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Robert I. L. Morrison

November 25, 2014

The Honorable Pamela Hyde, J.D.  
Administrator  
Substance Abuse and Mental Health Services Administration (SAMHSA)  
1 Choke Cherry Road  
Rockville, MD 20857

**RE: NASADAD Comments on Credentialing Criteria for Certified Community Behavioral Health Clinics**

The National Association of State Alcohol and Drug Abuse Directors, Inc. (NASADAD) appreciates the opportunity to comment on the development of the Substance Abuse and Mental Health Services Administration's (SAMHSA) criteria for credentialing of Certified Community Behavioral Health Clinics. We recognize this as an important opportunity to expand access to clinically appropriate substance use disorder services. Our members are the State Agencies responsible for oversight and management of the publicly funding substance use disorder prevention, treatment, and recovery system.

Section 223 of the "Protecting Access to Medicare Act of 2014" (H. R. 4302), signed into law on April 1, 2014, authorizes creation of a demonstration program for "certified community behavioral health clinics." We particularly note that clinics are expected to provide a broad scope of services that is inclusive of outpatient substance abuse services. This reflects the reality that providing services for substance use disorders is essential to improving their health outcomes.

The Association strongly urges that the provider certification requirements for this initiative require providers to provide a complete range of evidence-based substance abuse treatment services. These should encompass:

- Screening of all patients for substance use disorders, with appropriate protocols for brief interventions;
- Comprehensive substance use disorder assessments for those that screen positive;
- Assessment for appropriate level of care using a standardized assessment tool such as the American Society of Addiction Medicine (ASAM) patient placement criteria;
- Provision of (not merely referral for) evidence-based substance use disorder outpatient treatment services; and the
- Ability to prescribe and manage FDA-approved substance use disorder treatment and rescue medications for opioid as well as alcohol substance use disorders (e.g., buprenorphine, naltrexone (injection and oral), acamprosate, naloxone, etc.).

The clinic should have State specific substance abuse licensure or certification for delivery of co-occurring treatment services, or if the State does not have such a license/certificate they should have substance abuse licensure/certification for outpatient services.

The clinic should employ or contract for Medical/prescribing professionals that hold credentials/waivers to prescribe buprenorphine products for the treatment of opioid use disorders.

The clinic should also have and use counseling staff holding appropriate State credentials/licenses to deliver substance use disorder services (e.g., screening, assessments, brief interventions, individual and group outpatient services). These are credentials such the Licensed Addiction Counselor, Certified Alcohol and Drug Counselor, etc. and are specific to training and demonstrated ability to deliver evidence-based SUD services.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Morrison". The signature is fluid and cursive, with the first name "Robert" and last name "Morrison" clearly distinguishable.

Robert Morrison  
Executive Director