

**Testimony on H.69**

**Vermont Council of Developmental and Mental Health Services**

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It is important to acknowledge and take into consideration the increasing complexity of clinical presentation by substance abuse clients and the requisite need for a period of advanced educational exposure, training and supervision for substance abuse clinicians. Therefore, Vermont Council does not support the Medicaid participation of LADCs who lack postgraduate degrees and supervision or some type of oversight from a preferred provider (not necessarily a designated agency). Individual practitioners should be held to the same documentation standards, policy protocols and timelines, reporting requirements, and oversight review that DA and other preferred providers are required to address.

We do acknowledge that there is a need for additional workforce to meet the current demands for substance abuse expertise. One avenue to achieve this is to look at easing the process for mental health professionals to achieve dual certification.