



Network Development and Patient Access

July 15, 2025

Antonne Moore, M.Ed., Division Chief
Strategic and Network Development
Substance Abuse Prevention and Control



PRESENTATION OUTLINE

- 1. BHIN 25-019 Requirements**
- 2. Member service updates**
- 3. AI-Impics Updates – SSG/HOPICS**
- 4. Title 42, Part 2 Final Rule Update**
- 5. CIBHS**

- **Behavioral Health Information Notice (BHIN) [25-019](#)** released in May 2025 outlines requirements under SB923 for providing trans-inclusive health care for individuals who identify as transgender, gender diverse, or TGI.
 - **SAPC IN: 24-02** Requirements for Culturally and Linguistically Appropriate Services
 - Intended to improve access to culturally responsive care, increase a sense of belonging for clients, improve health outcomes and reduce disparities in access to care.
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- ☐ TGI Trainings will take place **September – November 2025**: 3 Live Virtual and 1 in-person; thereafter on SAPC LNC; continuing education credits will be provided.
- ☐ All provider staff that have direct contact with clients must complete training by **March 31, 2026**.
- ☐ New staff must complete within 6 months of onboarding.

MEMBER RIGHTS POSTER UPDATE



- All treatment providers must post the most current version of the SAPC [Member Rights Poster](#) in easy view for all members.
- An updated Member Rights Poster will be available on the [SAPC Provider Manual, Bulletins, and Forms Page](#) August.
- Printed versions of the Member Rights Poster will be available Fall 2025.
- Updates Include New Requirements from:
 - 42 CFR Part 2 Final Rule (2/8/2024 update)
 - California Ethical Treatment for Persons with Substance Use Disorder Act: Implementation of Senate Bill 349 & [BHIN 23-045](#)
 - [BHIN 24-034](#): Integrated Behavioral Health Member Handbook Requirements and Templates



YOUR RIGHTS

Substance Use Disorder Treatment

As someone who lives in Los Angeles County and is eligible for Medi-Cal or My Health LA, or other select County programs, you have a right to receive medically necessary substance use treatment services from the County and its network of providers, at no cost to you.

You also have the right to:

- Be treated and receive care with dignity and without discrimination based on your race, national origin, ethnic group identification, age, mental ability, physical ability, medical condition, religion, gender identity, or sexual orientation.
- Participate in decisions about your substance use care, including the right to refuse treatment.
- Be free from verbal, emotional, sexual, or physical abuse.
- Receive written materials critical to your care in other formats (such as other languages, large print size, braille, and audio), upon request.
- Receive treatment in a safe and healthful environment.
- Have your health information kept protected and private.
- Receive services in a manner that respects and acknowledges the impact of language, culture, and abilities on the individual.
- Request and receive a copy of your medical records, and request that they be amended or corrected as specified in 45 CFR §164.524 and 164.526.
- Receive oral interpretation services in your preferred language.
- Receive access to medically necessary services out-of-network, if the County does not have a provider who can deliver the services.
- Make a complaint, verbally or in writing, to the facility where you receive your care or to the County and receive a response.
- Request an appeal if you receive a Notice of Adverse Benefit Determination (or NOABD).
- Exercise these rights without it negatively affecting the services you receive.

For more information regarding your rights, refer to your Patient Handbook or go to publichealth.lacounty.gov/sapc/PatientPublic.htm for all other rights as provided by law or regulation.

SAPC Substance Abuse Prevention and Control



Los Angeles Al-Impics “Together We Rise in 2025”

- **Saturday, September 13, 2025**
 - ✓ Agency Check @ 7:00 a.m.
 - ✓ Opening Parade @ 10:00 a.m.
- **Los Angeles Harbor College**
 - ✓ 1111 Figueroa Pl., Wilmington, CA
- **Register online Now:**
 - ✓ <https://form.123formbuilder.com/6851806/los-angeles-al-impics-registration-2025>





42 CFR Part 2 Final Rule (2024)

July 15, 2025



42 CFR Part 2 Final Rule 2024 overview

- 42 Code of Federal Regulations (CFR) Part 2 Confidentiality of Substance Use Disorder (SUD) Patient Records (Part 2), is the federal regulation that restricts the disclosure and use of patient records maintained in connection with the performance of any federally-assisted substance use disorder (SUD) treatment program.
- On February 8, 2024, the U.S. Department of Health & Human Services (HHS) SAMHSA and the Office for Civil Rights announced a final rule modifying the Confidentiality of SUD Patient Records regulations, 42 CFR Part 2.
- That implement changes required by CARES Act (2020) to align certain aspects of Part 2 with HIPAA
 - [HHS factsheet on Final Rule](#)
- **Key dates:**
 - Effective date: April 16, 2024
 - Compliance date: February 16, 2026



What did not change with the 42 CFR Part 2 Final Rule 2024

➤ Definition of Part 2-covered program

- Federally assisted program offering SUD services, defined in § 2.11

➤ Clients must consent in writing before their Part 2 records are disclosed, unless an exception applies

- No major changes to exceptions

➤ Concept of “lawful holder” now defined in § 2.11

- An individual or entity who has received SUD record(s) as the result of a Part 2 compliant consent with an accompanying notice of disclosure.

➤ Court order requirements

- A subpoena or a similar legal mandate must be issued to compel use or disclosure



What changed with the 42 CFR Part 2 Final Rule 2024

❖ Client Consent and Disclosures

- Allows for single written consent to disclose TPO
- Requires a separate written consent to disclose SUD counseling notes* -or- for legal proceedings against the client

❖ Privacy Notices

- Updated the Notice to Accompany Disclosures
- Aligns the Notice of Part 2 Program's Privacy Practices (NPP) with HIPAA NPP requirements

❖ New Client Rights

- Right to request an accounting of disclosures made with consent
- Right to request restrictions on disclosures of records

❖ Security and Enforcement

- Aligns notification requirements for breaches of Part 2 records with HIPAA requirements
- Requirements for receiving and responding to client Part 2 complaints
- Updated penalties and enforcement by HHS

SAPC Efforts

- **SAPC will release an Information Notice with needed actions to confirm compliance**
 - Timeline for release early Fall 2025
- **Update workflows and forms to comply consent, notices, and client rights requirements**
 - Update Part 2 compliant consent form (aka Release of Information) to comply with Final Rule
 - *Establish workflows with Department partners and stakeholders*
 - *Update Notice of Privacy Practices (NPP)*
- **Trainings**
 - SAPC to offer Part 2 trainings series for Network providers later in Fall/Winter 2025.



Consideration for Network Providers

- ❖ **Review 42 CFR Part 2 Requirements**
- ❖ **Implement/revise workflows to comply with new requirements**
 - Incorporate new actions for communicating Part 2 client consent
 - Workflows for including a copy of the signed consent and *Notice to Accompany Disclosures* when sharing Part 2 information.
 - Update existing *Notice of Privacy Practices (NPP)*, include client acknowledgment
- ❖ **Update/revise policies and procedures (P&Ps)**
- ❖ **Ensure all staff are trained on changes to disclosure and redisclosure**
- ❖ **Ensure compliance with breach notification obligations**
 - Address the new breach notification requirements to maintain compliance

Compliance date: February 16, 2026

Resources for understanding 42 CFR Part 2 Published Final Rule

Overview and Factsheets

- [Fact Sheet 42 CFR Part 2 Final Rule](#) (U.S. Dept. of Health and Human Services)
- [Fundamentals of 42 CFR Part 2 and SUD Treatment Privacy](#) (Legal Action Center)
- [Changes to the Substance Use Disorder Confidentiality Regulation: Implications for Stakeholders](#) (Manatt)
- [HHS Finalizes Changes to the HIPAA Privacy Rule to Support Reproductive Health Care Privacy](#) (Manatt)

Center of Excellence for Protected Health Information (CoE – PHI)

- CoE-PHI has a helpful [resource library](#) on the changed to 42 CFR Part 2. Including
 - Webinar recording of [What You Need to Know](#) about the changes including new protections for SUD Counseling Notes.
 - [Implementation Fact Sheet](#)
 - [Criminal Court Orders Authorizing Disclosure](#)

Training Update

Access to Care: Service Design Follow up Implementation Plan (3-H) (VBI)

Change Leader Academy (CLA) (Virtual)

CLA Orientation Option A (3-H)

Date: July 29, 2025

Time: 9:00 am – 10:30 am

Registration: Invite Only*

CLA Orientation Option B (3-H)

Date: July 31, 2025

Time: 12:30 pm – 2:00 pm

Registration: Invite Only*

Workforce Development

Coming soon!

Change Management 101 (In-person)

Date: September 2025

Project Management part 2 (In-person)

Date: November 2025

Finance and Business Operations (VBI)

Coming soon!

CLAS Training: Inclusive SUD Services for Transgender, Gender Expansive, and Intersex (TGI) Clients

Coming soon!

Your Success Is Our Success!

We are here to support you, feel free to reach out

CIBHS CONTACT INFORMATION – ADD US TO YOUR CONTACTS!

Pranab Banskota	pbanskota@cibhs.org
Amy Mcilvaine	amcilvaine@cibhs.org
Claudia Murrillo Hernandez	cmurillo-hernandez@cibhs.org
Leslie Dishman	ldishman@cibhs.org
Krystal Edwards	kedwards@cibhs.org
Leslie Garcia	lgarcia@cibhs.org
Roneel Chaudhary	rchaudhary@cibhs.org