



STATE OF ARIZONA
BOARD OF BEHAVIORAL HEALTH EXAMINERS
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DOUGLAS A. DUCEY
Governor

TOBI ZAVALA
Executive Director

January 11, 2022

Jillian A. Vanselow



Dear Mrs. Vanselow:

On January 7, 2022, the Arizona Board of Behavioral Health Examiners (“Board”) reviewed your application for licensure as a licensed independent substance abuse counselor and determined that you are not eligible for licensure pursuant to A.R.S. § 32-3275(A)(6). Specifically, the Board found that you engaged in conduct that had you been licensed would have constituted grounds for disciplinary action. The Board determined that the disciplinary action invoked the following violations that were based upon the conduct referenced thereafter:

1. A.R.S § 32-3251(16)(l), engaging in any conduct, practice or condition that impairs the ability of the licensee to safely and competently practice the licensee's profession.
2. A.R.S § 32-3251(16)(m), engaging or offering to engage as a licensee in activities that are not congruent with the licensee’s professional education, training or experience.
3. A.R.S § 32-3251(16)(ii), violating any federal or state law, rule or regulation applicable to the practice of behavioral health, as it relates to:
 - a. A.A.C. R4-6-210. Practice Limitations
 - b. A.A.C. R4-6-211. Direct Supervision: Supervised Work Experience: General

These violations were based on the following findings:

1. Applicant was licensed by the Board as a LASAC from 10/13 – 09/21.
2. In 02/21, Applicant submitted her LISAC application in the State of Arizona.
3. In Applicant’s LISAC application, she indicated she has been the owner/CEO of Core Recovery (“Agency”) since approximately 07/13, without Board approval.
4. Within her LISAC application, Applicant indicated that she received clinical supervision from four separate clinical supervisors from 06/13 – 04/19.
5. Each of the four clinical supervisors provided clinical supervision to Applicant while they were employed by Agency, and during a time Applicant had an ownership interest in Agency.
6. Board rules prohibited Applicant from receiving supervised work experience or clinical supervision from someone within an Agency she had an ownership interest in.

7. Additionally, being the holder of a LASAC license limited Applicant's scope of practice to substance abuse counseling or issues related to substance abuse.
8. In review of clinical records, Applicant was actively practicing outside the scope of her license by providing behavioral health services unrelated to substance use.
9. During an investigative interview with Board staff, Applicant acknowledged providing services outside the scope of her LASAC license, estimating that approximately 15% of the clients she treated at Agency were outside the scope of her license.

In addition, pursuant to A.R.S. § 32-3321, the Substance Abuse Academic Review Committee determined that you did not establish eligibility for LISAC licensure based on the following:

1. You did not establish that you meet the supervised work experience as set forth in A.A.C. R4-6-705.
2. You did not establish that you meet the clinical supervision requirements set forth in A.A.C. R4-6-706

Pursuant to A.R.S. § 41.1092.03 (B), you may request a formal hearing by notifying the Board, in writing, within 35 days from the date of this letter. The hearing will be held within 60 days after the Board receives your request. (A.R.S. § 41-1092.05)(A)) At the hearing, you will have the burden of proof to demonstrate that you are qualified for licensure regarding the matters set forth above. The Office of the Attorney General will represent the State of Arizona at the hearing. In addition, if you request a hearing, you have the right to request a settlement conference. (A.R.S. § 41-1092.06) Please note that if you do not request a hearing by the close of business on **February 15, 2022**, your file will be closed without recourse to appeal. If you desire licensure in the future you will be required to submit a new application and fee. Please be further advised that pursuant to the Board's licensure statutes only persons holding licenses to practice behavioral health may do so unless they are exempt from licensure pursuant to A.R.S. § 32-3271.

Notice to Licensure Applicant:

Pursuant to A.R.S. § 41-1093.01, an agency shall limit all occupational regulations to regulations that are demonstrated to be necessary to specifically fulfill a public health, safety or welfare concern. Pursuant to A.R.S. § 41-1093.02 and A.R.S. § 41-1093.03, you have the right to petition this agency to repeal or modify the occupational regulation or bring an action in a court of general jurisdiction to challenge the occupational regulation and to ensure compliance with A.R.S. § 41-1093.01.

If you have any questions, I can be reached at (602) 542-1617.

Sincerely,



Tobi Zavala
Executive Director