

DATE: July 31, 2025

Behavioral Health Information Notice No: 25-029

TO: California Alliance of Child and Family Services California Association for Alcohol/Drug Educators California Association of Alcohol & Drug Program Executives, Inc. California Association of DUI Treatment Programs California Association of Social Rehabilitation Agencies California Consortium of Addiction Programs and Professionals California Council of Community Behavioral Health Agencies California Hospital Association California Opioid Maintenance Providers California State Association of Counties Coalition of Alcohol and Drug Associations County Behavioral Health Directors County Behavioral Health Directors Association of California County Drug & Alcohol Administrators

SUBJECT: Assembly Bill (AB) 2473 Alcohol or Other Drug (AOD) Counselor Educational Requirements

PURPOSE: To notify substance use disorder providers, certifying organizations, and alcohol or other drug (AOD) counselors of changes to the education requirements for counselors due to the passage of AB 2473, effective January 1, 2026.

REFERENCE: [AB 2473, Chapter 594; Health & Safety Code section 11833](#)

BACKGROUND:

DHCS has sole authority in state government to determine the qualifications, including the appropriate skills, education, training, and experience, of personnel working within alcohol or other drug recovery and treatment programs licensed, certified, or funded under Part 2 of Division 10.5 of the Health and Safety Code. ([Health & Saf. Code § 11833](#)).

AB 2473 amended [Health and Safety Code section 11833](#) to establish core competency education requirements for registered and certified counselors and increase the number of educational hours for registered counselors. It requires registered or certified counselors to have an understanding of the following core competency education

topics: AB

1. The current Diagnostic and Statistical Manual of Mental Disorders;
2. 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;
3. Utilizing cultural responsiveness, including for people with disabilities, and its implication for treatment;
4. Case management/care coordination;
5. Utilization of electronic health record systems;
6. Knowledge of medication assisted treatment;
7. Clinical documentation;
8. Knowledge of co-occurring substance use and mental health conditions;
9. Confidentiality;
10. Knowledge of relevant law and ethics
11. Professional boundaries; and
12. Delivery of services in the behavioral health delivery system.

A first-year registered counselor, as defined below, must complete the core competency education requirements to qualify for registration renewal. The education hours completed in core competency topics will count towards the total education hours that a registered counselor must complete to become certified. Additionally, the education hour requirements for an individual registered as a counselor on or after July 1, 2025, cannot be lower than the education hour requirements for a certified peer support specialist.

DHCS may implement, interpret, or make specific the amendments to Health and Safety Code section 11833 through this Behavioral Health Information Notice (BHIN). (Health & Saf. Code § 11833(g).) This BHIN sets forth AB 2473 education requirements for registered counselors effective January 1, 2026.

#### POLICY:

An individual who registers as a counselor for the first time on or after July 1, 2025, must complete a minimum of eighty (80) hours of education, including education in core competency education topics as specified in Health and Safety Code section 11833(b), within six (6) months of registration.<sup>1</sup> This aligns with the number of

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<sup>1</sup> The policy in this BHIN takes effect January 1, 2026. Counselors that register between July 1, 2025, and December 31, 2025, become subject to the six-month timeframe on January 1, 2026. Therefore,

education hours a peer support specialist must complete as specified in [BHIN: 25-010 Medi-Cal Peer Support Program Standards](#). Individuals who complete education hours prior to registration, using coursework approved by the certifying organizations, may count those hours towards the eighty (80) hours of education, including core competency education topic requirements. Additionally, registered counselors must complete annual education as specified in Section 3B of this BHIN.

An individual who registered as a counselor prior to July 1, 2025, must provide written documentation to the certifying organization that they completed a minimum of 315 hours of AOD education including core competency education topics as specified in Health and Safety Code section 11833(b) prior to initial certification. These hours will count towards the 315 education hours required for initial certification.

An individual who registers as a counselor and has a master's degree in psychology, social work, marriage and family therapy, or counseling is exempt from the core competency education pursuant to Health and Safety Code section 11833 (b)(9).

## **SECTION 1: UPDATES TO REGISTERED COUNSELOR TERMINOLOGY**

For the purposes of this BHIN, the following definitions apply:

“First-year registered counselor” means an individual who has been registered to provide AOD counseling services for less than one (1) year. A first-year registered counselor must renew their registration one time to be a registered counselor. An individual remains a first-year registered counselor as long as they have not renewed their registration at least one time even if they transfer to a different certifying organization.

“Registered counselor” means an individual who has been registered to provide AOD counseling services for one (1) year or more and has renewed their registration at least one time. An individual remains a registered counselor even upon transferring to a different certifying organization, as they have renewed their registration with a certifying organization at least one time prior to the transfer.

## **Section 2: UPDATES TO REQUIREMENTS FOR FIRST-YEAR REGISTERED COUNSELORS THAT REGISTER ON OR AFTER JULY 1, 2025**

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individuals who register between July 1, 2025, and December 31, 2025, shall complete the 80 hours of education including core competency education topics by July 1, 2026. For individuals who register on or after January 1, 2026, the six-month window takes effect immediately. Individuals shall be eligible to complete any education deficiencies before their one-year registration expires.

**A. Core Competency Education Requirements**

An individual who registers as a counselor for the first time on or after July 1, 2025, must complete a minimum of eighty (80) hours of education, including core competency education topics, within six (6) months of registration.<sup>2</sup> Individuals who complete education hours prior to registration, using coursework approved by the certifying organizations as described below, may count those hours towards the eighty (80) hours of education, including core competency education topic requirements.

The education must be completed with an education provider approved by the certifying organization. Individuals may contact their certifying organization to confirm if their education provider is approved and obtain a list of courses that meet core competency education requirements. Individuals may also access eighty (80) hours of education including core competency education topics through free courses sponsored by DHCS, if approved and accepted by the counselor's chosen certifying organization. A free, asynchronous online course sponsored by DHCS will be made available by the University of California San Diego (UCSD) in early 2026 and will be available through June 30, 2028.

**B. Certifying Organization Review of 80 Hours of Education and Core Competency Education Topics**

Within six (6) months of registration,<sup>3</sup> first-year registered counselors must submit written documentation to the certifying organization demonstrating they completed a minimum of eighty (80) hours of education, including core competency education topics. The written documentation must be from the education provider and include:

1. The registered counselor's full legal name;
2. Name of the education provider;
3. Name of the courses completed by the registered counselor; and
4. Number of education hours completed.

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<sup>2</sup> The policy in this BHIN takes effect January 1, 2026. Counselors that register between July 1, 2025, and December 31, 2025, become subject to the six-month timeframe on January 1, 2026. Therefore, individuals who register between July 1, 2025, and December 31, 2025, shall complete the 80 hours of education including core competency education topics by July 1, 2026. For individuals who register on or after January 1, 2026, the six-month window takes effect immediately. Individuals shall be eligible to complete any education deficiencies before their one-year registration expires.

<sup>3</sup> Counselors who initially registered between July 1, 2025, and December 31, 2025, as described in footnotes 1 and 2 shall complete the 80 hours of education including core competency education topics by July 1, 2026.

Within forty-five (45) calendar days of the first-year registered counselor's submission, the certifying organization must send a written notice to the first-year registered counselor to confirm whether the certifying organization finds that the counselor has met the education requirements. If the certifying organization determines that a first-year registered counselor did not fulfill their education requirements, the first-year registered counselor must complete the missing education hours before their first-year registration expires.

C. First-Year Registered Counselor Registration Renewal

First-year registered counselors must apply for registration renewal a minimum of one hundred twenty (120) calendar days prior to the expiration date specified on the current written registration. If the renewal is approved prior to the expiration date of the registered counselor's current credential, the expiration date for the renewed registration credential shall be one (1) year from the expiration date of the prior registration. If a renewal application is approved after the first-year registered counselor's registration credential expires, the renewal shall be valid from the date the renewal application was approved and for a period of one (1) year thereafter. First year registered counselors may continue to provide counseling services until their registration expires, unless the counselor's credential is suspended or revoked by DHCS and/or a certifying organization.

Within seven (7) calendar days of receipt of the registration renewal application, the certifying organization must provide written notice to the first-year registered counselor that confirms receipt of the application, specifies the application review timeline, and includes the certifying organization's contact information.

Within forty-five (45) calendar days of receipt of the registration renewal application, the certifying organization must provide written notice to the first-year registered counselor whether the application is approved, incomplete, or denied.

If the application is approved, the written notice of registration must include the first-year registered counselor's full legal name, registration number, registration issue date, and registration expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.

If the application is incomplete, the written notice must specify the missing information. The first-year registered counselor shall have thirty (30) calendar days from the date of the written notice to respond. If the first-year registered counselor responds, the certifying organization must provide written notice that the application is approved, denied, or remains incomplete within twenty-one (21) calendar days of the registered counselor's response. If the certifying organization determines that a registered counselor did not complete the eighty (80) hours of education including core

competency education topics, the first-year registered counselor may complete the missing education before their registration expires. The certifying organization may terminate the review of the application if the first-year registered counselor does not respond to the written notice within thirty (30) calendar days. If the certifying organization terminates the review, the first-year registered counselor may submit a new application for registration renewal.

If the application is denied, the written notice of denial must include the reason(s) for denial and the first-year registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.

<b>First-Year Registered Counselor's Application for Registration Renewal</b> <b>Timeline: Section 2B and Section 2C.</b>	
First-Year Registered Counselor Requirement	Within the first six (6) months of registration, the first-year registered counselor must provide written documentation to the certifying organization that a minimum of eighty (80) hours of education including core competency education topics has been completed.
Certifying Organization Timeline	Within forty-five (45) calendar days, the certifying organization shall review and send written notice to the first-year registered counselor stating the 80 hours of education including core competency education topics are incomplete or complete.
First-Year Registered Counselor Requirement	If incomplete, the first-year registered counselor must complete the missing education hours before their first-year registration expires.
First-Year Registered Counselor Timeline	A minimum of 120 calendar days prior to their expiration date (4 months before expiration) the first-year registered counselor must submit their registration renewal application.
Certifying Organization Application Timeline	Within seven (7) calendar days the certifying organization shall confirm receipt of the application, specify the application review timeline, and include the certifying organization's contact information.
Certifying Organization Application Timeline	Within forty-five (45) calendar days the certifying organization shall review the application and send written notice to the first-year registered counselor to indicate whether the application is approved, denied, or returned as incomplete.  If the application is approved, the written notice of registration must include the first-year registered counselor's full legal name, registration number, registration issue date, and registration expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.  If the application is incomplete, the written notice must specify the missing information.  If the application is denied, the written notice of denial must include the reason(s) for denial and the first-year registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.

<b>First-Year Registered Counselor's Application for Registration Renewal</b> <b>Timeline: Section 2B and Section 2C.</b>	
First-Year Registered Counselor Application Timeline	Within thirty (30) calendar days from the date of the written notice the first-year registered counselor must respond if the application is incomplete.
Certifying organization Application Timeline	<p>Within twenty-one (21) calendar days the certifying organization shall review the resubmission and send written notice to the first-year registered counselor whether the application approved, denied, or incomplete.</p> <p>If the application is approved, the written notice of registration must include the first-year registered counselor's full legal name, registration number, registration issue date, and registration expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.</p> <p>If the application is incomplete, the written notice must specify the missing information.</p> <p>If the application is denied, the written notice of denial must include the reason(s) for denial and the first-year registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.</p>
<i>* Counselors who register prior to July 1, 2025, are exempt from the requirement to obtain 80 hours of education within six (6) months of registration, however, these individuals must complete 315 hours of AOD education including core competency education topics prior to initial certification.</i>	

### **SECTION 3: UPDATES TO EDUCATION REQUIREMENTS FOR REGISTERED COUNSELORS**

#### **A. Core Competency Education Requirements for Registered Counselors That Registered Prior to July 1, 2025**

An individual who registered as a counselor prior to July 1, 2025, must provide written documentation to the certifying organization that they completed 315 hours of AOD education including core competency education topics as specified in Health and Safety Code section 11833(b) prior to initial certification. Registered counselors must complete

core competency education with an education provider approved by the certifying organization. The written documentation must be from the education provider and include:

1. The registered counselor's full legal name;
2. Name of the education provider;
3. Name of the courses completed by the registered counselor; and
4. Number of education hours earned.

Individuals may contact their certifying organization to confirm if their education provider is approved and obtain a list of courses that meet the core competency education topics. Individuals may also have access to eighty (80) hours of core competency education through courses sponsored by DHCS for free, if approved and accepted by the counselor's chosen certifying organization. This free asynchronous online course will be made available by UCSD in early 2026 and will be available through June 30, 2028.

Certifying organizations must send written notice to the registered counselor within forty-five (45) calendar days if they have completed the core competency education at an education provider approved by the certifying organization. If the certifying organization determined that a registered counselor did not complete core competency education, the registered counselor must complete the missing education prior to initial certification.

**B. Annual Education Requirements for Registered Counselors**

Registered counselors that have completed fewer than 315 hours of AOD education in total must provide written documentation to their certifying organization that they completed fifty (50) hours of AOD education to qualify for registration renewal. The AOD education must include topics set forth in California Code of Regulations, Title 9, section 13040, subdivisions (a)(1) through (5) or any core competency topics discussed in this BHIN. The education must be completed with an education provider approved by the certifying organization.

Registered counselors who have completed 315 hours of AOD education as required for initial certification shall submit 20 hours of continuing education to qualify for registration renewal. The education must include topics set forth in California Code of Regulations, Title 9, section 13040, subdivisions (a)(1) through (5) or any core competency topics discussed in this BHIN. The education must be completed with an education provider approved by the certifying organization.

**C. Certifying Organization Review of Annual Education**

As part of the renewal application, registered counselors must provide written documentation to the certifying organization that the registered counselor completed education as specified in Section 3B. The written documentation must be from the education provider and include:

1. The registered counselor's full legal name;
2. Name of the education provider;
3. Name of the course completed by registered counselor; and
4. Number of education hours earned.

A registered counselor must apply for registration renewal, a minimum of one hundred and twenty (120) calendar days prior to the expiration date specified on the current written registration. If the renewal is approved prior to the expiration date of the registered counselor's current credential, the expiration date for the renewed registration credential shall be one (1) year from the expiration date of the prior registration. If a renewal application is approved after the registered counselor's registration credential expires, the renewal shall be valid from the date the renewal application was approved and for a period of one (1) year thereafter. Registered counselors may continue to provide counseling services until their registration expires, unless the counselor's credential is suspended or revoked by DHCS and/or a certifying organization.

Within seven (7) calendar days of receipt of the registration renewal application, the certifying organization must provide written notice to the registered counselor that confirms receipt of the application, specifies the application review timeline, and includes the certifying organization's contact information.

Within forty-five (45) calendar days of receipt of the registration renewal application, the certifying organization must provide written notice to the registered counselor whether the application is approved, incomplete, or denied.

If the application is approved, the written notice of registration must include the registered counselor's full legal name, registration number, registration issue date, and registration expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.

If the application is incomplete, the written notice must specify the missing information. The registered counselor shall have thirty (30) calendar days from the date of the written notice to respond. If the registered counselor responds, the certifying organization must provide written notice that the application is approved, denied, or remains incomplete within twenty-one (21) calendar days of the registered counselor's response. The certifying organization may terminate the review of the application if the

registered counselor does not respond to the written notice within thirty (30) calendar days from the date of the written notice. If the certifying organization terminates the review, the registered counselor may submit a new application for registration renewal.

If the application is denied, the written notice of denial must include the reason(s) for denial and the registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.

<b>Registered Counselor's Application for Annual Registration Renewal Timeline: Section 3, C.</b>	
Registered Counselor Application Timeline	A minimum of 120 calendar days prior to the registered counselor's expiration date (4 months before expiration) the registered counselor must submit a registration renewal application, with proof of completion of education as required by Section 3C.
Certifying Organization Application Timeline	Within seven (7) calendar days the certifying organization shall confirm receipt of the application, specify the application review timeline, and include the certifying organization's contact information.
Certifying Organization Application Timeline	<p>Within forty-five (45) calendar days the certifying organization shall review and send written notice to the registered counselor whether the application as required by Section 3C is approved, incomplete or denied.</p> <p>If the application is approved, the written notice of registration must include the first-year registered counselor's full legal name, registration number, registration issue date, and registration expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.</p> <p>If the application is incomplete, the written notice must specify the missing information.</p> <p>If the application is denied, the written notice of denial must include the reason(s) for denial and the first-year registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.</p>
Registered Counselor Application Timeline	Within thirty (30) calendar days from the date of the written notice the registered counselor must respond if the application is incomplete.
Certifying organization Application Timeline	<p>Within twenty-one (21) calendar days the certifying organization shall review resubmission and send written notice to the first-year registered counselor to indicate whether the application is approved, denied, or incomplete.</p> <p>If the application is approved, the written notice of registration must include the first-year registered counselor's full legal name, registration number, registration issue date, and registration</p>

**Registered Counselor's Application for Annual Registration Renewal Timeline:  
Section 3, C.**

	<p>expiration date. The registration shall be valid for one (1) year unless revoked or suspended by DHCS and/or a certifying organization.</p> <p>If the application is incomplete, the written notice must specify the missing information.</p> <p>If the application is denied, the written notice of denial must include the reason(s) for denial and the first-year registered counselor's right to appeal, in accordance with California Code of Regulations, Title 9, section 13070.</p>
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**SECTION 3: COMPLIANCE**

Certifying organizations, first-year registered counselors, and registered counselors shall comply with this BHIN beginning on January 1, 2026. The certifying organizations shall promptly approve education providers and courses in order to meet the requirements specified in this BHIN for first-year registered counselors to obtain 80 hours of education, including core competency education topic requirements, and the requirements for individuals registered prior to July 1, 2025, to obtain education that includes all core competency topics. The certifying organizations shall publish a list of approved education providers and courses that may be used to meet the requirements for 80 hours of education, including core competency education topic requirements, by January 1, 2026.

In accordance with Health and Safety Code section 11833, subdivision (f), DHCS has the authority to conduct periodic reviews of certifying organizations to determine compliance with all applicable laws and regulations, and to take actions for noncompliance, including revocation of the DHCS' approval.

More information on DHCS approved certifying organizations may be found here:  
<https://www.dhcs.ca.gov/provgovpart/Pages/CounselorCertificationOrganizations.aspx>.

Individuals may contact their certifying organization directly or visit the following websites to determine if an education provider is approved by the certifying organization:

CCAPP: <https://ccappcredentialing.org/ab-2473/>

CADTP: <https://cadtpcounselors.org/education-directory/>

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CAADE: <https://dev.caade.org/ab2473/>

Questions regarding this BHIN should be directed to the Counselor and Medication Assisted Treatment Section by email at:  
[DHCSCOINQUIRY@DHCS.CA.GOV](mailto:DHCSCOINQUIRY@DHCS.CA.GOV).

Sincerely,

Janelle Ito-Orille, Chief  
Licensing and Certification Division