

March 20, 2007

TO: Mr. Scott Schalles

FROM: Samuel Knapp, Ed.D.

RE: Proposed Regulations on Gambling

Thank you for soliciting our opinions concerning the proposed regulations on compulsive gambling and especially the definition of "qualified treatment professional."

Our opinion is that the current definition of treatment professional is too broad. The public is better off when the individuals who are doing the treatment have some external oversight either from a health care licensing board, a certification board, or from professionals who work for an agency licensed by the State of Pennsylvania which provides treatment to persons who have gambling addiction problems. Some kind of external oversight is the key.

Second, even if a person or an agency has external oversight, they should also have specific training or education, or experience in the treatment of problem gambling. Although the treatment of problem gambling is within the scope of practice of psychologists, not all psychologists are qualified to treat problem gamblers. The same could be

said of other licensed health care professions.

Third, we were uncertain as to the meaning of the first paragraph. However, we read it as considering any addiction program as automatically qualifying as a "qualified treatment professional." Although there is high comorbidity of substance abuse among persons who are compulsive gamblers, not every agency that is licensed to treat persons addicted to alcohol or other drugs necessarily have staff qualified to treat compulsive gambling. Consequently, we think it should

be clarified that a referral to an addiction treatment program is not sufficient. The addiction treatment program must also have individuals with specialized knowledge in the treatment of problem or compulsive gambling.

Finally, we do not believe that a referral to a "gamblers anonymous" program should be, in and of itself, sufficient to satisfy the referral requirement. It may be a useful adjunctive referral, or it may be useful

for treatment or maintenance, in and of itself after an evaluation by a professional is made.