



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2018-112A

Richard Pierson, Executive Director  
Oklahoma Board of Licensed Alcohol  
and Drug Counselors  
P.O. Box 54388  
Oklahoma City, OK 73154

April 11, 2018

Dear Executive Director Pierson:

This office has received your request for a written Attorney General Opinion regarding agency action that the Oklahoma Board of Licensed Alcohol and Drug Counselors intends to take with regard to licensed alcohol and drug counselor applicant, P.J. The applicant represented to clients that the applicant was a certified alcohol and drug counselor (“CADC”) and provided CADC services without a license. The Board proposes to deny the application.

The Licensed Alcohol and Drug Counselors Act provides that the Board may “deny the issuance of a certificate or license” for good cause. 59 O.S.Supp.2017, § 1875(6)(a). Further, Board rules state that “[a] violation of the Rules of Professional Conduct” may be “the basis for the denial of or delay of licensure of the applicant.” OAC 38:10-5-2. The Rules of Professional Conduct require the applicants identify that they are merely candidates, and that they “not participate in, condone, or be associated with dishonesty, fraud, sexual harassment, deceit or misrepresentation.” OAC 38:10-3-2, 5(b). The Board may reasonably believe the proposed action will deter future violations.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Board of Licensed Alcohol and Drug Counselors has adequate support for the conclusion that this action advances the State of Oklahoma’s policy to ensure Oklahomans receive drug and alcohol treatment from competent, qualified providers.

MIKE HUNTER  
ATTORNEY GENERAL OF OKLAHOMA

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ASSISTANT ATTORNEY GENERAL