

Many of you may have read or heard of the renewed interest in seeking licensure for addiction counselors. The Alcohol and Drug Abuse Certification Board of Georgia (ADACBGA) does **NOT** support nor endorse seeking licensure for addiction counselors at this time.

As a Board, ADCACBGA has been engaged in conversations and research concerning the idea of seeking licensure in the State of Georgia for substance abuse counselors for well over a year. Based upon our findings, we find it would be detrimental to our workforce and to the public to seek licensure now. Furthermore, our research indicates that licensure does not guarantee the ability of addiction counselors to bill 3<sup>rd</sup> Party reimbursement. In fact, most do not. Georgia is the only state that currently offers an exemption to licensure. As a result, addiction counselors already have the ability to independently practice addiction counseling. You will learn more about our findings as you read through this statement.

ADACBGA was formed in 1992 to offer certification to Alcohol and Drug Abuse Counselors and to supervisors in alcohol and drug counseling and is based on the standards and methods offered by the International Certification and Reciprocity Consortium/Alcohol and Other Drug Abuse, a multi-state and nation body organized to promote uniform professional standards and quality for the substance abuse counseling profession and to give the profession greater visibility in the U.S. and abroad.

Our goal is to provide competency-based certification that will assure quality care for those affected by substance abuse. Certification is a process whereby professionals with a special interest in providing treatment to substance abusers and their families may receive recognition for their competency. The purpose is to establish professional standards which enable counselors, allied health professionals, health service providers, third party payors, employers, and the general public to recognize qualified professionals in this field. Certification offers evidence that standards of knowledge, skill, experience, attitudes and demonstration of competency have been met.

We continue to be at the forefront of certification development, extending our offerings beyond Alcohol and Drug Counselors to include clinical supervisors, criminal justice professionals, peer recovery coaches, gambling addiction counselors and recovery residence administrators. We believe our diverse offerings continue to enhance the field of addiction and recovery by ensuring that counseling services are provided in an appropriate, ethical manner using the latest evidence-based practices.

Certification requires counselors to demonstrate competence through a rigorous credentialing and examination process that promotes personal and professional growth, increased recognition, and professionalism of the field. Unified by adherence to the highest standards of quality and integrity, counselors holding an ADACBGA certification have created an international network of counselors with worldwide recognition and respect. We currently offer reciprocity to 47 states and 24 countries.

Certified counselors are already recognized in Georgia through the language in the Georgia Licensure Bill. There is no need to establish a license for alcohol and drug counselors in order to gain recognition.

To provide the full ADACBGA rationale for not supporting licensure, it will be necessary to share the platform being utilized to promote a renewed interest in obtaining licensure for addiction counselors. We will share the platform tenets and the ADACBGA response for each.

### **Proposed reasons to seek licensure and the ADACBGA Response**

1. Georgia's licensed workforce to address addictions is MUCH SMALLER than we think. Only 20% of licensed professional counselors are competent in addictions according to LPCA website.

#### **ADACBGA Response:**

There is a significant workforce of certified alcohol and drug counselors and other recovery specialties in the State of Georgia. Currently, ADACBGA has approximately 1400 addiction professionals in the state working with substance use disorders. There are areas of the state that may lack the necessary workforce to address the addiction and recovery needs of the community. However, we do not believe creating licensure will address the scarcity, but rather would increase the

lack of SUD practitioners in these areas. In other states, the transition to licensure has often to only master's level clinicians being able to treat substance use disorders. This would dramatically reduce our workforce.

As a professional board seeking to promote and increase competent SUD practitioners, we encourage and invite licensed mental health professionals to seek dual competency and certification to ensure the best possible care for the individuals we serve and to meet the ethical responsibilities to provide addiction services. At a minimum, we recommend obtaining education and training as part of on-going CE process.

2. Addiction Science is a medical specialty that needs specialized clinical support.

**ADACBGA Response:**

We agree with this tenet. Addiction is a specialty area and thus requires specific training and preparation utilizing updated testing processes that are specific to addiction care. The ADACBGA Board in alignment with IC&RC uses testing processes which consider the most updated information and evidenced based practices for the treatment of SUD. The testing process is legally defensible to ensure those individuals testing meet the minimum competencies to provide SUD treatment. The Board has concerns that licensure would lose the specialty process and focus and there has been no clarification on how the testing process would be integrated into a state system or licensure board.

ADACBGA additionally encourages licensed professionals holding an LPC, LCSW or LMFT, who seek to treat Substance Abuse Disorders, to obtain the Advanced Alcohol and Drug Counselor certification offered through our Board. We believe that anyone suffering with the disease of addiction should be treated by someone certified to treat Substance Use Disorders.

3. The need for addiction counselors is projected to grow by 22% by 2024. Georgia has no plan to meet the need.

**ADACBGA Response:**

There are numerous ways Georgia promotes development and retention of certified addiction counselors to meet the growing needs of the state. Georgia sponsors the Georgia School of Addiction Studies. Several State agencies, Department of Corrections, Department of Community Supervision, etc., provide on-going training. Both Certification boards have annual conferences. There are many private education and training opportunities. The ADACBGA has on-going new applicants for certification. The Board has concerns that licensing could decrease those who can provide services and further cause a workforce shortage. In two states, the licensure law now requires a clinical Master's degree. Many certified addiction counselors lost their ability to work and others are now required to be supervised by a Masters level licensed addiction counselor to maintain their employment. Furthermore, licensure would limit or even eliminate those with the personal experience to provide support for those in need. Georgia is a national leader in the Peer Movement and licensure would be a detriment to that area of care. ADACBGA continues to grow and expand each and every year, in addition to sponsoring and/or providing training to increase and/or retain the addiction and recovery workforce.

4. 17 other states (Tennessee, Indiana, Arizona,) currently grant separate licenses for addiction counseling. Others are in process.

**ADACBGA Response:**

Georgia recognizes certification; there is an exemption in the licensure law; and it is also written into the rules for the Community Service Boards. There are 17 other states that grant separate licenses for addiction counseling. We discovered that many of these states experience problems with governmental "red tape", unable to move quickly to make changes or modifications. Through this Board we can affect change without legislative involvement. There is a false belief that licensure will increase private insurance/3<sup>rd</sup> party reimbursement when in fact our research has found that licensure did not guarantee 3<sup>rd</sup> party payment in any of the states.

In Georgia, not only do addiction counselors have the ability to get reimbursed for providing addiction services, it in fact requires that addiction counselors are included. Not only for addiction specific services but with specialized services such as ACT teams. All ACT teams in Georgia require an addiction counselor on the team. Currently only Licensed Social Workers can receive reimbursement for Medicare. Not even LPC's can get Medicare reimbursement.

This also goes without saying there are 33 states that believe certification is the appropriate requirement for substance abuse professionals.

5. National health care, The Parity Act, state compliance and reimbursement systems now require employers to hire licensed clinical practitioners. Certifications are no longer enough. Experienced certified counselors are losing their jobs when we need experienced and trained staff.

**ADACBGA Response:**

Each state has the ability to determine scopes of practice, and Georgia recognizes certified alcohol and drug abuse counselors. There is no need for licensure. Addiction Counselors are currently granted a statewide legal exemption from the licensure law in Georgia.

Further, each state contracts with CMS/Medicaid, and those contracts and agreements determine who, what, and how much gets reimbursed. In Georgia, not only do addiction counselors have the ability to get reimbursed for providing addiction services, it in fact requires that addiction counselors are included. Currently only Licensed Social Workers can receive reimbursement from Medicare. Not even LPC's can get Medicare reimbursement. Requiring licensure for addiction counselors creates no guarantee for the ability to file for reimbursement. The current legal exemption for certified addiction counselors in the State of Georgia makes this issue moot.

6. A statewide addiction crisis, especially an opioid epidemic, per the CDC, is here now.

**ADACBGA Response:**

This is true. We are currently facing an opioid addiction and overdose epidemic in the State of Georgia and the nation at large. Certified alcohol and drug abuse counselors are competent practitioners. Licensure will add barriers to workforce development rather than increase development. Licensure could create fewer substance abuse counselors to address a growing need.

The passage of a licensure bill on average can take several years. Certification is a parallel process to licensure – very similar processes – the only difference is that only a governmental entity can offer a license. Licensure is another added cost to state government at a time when the Georgia Governor and our State Legislature is trying to reduce frivolous spending and exercise fiscal conservatism and restraint. The renewed licensure proposal only includes Bachelor and Masters level counselors which would further decimate and add barriers to growing the addiction workforce, leaving our CAC-I and CADC-I clinicians out in the cold. If the issue is a workforce shortage, licensure will only add to that shortage, not improve the shortage.

7. Without licensure Georgia universities are not likely to invest in addiction science curriculum to promote a more highly trained workforce.

**ADACBGA Response:**

This is not true. ADACBGA has entered a partnership, beginning this month (January 2017), with Clark Atlanta University School of Social Work to have all of their Master of Social Work graduates' certification-ready for the CAADC at graduation. If the partnership is a success, then it will also extend to their Bachelor of Social Work students as well for the CADC II.

Many other universities are also adding addiction curriculum. The university system is not concerned with licensure, that is something that has always been the responsibility of the graduate to obtain. Universities prepare students to meet the

requirements of licensure and/or certification – depending on the field – as many already do. Some of these are Kennesaw State, Emory University, University of Georgia, and Mercer. Universities have, in fact, utilized the core requirements for certification in preparation for students to pass the IC&RC exam as part of the course work. The Department of Corrections utilized Mercer for many years to prepare their staff not only for graduation but to pass the IC&RC certification exam. Licensure has nothing to do with the university system investing in addiction science. They are already moving that direction under our current certification processes.

8. The American Counseling Association sets national counseling standards for health systems and their 20/20 plan is to recognize only licensed professional counselors. Without licensure Georgia's current certified workforce could disappear.

**ADACBGA Response:**

The American Counseling Association (ACA) has no current involvement with the certification or licensure of addiction counselors. This is an association for licensed professional counselors (LPCs). On the ACA's website, there is only mention of school and rehabilitation counselors regarding their 20/20 plan. Addiction is not mentioned. None of the agencies listed by the ACA as addressing this issue specified the need for licensing of addiction professionals.

A quote from the ACA website:

*“Passage of a state licensure or credentialing law for a given profession restricts or prohibits the practice of that profession for individuals not meeting state-determined qualification standards, and violators may be subject to legal sanctions such as fines, loss of license to practice, or imprisonment.”*

Certification already addresses all of these issues in the State of Georgia. Furthermore, the Georgia Composite Board has enough on their plate without adding addiction counselor licensure to their already extremely large work load when our current system of certification is sufficient in all these areas.

In conclusion, the Alcohol and Drug Abuse Certification Board of Georgia does not support nor endorse seeking licensure for substance abuse counselors in the State of Georgia. Licensure for addiction counselors would most likely lead to the elimination of counselors who provide necessary, qualified and revered services because they lack a clinical master's degree.

Rather than enhancing workforce development, licensure would most likely decimate the numbers of qualified counselors. Not only would the general number of professionals available be decreased, not only those who enter the field because of their own personal journey of recovery but the marginalized communities would be disproportionately affected.

One of the more traditional routes into the field of addiction counseling is have a recovery story of one's own. Many of our certified counselors have experienced the horrors of addiction and the joys of recovery first-hand. For those who have followed this path into the field of substance abuse counseling, many lack advanced degrees. However, time and time again, we here from consumers and treatment providers that they make some of the best counselors.

Unfortunately, due to lack of opportunities, i.e., poverty, racism, homophobia, access to education, many marginalized communities who hold certification will not be allowed to get licensed, since many hold a bachelor's level certification and some may only a GED or high school diploma. The Latino community of Georgia who have immigrated from other countries would be at a disadvantage because of laws already in place, a PhD from another country only translates to a minimum of a High School Diploma, maximum BA. Looking at the statistics of most of our Latino certified counselors, while they may hold advanced degrees in their country of origin, it does not translate to more than a BA in GA.

In a dynamic field that is finding new and better treatments, a licensure bill would require an act of the legislature to make changes. With certification, needed changes can be made more easily. Our certification exemption therefore strengthens are ability to better protect and serve the public.

It is our firm belief that seeking licensure for substance abuse counselors would be detrimental to workforce development and retention, would limit our ability to swiftly adapt to changes in the field of addiction and recovery, and would not enhance the services provided to those in need. We do NOT support nor endorse seeking licensure at this time.

