



**California
Behavioral Health
Planning Council**

ADVOCACY • EVALUATION • INCLUSION

CHAIRPERSON
Tony Vartan

EXECUTIVE OFFICER
Jenny Bayardo

ADDRESS
P.O. Box 997413
Sacramento, CA
95899-7413

PHONE
(916) 701-8211

FAX
(916) 319-8030

MS 2706

July 23, 2025

The Honorable Buffy Wicks, Chair
Assembly Committee on Appropriations
1021 O Street, Suite 8140
Sacramento, CA 95814

The Honorable Mike McGuire, Chair
Senate Rules Committee
1021 O Street, Suite 8518
Sacramento, CA 95814

RE: Opposition for SB 35 – Alcohol and drug programs

Dear Assemblymember Wicks and Senator McGuire:

On behalf of the California Behavioral Health Planning Council (CBHPC), I am writing to express our opposition to Senate Bill (SB) 35 (Umberg).

The CBHPC serves as an advisory body to the Legislature and the Administration on behavioral health policies and priorities, as outlined in Welfare and Institutions Code §§ 5771 and 5772. Our diverse membership includes individuals with lived experience of serious mental illness and substance use disorders, family members, service providers, professionals, and representatives from state departments whose work intersects with California's behavioral health system. Their perspectives are essential in our evaluation of the public behavioral health system and shape the Council's recommendations.

SB 35 intends to establish timelines for the Department of Health Care Services (DHCS) to investigate allegations of treatment at unlicensed sober living homes. It would also authorize cities and counties to request approval to conduct site visits and enforce compliance with existing state licensing requirements should DHCS not be able to meet the timelines.



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Although we recognize the well-intentioned purpose behind the bill, we remain deeply concerned about the potential implications it may have on counties.

While the bill emphasizes the responsibility of the Department of Health Care Services (DHCS) to investigate allegations, it may eventually be delegated to the respective counties in which the alleged unlicensed facility is located. Given the already strained behavioral health workforce, it would be challenging for counties to dedicate staff to administer these duties and adhere to the tightened timelines without impacting direct services for beneficiaries, thereby placing additional burdens on counties.

SB 35 lacks funding provisions and inadequate guidelines regarding county reimbursement for work performed under the bill. Furthermore, the outlined mandates in the bill are outside the purview of county behavioral health departments considering counties do not have authority, oversight, or code enforcement jurisdiction over unlicensed facilities. This would necessitate counties to provide training to designated teams without sufficient funding or guidance.

The Council respectfully opposes SB 35. If you have questions about our position, please contact Jenny Bayardo, Executive Officer, at (916) 750-3778 or via e-mail at Jenny.Bayardo@cbhpc.dhcs.ca.gov.

Sincerely,

Tony Vartan, Chairperson

cc: The Honorable Senator Thomas Umberg
Honorable Members, Assembly Committee on Appropriations
Honorable Members, Senate Rules Committee
Zach Keller, Legislative Director
Mufida Assaf, Legislative Aide