



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2018-339A

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

August 23, 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 pursuant to a consent agreement with licensed alcohol and drug counselor applicant, S.L.B. The applicant self-reported to the Board and her employer that she practiced without supervision from August 28, 2017 through November 24, 2017. The Board proposes to require the licensee to complete additional licensure requirements.

The Licensed Alcohol and Drug Counselors Act provides that the Board may “[i]nitiate disciplinary, prosecution and injunctive proceedings against any person . . . who violates any of the provisions of the Licensed Alcohol and Drug Counselors Act, or any rule promulgated or order issued pursuant thereto[.]” 59 O.S.Supp.2017, § 1875(9). Board rules require an applicant to practice only with supervision. OAC 38:10-9-4. The Board may reasonably believe that the proposed action will ensure that a licensed alcohol and drug counselor supervisee meets minimum requirements for licensure.

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.

Handwritten signature of Mike Hunter in black ink.

MIKE HUNTER  
ATTORNEY GENERAL OF OKLAHOMA

Handwritten signature of Amanda Otis in black ink.

AMANDA OTIS  
ASSISTANT ATTORNEY GENERAL