



The Supreme Court of Ohio
30 East Broad Street, Columbus, Ohio 43266-0419

**Ohio's Experience Addressing Substance Abuse
And The Courts: Progress And Prospects**

Prepared by
Lila S. Cox and Richard A. Dove

Funded by the State Justice Institute
Grant No. SJI-92-11H-A-149

SJI

January, 1994

KFO
366
N35
C69
1994

This document was developed under a grant from the State Justice Institute. The points of view expressed are those of the authors and do not necessarily represent the official position or policies of the State Justice Institute.

Cox, Lila Sams

Ohio's experience addressing substance abuse and
"the courts : progress and prospects,

KFD

366

N35

C69

1994

new
6-28-94

Library
National Center for State Courts
300 Newport Ave.
Williamsburg, VA 23187-8798

Call to Action

It is our belief that courts are ready to assume the necessary leadership role to develop cooperative arrangements with substance abuse treatment and public health agencies. But judges cannot do it unilaterally. The coordination must begin with a search for the best process and procedures for linking courts and treatment providers.

The Honorable Thomas J. Moyer, Chief Justice of the Supreme Court of Ohio and the Honorable Jack Holt, Jr., Chief Justice of the Arkansas Supreme Court provided this call to action in a guest editorial written for a special issue of a newsletter distributed by the Center for Substance Abuse Treatment. As co-chairpersons of the Committee on Drug Issues Affecting State Courts, a joint committee of the Conference of Chief Justices and the Conference of State Court Administrators, Chief Justice Moyer and Chief Justice Holt were communicating the commitment of state court leaders to promoting coordination among the courts, other elements of the justice system, and various components of the alcohol and other drug service system.

For more than a year prior to publication of the guest editorial, state officials in Ohio were involved in a collaborative planning effort designed to more fully address the substance abuse treatment needs of the justice community. The first phase of this project has produced two important results: a comprehensive substance abuse services plan for Ohio that includes substantial input from justice system leaders and a model for multidisciplinary cooperation. This model will serve as the guiding force for the implementation phase of the project and can be used by other states that wish to develop cooperative arrangements between courts and substance abuse treatment providers.

Impact of Substance Abuse

Responding to public opinion, federal, state, and local policymakers traditionally have placed a heavy emphasis on criminal sanctions, with limited concern for the impact of these policies on the courts.² A brief review of national drug control policy demonstrates the extent to which executive and legislative branch policies affect the operation of state courts and demonstrates the need for appropriate action by the judiciary.

Although criminal justice is primarily a function of state and local governments, the federal government has been especially active in drug law enforcement. The Federal drug control budget exceeded \$10.8 billion in 1991, a 641 percent increase over 1981 spending. Various law enforcement activities made up 66 percent of federal drug control expenditures in 1991, with the other one-third going for treatment, drug abuse prevention, and research and development. Interdiction represents the largest share of law enforcement spending at 28.3 percent, twice the amount allocated for state and local enforcement related assistance.³ Yet in 1990, the Drug Enforcement Administration made only 22,000 arrests compared with an estimated 1.1 million arrests for drug offenses by state and local law enforcement agencies.⁴

The impact of stricter drug laws and more aggressive enforcement efforts is reflected in state court caseloads. The analysis of case data from 39 large urban trial courts indicated a 56 percent increase in drug-related felony case filings between 1983 and 1987.⁵ Anecdotally, most Ohio courts of common pleas report similar increases in drug and drug-related cases and estimate that as much as 85 percent of their felony caseload consists of these cases. Addressing case processing concerns is nothing new for the courts. Ohio pioneered delay reduction in the early 1970s after

passage of the Modern Courts Amendment to the Ohio Constitution and adoption of the Rules of Superintendence by the Supreme Court.⁶ But the deluge of substance abuse offenders into the court system presents challenges that go beyond the internal day-to-day management of a trial court. "Drug cases illustrate the tremendous interdependence among the numerous agencies that form an interorganizational justice network."⁷

Increased governmental spending to reduce the demand for drugs began in the late 1980s, at the same time court leaders began voicing concerns about the caseload crisis associated with heavy reliance on a supply side drug control strategy. Just as stricter laws and enhanced drug enforcement result in more cases flowing into the courts, the use of treatment programs as a demand reduction strategy has consequences for case management. Delay reduction and caseflow monitoring began as internal court system strategies to expedite case disposition. The effects of enforcement and prosecution efforts brought to light the external influences on processing drug cases. Realization of the extent to which substance abuse pervades matters coming before state courts necessitates a coordinated response that extends beyond the justice system to the alcohol and other drug service system.

The commitment of state court leaders to forging links with the substance abuse treatment community stems from recognition of the need to expand dispositional options available to courts. Although two-thirds of the 1991 federal drug control budget was allocated to enforcement activities, the amount allocated for drug treatment (\$1.752 billion) was four times the spending level ten years before.⁸ The majority of federal drug treatment funds are disbursed to the states in the form of block grants that, in turn, support local alcohol and other drug abuse

services. These funds represent a tremendous resource for state courts. Decisions about how treatment resources are brought to bear on the justice system population affect the judiciary. The time has come to find a means to involve the courts in policy development intended to address substance abuse.

The foundation has been laid not just for judicial involvement in this policy arena, but for judicial leadership. In the Summer of 1990, the Conference of Chief Justices and the Conference of State Court Administrators adopted resolutions calling for state court leadership in promoting coordination between and among justice and treatment agencies. This resolution resulted in the first National Conference on Substance Abuse and the Courts held in November, 1991. State chief justices were asked to form a team representing state agencies and organizations with a common interest in combating alcohol and other drug abuse. A primary purpose of this conference was to encourage development of coordinated multidisciplinary state plans to address substance abuse. A number of different strategies were devised by the states represented at the National Conference on Substance Abuse and the Courts.⁹ The purpose of this article is to recount the action taken by the Ohio team as a result of the working relationships established at the November, 1991 national conference. What was learned in the course of developing a coordinated state plan provides the impetus for an ongoing commitment of judicial leadership that may serve as a model for replication by other state court leaders.

Commitment to Collaboration

Ohio is one of only four states that have made the issue of alcohol and other drug addiction a cabinet level concern of state government. The Ohio Department

of Alcohol and Drug Addiction Services, which was established in 1989, is required to coordinate efforts in the provision of substance abuse services¹⁰ and develop, administer, and revise as necessary a comprehensive statewide drug and alcohol addiction services plan.¹¹ The State of Ohio's Alcohol and Drug Addiction Services Plan for state fiscal years 1992, 1993, and 1994 was an effort by the Department of Alcohol and Drug Addiction Services to coordinate the different activities of state agencies into a collaborative drug and alcohol services plan and contained a chapter devoted to justice concerns. However, the plan was developed by thirteen executive branch agencies without significant input from the courts and court-related organizations and did not fully address justice system concerns. In order for the justice chapter of the Ohio Plan to be a truly collaborative plan, it was necessary to secure a broader perspective of the justice system than executive branch agencies at the state level can provide.

An opportunity for judicial participation in the planning process presented itself when Chief Justice Thomas J. Moyer organized the Ohio Team to represent the state at the National Conference on Substance Abuse and the Courts in November of 1991. The nine members of the Ohio Team represented the Supreme Court, the Departments of Alcohol and Drug Addiction Services, Education, Rehabilitation and Corrections, and Youth Services, the State Public Defender, Fraternal Order of Police, Prosecuting Attorneys Association, and the Common Pleas Judges Association. Ohio had an advantage in its efforts to accomplish the primary goals of the national conference since the General Assembly already had established Department of Alcohol and Drug Addiction Services, with responsibilities that included development of an action plan. The Chief Justice proposed bringing justice system representatives together with other disciplines to collaborate on revision of the justice chapter of the Ohio Plan. This effort depended

on an improved understanding among participants of the roles each might play, as well as realistic expectations of what might result from this coordinated effort.

The unique aspect of the planning process for the next five year statewide plan was the stewardship role assumed by the Supreme Court. The Chief Justice had assembled the team for the national conference, which allowed the heads of agencies and organizations addressing substance abuse to band together. The Ohio Team identified the justice chapter of the state alcohol and drug addiction services plan as the mechanism for communicating statewide priorities and a model for collaborative planning. The Director of the Department of Alcohol and Drug Addiction Services, Luceille Fleming, welcomed broader participation in the planning process and supported the initiative taken by the Supreme Court to take administrative leadership of the strategy adopted by the Ohio Team. This spirit of cooperation and shared responsibility would characterize the entire planning process.

Multidisciplinary Planning

Having benefited from the opportunity to interact at the National Conference on Substance Abuse and the Courts, Ohio began to carry out its team strategy by staging the first Ohio Conference on Substance Abuse and the Courts in June of 1992. The turnout was impressive. Seventy-five participants attended, representing forty-three diverse entities with a common interest in the impact of alcohol and other drug abuse on the justice system. Participants helped identify the issues that needed to be addressed in a state plan.

The Supreme Court secured a grant from the State Justice Institute to further the collaborative planning process. State conferences would continue to provide the

forum to elicit input from a broad range of constituencies on justice system needs related to substance abuse services. A consultant project coordinator would develop the input generated from these conferences into a revised justice chapter. Regional conferences also were scheduled after the plan was completed to discuss the impact of the statewide plan and encourage further collaboration at the local level.

Two additional state conferences were held at the Supreme Court in February and April of 1993. The goal of expanding involvement in the planning process was accomplished. All executive branch state agencies responsible for enforcement activities or services to populations affected by substance abuse sent directors or staff representatives to each of these conferences. State associations representing county commissioners, prosecutors, and law enforcement came together with individuals attending on behalf of substance abuse service system. The interests of the judicial branch and the legal community were represented by the Supreme Court, the Ohio Judicial Conference, the Ohio State Bar Association, and members of associations of state judges, court administrators, and chief probation officers. Attendees at the February conference identified needs and recommended goals, objectives, and activities appropriate for inclusion in the state's alcohol and drug addiction services plan, and participants in the April conference commented on a draft of the plan. This effort resulted in a revised justice chapter in the State of Ohio's Alcohol and Drug Addiction Service Plan for State Fiscal Years 1994 through 1998, issued by the Department of Alcohol and Drug Addiction Services on June 18, 1993.

Statewide Planning to Facilitate Community Service

Most alcohol and other drug abuse services are provided in local programs, based on a community planning process. The justice chapter focuses on statewide

policy options that can improve services to offenders through coordinated, systematic initiatives. This strategy complements the three-tiered nature of Ohio's publicly funded alcohol and other drug service system. The state level Department of Alcohol and Drug Addiction Services establishes guidelines and distributes state and federal program funds. Fifty-three middle management entities known as Boards of Alcohol, Drug Addiction, and Mental Health Services or Boards of Alcohol and Drug Addiction Services determine local needs and plan services. These single or multi-county boards contract with and monitor approximately 269 local agencies certified to provide substance abuse services.

Juvenile and adult offenders are specified by statute as underserved populations that must be addressed within the comprehensive statewide plan developed by the Department of Alcohol and Drug Addiction Services (R.C. 3793.04). The community plans developed by local service boards are a vital part of the overall planning effort. Guidelines established by the Department of Alcohol and Drug Addictions Services for these plans require the boards to establish working agreements with the courts. These agreements are intended to facilitate the provision of substance abuse services to the underserved offender population.

Creating linkages between the courts and the service system involves a number of complex administrative issues. There are 340 trial courts in Ohio with jurisdiction that includes adult or juvenile offenders. To establish written agreements considerate of the varied needs of different courts is no small task for alcohol and drug addiction services boards to accomplish. Individual courts have an equally difficult task in finding the time required to work through the details necessary to assure appropriate assessment and treatment for offenders with substance abuse problems. In addition, there are other independent elements of the

justice system that must be involved in local service arrangements. The common understanding and administrative innovations necessary to link the justice system and the service system could benefit from concerted statewide efforts to generate and promote model working agreements.

The goals set forth in the justice plan are designed to bridge the gap between statewide policy decisions and local planning and service delivery efforts. Activities are identified that require cooperative effort at the state level. Collaboration will continue through implementation, evaluation, and further refinement of the action plan. Just as there was a need for a coordinated approach to revise the justice chapter, the diverse entities represented at the Ohio Conferences on Substance Abuse and the Courts must collaborate in execution of the plan.

Ohio's Statewide Substance Abuse Services Plan

Specific activities to address justice chapter goals are expected to follow from the rationale on which the individual goals are based. The six broad goals established in the justice chapter are designed to:

- determine appropriate criteria for estimating the number of cases processed through the justice system in need of alcohol and other drug treatment services
- define performance measures to be used to evaluate agencies providing services to offenders
- promote better public awareness of the justice system's ability to deal with substance abuse offenders
- develop processes to facilitate referrals for appropriate treatment services by the courts
- improve substance abuse assessment and case management efforts
- identify needs that can be addressed through cross-disciplinary training programs.

Needs assessment provides a means of estimating what services are necessary for different target groups. Various methods are used in developing local alcohol and drug addiction service plans to identify the number of adult and juvenile offenders in need of services. Without a standard technique that makes use of the best data available statewide, the estimates of the service needs of substance abuse offenders are not comparable and may not adequately direct services to this special interest population. Justice system needs assessment will be improved through identifying the best data to estimate need and devising a standard process for using the information generated to make appropriate policy and funding decisions.

Systematic efforts are also necessary for evaluating the effectiveness of alcohol and other drug addiction services. The justice system has a special interest in the relationship between treatment for alcohol and other drug abuse problems and the incidence of criminal activity. Executive branch agencies assigned to the state criminal justice cluster are planning to work together to establish uniform performance and outcome measures and to promote the use of comparable data by all programs serving adult and juvenile offenders. It will be important to communicate the resulting evaluation information to the judiciary and other key decision makers who need to know what programs work for specific types of offenders.

Needs assessment and program evaluation information will provide the basis for addressing public expectations of the justice system regarding treatment of alcohol and other drug offenders. It is one thing to advocate alternatives that provide a balance between ensuring public safety and attending to the social service needs of offenders. It is quite another when the need for specific approaches is well documented and the effectiveness of particular alternatives is backed up with

cost-conscious and results-oriented information. This is the kind of information vital to promote linkages between the justice system and the treatment system that will in turn, be used to promote greater public understanding of the range of responses needed to address substance abuse problems.

Information remains key to achieving the next two justice chapter goals. The Department of Alcohol and Drug Addiction Services is required to develop and maintain a program that continually provides Ohio courts with information pertaining to alcohol and drug addiction services and programs available both within their jurisdictions and statewide in order to facilitate the ability of the courts to utilize treatment and rehabilitation alternatives in addition to or in lieu of imposing sentences of imprisonment upon appropriate offenders.¹² The information necessary to generate program referrals is central to client assessment and case management practices. Establishing and promoting effective statewide model working agreements would benefit processes, such as these, that are dependent on intersystem understanding and interagency relationships. Coordinated efforts at the state level could serve to communicate information about successful models and provide a source of technical assistance for assessment, referral, and case management related activities.

Cross-disciplinary training provides a means of creating better understanding of the functions of the various systems dealing with adult and juvenile substance abuse offenders, while also attending to the training needs of the professionals within these systems. Numerous sources fund training efforts, often supporting programs for the same audience or duplicating subject matter. A comprehensive effort to document training needs and existing resources has been recognized as an advantageous starting point intended to increase the extent to which educational programs serve multidisciplinary needs.

Linking State and Local Efforts

The strategy for developing multidisciplinary cooperation included staging regional conferences to discuss the state plan and encourage collaboration on the local level. Regional conferences were held at five locations across the state in September of 1993. Invitations were extended to trial court judges, county commissioners, sheriffs, court administrators, chief probation officers, representatives of local drug and alcohol boards, and directors of substance abuse service programs. Over 310 persons from seventy-two of Ohio's eighty-eight counties were represented at the conferences.

Members or designees of the Ohio Team from the Supreme Court, the Ohio Judicial Conference, the Office of Criminal Justice Services, and the Departments of Alcohol and Drug Addiction Services, Rehabilitation and Correction, and Youth Services presented a program that provided information on the development and content of the justice chapter. A portion of the conference program was devoted to a panel discussion that allowed participants to react to state level efforts. While participants in the regional conferences expressed agreement with the goals, objectives, and activities in the revised justice section of the state substance abuse services plan, additional issues were raised for consideration at the state and local levels.

Also worthy of note are some of the more intangible benefits of bringing together such diverse entities with a common interest in the impact of substance abuse. For example, one executive director of a local alcohol and drug addiction board credited participation in the state conferences with increasing her understanding of the role of the courts. As a result, this board's contracts with

service providers are placing a greater emphasis on offender treatment, and the board director attended a regional conference in hopes of learning more about establishing relationships with individual courts. State and regional conferences also provided the opportunity for some individuals from different disciplines to meet for the first time. One such instance involved a judge and a service provider from the same county who introduced themselves and agreed to meet again upon returning home to further the process of establishing a working relationship between their respective systems.

Progress and Prospects

From the judiciary's perspective, this project represents several significant accomplishments on which to build:

- This planning effort provided a means for the judiciary and court personnel, and other representatives of the legal community to participate in state level planning and policy development intended to impact on alcohol and other drug offenders processed through the court system.
- The state and regional Ohio Conferences on Substance Abuse and the Courts fostered greater understanding of the dimensions and the effects of substance abuse and the functions of the respective systems involved with offenders and facilitated sharing of information about strategies, programs, and resources.
- The work of the Ohio Team and the statewide services plan encourages development of local multidisciplinary cooperative agreements to promote treatment of juvenile and adult substance abusing offenders. Activities in the Justice Chapter are intended to promote the judicial branch with a continuing role in important state level functions designed to facilitate better working relationships between the court system and the alcohol and other drug service system at every level.

The leadership of Chief Justice Moyer and the Supreme Court of Ohio have provided a focal point for justice system interests through partnership on the Ohio

Team and sponsorship of the Ohio Conferences on Substance Abuse and the Courts. Continuation of an Ohio Team during the implementation phase would further coordination among entities involved in the administration of justice and serve to maintain partnerships established between the court system, law enforcement, corrections, and service systems. Interdisciplinary conferences have proven effective for generating broad-based input on appropriate goals and objectives for statewide action and have the potential to consolidate a number of justice related planning processes into one.

While Ohio's experience with collaborative planning has proven successful to date, there are several things to be accomplished to realize the true exemplary nature of this effort.

- There is a need for a comprehensive justice system strategy to address substance abuse.
- Attention to the priorities and interests of the diverse state courts must be assured through coordination within the judicial branch.
- The goals and objectives developed from the planning process must be put into action.

The activities completed thus far focus on the state's alcohol and drug addiction services plan, developed under the auspices of the Department of Alcohol and Drug Addiction Services. During the revision of the Justice Chapter, it became increasingly apparent that while the justice system shares many prevention and treatment goals with the alcohol and other drug service system, other responsibilities of law enforcement, corrections, and the courts do not translate into goals appropriate for inclusion in a service plan. A comprehensive strategy for addressing substance abuse concerns must include coordination of policy matters unique to the administration of justice. A joint policy statement issued in August, 1993 by the

Conference of Chief Justices and the Conference of State Court Administrators recognizes the need for a balanced approach. "The problem of the harmful consequences of substance abuse in our society must be addressed as a social and medical problem requiring treatment services as well as a criminal justice problem requiring law enforcement, punishment, and other programs that diminish the harmful consequences of substance abuse. Public policy and the funding to support the policy must focus on both treatment and punishment."

The state's alcohol and drug addiction services plan is not the only mechanism for addressing court system concerns. The mission of the Office of Criminal Justice Services is to serve as the focal point in state government for the development and coordination of state criminal justice policies and intergovernmental and interagency criminal justice activities. During the early stages of the State Justice Institute funded project, the Ohio Team was expanded to include the director of the Office of Criminal Justice Services. The planning alliance with the Department of Alcohol and Drug Addiction Services needs to be replicated in a similar policy development process with the Office of Criminal Justice Services. These two principal partnerships are not meant to diminish the importance of other Ohio Team members. Rather, these relationships provide a focus for the dual interests of the court system within agencies with specific funding and policy responsibilities associated with a comprehensive strategy.

The other element of a model court system plan is intrajudicial coordination. Alcohol and other drug abuse present unique operational problems for the state's trial courts. The ability of the courts to respond to substance abuse is affected by the policies, programs, and funding decisions of the other branches of government. Executive, legislative, and popular misunderstanding of the judiciary often results in

expectations that the courts have neither the purview nor the resources to address. In order to remain a respected and independent branch of government, the judiciary needs to garner its resources and coordinate its efforts to participate effectively in decision-making that impacts the courts' responsibilities.

Representatives of judicial and court personnel associations participated in the state and regional conferences. While the needs and priorities of these groups should continue to be communicated in these forums, state associations have limited resources with which to participate in activities resulting from interdisciplinary planning efforts. An Advisory Committee on Substance Abuse and Court Policy, including representatives of state judicial and court personnel associations, would prove an invaluable method of ensuring intrabranh coordination and devising as well as implementing a statewide strategy. There is considerable expertise and different perspectives on substance abuse within the court system. By establishing this committee, the Supreme Court would provide a conduit for collaboration and cooperation within the judicial branch, as well as a necessary resource for intergovernmental efforts.

The Advisory Committee on Substance Abuse and Court Policy is a means for coordinating judicial branch efforts at the state level. Continuation of interdisciplinary planning partnerships is in essence a replication of the method employed in the original State Justice Institute grant. The focus, however, changes from revision of the Justice Chapter of the state's services plan to development of a more comprehensive justice system strategy that addresses both law enforcement and treatment. The recommendation to establish a committee to organize judicial branch planning, programming, and policy efforts adds a new and necessary element

to this model. This committee would determine appropriate policy positions, develop judicial implementation initiatives, and represent court system interests in interdisciplinary efforts with the assistance of staff of the Supreme Court.

The recommendations made for continuation of this effort necessitate ongoing state court leadership. Involvement of the Chief Justice engenders the interest of the judiciary and court personnel and attention from the other branches of government. While the success of this effort provides impetus for further action, it is important to remember this is a demonstration project. The Supreme Court's commitment is to coordinate development of a model justice system strategy for addressing substance abuse. If the Ohio Team concept and interdisciplinary conferences continue to prove useful, team members will need to determine the best way to maintain collaborative planning over the long term. How best to continue the court system's involvement in state level substance abuse planning, programming, and policy development on an ongoing basis will also merit careful evaluation. The Advisory Committee on Substance Abuse and Court Policy should be charged with making these recommendations.

The court system also needs to take part in implementing activities identified in the Justice Chapter. Implementation of the state's five year services plan creates a role for the judicial branch that has not existed before. Court system involvement should be coordinated through the Advisory Committee on Substance Abuse and Court Policy. Proposals need to be developed and resources secured to accomplish specific objectives that are best addressed through judicial branch initiative. The progress of these efforts should be communicated as part of the evaluation of the Justice Chapter, which remains the responsibility of the Department of Alcohol and Drug Addiction Services.

Ohio's strategy to address the substance abuse and the courts answered the call for judicial leadership, but proved that the courts cannot respond to the issues associated with alcohol and other drug abuse in isolation. It is unrealistic to expect that the war on drugs will be won anytime soon. But the situation can be expected to improve as court leaders take a more active role in the policy processes that define how the battle is waged.

- ¹ Thomas J. Moyer and Jack Holt, Jr., "Judicial Coordination with the Treatment Community," Spring 1993, published in *TIE Communique*, A Memo to the Field from the Center for Substance Abuse Treatment's Treatment Improvement Exchange.
- ² Robert D. Lipscher, "The Judicial Response to the Drug Crisis, A Report of an Executive Symposium Involving Judicial Leaders of the Nation's Nine Most Populous States," *State Court Journal*, Fall 1989.
- ³ Bureau of Justice Statistics, *Drugs, Crime, and the Justice System: A National Report*, Washington, D.C.: Government Printing Office (1992), p. 128.
- ⁴ Bureau of Justice Statistics, *Drugs, Crime, and the Justice System: A National Report*, Washington, D.C.: Government Printing Office (1992), p. 76.
- ⁵ John A. Goerdt, Chris Lomvardias, and Geoff Gallas, *Reexamining the Pace of Litigation in 39 Urban Trial Courts*, Williamsburg, VA: National Center for State Courts, (1991), p. 1.
- ⁶ Barry Mahoney, Alexander B. Aikman, Pamela Casey, Victor E. Flango, Geoff Gallas, Thomas A. Hernderson, Jeanne A. Ito, David C. Steelman, and Steven Weller, *Changing Times in American Trial Courts*, Williamsburg, VA: National Center for State Courts, (1988), p. 164.
- ⁷ John A. Goerdt and John A. Martin, "The Impact of Drug Cases on Case Processing in Urban Trial Courts," *State Court Journal*, Fall, 1989.
- ⁸ Bureau of Justice Statistics, *Drugs, Crime, and the Justice System: A National Report*, Washington, D.C.: Government Printing Office (1992), p. 130.
- ⁹ Marilyn M. Roberts, "Cooperation and Communication: Keys to Effective Substance Abuse Programs," *State Court Journal*, Winter 1993.
- ¹⁰ Ohio Revised Code 3793.02(B)(1).
- ¹¹ Ohio Revised Code 3793.04.
- ¹² Ohio Revised Code 3793.18.

