

## ADMINISTRATIVE RULES

### Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis  
 Original    Updated    Corrected

2. Administrative Rule Chapter, Title and Number  
SPS 160, 166

3. Subject  
Substance Abuse Professionals

4. Fund Sources Affected  
 GPR    FED    PRO    PRS    SEG    SEG-S

5. Chapter 20, Stats. Appropriations Affected  
20.165(1)(g)

6. Fiscal Effect of Implementing the Rule

<input type="checkbox"/> No Fiscal Effect	<input type="checkbox"/> Increase Existing Revenues	<input checked="" type="checkbox"/> Increase Costs
<input type="checkbox"/> Indeterminate	<input type="checkbox"/> Decrease Existing Revenues	<input checked="" type="checkbox"/> Could Absorb Within Agency's Budget
		<input type="checkbox"/> Decrease Cost

7. The Rule Will Impact the Following (Check All That Apply)

<input type="checkbox"/> State's Economy	<input type="checkbox"/> Specific Businesses/Sectors
<input type="checkbox"/> Local Government Units	<input type="checkbox"/> Public Utility Rate Payers
	<input type="checkbox"/> Small Businesses (if checked, complete Attachment A)

8. Would Implementation and Compliance Costs Be Greater Than \$20 million?  
 Yes    No

9. Policy Problem Addressed by the Rule

Current Department administrative rules require that an individual seeking substance abuse counselor certification attend a comprehensive program that has been pre-approved by the Department. The proposed rule modifies the comprehensive program approval requirements to allow for competency-based flexible option programs. Competency-based flexible option programs address workforce shortage issues by providing an academically rigorous but less time-consuming avenue for obtaining the substance abuse counselor education requirements that is appealing to working adults.

10. Summary of the businesses, business sectors, associations representing business, local governmental units, and individuals that may be affected by the proposed rule that were contacted for comments.

This rule was posted for 14 days for economic impact comments and none were received.

11. Identify the local governmental units that participated in the development of this EIA.

None. This rule does not affect local government units.

12. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred)

This rule will not have an economic or fiscal impact on businesses, business sectors, public utility rate payers, local government units or the state's economy as a whole.

13. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

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Competency-based flexible option programs address workforce shortage issues by providing an academically rigorous but less time-consuming avenue for obtaining the substance abuse counselor education requirements that is appealing to working adults. The alternative to implementing the rule would be to continue with the rules as currently written. These rules inhibit the approval of competency-based flexible option programs.

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#### 14. Long Range Implications of Implementing the Rule

In the long run, implementing this rule could allow more individuals to receive certification as substance abuse counselors meeting the state's growing demand for these professionals. As more individuals receive adequate treatment for substance abuse, Wisconsin could see a decrease in substance abuse rates.

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#### 15. Compare With Approaches Being Used by Federal Government

None

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#### 16. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

In Illinois, all professional staff providing clinical services at organizations licensed to provide alcoholism and substance abuse treatment and intervention by the Department of Human Services must hold clinical certification as a Certified Alcohol and Drug Counselor from the Illinois Alcoholism and Other Drug Abuse Professional Certification Organization (IAODAPCA) or be a licensed professional counselor, licensed clinical professional counselor, a licensed physician, a licensed psychologist, or a licensed social worker or clinical social worker.. (77 Ill. Adm. Code 2060.309 Professional Staff Qualifications) IAODAPCA does not pre-approve education courses for initial application. Acceptable sources of education include: college courses, seminars, conferences, in-services, and lectures (IAODAPCA AODA Counselor Model, page 8). IAODAPCA does not restrict online course credit hours.

In Minnesota, all individuals who use the title alcohol and drug counselor and all individuals who provide alcohol and drug counseling services to clients who reside in Minnesota must be licensed as an alcohol and drug counselor by the Minnesota Board of Behavioral Health and Therapy. Education requirements for licensure include: a bachelor's degree from an accredited school or educational program, 18 semester credits or 270 clock hours of academic course work, and 80 clock hours of supervised alcohol and drug counseling practicum from an accredited school or education program. The course work and practicum do not have to be part of the bachelor's degree. (Minnesota Statutes 148F.025) An accredited school or educational program is defined as "a school of alcohol and drug counseling, university, college, or other postsecondary education program that, at the time the student completes the program, is accredited by a regional accrediting association whose standards are substantially equivalent to those of the North Central Association of Colleges and Postsecondary Education Institutions or an accrediting association that evaluates schools of alcohol and drug counseling for inclusion of the education, practicum, and core function standards in this chapter." (Minnesota Statutes 148F.01 subd. 3.)

Iowa's and Michigan's statutes and administrative rules do not require the certification of substance abuse professionals.

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<b>17. Contact Name</b>	<b>18. Contact Phone Number</b>
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**ADMINISTRATIVE RULES**  
**Fiscal Estimate & Economic Impact Analysis**

**ATTACHMENT A**

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1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

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2. Summary of the data sources used to measure the Rule's impact on Small Businesses

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3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- Less Stringent Compliance or Reporting Requirements
- Less Stringent Schedules or Deadlines for Compliance or Reporting
- Consolidation or Simplification of Reporting Requirements
- Establishment of performance standards in lieu of Design or Operational Standards
- Exemption of Small Businesses from some or all requirements
- Other, describe:

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4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

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5. Describe the Rule's Enforcement Provisions

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6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

- Yes    No
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