MN PREVENTION
& RECOVERY ALLIANCE
EDUCATION · ADVOCACY · SUPPORT

November 8, 2021

Dear Senator Ruud,

I am writing to you because you represent a district where MN Adult & Teen Challenge operates a campus and serves clients, specifically our Brainerd campus; 2424 Business 371 Brainerd, MN 56401. As a constituent we have an issue we kindly request your help to resolve.

Mn Adult & Teen Challenge is the fiscal agent for MN Prevention & Recovery Alliance, an emerging recovery community organization, which I lead. Our organization was denied approval by the Association of Recovery Community Organizations (ARCO). We believe we have been overlooked at the detriment of those who are struggling and dying of substance use disorder. Those in treatment and early recovery have significant service and support needs that may be met by certified peer recovery specialists (CPRS's). Today the demand for those peer support services in Minnesota far exceeds the resources available through existing recovery community organizations (RCOs).

The certifying association, ARCO, is not embedded in the 254b.01 statute but is a DHS rule. Since the Commissioner can identify the certification requirements for a recovery community organization, the Commissioner has the authority to change the certification requirements.

Here is the current statute:

> **254B.01**
> **Subd. 8. Recovery community organization.**
>
> "Recovery community organization" means an independent organization led and governed by representatives of local communities of recovery. A recovery community organization mobilizes resources within and outside of the recovery community to increase the prevalence and quality of long-term recovery from alcohol and other drug addiction. Recovery community organizations provide peer-based recovery support activities such as training of recovery peers. Recovery community organizations provide mentorship and ongoing support to individuals dealing with a substance use disorder and connect them with the resources that can support each person's recovery. A recovery community organization also promotes a recovery-focused orientation in community education and outreach programming, and organize recovery-focused policy advocacy activities to foster healthy communities and reduce the stigma of substance use disorder.

This is the rule…
RCOs are not required to obtain licensure but must be certified as an RCO by the Association of Recovery Community Organizations (ARCO).

The additional arbitrary rule gives authority to decide who is able to operate an RCO in MN to an association, ARCO, which operates out of state and appoints individuals with board members from other Minnesota RCO's. This raises ethical red flags for us.

Since the Commissioner can identify the certification requirements, the Commissioner has the authority to change the certification requirements.

> **<u>Minnesota Statutes 254B.05,</u> subdivision 1(d) (Vendor Eligibility- recovery community organizations)**
>
> (d) A recovery community organization that meets certification requirements identified by the commissioner is an eligible vendor of peer support services.

The resolution in our mind is to find a way to partner with our own Minnesota Certification Board (MRC), which is already certifying peer recovery support specialists, the individuals who are providing the services being billed to start with.

Here was our experience with the ARCO association over the past ten months.

- January – October, 2021: over 10 months, we consistently sought guidance, feedback, and constructive input from members of ARCO, from resources at Minnesota Department of Health & Human Services (DHS), from the Peer Recovery Support Center of Excellence, from numerous stakeholders in the recovery community, and from the peer recipients whom we serve and support in our efforts to establish a new recovery community organization in Minnesota. In all efforts, our focus was to ensure our adherence and alignment with the "10 best practices of RCOs" which we were provided by ARCO as a roadmap to building a successful RCO.
- Based on belief, as well as multiple assurances made to us by various ARCO members over the past many months, we have fully met the 10 best practices and all criteria for the definition of a stand-alone "recovery community organization" and demonstrated the same.
    - We have created a separate, autonomous organization with its own dedicated staff and leadership that demonstrates alignment with the "10 best practices of RCOs"
    - People in need are actively seeking out services from us. Members of Hennepin County, Dakota County, Ramsey County, and multiple other districts, are waiting for our RCO to be active so we may begin providing them community-based peer support services.
    - We currently have a team of dedicated staff, all trained and fully credentialed as community peer recovery support specialists, who are poised and ready to offer help to those in need.
- Despite our significant efforts to understand, align, and implement our RCO, on October 18, 2021 ARCO sent a simple and dismissive email (see page 5) in which it denied our request to become an RCO based on its superfluous claims which are easily debunked with even a cursory review of the facts or the details already provided to ARCO and its members in our application.
- The only remedy provided to us is to set up yet another meeting with the same person who has been providing guidance to us since January, 2021 and to consider reapplying in the future.
- We are concerned that, rather than acting in the best interest of those it purports to serve, that ARCO instead makes arbitrary determinations and suffers from significant conflicts of interest among members of its own body. For example, 2 MN RCOs are represented at ARCO. Phil Rutherford, the COO of Faces and Voices of Recovery, is on the Board of Twin Cities Recovery

Project and also serves on the Board for Doc's Recovery House. Additionally, Brandy Brink, the Executive Director of WEcovery, a MN based RCO was just appointed to the ARCO Review Committee.

I welcome the opportunity to address any questions that may exist and provide additional documentation in support of the claims above.

Sincerely,

Tracee Anderson
Prevention & Community Engagement Director
MN Prevention & Recovery Alliance
Know the Truth ™ Prevention Program
Mobile: 715-441-4971

Cc:

rep.jennifer.schultz@house.mn
sen.jim.abeler@senate.mn
sen.david.senjem@senate.mn
sen.carla.nelson@senate.mn
rep.liz.boldon@house.mn
rep.duane.quam@house.mn
rep.tina.liebling@house.mn
rep.nels.pierson@house.mn
rep.liz.olson@house.mn
sen.jennifer.mcewen@senate.mn
tomba@senate.mn
rep.rob.ecklund@house.mn
rep.mary.murphy@house.mn
sen.carrie.ruud@senate.mn
rep.josh.heintzeman@house.mn
rep.dale.lueck@house.mn
sen.paul.gazelka@senate.mn
rep.john.poston@house.mn
rep.ron.kresha@house.mn
sen.bruce.anderson@senate.mn
rep.marion.oneill@house.mn
rep.dean.urdahl@house.mn
rep.joe.mcdonald@house.mn
sen.omar.fateh@senate.mn
rep.hodan.hassan@house.mn
rep.aisha.gomez@house.mn
karid@senate.mn
rep.sydney.jordan@house.mn
rep.mohamud.noor@house.mn
sen.patricia.torres.ray@senate.mn
rep.jim.davnie@house.mn
rep.emma.greenman@house.mn
sen.mark.koran@senate.mn

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Attachment I: Timeline: Discussions with ARCO regarding creation of a new RCO: Mn Prevention & Recovery Alliance

January 26	Email to Phil Rutherford; stated interest in establishing a MN-based RCO. Provided overview of our plans, including focus on youth peer support. Phil provided introduction to Mariana for my additional guidance and support.
February 2	Had 1st virtual meeting with Mariana; she explained the overall process, shared the 10 principles of RCOs, and answered questions about various pros/cons of different approaches. Her role will be to provide ongoing guidance.
May 5	Had 2nd virtual meeting with Mariana; reviewed our overall strategies; focus was demonstration of autonomy. Discussed our progress and MnTC as fiscal host; Marianna assured us that others have done this; it allows for faster scale-up of services.
May 25	Had 4th virtual meeting with Marianna; progress looks good
May 26	First public mention: Mn Prevention & Recovery Alliance, a new MN-based RCO, was introduced at the Opioid Epidemic Response Advisory Council (OERAC) meeting
May 26	Mn Prevention & Recovery Alliance formally established as a stand-alone Mn LLC
May 28	Mn Prevention & Recovery Alliance website goes live (www.mnpra.org)
June 4	Wendy Jones (Executive Director of Minnesota Recovery Connection), sent an email challenging information I'd provided at recent OERAC meeting. I responded, providing written support and other evidence of all claims I'd made.
June 16	MARCO meeting took place; I was not present. However, I was informed by another that our pending RCO was a topic of discussion and existing MN RCOs were concerned about competition. I was also told that P. Rutherford stated "I will take care of it" – we took this to mean that Rutherford would not allow our RCO to become accredited.
June 17	Our ARCO application was formally submitted; we were told that a decision typically takes 8 weeks.
June 22	I had a phone conference call with Phil R and Marianna; Phil said he was going to "hold" our application for another month until he was able to "calm the storm with the other Minnesota RCOs" who were concerned about our RCO.
July 14	I attended the MARCO meeting and shared that MnPRA intends to be an expansion of our Know the Truth (KTT) efforts which have been operating since 2006. In addition, I clarified that Mn Adult & Teen Challenge acts only as the fiscal host and clinical supervisor of MnPRA, and that this approach was blessed both by Marianna and Phil, as well as the Mn DHS.
July 31	I contacted Marianna to follow-up on our ARCO submission
August 19	I contacted Marianna to follow-up on our ARCO submission
September 23	I contacted Marianna to follow-up on our ARCO submission. This time Marianna informed me that a committee member, Crister, wanted to talk with me for clarification on a few items.
September 23	I called Crister and spoke with him about our services, which he said he liked. He asked if we were a 501c3; I said yes, and that we had a parent organization. There were no further questions asked.
October 13	I received an email from Hanna Lowry, new Coordinator for ARCO, apologizing for missing all of my calls
October 18	I received an email from Mariana denying our accreditation as an RCO based on claims that we did not meet their 10 best practices since we have a parent org and have not established enough autonomy. The only remedy offered to me was a phone call to discuss, and a suggestion to reapply.

Attachment II – Denial email from ARCO

---------- Original Message ----------
From: Marianna Horowitz <mhorowitz@facesandvoicesofrecovery.org>
To: "tanderson@mnpra.org" <tanderson@mnpra.org>
Cc: Hannah Lowry <hlowry@facesandvoicesofrecovery.org>
Date: October 18, 2021 4:27 PM
Subject: Follow up to ARCO application

Hello Tracee,

I apologize, I have been a bit behind in getting back to you and wrapping up the notes from our last ARCO review committee. Please see the feedback below.

The ARCO Review Committee highlighted that there are services available in various counties, and peer services are offered at no cost. However, the website lacks clarity on who the organization is.

However, the website lacks clarity on who the organization is. In part, it seems like they are trying to fit what an RCO is, but the website doesn't seem to communicate RCO, but it looks like they might also be an RCO that includes OPUS and KTT.

A committee member followed up with the organization and identified that the OPUS and KTT are programs under the organization. However, the organization MN Prevention & Recovery Alliance and KTT appear to be housed with Minnesota Teen Challenge. Additionally, several of the programs under the MN Prevention & Recovery Alliance, have contact emails for staff at Minnesota Teen Challenge. There is concern that the proper levels of autonomy has not yet been established between MN Prevention & Recovery Alliance and Minnesota Teen Challenge.

The organization has strong leadership and through additional mentorship and infrastructure development, this organization could strengthen their autonomy and reapply for ARCO membership in the future.

If you would like to schedule a time to discuss any of this feedback you can access my availability and scheduling at https://calendly.com/mhorowitz/30min.

Warm Regards,

Marianna Horowitz

Schedule a 15-minute zoom meeting with me here.

Marianna Horowitz
(She/Her) What's This?
Programs Manager

+1 202.737.0690
mhorowitz@facesandvoicesofrecovery.org
facesandvoicesofrecovery.org
10 G Street NE, Suite 600
Washington, DC 20002