

**STATE OF IOWA**

**LEGISLATIVE  
FISCAL BUREAU**

**SUMMARY**  
**PROGRAM EVALUATION:**  
**IOWA DEPARTMENT**  
**OF**  
**SUBSTANCE ABUSE**

**DECEMBER, 1981**

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may be obtained  
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## SUMMARY REPORT

### PROGRAM EVALUATION: IOWA DEPARTMENT OF SUBSTANCE ABUSE

#### Introduction

The authorizing legislation and appropriations for the Iowa Department of Substance Abuse (IDSA) will expire on July 1, 1982. To guide the General Assembly's consideration of the department's future, an evaluation of the administration, structure and funding was mandated to be performed by the Legislative Fiscal Bureau (Chapter 58.14, Acts of the 69th General Assembly, 1981 regular session).

To address these issues, the program evaluation team identified four questions for study:

- Has the policy of the state defined in Chapter 125.1, 1981 Code of Iowa, been implemented?
- Is the current administration and structure efficiently meeting legislative mandates?
- Is the current funding system efficiently and economically meeting legislative mandates?
- What alternatives exist to the current system of state-wide substance abuse administration?

Fieldwork for the evaluation began in June, 1981 and was completed in November, 1981. A number of information sources were used during the evaluation, including:

- A review of legal and administrative documents,
- Interviews with IDSA staff, State Auditor's Office, Attorney General's Office, Administrative Rules Review Committee staff, Legislative Service Bureau staff, legislators, members of the Substance Abuse Program Director's Association and the regional office of the Alcohol, Drug Abuse and Mental Health Administration,
- A survey of all county boards of supervisors and substance abuse program directors who had applied for IDSA funds in FY 1982, and
- Information obtained on other states' substance abuse administration, structure and funding mechanisms.

The full report is organized into four major sections. Section I contains the Conclusions and Recommendations of the program evaluation team; Section II presents an historical review and description of substance abuse legislation, administration and programming in Iowa; Section III discusses the analysis and findings of the evaluation team; and Section IV describes possible alternatives to the current system of substance abuse administration and programming in Iowa.

The remainder of this summary contains the list of findings and the conclusions and recommendations of the program evaluation team regarding the Iowa Department of Substance Abuse as they are found in the full report.

## List of Findings

WITHIN GEOGRAPHICAL BOUNDARIES ESTABLISHED BY IDSA TREATMENT SERVICE AREAS, A COMPLETE RANGE OF SUBSTANCE ABUSE SERVICES IS AVAILABLE IN ONLY HALF OF THE REGIONS.

REGIONAL DELINEATIONS MADE BY IDSA AS MANDATED IN THE 1981 CODE OF IOWA HAVE BEEN CONSISTENT.

THE COMMISSION'S POLICY OF PLACING PRIORITY ON THE AVAILABILITY OF SUBSTANCE ABUSE SERVICES MAY CONFLICT WITH THE DEPARTMENT'S MANDATE TO INSURE QUALITY.

COUNSELOR CREDENTIALING STANDARDS TO EVALUATE THE QUALIFICATIONS OF INDIVIDUALS PROVIDING SUBSTANCE ABUSE SERVICES HAVE NEVER BEEN FORMALLY ADOPTED BY THE COMMISSION.

SUBSTANCE ABUSE PREVENTION AND EDUCATION SERVICES ARE NOT UNIFORMLY AVAILABLE AND CHANGES IN IDSA POLICY MAY FURTHER FRAGMENT SERVICES.

THE COORDINATION THAT HAS EXISTED BETWEEN IDSA AND OTHER STATE AGENCIES HAS OCCURED PRIMARILY THROUGH MONETARY AID OR REPRESENTATION ON SPECIFIC BOARDS.

COORDINATION BETWEEN IDSA AND STATE MENTAL HEALTH AGENCIES HAS BEEN MINIMAL, ALTHOUGH BOTH ARE MANDATED TO INSURE AVAILABILITY OF SUBSTANCE ABUSE SERVICES.

THE TOTAL NUMBER OF IDSA STAFF HAS BEEN REDUCED 34% SINCE THE MERGER OF THE IOWA DIVISION ON ALCOHOLISM AND THE IOWA DRUG ABUSE AUTHORITY.

IDSA HAS DEVELOPED A COMBINED ALCOHOL AND DRUG MANAGEMENT INFORMATION SYSTEM, ELIMINATING THE NEED FOR TWO SEPARTE REPORTING SYSTEMS.

DESPITE AN INCREASE IN LOCAL INVOLVEMENT IN STATEWIDE PLANNING EFFORTS, THE STATE PLAN IS PERCEIVED TO BE IRRELEVANT.

THE DEPARTMENT VIOLATED LICENSURE PROVISIONS IN CHAPTER 125 BY THE USE OF EMERGENCY RULES ALLOWING OPEN-ENDED LICENSES IN COMBINATION WITH DELAYED IMPLEMENTATION OF FINAL RULES FOR LICENSURE STANDARDS.

IDSA EXCEEDED ITS STATUTORY AUTHORITY BY CREATING AN ADDITIONAL LICENSE CATEGORY.

IDSA'S GENERAL OPERATING EXPENDITURE HAS DECLINED AS A PERCENTAGE OF FUNDS EXPENDED.

HISTORICALLY, STATE SUBSTANCE ABUSE FUNDS HAVE INCREASED, REPLACING DECLINING FEDERAL DOLLARS.

THE COMMISSION ON SUBSTANCE ABUSE HAS A POLICY OF AWARDING FUNDS ON A MAINTENANCE OF EFFORT BASIS

THE CURRENT DISTRIBUTION OF TREATMENT FUNDS CORRESPONDS WITH POPULATION DISTRIBUTION.

THE CURRENT DISTRIBUTION OF PREVENTION FUNDS DOES NOT CORRESPOND TO POPULATION DISTRIBUTION.

WHILE THE DEPARTMENT HAS RECENTLY IMPLEMENTED A UNIT COST REIMBURSEMENT SYSTEM, THEY HAVE NOT DEVELOPED A CLIENT-ORIENTED BILLING PROCEDURE AS REQUIRED IN CHAPTER 125.44 OF THE 1981 CODE OF IOWA.

IDSA HAS NOT ESTABLISHED RULES OR ENFORCED PROCEDURES TO INSURE THAT PRIMARY LIABILITY FOR THE COST OF TREATMENT SERVICES IS ASSUMED BY THE SUBSTANCE ABUSER OR PERSONS LEGALLY RESPONSIBLE FOR THE SUBSTANCE ABUSER.

THE RELATIONSHIP BETWEEN THE STATE, COUNTIES, AND PROGRAMS REGARDING FINANCIAL RESPONSIBILITY FOR TREATMENT EXPENSES ARE UNCLEAR IN THE LEGISLATION AND POLICIES OF THE DEPARTMENT.

THE MAJORITY OF SURVEY RESPONDENTS FAVOR THE USE OF PROFITS AND TAXES FROM THE SALE OF LIQUOR AND BEER AS THE PRIMARY SOURCE OF REVENUE FOR FUNDING SUBSTANCE ABUSE SERVICES.

## CONCLUSIONS AND RECOMMENDATIONS

### Conclusions

Since the formation of the Iowa Department of Substance Abuse (IDSA) in 1978, substance abuse administration and programming in Iowa is marked by several accomplishments:

- The overall quality of substance abuse treatment has generally improved
- Prevention and education efforts have expanded
- Management information systems have been combined for drug and alcohol service reports
- Statewide planning processes have been expanded to encourage greater local participation
- General state operating expenses have declined as a percentage of total expenditures
- Stability in alcohol treatment program funding levels has been maintained by substituting state funds for decreasing federal funds
- Drug treatment program funding levels have increased due to increasing federal funds

Despite the progress that has been made, renewed and expanded efforts are needed to continue the development of substance abuse programming in Iowa. Some areas of the state lack a complete range of substance abuse programs, particularly community-based residential treatment and prevention/education/intervention services. IDSA has not taken a sufficiently strong stance in regard to assuring the quality of treatment services through licensure and the availability of prevention services through funding.

IDSA has delayed enforcing licensure provisions of Chapter 125, 1981 Code of Iowa, and has expanded the license categories to provide maximum flexibility to programs seeking the authority to offer substance abuse treatment in Iowa. The process of licensure has been seen by the department as developmental as opposed to enforcement-oriented. While this orientation would seem justifiable in light of IDSA's responsibility to provide technical assistance to applicant programs, it has been noted that the delays and flexibility granted to programs has resulted in some areas of the state being served by programs for which the degree of quality has yet to be determined by licensure.

IDSA has a policy of "maintenance of effort" funding which has promoted stability in existing programs. It has, however, further exacerbated the problems associated with gaps in services in certain areas of the state. Areas which did not have residential treatment services prior to 1978 still do not have such services readily available.

Prevention/education services are funded through an uncoordinated, non-uniform distribution of state and regional programs. IDSA's policy of "maintenance of effort" has produced little change in the distribution and availability of substance abuse treatment and prevention services in Iowa.

IDSA's grants and contracts management process has been slow to implement legislative intent regarding the reimbursement of services for individual substance abusers on a cost-related basis. The development of procedures for determining how counties will reimburse programs for the required remaining 25% of the costs of treatment has been lacking by the department, resulting in a widely-variant system of county reimbursement procedures across the state which cannot be easily monitored. IDSA has not developed adequate rules and procedures to enforce the collection of payments from all other non-public entities liable for the treatment costs of the substance abuser (e.g., private insurance, client fees, etc.).

### Recommendations

To strengthen the current system of statewide substance abuse treatment programming in Iowa, the program evaluation team has developed the following recommendations.

TO CONTINUE THE CURRENT SYSTEM OF SUBSTANCE ABUSE ADMINISTRATION AND PROGRAMMING, THE IOWA GENERAL ASSEMBLY SHOULD EXTEND THE AUTHORIZING LEGISLATION FOR THE IOWA DEPARTMENT OF SUBSTANCE ABUSE.

The Department of Substance Abuse has fulfilled its mandates since the merger of the Iowa Division on Alcoholism and the Iowa Drug Abuse Authority. They have generally operated departmental programs in an efficient and effective manner. Further improvements are needed to strengthen some of the activities of the department and this can be achieved by continuing the current administrative structure with changes as further recommended by the program evaluation team.

TO BETTER COORDINATE STATE ADMINISTRATION AND PROGRAMMING OF SIMILAR SERVICES, THE DEPARTMENT OF SUBSTANCE ABUSE AND THE DIVISION OF MENTAL HEALTH, MENTAL RETARDATION AND DEVELOPMENTAL DISABILITIES WITHIN THE DEPARTMENT OF SOCIAL SERVICES SHOULD ESTABLISH AN INTERAGENCY AGREEMENT MAKING COMPATIBLE AS MANY FUNCTIONS AS POSSIBLE BETWEEN THE TWO AGENCIES. THESE FUNCTIONS SHOULD INCLUDE, BUT NOT BE LIMITED TO:

- MANAGEMENT OF INFORMATION SYSTEMS
- PROCEDURES FOR LOCAL AND STATE PLANNING ACTIVITIES
- LICENSURE AND ACCREDITATION OF COMMUNITY PROGRAMS
- PROVISION OF TRAINING AND TECHNICAL ASSISTANCE TO LOCAL PROGRAMS AND GOVERNMENTS

Currently, there is not strong evidence to indicate benefits resulting from a merger between the Department of Substance Abuse and the Department of Social Services' Division of Mental Health, Mental Retardation and Developmental Disabilities. However, the existence of similar mandates as well as the future need for more coordination in planning for the distribution of federal funds implies a stronger relationship is needed between the two



agencies. An interagency agreement would provide better coordination of activities at the state level and help reduce any unnecessary burden on local governments and programs where duplication may exist or develop.

TO STRENGTHEN LICENSURE PROVISIONS, THE GENERAL ASSEMBLY SHOULD:

- ESTABLISH BY STATUTE ONLY TWO TYPES OF LICENSES WHICH MAY BE ISSUED BY THE COMMISSION ON SUBSTANCE ABUSE: A STANDARD TWO-YEAR LICENSE AND A NON-RENEWABLE PROVISIONAL LICENSE. RENEWABLE PROVISIONAL LICENSES MAY BE ISSUED FOR THE PURPOSE OF SPECIFYING SCHEDULES OF COMPLIANCE FOR PROGRAMS NOT IN COMPLIANCE WITH LICENSURE STANDARDS AND MAY NOT BE ISSUED FOR A PERIOD OF TIME LONGER THAN ONE YEAR.
- ELIMINATE THE PRESENT STATUTORY EXEMPTION OF NON IDSA-FUNDED PROGRAMS FROM INSPECTION BY THE DEPARTMENT WHEN BELIEVED TO BE OPERATING WITHOUT A LICENSE.
- PROVIDE ADDITIONAL STATUTORY AUTHORITY FOR THE ENFORCEMENT OF MANDATORY LICENSURE BY ALLOWING THE DEPARTMENT TO IMPOSE FINES OR SEEK AN INJUNCTION AGAINST PROGRAMS SUSPECTED OF VIOLATING THE LAW BY OPERATING A TREATMENT PROGRAM WITHOUT A LICENSE. (SIMILAR TO POLICIES SET FORTH IN CHAPTER 135C, 1981 CODE OF IOWA.)

The findings upon which this recommendation is based are found in Section III, pages 30 and 31.

TO IMPROVE THE ADMINISTRATION OF LICENSURE PROCEDURES, THE IOWA DEPARTMENT OF SUBSTANCE ABUSE SHOULD:

- CEASE PRE-SITE INSPECTIONS OF PROGRAMS APPLYING FOR LICENSURE AND PROMULGATE RULES ESTABLISHING A SPECIFIC TIME LIMIT WITHIN WHICH TREATMENT PROGRAMS ARE ALLOWED TO OPERATE AFTER APPLICATION AND BEFORE THEIR INITIAL LICENSURE INSPECTION.
- PROMULGATE RULES REQUIRING PROGRAMS TO FOLLOW A SCHEDULE OF COMPLIANCE WHEN THEY FAIL TO MEET STANDARDS DURING A ROUTINE LICENSURE INSPECTION AFTER THEY HAVE BEEN INITIALLY LICENSED.
- PROMULGATE RULES SPECIFYING MINIMUM QUALIFICATIONS FOR SUBSTANCE ABUSE COUNSELORS BASED ON EXPERIENCE, EDUCATION OR A COMBINATION OF BOTH.
- PROMULGATE RULES FOR THE INVESTIGATION OF COMPLAINTS MADE TO THE DEPARTMENT.

The findings upon which this recommendation is based are found in Section III, pages 23, 30 and 31.

TO STRENGTHEN PROCEDURES FOR GRANTS AND CONTRACTS MANAGEMENT, THE IOWA DEPARTMENT OF SUBSTANCE ABUSE SHOULD:

- PROMULGATE RULES SPECIFYING PROCEDURES FOR THE USE OF A CLIENT-ORIENTED, COST-RELATED REIMBURSEMENT AND BILLING SYSTEM.
- IMPLEMENT THE CLIENT-ORIENTED COST RELATED REIMBURSEMENT AND BILLING SYSTEM.

- PROMULGATE RULES ESTABLISHING UNIFORM CLIENT ELIGIBILITY GUIDELINES AND PROCEDURES FOR THE USE OF PROGRAM REVENUES IN BUDGETING AND BILLING.
- PURSUE CLARIFICATION\* OF SECTION 44, CHAPTER 125 OF THE 1981 CODE OF IOWA.

The findings upon which this recommendation is based are found in Section III, pages 37-41.

TO IMPROVE THE USE OF LOCAL SUBSTANCE ABUSE PLANNING EFFORTS IN IOWA, THE IOWA DEPARTMENT OF SUBSTANCE ABUSE SHOULD:

- REQUIRE LOCAL PLANNING MEETINGS TO BE HELD EARLY ENOUGH IN THE YEAR SO THAT THE INFORMATION RECEIVED CAN BE INCORPORATED INTO THE DEPARTMENT'S BIENNIAL BUDGETING PROCESS.
- USE THE INFORMATION OBTAINED THROUGH A NEEDS ASSESSMENT AND LOCAL PLANNING PROCESSES TO DEVELOP THE BIENNIAL BUDGET REQUEST AND DETERMINE ALLOCATIONS FOR SERVICES.
- STRENGTHEN THE LOCAL PLANNING PROCESS TO ENCOURAGE INCREASED INVOLVEMENT OF LOCAL PUBLIC OFFICIALS AND REPRESENTATIVES OF MENTAL HEALTH SERVICE DELIVERY SYSTEMS.

The findings upon which this recommendation is based are found in Section III, pages 25, 26, 28, 37, 38 and 39.

\* The program evaluation team has requested clarification on this section from the Attorney General's office but it was not completed at the time this report went into print.

In accordance with Chapter 2.55, 1981 Code of Iowa, the final draft of the report has been reviewed by the director of the department and the Commission on Substance Abuse. Their comments are included as an appendix to the full report. The following is a summary of their response to the recommendations made by the program evaluation team:

"The department agrees that since IDSA has operated efficiently and effectively, there are no grounds for discontinuing or restructuring the department.

"The department agrees that there should be increased coordination with the Division of Mental Health, Mental Retardation and Developmental Disabilities. We have implemented a number of systems throughout IDSA which we could share with DSS to help in their internal merger problems.

"The department agrees that the General Assembly could strengthen the IDSA licensure provisions to the benefit of statewide community services.

"The department believes that if it is the intent of the Legislature for IDSA to begin licensing practitioners, we would like more specific guidelines from the Legislature to begin the process of licensing a profession.

"The department is continuing to develop planning efforts to identify the types of services needed statewide.

"The department has supported maintenance of effort funding of existing services because the alternative of funding the needed services in all parts of the state would have required closing existing services in some parts of the state. This, we felt, would only have been disruptive and not a positive or helpful approach."

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