



NEWS RELEASE

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Governor

TALLAHASSEE -- Seed is a viable drug treatment program for its specific type of clientele which is mainly composed of 13 to 16 year olds who are early users and experimenters, Judge Herboth S. Ryder, Tampa, reported to Governor Reubin Askew.

Judge Ryder, as chairman, made the report of the findings of the special subcommittee of the Florida State Drug Abuse Advisory Council which has been making a study since July 17, 1973.

Governor Askew had requested that Judge Ryder and other members of a committee review the licensing procedures and standards of the State Office of Drug Abuse as well as The Seed, Inc., a drug treatment program.

Judge Ryder said the committee was not endorsing the Seed program, "but it is a viable alternative which should be treated as any other program."

The Judge said the committee found no reason not to license Seed, Inc. for carrying on its type of drug abuse treatment program.

The Judge pointed out the program deals mainly with early drug users and experiments and does not focus upon the needs of older hard-core addicts.

The report said a consultant's study of Seed admissions over a one month period showed that 86.3 percent of the 163 persons

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admitted met The Seed criteria for graduation. However, the report said, these statistics failed to include a number of persons who left the program within their first week of admission.

Judge Ryder pointed out that "graduation from a treatment program should not necessarily be equated with successful rehabilitation, for only the person's behavior over a period of time thereafter, can reflect true rehabilitation and this type of statistics are not available in regard to this as well as other drug abuse programs."

The committee report noted that although clients are required to live in volunteer foster homes for a portion of their treatment, these homes are not inspected for compliance with fire, health, and safety regulations.

Recommendations were made that Seed take steps to insure the safety from a fire and health standpoint of the foster homes in which their clients must reside for part of their treatment.

The report recommended that Seed work to improve its professional staffing.

It also said, "We are of the opinion The Seed has isolated itself from the mainstream of the Drug Rehabilitation Community by failing to establish and maintain a cooperative and working relationship with that community. We recommend the establishment of this relationship to The Seed."

One reason for Governor Askew requesting the review was a licensing controversy in Dade county in which The Seed was involved. The committee reported that the actions and inactions of the Drug Abuse Regional Office in that area contributed to much of the controversy.

SUMMARY

The special subcommittee of the Drug Abuse State Advisory Council, appointed to review State Licensing Procedures and The Seed, Inc. has completed its study. Along with the Committee's report two background reports have been submitted. The report to the committee by the consultant hired to assist them is accompanied by a minority report in which a member of the committee questions the objectivity of the language used by the consultant and, among other things, states that the report inappropriately compares The Seed with other types of programs. The success rate of The Seed, in his opinion, is comparable to many other programs which serve a similar clientele.

The committee has taken both documents into consideration in writing its report. The report is divided into four sections, each setting forth the committee's findings, conclusions and recommendations.

The first two sections deal specifically with the Standards Manual as published by the Office of Drug Abuse. The report is basically positive and the recommendations are largely concerned with changes in the format and structure of the Manual. The major recommendations are to separate rules and regulations, guidelines and standards into three separate documents and to more clearly define the different types of programs.

The third section involves the examination of The Seed, Inc. In general, the report supports The Seed as a viable drug treatment program. Several specific recommendations are made.

1. We recommend the Standards Manual be expanded to include criteria, rules and regulations necessary to the proper administration of a foster home residential program such as the Seed.

a. With regard to the foster homes, written procedures and standards should be developed and judiciously implemented by the Seed in the following areas:

- (1) An inspection of fire, health and safety requirements would be conducted before a client is placed in a foster home.
- (2) A determination should be made in each case as to the suitability of the particular foster family for the client.
- (3) A procedure through which emergency information can be received by the client in a foster home should be established. Proper safeguards should be taken to protect the anonymity of the foster parents and to insure the continuation of volunteer foster care programs.

2. The Seed, Inc., as well as all programs, should have identifiable professional support staff available in each community where it maintains a facility.
3. We are of the opinion the Seed has isolated itself from the mainstream of the Drug Rehabilitation Community by failing to establish and maintain a cooperative and working relationship with that community. We recommend the establishment of this relationship to the Seed.

The fourth section of the report looks into the licensing controversies in Dade and Broward counties. In the opinion of the committee, much of the controversy concerning the Dade County license can be attributed to the Drug Abuse Regional Office in Health and Rehabilitative Services Region 11. Its actions and inactions probably added to the delays and disruptions of the normal licensing procedure.

The following recommendations are made with regard to the operations and procedures of the Office of Drug Abuse.

D. Recommendations

1. In the future, in an effort to insure the objectivity of the original pre-licensing on-site evaluation of all programs, it is recommended that not less than four members of the Regional Advisory Council accompany the Regional Coordinator in accomplishing this evaluation.

2. Personnel operating out of the State Office in Tallahassee should make periodic on-site evaluations of all licensed programs. These evaluations should be conducted at intervals not exceeding 12 months and may be performed with or without notice to the program.
3. Regional Coordinators must be held under much closer control and supervision by the State Office than has heretofore been the case and their actions should be subject to greater scrutiny.
4. The Drug Abuse Program Director should avoid the issuance of program endorsements before the results of on-going program evaluations are complete.
5. A review of the make-up of the Regional Advisory Councils should be undertaken. These Councils should be objectively accountable for both the efficiency and the propriety of program licensure in their regions.
6. A review of the qualifications of the Regional Coordinators and the personnel in the State Office should be undertaken.

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Your first inquiry was:

- I. EXAMINE THE STANDARDS MANUAL FOR DRUG ABUSE TREATMENT AND EDUCATION CENTERS IN FLORIDA TO DETERMINE WHETHER IT COMPLIES WITH CHAPTER 397 OF THE FLORIDA STATUTES, AND WHETHER THE REQUIREMENTS AND PROCEDURES SET FORTH ARE REASONABLE AND APPROPRIATE TO THE INTENT OF THE STATUTES.

- A. Procedure

Circuit Court Judge Joseph DuRocher and Attorney Edgar C. Booth, members of this subcommittee, reviewed in detail the Standards Manual published by the Florida Drug Abuse Program, Department of Health and Rehabilitative Services, in January, 1974. They reviewed Chapter 397 of the Florida Statutes and compared its provisions and intent to the requirements, procedures and guidelines set forth in the Standards Manual.

- B. Findings

1. The Standards Manual for Drug Abuse Treatment and Education Centers in Florida, as published by the Department of Health and Rehabilitative Services, in January, 1974, is a 60 page document which is arranged in five major sections.

a. The introduction gives a brief background and history of the Florida Drug Abuse Program, describes the regional structure used to administer the program and outlines the licensing process for Drug Abuse Treatment and Education (DATE) Centers. Each of the 11 Department of Health and Rehabilitative Services regions is staffed by a Regional Coordinator and a Youth Coordinator. A Regional Advisory Council of local citizens advises the staff on local needs and priorities. The licensing process begins when application is made by a program to the Regional Coordinator. The Regional Coordinator reviews the application, performs an on-site evaluation of the program and presents his findings to the Regional Advisory Council. The recommendations of the Regional Coordinator and Advisory Council are sent to the central office in Tallahassee where the Licensing Review Committee, made up of central office staff, reviews the application and forwards its recommendations to the Drug Abuse Program

Director for approval. An appeal process is delineated in the section on rules and regulations.

- b. The second section is an incomplete reproduction of Chapter 397, Florida Statutes.
- c. Section Three sets forth Rules and Regulations for all Drug Abuse Treatment and Education (DATE) Centers.
- d. Section Four gives the minimum standards and guidelines applicable to all DATE centers.

In this section, as in the next section, minimum standards appear in bold-face type and guidelines appear in regular type. The guidelines in this section state that any person who has been a client in any drug abuse rehabilitation center should be engaged in gainful employment or other productive activity for a minimum of six months before being employed by any DATE center. Ex-addicts should also have experience and training in some program other than the one in which they are employed.

- e. The major portion of the Manual is dedicated to "Minimum Standards and Guidelines for Specific Treatment Modalities." Here, the different types of centers are vaguely defined, and, again, minimum standards for each are printed in bold-face type and guidelines are printed in regular type. The term "non-residential treatment center", on page 44 is not as adequately defined as the Committee desires.
2. Chapter 397 of the Florida Statutes, 1971, as amended, is titled "Rehabilitation of Drug Dependents". It includes definitions and requires that the Department of Health and Rehabilitative Services be the sole licensing agent for all DATE centers in the State. It gives the Department authority to promulgate rules and regulations for the implementation of the chapter and establish guidelines for the comprehensive evaluation of the effectiveness of programs licensed by the Department. Section 397.021, Florida Statutes, defines a non-residential day-care center as (4) (b) "... a facility offering therapeutic programs operated by trained professionals and para-professional persons

who are able to live in their own homes in the community."

C. Conclusions

1. The provisions of Chapter 397 are quite broad and delegate to the Department of Health and Rehabilitative Services complete authority to establish specifications and regulations for drug abuse programs. We find the Manual to be an appropriate attempt on the part of the Department to describe programs, establish minimum standards and identify both mandatory regulations and suggested minimum requirements for drug abuse programs in the State. It is an innovative effort to introduce standards and maintain a consistent level of quality care in all drug rehabilitation programs, and as such, reflects the general intent of legislation in this area.
2. A discrepancy exists between the statute and the manual in the definition of a "non-residential center". The statute reads, the clients of a non-residential treatment center are "able to live in their own homes in the community." The Manual makes no mention of where the client resides.

D. Recommendations

1. The General Counsel of the Department should insure that the reproduction of Chapter 397, Florida Statutes, in the Standards Manual is complete and that all amendments are included.
2. In those instances where definitions are set forth in the Statute, the Standards Manual should adopt those definitions.

Your second inquiry was:

II. RECOMMEND ANY CHANGES IN THE STATE'S MANUAL, LICENSING REQUIREMENTS AND PROCEDURES WHICH ARE NECESSARY TO MORE EFFECTIVELY CARRY OUT THE INTENT OF THE STATUTES.

A. The conclusions and recommendations in this section are based on the sub-committee's review of the Standards Manual and Statutes described in the preceding section, and on the Committee's review of the report to the Committee by the consulting firm of Addiction, Consultation and Evaluation, P.C., which was under contract to the Committee.

B. Findings

1. The terms and definitions (residential treatment centers, rap houses, transitional centers) used to describe the various types of programs throughout the Manual are not mutually exclusive and mix generic and

specific categories.

2. The Client Oriented Data Acquisition Process (CODAP), is mentioned but not defined in the Manual.
3. The federal Food and Drug Administration regulations, as they relate to Methadone, are not quoted in the Manual. For example, the consent of the parent or guardian of persons under age 18 is not required for treatment if the minor signs a consent to treatment form.
4. Under Methadone Treatment Center, III, F,1, page 46, the "One random, observed urine collection and analysis for opiates must be taken weekly for all clients" is confusing.
5. On page 54, under Education Program, III, B, an evaluation of the techniques and materials is required, but the person or agency responsible for conducting the evaluation is not specified.
6. Free clinics are included as a type of treatment program.

C. Conclusions

1. Florida is one of the first states to attempt to regulate drug abuse programs. The Standards Manual is an innovative effort on the part of the State of Florida in the field of drug abuse to introduce standards and maintain a consistent level of quality care in all drug rehabilitation programs. However, because of the broad

powers delegated by the Legislature to the Department, and because of the importance of the Standards Manual to the overall administration of drug abuse programs in the State, we feel the Manual does not meet with accepted administrative practices. Specifically, the Committee feels that the practice of identification of mandatory requirements in bold type and suggested requirements in regular type is too vague to properly convey minimum requirements to those persons charged with the responsibility of carrying out drug abuse programs.

2. The definitions for DATE centers mix generic (i.e. residential treatment centers) with specific (i.e. rap houses) categories. These categories are presently combined and are not mutually exclusive. Program description is not only difficult but open to "game play". For example, the requirements for operating an out-patient service are both fewer in number and less stringent than those for non-residential treatment centers; yet, an out-patient service may be a non-residential treatment center, and so problems of program identification or qualification are inevitable.

3. Your committee concludes that the major weakness of the standards stems from poor structural organization, further, the language utilized in the Manual is too vague, ambiguous, and imprecise and, still further, because the Manual will be, at some point in the future, subject to interpretation by persons who are not professionals in the field of drug abuse that every effort should be made to minimize and eliminate idioms and bureaucratic jargons popularly used. The lack of specific definitions does not lend itself to proper administration or judicial interpretations.
4. All readers are not necessarily familiar with CODAP (Client-Oriented Data Acquisition Process), although the Manual seems to assume an understanding of what it is.

D. Recommendations

1. The Committee recommends the Standards Manual be reorganized and the difference between standards and guidelines be made more obvious, and we recommend this be accomplished by the publishing of three separate documents. The first would include rules and regulations, the second would be the guidelines for adherence to

those regulations, and the third document would include standards for the various programs.

2. Program categories should be redefined according to the four following treatment types:

- a. Residential
- b. Non-residential
- c. Methadone
- d. Non-methadone

All program types would then fit into a matrix as follows:

<u>Residential</u>		<u>Non-Residential</u>		<u>Other</u>
<u>Meth</u>	<u>Non-Meth</u>	<u>Meth</u>	<u>Non-Meth</u>	Other
	Residential Treatment Center	Methadone Treatment Center	Non-residential Treatment	Hot-line
	Transitional Center		Rap house	Education program
			Out-patient center	
			Free clinic	

3. In addition to realigning the standards according to the above plan, we recommend that certain language changes and additions be made in the following modality descriptions:

- a. Page 46, Methadone Treatment Center, III, F,1 should be amended to read "One random,

observed urine collection must be taken weekly for all clients and analyzed for opiates. Additionally, one specimen per month must be analyzed for all drugs."

- b. It should be made clear whose responsibility it is to evaluate the materials referred to on page 54 under Education Program, III, B.

- 4. A clear and comprehensive explanation of Client Oriented Data Acquisition Process must be prepared and included in the Standards Manual as an appendix. In the "Methods and Procedures" section, Client Oriented Data Acquisition Process (CODAP) should be cited by reference throughout the text in each appropriate section.
- 5. The Committee recommends that the licensing procedure for DATE centers presently found in the introduction to the Standards Manual be incorporated and made a part of the Rules Chapter 10A, State of Florida, Drug Abuse Program.
- 6. A statement requiring adherence to FDA regulations should be included for all methadone programs.

This would include amending Chapter 10-A3 to reflect that those persons who have not obtained their 18th birthday be required to have parental or guardian consent to enter a Methadone Treatment Program.

7. Imprecise, vague and bureaucratic language should be eliminated from the Manual.

III. EXAMINE THE SEED, INC. TO ASCERTAIN WHETHER IT MEETS ALL STATE REQUIREMENTS AND LICENSING PROCEDURES.

A. Procedure

The Committee requested the advice of the Special Action Office for Drug Abuse Prevention of the White House in seeking the services of a knowledgeable and objective consultant to assist in this task. Addiction, Consultation and Evaluation, P.C. (ACE) was recommended and retained to provide the Committee with an additional perspective in examining the State's licensing requirements and procedures as well as the Seed, Inc., drug rehabilitation program. In its review, the Committee used, inter alia, reports and information supplied by the Seed. This study also included on-site observations of the treatment process and foster homes, examination of the central record keeping system, financial accountability and prior

evaluations of the Seed program. The Seed supplied the names of six foster parents and four former clients who were interviewed. The Dade County Health Planning Council arranged 11 interviews with former Seed clients. Interviews were also conducted with Seed staff members and local officials from schools and other drug rehabilitation programs. Committee members also conducted interviews with former Seed clients and other interested parties.

B. Findings

1. In July of 1970, the Seed, Inc., was founded by the current director, Arthur R. Barker, and his wife, Shelly Barker, the assistant director. At first it was financed by private sources. During the program's first year of operation, it received its first LEAA grant and in February, 1972, received its first grant from NIMH.
2. The Seed reports that from its inception to October, 1973, 4,554 clients had been enrolled in its program. The age range of the clients is generally 11-25 with the majority falling between 13 and 16. Approximately 48% of Seed

clients are defined by the Seed as "Abusers". That is, according to the Seed, they had daily involvement in drugs, including all types from alcohol to hard drugs. Fourteen percent are classified either as "pre-drug" clients or simply "experimenters".

3. Seed records revealed about 68% of the clients are referred to Seed by private sources. 17% are referred by the courts and 15% by school counselors. Persons with lengthy opiate addictions or criminal histories, and those over 25 years of age are referred to other programs.
4. ACE undertook a statistical study of records provided by the Seed for one month's admission to Seed, Inc. This review revealed 142 admissions during the period surveyed. After six months, 54 remained in the program; 17 "Pulled Out"; 12 "Dropped Out"; 5 Graduated, and 8 were referred to other agencies. After 12 months, ACE reports Seed records reflected that, out of the original 142, eight remained in treatment; 20 "Pulled Out"; 12 "Dropped Out"; 88 Graduated and 14 were referred to other agencies. In November of 1973, out of the original 142, five

remained in the program; 20 "Pulled Out"; 12 "Dropped Out"; 91 graduated and 14 were referred to other agencies.

From the Seed's statistics furnished above, ACE determined that of those clients who entered the Seed and did not "pull out" or were not "referred to other agencies", 88.3% met the criteria established by the Seed for graduation.

The above statistics, however, also did not include 21 admissions during that particular month who left the program in less than eight days after entering the Seed.

The data also furnished ACE by Seed, Inc. indicates that the typical Seed client is between the ages of 13 and 16 (68%) and is neither committed to drugs (41%) nor involved short of addiction (48%).

Approximately 96.5% of Seed clients are white; 3.5% are black; 57% are male and 43% are female.

According to ACE the result of the Seed is excellent. However, ACE judged the Seed's standards against stereo-typical classical program designs. The Seed is neither a stereotyped program methodology nor is it assessable by those standards due to its uniqueness.

According to ACE, the Seed, over the course of its three year history, has treated about 5,000 persons.

One must compare the Seed not with stereotyped classical treatment programs and methadone programs as did ACE, but with similar non-stereotyped programs which address a similar population group. For example, the SPARK program in New York, PRIDE in Dade County schools, DASEIN in Miami, PREHAB in Arizona, and DARTE in Michigan also have no difficulty in recruiting truly voluntary clients and also are working beyond their designed capability. An excellent discussion of these types of programs is contained in the Congressional Record-Senate, December 1, 1973.

It should also be noted that the SPARK program in New York arrived at its original static capacity of 1,000 clients in only two months. We find that PRIDE in Dade County schools has enrolled a total of 5,000 clients and 1,300 peer counselors (13-18 year old staff members) in approximately twelve months preceding January 31, 1974.

5. All Seed clients must live in foster homes during a portion of their treatment.

- a. The foster home is generally the home of another more senior Seed client. The Seed reports that the client sent to a foster home must sleep in a room which is secured from escapes. Instances were found where doors were locked from the outside and windows were permanently secured.
- b. There is no evidence that these foster homes are required to comply with any fire, health or safety regulations.
- c. We have also found that there is no governmental investigation into the qualifications of the foster home parents or their facility to serve as such.
- d. The practice of the Seed is to give anonymity to the foster parent and deny to the real parent knowledge of the location of the child or access to the child. In the assignment of clients to foster homes, we have found the ability of the parent to exchange emergency information with the child grossly impaired.

6. The Seed is currently classified as a non-residential treatment center.
7. The Seed selects its staff directly from the population of successful graduates and provides its own training. While in "training status" staff members are supervised and trained by senior staff members. The senior staff is supervised by a staff director who, in turn, reports to the central office Supervisory Staff. According to the Seed, the few professional staff members operate in the periphery of the program providing specific services as needed.
8. Charges of physical abuse and mistreatment of Seed clients reported to the Committee were investigated and could not be substantiated.
9. The Seed has no working relationship with other drug rehabilitation programs. It does work with the Division of Youth Services, the courts and the Probation and Parole Department.
10. All required data elements are reported in the Seed's record and files.
11. The accounting firm of Bissell, Hunt and Hollis states that the CPA audit performed for the Seed was typical and adequate for a non-profit organization.

C. Conclusion

1. At present, The Seed, Inc., is licensed as a non-residential treatment center. However, the Committee expresses grave concern as to whether or not this is the appropriate classification. Every Seed client is required to participate in the program on a 24-hour basis, seven days a week, and as a part of the conditions of that treatment, must reside at night for an extended period in a foster home somewhere in the community. This foster home is not the client's own home; it is the home of another Seed client.

The Seed, Inc., is a "non-residential" program with a required residential component and does not use its facilities as a residence. Thus, the program is not classified under the existing standards of the Manual.
2. There is no apparent procedure established by the Seed to insure local compliance with fire, health and safety regulations in foster homes.
3. The Seed furnished statistics reveal, during the month reviewed by ACE, that 88.3% of those persons entering that month meet the standards and criteria the Seed sets for graduation. This percentage figure, however, does not take into account 21 persons of the original

163 entrees, who left the Seed within eight days of enrollment. The figure also does not include those persons in the categories of "pulled out" and "referred to other agencies". Further, 5% of all clients had not used drugs, 9% have only tried drugs and 27% have used drugs occasionally, a total of 41% with no significant life style commitment to drugs.

According to the Florida State Incidence Prevalence Study done by Resource Planning Corporation, directed by Dr. Carl D. Chambers, Florida has patterns of drug use very similar to those found elsewhere in the United States. Dr. Chambers, is one of the main consultants to the Florida State Drug Abuse Advisory Council in the establishment of the Florida State Drug Abuse Plan. Dr. Chambers has noted in his Incidence Prevalence Study that given 100 persons under 21 years of age who try drugs, 78 of that number will stop of their own accord during early to moderate stages. Of the remainder, two to three will eventually become dysfunctional and the remaining 20 will reach various levels short of dysfunctional involvement and will cease only under

pressure. Thus, as the Seed refers dysfunctional addicts, we find its percentage of graduates by its standards and criteria, considering the age group it serves and the percentage of graduates from other unique non-stereotyped programs about the Country, quite reasonable but not extraordinary.

4. The Seed ignores the guidelines referred to in Section I. Personnel of the Standards Manual which state that a graduate from a drug rehabilitation program should be otherwise productively engaged for six months before being employed by any DATE center and that an ex-addict should have experience in another type of treatment than the type from which he graduated. Due to the uniqueness of the techniques and concepts employed by the Seed, compliance with the six month guideline, by the Seed, does not appear to be necessary.
5. Charges of physical abuse have not been substantiated.
6. The financial audit and accountability of Seed, Inc., appears to be in order.
7. The minimum Standards and Guidelines of the Standards Manual contain sufficient latitude to allow a program such as the Seed to develop and establish credibility.

8. The Seed, Inc. has no cooperative or working relationship with any other drug program.

D. Recommendations

1. We recommend the Standards Manual be expanded to include criteria, rules and regulations necessary to the proper administration of a foster home residential program such as the Seed.
 - a. With regard to the foster homes, written procedures and standards should be developed and judiciously implemented by the Seed in the following areas:
 - (1) An inspection of fire, health and safety requirements would be conducted before a client is placed in a foster home.
 - (2) A determination should be made in each case as to the suitability of the particular foster family for the client.
 - (3) A procedure through which emergency information can be received by the client in a foster home should be established. Proper safeguards should be taken to protect the anonymity of the foster parents and to insure the continuation

of volunteer foster care programs.

2. The Seed, Inc., as well as all programs, should have identifiable professional support staff available in each community where it maintains a facility.
3. We are of the opinion the Seed has isolated itself from the mainstream of the Drug Rehabilitation Community by failing to establish and maintain a cooperative and working relationship with that community. We recommend the establishment of this relationship to the Seed.

IV. WHETHER THE LICENSING REQUIREMENTS OR PROCEDURES OF THE STATE DRUG ABUSE PROGRAM ARE IN ANY WAY PREJUDICIAL TO THE SEED, INC.

A. Procedure

In order to ascertain the validity of the charges and counter charges alleged regarding the licensing of the Seed, Inc. in Dade County and in Broward County, the Committee directed a detailed investigation of the events surrounding the controversies by ACE. All pertinent documents for the period from January, 1972, through April, 1973, were gathered and analyzed. The bulk of this documentation is in the files of the Drug Abuse Program in Tallahassee.

B. Findings

1. An interim (90 day) license was issued to Seed, Inc. in Broward County in February, 1972. The stated reason for the granting of an interim license rather than a regular license was the Seed's intention to expand to a residential program.
2. On April 20, 1972, Mr. Barker, Seed President, notified the State Drug Abuse Program that the planned construction would not be completed and requested classification of the Seed, Inc., as a "non-residential treatment center". There is no record that it was re-classified and no license was issued.
3. The Seed, Inc., received its first NIMH grant in February, 1972. On June 6, 7, and 8, 1972, a routine review of the Seed, Inc. was conducted by NIMH staff. This review revealed programmatic deficiencies which NIMH wanted corrected.
4. A public controversy was generated as a result of this review. A "blue ribbon" committee was established to review the program in August, 1972.
5. A memo dated July, 1972 from Mr. Charles Lincoln, the Dade County Regional Coordinator to Mr. Frank Nelson, State Drug Abuse Program Director, stated that there

was reason to believe that the Seed, Inc. would soon be starting a facility in Dade County. He expressed reservations about the program and asked support in seeking to contain the Seed, Inc., to its one facility in Broward County.

6. On July 27, 1972, shortly before the blue ribbon committee began its evaluation efforts, Mr. Nelson issued a joint statement with Mr. Barker giving strong public endorsement to the Seed, Inc.
7. In a letter dated September 27, 1972, Mr. Nelson notified Mr. Barker that the intensive records review forthcoming as a part of the evaluation was standard and that all Florida programs would undergo a similar review prior to the end of calendar 1972. ACE staff was unable to find any evidence that such a review was made of any other program.
8. The blue ribbon committee report was issued in October, 1972.
 - a. The first section of the report, up to and including "A Summary of Committee Observations and Recommendations" presents an interpretation of committee member comments. ACE found it inconsistent with the standards of objectivity and fairness

to exclude the full body of those comments from the report.

b. The "Addendum" to the report contained a statistical synopsis of the program. This section also contained statistical inconsistencies and ambiguous statements. For example, "Most Seedlings, 36%, have never been arrested". By definition, 36% cannot be called "most" in this presentation. In another place the statistics account for 109% of the termination from the program, and are thus difficult to interpret.

c. Subsequent to the report, a regular license was issued to Seed, Inc., for the Broward County facility on October 11, 1972.

9. An application for licensure of a Dade County facility was sent to Mr. Charles Lincoln on November 14, 1972. He acknowledged receipt in a letter dated November 23, 1972.
10. Mr. Barker received another set of application forms in February, 1973, and voiced some confusion to the State Drug Abuse Office as he was still waiting to be notified on the status of the application filed in November.

by Mr. Nelson on July 27, 1972. These things lead us to two conclusions.

a. Much of the controversy concerning the Dade County license can be attributed to the Drug Abuse Regional Office in Health and Rehabilitative Services Region 11. Its actions and inactions probably added to the delays and disruptions of the normal licensing procedure.

b. Mr. Nelson's control over his regional staff is questionable.

5. Supervision and administrative control over the Regional staff and State office do not appear to be adequate.
6. The Regional Councils do not appear to be fully and objectively accountable for the efficiency and propriety of licensing in their Regions.

D. Recommendations

1. In the future, in an effort to insure the objectivity of the original pre-licensing on-site evaluation of all programs, it is recommended that not less than four members of the Regional Advisory Council accompany the Regional Coordinator in accomplishing this evaluation.

2. Personnel operating out of the State Office in Tallahassee should make periodic on-site evaluations of all licensed programs. These evaluations should be conducted at intervals not exceeding 12 months and may be performed with or without notice to the program.
3. Regional Coordinators must be held under much closer control and supervision by the State Office than has heretofore been the case and their actions should be subject to greater scrutiny.
4. The Drug Abuse Program Director should avoid the issuance of program endorsements before the results of on-going program evaluations are complete.
5. A review of the make-up of the Regional Advisory Councils should be undertaken. These Councils should be objectively accountable for both the efficiency and the propriety of program licensure in their regions.
6. A review of the qualifications of the Regional Coordinators and the personnel in the State Office should be undertaken.

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