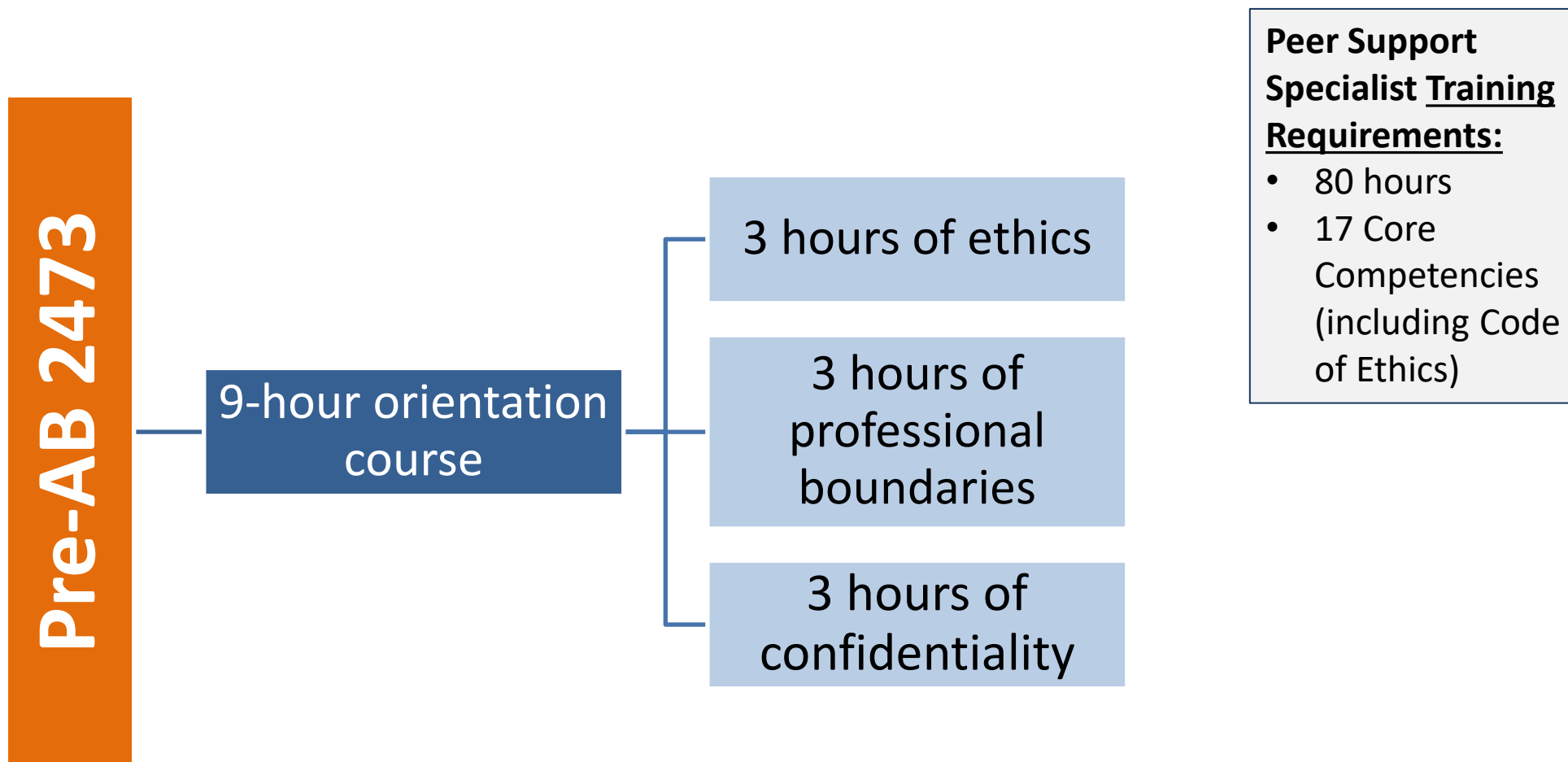


- CA has the lowest SUD counselor training standards of any state in the nation, and is one of only 4 other states that requires 10 hours or less of training for SUD counselors.

- ~50% of states don't even offer a training classification for SUD counselors below licensure or certification.



SUD Counselor Registration Requirements BEFORE AB 2473



SUD Counselor Registration Requirements AFTER AB 2473

Post-AB 2473

Hour requirements shall not be lower than hours approved for certified peer support specialists (80 hrs)

Core Competencies of AB 2473

Knowledge of the current Diagnostic and Statistical Manual of Mental Disorders (**DSM**)

Knowledge of the American Society of Addiction Medicine (**ASAM**) criteria and continuum of ASAM levels of care, or other similar criteria and standards as approved by the department

Cultural competence, including for people with disabilities, and its implication for treatment

Case management

Utilization of **electronic health record systems**

Knowledge of **medications for addiction treatment**

Clinical documentation

Knowledge of **co-occurring substance use and mental health** conditions

Confidentiality

Knowledge of relevant **law and ethics**

Understanding and practicing **professional boundaries**

Understanding of **behavioral health delivery systems**

At-a- Glance Requirements for Registration and CEUs

Registration Date	Hours of Education	Due	Highlights
Prior to July 1, 2025	Exempt from 6 -month time frame	Prior to initial certification	<i>Must complete 315 hours of AOD education including core competency topics prior to initial certification</i>
July 1, 2025-December 31, 2025	80	July 1, 2026	<i>Educational deficiencies to be met prior to one-year registration expiration</i>
On or after January 1, 2026	80	Within 6 months of registration	<i>The six-month timeframe takes effect immediately upon initial registration.</i>

Annual Education Requirement	CEU's to Qualify for Registration Renewal
Registered Counselors that have completed fewer than 315 hours of AOD education must provide documentation of completion to Certifying Organizations (COs) at least 120 days before registration expiration	50 Hours
Registered Counselors that have completed 315 hours of AOD education must provide documentation of completion to CO's at least 120 days before registration expiration	20 Hours

BH Information Notice 25-029 AB2473 AOD Educational Requirements for details

- <https://www.dhcs.ca.gov/provgovpart/Documents/BHIN-25-029-Assembly-Bill-AB-2473-Alcohol-or-Other-Drug-AOD-Counselor-Educational-Requirements.pdf>

Flexibilities Built into AB 2473

- Launching January 2026 after an extended implementation runway originally slated for July 2025 to allow time for DHCS stakeholder process and certifying organization planning
 - Development of 80-hr free online curriculum, certifying organization planning with DHCS, etc.).
- A six-month grace period that allows registrants to work as an SUD counselor while completing their 80 hours of required core competency coursework.
 - 80 core competency hours count toward the 315 AOD education hour requirement.
- An exemption from coursework requirements for those who have a Master's degree in psychology, social work, marriage, and family therapy or counseling.

What the Passing of AB 2473 Accomplishes

- **Modernizes the SUD Counselor Training Curriculum**

Updates training standards to reflect current clinical and technological standards, including ASAM Criteria, DSM-5, and electronic health records (EHR), to better prepare SUD counselors for today's evolving healthcare landscape.

- **Builds a More Skilled and Sustainable Workforce**

Strengthens the SUD counselor workforce to better prepare it to meet the complex needs of today's client population, justifies higher investments in this workforce, and ultimately improves the quality of care they deliver.

- **Aligns with CalAIM's Integrated Care Goals**

Strengthens the position of the SUD workforce by aligning with CalAIM's focus on care integration and promoting parity between SUD and mental health services.

What AB 2473 Means for Providers

- **Effective January 1, 2026, registered SUD counselors' will have 6 months to complete the required 80 hours of approved training required under AB 2473**
 - **Free online training will be available starting in Jan 2026**
 - Developed through AB 2473 stakeholder process including DHCS, certifying organizations, SAPC, and other thought leaders across the State
- **SAPC recommends that agencies start preparing now by ensuring that:**
 - Registered SUD counselor staff are aware of these upcoming requirements based on date of registration
 - SUD counselor staff is compliant with current requirements around annual CEU's and are in good standing with the certifying organizations
 - Your agency has a process to track registered SUD counselor staff completion of their various required trainings (80 hrs for AB 2473; 20 or 50 hrs annually of CEU's based on 315 AOD education hour completion, SAPC-required trainings, etc.)

BHSA End of Year Schedule

	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
CPT MEETINGS	9/9 – LEVEL SETTING <ol style="list-style-type: none"> Overall Budget Local Behavioral Health Continuum Calendar of Presentations Stakeholder Engagement 9/26 – PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Adults & Older Adults: Outpatient, Clubhouse, Peer Run Adults & Older Adults: ACT/FACT/FSP 	10/14 – PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Harm Reduction Coordinated Specialty Care—First Episode Psychosis (Adults/Children) Crisis and Residential Care Day Treatment Intensive (DTI)/Day Rehabilitation (DR) 10/31– PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Workforce Strategy and Workforce, Education, and Training Medication Assisted Treatment (MAT) 	11/14 – PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Prevention Early Intervention Child/TAY Continuum of Care 11/18 – PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Housing Interventions Residential SUD Treatment Program Budget 	12/9 – PRESENTATION & FEEDBACK <ol style="list-style-type: none"> Final feedback on overall BHSA Integrated Plan
SPECIALTY FORUMS	9/29 from 1-4pm: Housing Forum #1	10/17 from 9:30-12:30pm: Housing Forum #2 TBD: Prevention Forum	TBD: Data Justice Forum TBD: Youth Forum	