

Response to Economic Impact Analysis

The Board of Counseling concurs with the Economic Impact Analysis of the Department of Planning and Budget for 18VAC115-30 Regulations Governing the Certification of Substance Abuse Counselors with the exception of the statement in the EIA that the time cost for the proposed required 10 contact hours of continuing education for CSACs would be about \$200. The EIA notes that “many employers of CSACs, such as community services boards, offer continuing education through in-service programs at no costs.” A CSAC who completes in-service programs or continuing education offered by or required by an employer would not lose pay for the time spent in such a course. Therefore, the agency does not concur that there would be a loss of income of \$200 as asserted by the EIA.