



## **Economic Impact Analysis Virginia Department of Planning and Budget**

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### **18 VAC 115-30 – Regulations Governing the Certification of Substance Abuse Counselors Department of Health Professions September 23, 2002**

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The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.G of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

### **Summary of the Proposed Regulation**

Pursuant to sections § 54.1-3507.1 and § 54.1-3507.2 of the Code of Virginia, the Board of Counseling (board) proposes to require that newly certified substance abuse counselors have a bachelor's degree and to create the substance abuse counseling assistant certification.

### **Estimated Economic Impact**

Under both the current and proposed regulations, in order to obtain a substance abuse counselor certification individuals must: 1) have completed 400 clock hours of substance abuse education, 2) have had 2,000 hours of supervised experience in the delivery of clinical substance abuse counseling services, and 3) pass a written exam approved by the board. The current regulations require that the applicant have a high school diploma or general education development certificate (GED).

In order to comply with House Bill 2095 (Chapter 460 of the 2001 Acts of Assembly), the board proposes to require that newly certified substance abuse counselors (CSAC) have a bachelor's degree. The bachelor's degree can be in any field.

Under the proposed regulations someone who has earned credits in numerous courses relevant to substance abuse counseling (psychology, for example) without earning a bachelor's degree, followed by the completion of 400 clock hours of substance abuse education, would not qualify for substance abuse counselor certification; while someone who earned a bachelor's degree without taking any courses related to substance abuse counseling, followed by the 400 clock hours of substance abuse education, would qualify for substance abuse counselor certification (assuming other requirements are met). It is not evident that the person without a bachelor's degree who has taken several courses relevant to counseling would be less qualified to perform substance abuse counseling duties than the person with a bachelor's degree in an unrelated field who has taken no courses relevant to counseling (other the 400 clock hours of substance abuse education required of both individuals). Yet the former would be required to take the time and incur the expense of taking additional undergraduate courses while the latter would not. Since the courses taken to earn the bachelor's degree could be entirely unrelated to substance abuse counseling, the benefit of requiring a bachelor's degree may be relatively small while the time and tuition costs may be substantial.

Also in order to comply with House Bill 2095 (Chapter 460 of the 2001 Acts of Assembly), the board proposes to create the substance abuse counseling assistant certification. Substance abuse counseling assistant certification will require a high school diploma or GED, 300 clock hours of substance abuse education, and passing a board-approved exam. According to the Department of Health Professions, the certified substance abuse counseling assistant exam will most likely only cover contents of the regulation, be administered by the board, and have no charge for the examinees. The certification does not legally permit the holder to perform any actions that a non-holder may not perform. However, the substance abuse counseling assistant certification can be a useful informational tool for potential employers to use in comparing applicants for positions in a substance abuse counseling office.

## **Businesses and Entities Affected**

There are currently 1,245 individuals in the Commonwealth that are certified substance abuse counselors. Those individuals will not be required to obtain a bachelor's degree, but they will be indirectly affected by the proposed requirement that new CSACs have a bachelor's degree. The bachelor's degree requirement will likely reduce competition in the CSAC labor market by reducing the number of new individuals that obtain that designation. Employers and clients of CSACs will also be affected.

## **Localities Particularly Affected**

The proposed regulations affect all Virginia localities.

## **Projected Impact on Employment**

The bachelor's degree requirement will likely discourage some individuals from pursuing the certified substance abuse counselor designation, but will not likely have a significant effect on overall employment levels.

## **Effects on the Use and Value of Private Property**

The proposed amendments will likely encourage some individuals to complete their bachelor's degree who would not have done so otherwise.