

## **Network Development and Patient Access**

November 4, 2025

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## 42 CFR Part 2 Final Rule (2024) Reminders

**November 4, 2025** 

Strategic and Network Development Substance Abuse Prevention and Control



## Title 42 Part 2: KEY IMPLEMENTATION ACTIVITIES

## **Compliance deadline February 16, 2026**

### Training

- Provider agencies should ensure all relevant staff are trained on changes to Part 2.
- SAPC will offer <u>required</u> Part 2 training series to provider agency staff. The first round of trainings are scheduled for (additional information and registration to follow):
  - December 3, 2025
  - January 15, 2026
- Trainings on understanding Part 2 and Informed Consent will be available on SAPC LNC.

## Update Consent and Notice of Privacy Practices

- Providers will be required to use the SAPC Part 2 compliant consent form (aka Release of Information or ROI) to comply with Final Rule – Currently in final review
- Update Notice of Privacy Practices (NPP)



## Title 42 Part 2: KEY IMPLEMENTATION ACTIVITIES

### **Compliance deadline February 16, 2026**

- Update internal policies, procedures & workflows
  - Use of consents to allow redisclosures of Part 2 records for TPO.
    - Clients will now need to be educated on impact of uses, disclosures and redisclosures.
    - For <u>each disclosure</u>, providers must include:
      - Copy of consent
      - Notice to Accompany Disclosures
  - Separate consent to be used for civil, criminal, and administrative proceedings.
  - Update breach notification procedures.
  - Include client acknowledgment that they received the Notice of Privacy Practices.
- **Become familiar with Part 2 and, where indicated, consult with legal counsel.**



## Resources for understanding 42 CFR Part 2 Published Final Rule

#### **Overview and Factsheets**

- <u>Fact Sheet 42 CFR Part 2 Final Rule</u> (U.S. Dept. of Health and Human Services)
- <u>Fundamentals of 42 CFR Part 2 and SUD</u>
   <u>Treatment Privacy</u> (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 <u>resource library</u> on the changed to 42 CFR Part 2. Including
  - Webinar recording of What You Need to <u>Know</u> about the changes including new protections for SUD Counseling Notes.
  - Implementation Fact Sheet
  - Criminal Court Orders Authorizing
     Disclosure



## **Culturally Affirming Care for TGI Clients**

**November 4, 2025** 





# REQUIREMENTS FOR CULTURALLY AFFIRMING CARE FOR TRANSGENDER, GENDER DIVERSE, AND INTERSEX (TGI) CLIENTS

- Training Requirements:
  - Live in-person and virtual trainings in November – Opportunity to interact with presenters to share
  - Beginning January 2026, the TGI training will ONLY be available on SAPC LNC.
  - All current staff MUST complete training by March 31, 2026.
  - New staff MUST complete training within six
     (6) months of hire.

- Other Requirements:
  - Incorporate the right to file a complaint for failure to provide trans-inclusive care into complaints/grievances processes.
- Other Resources:
  - Ensuring Affirming and Culturally Responsive Care for Transgender Clients <u>Toolkit</u>.





## Member Handbook & Rights Updates 2026

**November 4, 2025** 



## 2026 Behavioral Health Member Handbook



DHCS BHIN (to be issued)- NEW requirements for Member Handbook AND notifying existing beneficiaries which become effective January 2026.

## Major Changes for the Integrated Handbook Include:

- Traditional Health Care Practices
- Additional Services Evidence Based Strategies under BH-CONNECT
  - 1. Parent-Child Interaction Therapy (PCIT)
  - Functional Family Therapy (FFT)
  - Multisystemic Therapy (MST)
  - Assertive Community Treatment (ACT)
  - 5. Forensic Assertive Community Treatment (FACT)
  - 6. Coordinated Specialty Care (CSC) for First Episode Psychosis
  - 7. Clubhouse Services
  - 8. Enhanced Community Health Worker Services
  - 9. Supported Employment
  - 10. ACT, FACT, CSC, Clubhouse Services, Enhanced CHW Services, and IPS

SAPC will be collaborating with Department of Mental Health to update the member handbook to reflect these changes.

## **2026** Behavioral Health Member Handbook



#### **Anticipated Dates:**

11/24/25 E-mail provider agencies Notice of Significant Change letter that should accompany all

notifications to patients (English & Spanish)

• 12/1/2026 Post a Notice of Significant Change on the SAPC Website

• 12/29/2025 E-mail the Updated handbook (English; follow link for other languages)

• January 2026 Post Handbook on SAPC Member Webpage

#### **PROVIDER RESPONSIBILITIES:**

- Notify all active patients of the updates to the patient handbook by providing the Notice of Significant Change letter by deadlines.
- Provide the updated handbook to all new clients at the time they first access services.
- Notification/Provision Formats:
  - Provide a printed copy during <u>direct interactions</u> OR <u>mail it</u> to the patient's mailing address; OR
  - Electronically (e.g., email or text) that includes hyperlink or QR code to the handbook posted on SAPCs website (after obtaining the patient's agreement to communicate by email).

## MEMBER RIGHTS POSTER DISTRIBUTION

### **Poster Quantity**

- Each treatment provider will be given one (1) poster PER CONTRACTED SITE
- Executive Directors were emailed a listing of all site locations that will receive a poster, including need for Spanish translations.
- Additional copies and other threshold languages are downloadable from <u>SAPC</u> website
- The designee picking up posters must print and sign their name and are responsible for that all sites receive their posters

# Post Meeting Pickup by 12/15

- Providers that are unable to attend the 11/4 Provider Meeting, or cannot stay until the end of the meeting when posters will be distributed, must email <a href="MemberServices@ph.lacounty.gov">MemberServices@ph.lacounty.gov</a> and schedule pickup at the SAPC offices in Alhambra by 12/15
- Posters will NOT be mailed and will NOT be held beyond 12/15/25



### YOUR RIGHTS

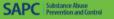
#### **Substance Use Disorder Treatment**

As someone who lives in Los Angeles County and is eligible for Medi-Cal or other select County programs, you have a right to receive medically necessary substance use treatment services 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.
- Receive an individualized, outcome-driven treatment plan.
- Be free from mental and physical abuse, exploitation, coercion, and physical restraint.
- Receive written materials critical to your care in other formats (such as other languages, large print size, braille, and audio), upon request.
- Receive evidence-based and ethical treatment by qualified staff in a safe and healthful environment
- Have your health information kept protected and private, and the ability to opt-out of receiving fundraising communications.
- 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.
- Receive timely access to care.
- Request an appeal if you receive a Notice of Adverse Benefit Determination.
- Be treated simultaneously for co-occurring behavioral health conditions
- Remain in treatment for as long as the treatment provider is authorized to treat you.
- Receive support, education, and treatment for your families and loved ones, if the treatment provider is authorized to provide these services.
- Make a complaint to the facility where you receive your care, the County, and in some cases, the Health and Human Services Secretary, and receive a response
- Exercise these rights without it negatively affecting the services you receive

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







## CIBHS TRAINING REMINDERS

November 4, 2025







### **Training Update**



#### Finance and Business Operations (VBI)

Building Performance and Risk Metrics (VBI 1-A): Evaluating Your

Data Landscape

<u>Date:</u> November 13, 2025 Time: 9:00 am – 12:00 pm Format: In-Person Only

**Registration:** Registration Link

Building Performance and Risk Metrics (VBI 1-A): Managing Internal

<u>Assessments</u>

**Date:** Mid- December

Time: TBD

Format: Virtual

**Registration:** Coming Soon!

Building Performance and Risk Metrics (VBI 1-A) Pop-Up: Vendor

<u>Demos</u>

**Date:** Mid- December

Time: TBD

Format: Virtual

**Registration:** Coming Soon!

#### **Workforce Development**

Project Management Follow-up Training (In-person)

<u>Date:</u> November 5, 2025 <u>Time:</u> 9:00 am – 4:00 pm

Format: In-Person

**Location:** All4kids Magnolia Place **Registration:** Registration Link



Building Performance and Risk Metrics (VBI 1-A): Evaluating Your Data Landscape



Project Management Follow-up Training (In-person)



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

#### **Change Leader Academy (CLA)**

#### **Coaching Call #2**

Date: November 6, 2025
 Time: 10:00 am – 11:30 am

**Registration:** Invite Only

CLAS Training: Transgender, Gender Expansive, and Intersex (TGI) Cultural Competence in Behavioral Health Service Provision

#### **Zoom Option Date (9:00 am - 12:00 pm):**

Thursday November 20, 2025- Session Full

#### <u>In-Person Option Date (9:00 am – 12:00 pm):</u>

Tuesday November 18, 2025 - Session Full

If you weren't able to register this round, the training will be available again in early 2026 through SAPC-LNC. Stay tuned for future registration announcements.

#### **Your Success Is Our Success!**

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

## CIBHS CONTACT INFORMATION – ADD US TO YOUR CONTACTS!

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