

Dear Chairman Wobbema and members of the committee,

I am giving written testimony on behalf of the North Dakota Board of Addiction Counseling Examiners (NDBACE) to express opposition to Senate Bill 2357. This bill proposes the creation of a composite mental health licensing board in North Dakota. While the intention to streamline processes has validity, the potential negative impacts on our mental health system warrant further consideration of the possible negative outcomes. This testimony will outline several key concerns regarding this bill.

The consolidation of multiple licensing boards into a single entity, as proposed by SB 2357, risks increasing bureaucracy and inefficiencies. Each existing board currently operates with a specific focus, ensuring that licensure processes are tailored to the unique needs of each discipline. By merging these boards, we may introduce redundancies that complicate the licensure process, potentially delaying access to services for those in need. This could be particularly detrimental in a field where timely intervention is critical.

The distinct professional disciplines within mental health, such as psychology, social work, addiction counseling, and marriage and family therapy, each require specialized knowledge and tailored regulations. The proposed composite board could dilute this specialization, leading to a one-size-fits-all approach. Such an approach may fail to adequately address the unique challenges faced by each discipline, ultimately compromising the quality of care provided to clients.

SB 2357 allows for the governor to appoint board members from various mental health fields. This raises concerns about potential conflicts of interest, as board members might prioritize the interests of their profession over the equitable treatment of all licensed disciplines.

This could lead to biases in decision-making and regulation enforcement, undermining the integrity of the board's operations.

There is significant apprehension among current licensees regarding how the transition to a composite board will affect their existing licenses and the renewal process. Although the bill proposes that existing licensees retain their status without reapplication, uncertainties regarding the new board's policies and oversight might create confusion and anxiety. Clear guidelines and communication will be essential to mitigate these concerns.

The financial implications of establishing a new board, including administrative costs and the potential need for additional staff, are contentious. Arguments could be made that funds could be better utilized to enhance existing mental health services or improve access to care rather than creating a new administrative structure. It is important to consider whether the benefits of a composite board justify the financial investment required.

The merging of boards might affect public perception and trust in mental health professionals. Stakeholders may worry that a composite board could lead to a dilution of standards, resulting in a decrease in the overall quality of care provided to clients. Maintaining high standards is essential to preserving public confidence in mental health services.

Combining various licensing requirements and regulatory frameworks may create challenges in maintaining consistent standards across disciplines. This could lead to confusion among practitioners and clients alike regarding the qualifications and competencies required for different types of mental health professionals. Ensuring clarity and consistency in regulations will be vital to avoid such confusion.

Another aspect to consider is the quantitative impact of this bill. There are approximately 5,000 licensed individuals across the existing boards, each with an approximate average caseload of 10 people, impacting around 50,000 North Dakotans. However, according to the Department of Health and Human Services, 20.5% of citizens have a behavioral health condition, equating to 160,704 individuals potentially affected by this bill. A comprehensive study is necessary to fully understand the implications of this legislative change.

In conclusion, while Senate Bill 2357 aims to streamline mental health licensing processes, it raises significant concerns about specialization, potential conflicts of interest, and the impact on existing licensees, resource allocation, public trust, and the complexity of regulatory standards. These arguments warrant careful consideration in the legislative process. I urge the committee to thoroughly evaluate these concerns and consider the potential consequences before the advancement of this bill.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Traen', with a long horizontal flourish extending to the right.

Jeremy Traen LBSW, LCAC
Chairman
North Dakota Board of Addiction Counseling Examiners