SOUTH DAKOTA
COUNCIL OF SUBSTANCE ABUSE DIRECTORS, Inc.
PO Box 532
Pierre, South Dakota 57501

SEP 25 2017

September 21, 2017

COPY

Tina Nelson, Administrative Officer
Board of Addiction and Prevention Professionals
3101 W. 41st Street, Suite 205
Sioux Falls, South Dakota 57105

Dear Ms. Nelson:

The purpose of this letter is to request the opportunity to meet with the Board of Addiction and Prevention Professionals (BAPP) to prospectively discuss concerns and potential solutions related to workforce development issues/challenges, which are being experienced by the members of the South Dakota Council of Substance Abuse Directors (SDCSAD).

The SDCSAD is a non-profit association consisting of fifteen comprehensive alcohol/drug treatment and prevention agencies. I'm enclosing a copy of our membership roster to clarify our constituency.

Our main concerns fall into three general categories:

1. **Interstate reciprocity** - CSAD members have experienced multiple instances in which recruitment/hire candidates licensed in other states, have not been deemed licensable in South Dakota. In most of the cases rising to our attention, candidates have been licensed at the highest level in their originating states under IC/RC standards and have completed training from CACREP accredited programs. Also in many situations, these same individuals were highly experienced in their field. It is our observation that the reason for non-licensure in South Dakota sources to specific academic preparation. Whereas the general academic requirements stipulated within ARSD Chapter 20:80:05 appear fairly straight-forward, it seems that the internal standards utilized by the BAPP for meaningful fit with these requirements has been overly restrictive. We are aware of several situations involving highly qualified professionals who have left employment with member agencies only to migrate to other states with more attainable licensing standards rather than bearing the expense and time investment required to meet South Dakota-specific course requirements. It is the CSAD's position that LAC candidates properly licensed and practicing in other IC/RC states, who are licensed at the highest level of qualification within those states, should be deemed and granted reciprocity in South Dakota barring other more significant disqualifying factors.

BAPP's CURRENT PROCESS.

Phone & FAX: (605) 224-0123

2. **Dual/multiple licensing** - It is increasingly common-place - and desirable - for other behavioral health practitioners, such as LPCs and MSWs to seek dual licensure as addiction professionals. We have found that individuals seeking dual licensure are generally required to "start-over" from the standpoint of transferrable academic preparation and supervised practice. It is the CSAD's position that, to a substantial degree, the academic requirements completed in preparation for these other behavioral health disciplines should be credited. Academic requirements related to these disciplines fit well with the categories enumerated in ARSD Chapter 20:80:05. Ethics courses serve as a good example. Again, it seems that the BAPP's internal standards frequently require applicants to re-take specifically prescribed curriculum, which in function doesn't appear to enhance professional preparation as an addiction counselor. In addition, we believe that the supervisor requirements outlined in ARSD Section 20:80:06:03 are deserving of review. Limiting allowable clinical experience only to that supervised by a CAC/LAC/CPS imposes a significant barrier to individuals who have been licensed in another behavioral health field and who in many cases have logged years of competent practice. The CSAD's position is that supervisory experience completed under the oversight of other properly qualified behavioral health professionals should be at least partially credited.

3. **BAPP licensing practices** - The CSAD maintains that the BAPP should identify ways of streamlining the existing licensing review process to derive a smoother, more facilitative, and less costly progression from application through to licensure. As we work with our staff to assist them meet licensing requirements, we have observed that the current process is compartmentalized and time-consuming, often resulting in frustration and discouragement on the part of the applicant. We are not suggesting that the process should be short-cut or inappropriately over-simplified; however we do assert that it can and should be made more "friendly" and cost-effective to navigate.

4. **State Priority Initiatives** - The demands on our presently strained staffing resources are ever increasing. The Governor and the Chief Justice have implemented several justice reform initiatives to reduce prison recidivism, improve public safety, and expand community-based services for offenders. All of these justice-related initiatives pivot around the availability of effective SU services. Moreover, the Department of Social Services has outlined a plan including eight top priority goals associated with South Dakota's participation in federal Behavioral Health Block Grant and other categorical grant programs. Five of these priority areas involve building/enhancing the state's SU services delivery capacity. These priority areas include:

- Access to services for priority populations (PWWDC & PWID);
- Addressing the opioid epidemic;
- Addressing the methamphetamine epidemic;
- Advancement of evidence-based practices; and,
- Workforce development.

These efforts cannot succeed if we are unable to ensure sufficient and stable staffing levels. We, therefore, urge the BAPP to work in concert with the CSAD and the general provider community to meet South Dakota's future needs.

We are in the process of preparing several "case studies" to exemplify the staff recruitment/retention problems resulting from the afore-described concerns and will provide them in follow-up to this correspondence to facilitate discussions with the Board.

The SDCSAD acknowledges and deeply appreciates the dedication and hard work of the BAPP in fulfilling its mission of promoting high professional standards and assuring the public safety. We believe that supporting a viable workforce of qualified professionals to meet the access and service needs of South Dakota residents fits with this mission, as well. It is in this spirit that we overture for constructive dialogue.

Thank you for your consideration of our concerns. I look forward to your reply to discuss process for future interaction with the BAPP. I may be reached by calling (605-) 224-0123; my e-mail is tladosch@dakota2k.net.

Very truly yours,

Terrance L. Dosch
Executive Director
South Dakota Council of Substance Abuse Directors

Cc: Amy Iversen-Pollreisz, Deputy Secretary, South Dakota Department of Social Services