Report of Findings & Recommendations

By the

Nebraska Board of Health

on the Application for Certification

of the

Nebraska Association of Substance Abuse Directors

to the

Director of Health

and the

Nebraska Legislature

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## Introduction

The Nebraska Regulation of Health Professions Act created a three-tier process for the review of proposals pertaining to the credentialing of health occupations. These three tiers are the technical reivew committees, the Nebraska Board of Health, and the Director of Health. The Board of Health reviews specific proposals for credentialing only after the technical committees have completed their reports on these proposals. After the Board completes its reports on the proposals, these reports, and those of the technical committees are presented to the Director of Health, who in turn prepares his own report on them. All reports are submitted to the Legislature for its consideration.

Each of these three review bodies issues reports that represent the advice of their membership on the proposals in question. Each report is a separate, independent response to the proposals, and is in no way dependent upon the reports that have preceded it.

The Board of Health reviews credentialing proposals only after receiving a preliminary recommendation on each proposal from an advisory subcommittee selected from its own membership. This subcommittee met on November 1, 1988 in order to give the full Board its advice on the proposal of the alcohol and drug abuse counselors. The full Board of Health then met on November 21, 1988 and formulated its own, independent report on this proposal. The following pages constitute the body of this report.

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## Recommendations

In their application, the Nebraska Association of Substance Abuse Directors sought to transfer the certification of Alcohol and Drug Abuse Counselors from the Department of Public Institutions to the Department of Health, and to upgrade the educational requirements for this certification. The technical committee recommended approval of this proposal. The Board of Health decided to recommend approval of the proposal.

## The Deliberations of the 407 Subcommittee

There was consensus among the subcommittee members that there is a need to upgrade the quality of alcohol and drug abuse counseling in Nebraska. Most of the discussion of this proposal focused on the question of how to accomplish this goal without imposing unnecessary hardships or restrictions on practitioners. The subcommittee members heard testimony from a member of the alcohol and drug abuse counselors association. This counselor stated that the current proposal was not the best way to improve the profession. This counselor stated that the educational requirements of the proposal are unduly restrictive because current practitioners would not be eligible for certification at the highest level unless they receive a bachelors degree. This counselor felt that all current practitioners should be allowed to upgrade to the highest level of certification (which is level three) without having to get a college degree. This counselor was skeptical of the viewpoint that satisfying educational requirements is the best route to competence in the field of alcohol and drug abuse counseling. This counselor expressed support for training programs that stress practical experience in the field rather than academic preparation, and encouraged the committee to

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recognize alternative forms of education such as workshops, seminars, and other non-academic types of training.

The majority of the subcommittee members responded to this testimony by expressing their support for the educational standards contained in the proposal. Lar Voss stated that the current proposal provides a means by which the profession in question can be upgraded. Mr. Voss also stated that the opponents provided no viable alternative to the proposal. He stated that requiring a bachelors degree as a prerequisite for the highest level of certification is not unduly restrictive.

Jack Clark expressed concern about alcohol and drug abuse counselors whose knowledge of chemical dependency comes solely from personal experience. He stated that these counselors need the direction and guidance that formal education and training can provide.

Dr. Shapiro stated that Nebraska should take the lead in improving the standards for alcohol and drug abuse counseling, and that the current proposal is the best way to accomplish this goal. Dr. Shapiro added that he was concerned about the availability of alcohol and drug abuse counselor training programs in outstate Nebraska, and asked representatives of the applicant group how this problem could be addressed. A representative of the applicant group responded by stating that the University of Nebraska has an extension program that would be helpful in providing some course work to counselors in outstate Nebraska.

The subcommittee members unanimously found that this application satisfied each of the four criteria of the credentialing review statute. By this action, the subcommittee advised the full Board of Health to recommend approval of the proposal. The 407 subcommittee advised the full Board to recommend that the title "Alcohol and Drug Abuse Counselor" be

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made a protected title. The 407 subcommittee also advised that the full Board recommend that post-secondary schools be encouraged to increase their involvement in the training of alcohol and drug abuse counselors. The Deliberations of the Full Board of Health

After listening to comments by both opponents and proponents of the proposal, Janet Coleman moved that the Board endorse the action of the 407 Subcommittee which was to recommend approval of the proposal. Lar Voss seconded the motion. Voting aye were Marcum, Coleman, Jeffers, Lefler, Nelson, Adickes, Blair, Masek, Kenney, Williams, Shapiro, Voss, and Clark. There were no nay votes or abstentions. By this action, the Board of Health recommended approval of the proposal.

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