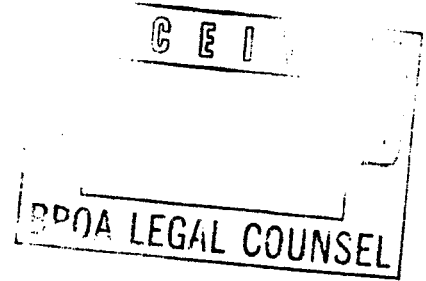


State Board of Social Workers,
Marriage and Family Therapists
And Prof. Counselors
PO Box 2649
116 Pine Street
Harrisburg, PA 17105-2649



March 31, 2001

Dear Eva Cheney,

I am writing to you as a Certified Addictions Counselor with a graduate degree from Temple University. My Masters is in Educational Psychology and was for 36 hours. The recent publication of the regulations related to ACT 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. My issue with the bill revolves around the grand parenting clause. The regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. Speaking for myself, I have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC) and feel ACT 136 fails to consider the hard work and effort, I put forth in obtaining my current credentials.

I am strongly advocating for the inclusion within the regulations of the following:

- Inclusion under the grand parenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC Diplomat).
- Inclusion under the grand parenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.

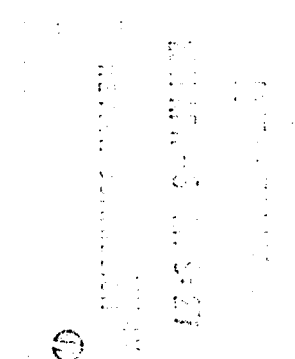
It is extremely disturbing that I can manage a multimillion dollar agency, be responsible for the lives of the 600 clients who attend my clinic yet will not be recognized in the licensure regulations.

I sincerely urge your consideration in this matter as a means of assuring that the citizens of our Commonwealth are provided counseling services that serve our diverse communities.

Sincerely

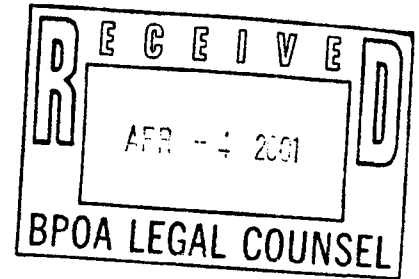
Lawrence Norton M.Ed., NCAC, CAC, CCS
1413 Colonial Drive
Boothwyn, PA. 19061
1-610-459-9810

CC: PCB Board



3-31-01

Ms. Eva Cheney
State Board of Social workers, Marriage and Family Therapists
& Professional Counselors
PO Box 2649, 116 Pine St.
Harrisburg, Pa. 17105-2649



Dear Ms. Cheney,

I am a concerned resident of the Commonwealth of Pa. and a Master's level Certified Addiction Counselor working in the field as a Clinical Supervisor. I have concerns about the grandparenting clause in the regulations of Act 136. The provision does not include a CAC with a Master's Degree. I have worked in the addictions field for 14 years. My current position as well as previous positions required me to obtain and maintain my CAC as part of my employment. The Pa Dept. of Health and Welfare, which licenses facilities to provide treatment, requires persons providing treatment to obtain a CAC. I think this is a great disservice to the clients who request Substance Abuse services as well as to the Master's level CAC who up until Act 136, was appropriately recognized by the Commonwealth, employers and insurance providers. This would cause problems to individuals like myself who have many years of experience, a Master's Degree and ongoing training from becoming a Licensed Professional Counselor. Employers may have to review hiring policies, as many now require individuals to have a CAC.

The national exam I was required to take by International Certification & Reciprocity Consortium should be included as an acceptable exam. This competency-based exam is a national exam with strict guidelines and is not recognized as part of Act 136.

I am also concerned to learn that some individuals with a Master's Degree in Human services from Lincoln University are not provided for in the Act. I think this is a disservice to those individuals and to many minorities to whom they may provide services.

The main problem appears to be all grandparenting issues are non-statutory in nature. The Act(136) lists several specialty counseling groups, dance, music, art, and drama therapist but does not recognize addictions therapists. I would suggest you include Master's Level CAC in the grandparenting.

Sincerely,

Joseph Bindas MA, CAC
556 Carnival Dr.
Pittsburgh, Pa. 15239

A handwritten signature in cursive script that reads "Joseph Bindas".

A vertical stamp or text on the right side of the page, partially obscured and difficult to read. It appears to contain some administrative or tracking information.

Jerry Waxler, M.S.
P.O. Box 99
Quakertown, PA 18951
610-390-0325
March 31, 2001

Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and Professional
Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

Re: Comment on the Proposed Licensure Regulations, 16A-964

Having recently received my Master's degree in Counseling from Villanova University, and having passed the NBCC's NCE, I thought I was well prepared and on track to qualify for licensure. Now I find a regulation that has me seriously concerned.

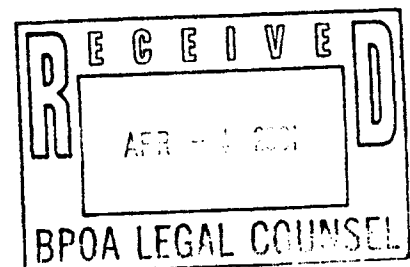
The 700 hour practicum/internship requirement will present a hardship for me. I already have a 300 hour practicum/internship, as required by Villanova's Master's degree program. Because I was in a school program, I worked those practicum/internship hours without pay. Now, to meet the PA Licensure requirement of a 700 hour internship/practicum, I would have to perform more low- or no-pay counseling within a school program. Since I need to work for a living, these additional hours of school will create an added financial burden.

By increasing the number of hours of practicum/internship, the licensure regulations create a financial barrier around the profession that will favor young people supported by wealthy parents. Those of us who must work to pay our way during the education process, and notably older adults with family responsibilities who want to transition into the profession, are going to be kept out. In my opinion this is not a benefit to either the public or the profession.

I urge you to reconsider this regulation and bring it into line with the existing practices of graduate programs such as those at Villanova that require 300 hours of practicum/internship.

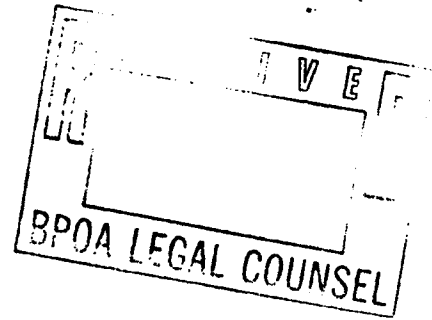
Sincerely,

Jerry Waxler, M.S.



March 31, 2001

Eva Cheney, Counsel
State Board of Social Workers, Marriage and
Family Therapists, and Professional Counselors
PO Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649



Dear Ms. Cheney:

I am a resident of Pennsylvania and a Certified Addictions Counselor (CAC) with a Master's degree in Clinical Psychology. I am very concerned about the Professional Counselor Licensing Bill. Under the current grandparenting regulations, I would not be considered as a licensed counselor even though I have years of clinical supervision and have passed a nationally recognized exam under the auspices of the International Certification & Reciprocity Consortium (IC&RC).

I strongly advocate that Master's level Certified Addiction Counselors be included under the grandparenting regulations and that the IC&RC national exam be considered an acceptable exam. I also believe that you need to take into account the number of African-American counselors that have a Master's degree in Human Services from Lincoln University. Excluding these counselors from the grandparenting regulations does a great disservice to our profession's attempt to provide multicultural counseling within our communities.

I sincerely hope that you will take into account the work of addictions counselors in providing much needed services to one of the largest specialty treatment populations within the Commonwealth of Pennsylvania.

Sincerely,

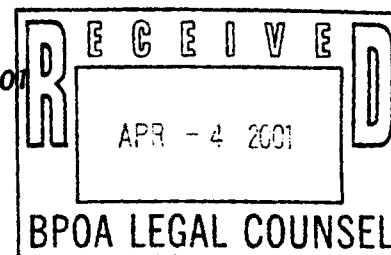
Carol Chaffin-Page

Carol Chaffin-Page
6013 McDaniel Road
Cochranton, PA 16314
814-425-7878
cc: PCB Board

RECEIVED
MARCH 31 2001
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
HARRISBURG, PA

Eva Cheney, Counsel
State Board of Social Workers, Marriage &
Family Therapists & Professional Counselors
PO Box 2649, 116 Pine St.
Harrisburg, PA 17105-2649

March 31, 2001



Dear Counsel Cheney:

I am writing to you as a Certified Addiction Counselor Diplomate as well as a concerned resident of the Commonwealth of Pennsylvania.

I am concerned with the language and intent of the regulations related to Act 136, The Professional Counselor Licensing Bill as it raises concern for the health and welfare of substance abusers seeking counseling services. The regulations fail to recognize Master's level addiction specialists who are treating the largest specialty treatment population in the Commonwealth.

Notably, the regulations do not recognize Certified Addiction Counselors with a Master's degree. Master level CAC's have achieved a competency-based credential set under the strictest of guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

In so many ways, I believe these regulations, as written are discriminatory of minority populations through exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American University. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth and may directly impact the provision of services to minorities.

The exclusion of the CAC from the grandparenting regulations is a severe disservice to residents of the Commonwealth. Additionally, this directly and indirectly has a negative impact on the provision of services to all.

I am strongly advocating for you to include within the regulations the following:

- Grandparenting regulations for individuals possessing a Master's Degree and Certification as an Addiction Counselor (CAC).*
- Grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.*
- Individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.*

I sincerely urge your consideration of the above.

Sincerely,

Beth Rudberg, MA, CAC Diplomate

Beth M. Rudberg, M.A., CAC Diplomate
627 Rostraver Rd.
Belle Vernon, Pa. 15012

Cc: PCB Board

Vertical stamp: RECEIVED APR 10 2001 BPOA LEGAL COUNSEL

VICKI KIM LIBERTO, M.A., C.A.C. DIPLOMATE

515 Crystal Cave Rd.

Kutztown, PA 19530

(610) 683-9526

vfrutchev@aol.com

March 30, 2001

Eva Cheney, Counsel
State Bd. Of Social Workers, Marriage & Family
Therapists and Professional Counselors
PO Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649

Re: Regulations Relating to Act 136, No. 16A-694

Dear Ms. Cheney:

I am writing to you, in my capacity as a master's level therapist/Certified Addictions Counselor/informed Pennsylvania resident, to express my concerns, and to offer suggestions, regarding Act 136, the Professional Counselor Licensing Bill.

The Bill, as it stands, raises some concerns; specifically in the grandparenting criteria, and my concerns are non-statutory in nature.

The Bill fails to recognize Certified Addictions Counselors, who, by far, are the single largest specialty treatment population in the Commonwealth of Pennsylvania. Certified Addictions Counselors have already achieved competency-based, clinically supervised credentialing under the strict guidelines of the International Certification & Reciprocity Consortium (IC&RC). The Bill fails to recognize this pool of professional counselors, most of who have had years of experience, continuing education criteria, and clinical expertise.

The Bill also discriminates against those populations who hold a Master's degree from Lincoln University, most of which are minority therapists. These individuals would be unfairly prejudiced, strictly because their degree is from Lincoln.

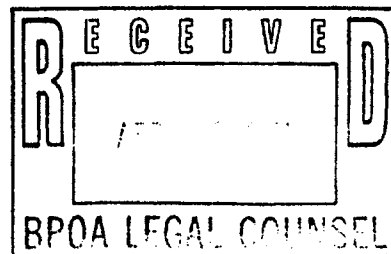
I am strongly advocating for the inclusion of the following in the regulations:

- ❖ Inclusion under the grandparenting criteria of individuals in possession of a Certified Addiction Counselor credential.
- ❖ Inclusion under the grandparenting criteria of the IC&RC national exam as acceptable for addictions counselors
- ❖ Inclusion under the grandparenting criteria of those counselors who hold the Master's Degree in Human Services from Lincoln University

I urge your consideration in this matter to ensure that our citizens, those in professional counseling and those who seek our services, are adequately and fairly served.

Very truly yours,

Vicki Kim Liberto, M.A., C.A.C. Diplomate



State Board of Social Workers, Marriage &
Family Therapist & Professional Counselors
116 Pine St., P.O. Box 2649
Harrisburg, PA 17105

RECEIVED
March 30, 2001

2001 APR - 6 11:31:23

REVIEW SUBMISSION

Re: #16A-694

Dear Ms. Cheney:

I am writing to you as a concerned resident of the Commonwealth of Pennsylvania, who holds the credentials of Certified Addiction Counselor (CAC), Certified Clinical Supervisor (CCS) and the degree of Master of Human Services (MHS). The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concern for the chemically addicted population of Pennsylvania that seek counseling services. The problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in the Commonwealth. Most notably, CACs with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC).

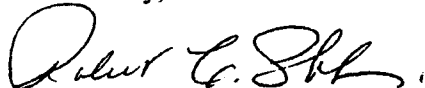
The regulations are also notably discriminatory of minority populations through the exclusion of the Master of Human Services degree offered by Lincoln University, the nation's oldest African American university. The majority of these individuals holding this Master's degree are working with minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impact the provision of services to minorities.

I am strongly advocating for the inclusion within the regulations of the following:

- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- Inclusion under the grandparenting regulations of individuals in possession of the Master of Human Services degree, as provided by Lincoln University.

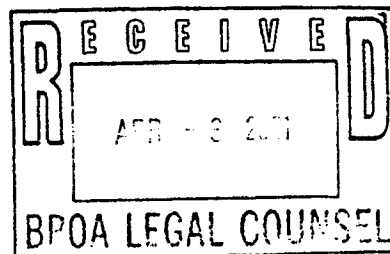
I sincerely urge your consideration in this matter as a means of assuring that the citizens of our Commonwealth are provided counseling services that serve our diverse communities.

Sincerely,

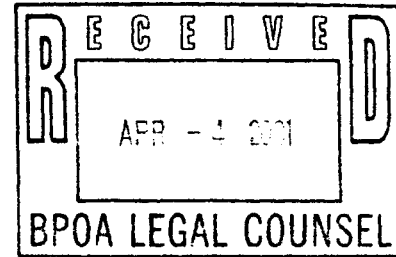


Robert C. Skiles
249 Pulte Rd.
Lancaster, PA 17601 717-569-0035

cc: PCB Board



March 29, 2001



State Board of Social Workers,
Marriage & Family Therapists & Professional Counselors
Eva Cheney, Counsel
116 Pine Street
PO Box 2649
Harrisburg PA 17105

Re: #16A-694

Dear Ms. Cheney:

Upon reviewing the Professional Licensure Bill, Act 136 and the regulations, I was extremely disturbed by the obvious absence of consideration given to Addiction Specialists and the consumers of addiction services. I am a degreed, Certified Addiction Counselor and have worked in the field for more than 17 years.

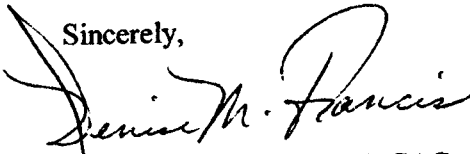
Not only does the Professional Licensure Bill overlook Addiction Specialists, the regulations exclude Master's Degrees from the oldest African American University in the United States, Lincoln University, and discriminates against minority populations in doing so. Certified Addiction Counselors (CAC's) with a Master's Degree are not even recognized. CAC's have achieved a supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC). These oversights would appear to be both discriminatory and elitist.

I strongly urge you to amend the regulations to include:

- Grandparenting regulations for those with a Master's Degree in Human Services as provided by Lincoln University.
- Grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor.
- Grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.

I genuinely wish to believe that this was an unintentional oversight on the parts of those involved with the design of Act 136. Please consider inclusion of the changes I have proposed.

Sincerely,


Denise M. Francis, MHS, CAC

Barbara M. Stout

BMS PR

**Public Relations
&
Counseling**

March 27, 2001

Eva Cheney, Board Counsel
State Board of Social Workers, Marriage & Family Therapists & Professional Counselors.
116 Pine Street
PO Box 2649
Harrisburg, PA 17105-2649

RE:16A-964: Proposed Licensure Regulations

Dear Eva-

This is written to you today because of my very great concern regarding the wording of the soon to be passed Pennsylvania's Licensure Law for Social Workers, Marriage and Family Therapists and Professional Counselors. The SB 619 Bill makes it impossible for many professional counselors to obtain a license in the state of Pennsylvania because only 6 categories of Counselors are mentioned and Pastoral Counselors, such as myself- with a fully earned Masters Degree from Moravian College & Theological Seminary-are not named in these 6 categories.

This means that many current and future well trained, qualified and practicing Counselors in our Lehigh Valley region- if these 6 categories continue to be the only ones eligible for licensing- will be unable to obtain licensure no matter how many of the steps to eligibility are taken. This means a great loss also to those who would seek and need counseling in our area as well.

A previous version of the Licensure Bill included the short phrase directly before naming these 6 categories- BUT NOT LIMITED TO-. Therefore there MUST be a change made in the wording of the regulations back to the original definition of the degrees in the 6 fields that qualify for licensure to include the original definition of "degrees in fields including BUT NOT LIMITED TO the following.."/

I beg seek and hope that you will see the prudence in returning this short phrase to this Bill- and that you will use your own personal influence to accomplish this end in order to best serve all those many folks who desperately need Counseling in our great state of Pennsylvania and particularly those in our greater Lehigh Valley where so many of us have received excellent training in the past and currently.

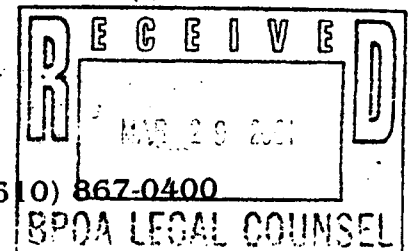
Thank you for your attention in this matter.

Most sincerely yours,

Barbara M. Stout 1987
Barbara M. Stout MAPC: Moravian College & Theol.

XC: Dent, Boscola, Civera, Samuelson.

50 West North Street • Bethlehem, Pennsylvania 18018 • (610) 867-0400



HARBOR COUNSELING

P.O. BOX 685
WELLSBORO, PA. 16901

717-724-5272

March 30, 2001

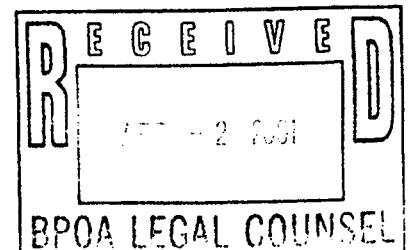
Ms. Eva Cheney, Counsel
State Board of Social Workers,
Marriage/Family Therapists, & Professional Counselors
PO Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649

Dear Ms. Cheney:

I am writing to you as a concerned citizen, as a Certified Addiction Counselor (CAC) and as the Director of a licensed substance abuse treatment agency, in reference to recently published regulations related to Act 136, the Professional Counselor Licensing Bill. I believe that the regulations as presented raise serious concerns for the equitable delivery of substance abuse treatment services. I would like to point out that I would not personally benefit from the changes I am advocating in this letter, for I believe that I will be eligible for licensure under the regulations as they currently stand. My concern is for the clients we serve, and for the negative impact Act 136 might have on the agencies and professionals providing these services.

The fundamental problems with the regulations as presented involve grandparenting issues and are non-statutory in nature. For example, the regulations currently fail to specifically recognize Master's level Certified Addiction Counselors who represent, by far, the largest specialty treatment population in the Commonwealth. These CAC's have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC).

As currently written, the regulations also unintentionally discriminate against minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American university. The majority of individuals holding this Master's degree are working with already disenfranchised minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic and culturally sensitive counseling services within the Commonwealth and may impact the provision of services by and to minority populations.



We offer solutions for substance abuse problems.

In light of these issues, I am advocating for the inclusion of the following items within the Act 136 regulations:

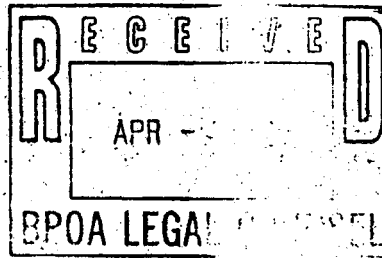
- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as a Addiction Counselor (CAC);
- Inclusion under the grandparenting regulations of the IC&RC national certification process for addiction addiction counselors as an acceptable exam process;
- Inclusion under the grandparenting regulations of individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

I thank you for your consideration of these matters, and for you aid in assuring that the diverse communities and citizens of our Commonwealth are provided professionally competent and equitable services.

Respectfully,



Douglas Candelario, MA, CAC
Director



RECEIVED
01 APR - 3 AM 9:22
HEALTH LICENSING
DIVISION

March 28, 2001

Eva Cheney, Counsel
State Board of Social Workers, Marriage and Family
Therapists and Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

Reference Number 16A-694

Dear Ms. Cheney:

Enclosed please find my comments regarding the Proposed Rulemaking by the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (49 Pa. Code, Chapters 47-49). I have only one significant comment regarding the regulations as published, and that comment relates to the Exemption from Licensure Examination section on professional counselors (P49.15). As currently written, the regulations will not allow for "grandfathering" of individuals who have direct counseling experience in their professional experience, but for the past several years have been engaged in supervisory, administrative, or education positions. It is critical that these individuals be grandfathered for licensure. Let me provide some examples of individuals who would not be eligible for licensure as the regulations are currently written:

- A. A Professor of Counseling at an accredited educational institution who holds an Ed.D. in Counselor Education, has 12 years of experience providing direct, clinical services, is certified as an NCC and a CCMHC, but has been a full-time professor for 8 years.
- B. A Director of Outpatient Services at a community mental health center who holds a 48-hour master's degree in counseling from an accredited university, has over 20 years of experience in the field, holds certification as an NCC, but has been a full-time clinical supervisor (providing supervision but no direct client service) for the past 4 years.
- C. An Agency Administrator who holds a 48-hour master's degree in counseling from an accredited university, has 13 years of experience in the field, holds certification as an

NCC and a CCMHC, but has been a full-time administrator and clinical supervisor for the past 3 years.

These individuals all fail to be eligible for the grandfathering clause because they do not meet the requirement in 49.15.4 of practicing for at least 5 of the past 7 years at least 15 hours per week *with 10 of those hours consisting of direct client contact*. These individuals are not currently engaged in direct client contact, which is not defined in the regulations, but I assume means one of the activities described in 49.13(b)(1) including assessment, counseling, therapy, psychotherapy, other therapeutic interventions, and consultation. However, these are key individuals to be eligible for grandfathering, *as they will be the ones who will be providing the education and supervision of new licensees*. I believe that it would be inappropriate to exclude from license eligibility these individuals because they have progressed in their professional roles to positions of educators, administrators, and supervisors.

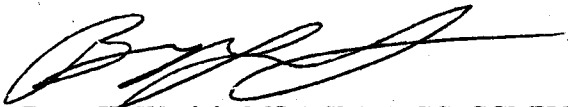
Therefore, I would recommend that 49.15.4 (Relating to the Exemption from the licensure examination) be revised to read as follows:

Demonstrated proof of practice of professional counseling for at least 5 of the 7 years immediately prior to the date of application for license. To satisfy the practice of professional counseling requirement, the applicant's practice shall have consisted of at least 15 hours per week with 10 of those hours consisting of ~~direct client contact~~ *activities defined in Chapter 49.13.4(b)(1), direct supervision of individuals engaged in those activities, and/or instruction in a counseling program or in a program closely related to the practice of professional counseling at an accredited educational institution.*

It is only through adopting this change that we can assure that our most highly qualified and experienced counselors will be eligible for licensure so that they can act as clinical supervisors as defined in the regulations and serve as role models for other counselors in pursuing licensure.

I thank you for consideration of this requested change. If you have questions regarding the comment, you may contact me by telephone at 717-264-5410, by email at bwyrick@innernet.net, or in writing at 533 S. Main St., Chambersburg, PA 17201.

Sincerely,



Barry K. Wyrick, MS, MBA; NCC, CCMHC
Executive Director



LINCOLN UNIVERSITY

LINCOLN UNIVERSITY, PENNSYLVANIA REQUESTED CHANGES TO ACT 136 PROPOSED REGULATIONS – PROFESSIONAL COUNSELING LICENSURE

Section 3. Definitions

“Practice of professional counseling” includes all of the following:

- (1) The application of principles and practices of counseling, mental health, **human services**, and human development to evaluate and facilitate human growth and adjustment throughout the life span and prevent and treat mental, emotional or behavioral disorders and associated stresses which interfere with mental health and normal human growth and development.

Section 7. Qualifications for Licenses

- (f)
 - (i). Within five years after the board has promulgated final regulations, has successfully completed 60 semester hours or 90 quarter hours of graduate coursework in counseling, **human services** or a field determined by the board by regulations to be closely related to the practice of professional counseling from an accredited educational institution.
 - (ii). Has successfully completed a planned program of **48** semester hours or **72** quarter hours of graduate coursework in counseling, **human services** or a field determined by the board by regulation to be closely related to the practice of professional counseling from an accredited educational institution.

Section 9. Exemption from License Examination

- (c)
 - (ii). Has a master’s degree of at least 48 semester hours or 72 quarter hours in **counseling, human services** or a field determined by the board by regulation to be closely related to the practice of professional counseling from an accredited educational institution.

**LINCOLN UNIVERSITY, PENNSYLVANIA
REQUESTED CHANGES TO ACT 136
PROPOSED REGULATIONS – PROFESSIONAL COUNSELING LICENSURE**

Section 9. Exemption from License Examination

- (c)
 - (iii). Has a master's degree of at least 48 semester hours or 72 quarter hours in **counseling , human services** or a field determined by the board by regulation to be closely related to the practice of professional counseling from an accredited educational institution.
 - (iii). Has a master's degree of less than 48 semester hours or 72 quarter hours but not less than 36 semester hours or 54 quarter hours in **counseling, human services** or a field determined by the board by regulation to be closely related to the practice of professional counseling and has within the past ten years completed sufficient continuing education satisfactory to the board to equal the number of hours needed to achieve a total of 48 semester hours or 72 quarter hours at a ratio of 15 continuing education hours equaling one semester hour.
 - (iv). **Within two years after the board has promulgated final regulations, applicants who can demonstrate holding a current professional certification in professional counseling or a related field must pass a national certification examination in professional counseling administered by a recognized credentialing agency approved by the board.**

**MASTER OF HUMAN SERVICES PROGRAM
CURRICULUM MATRIX**

DIMENSIONS	COMPETENCY UNIT I	COMPETENCY UNIT II	COMPETENCY UNIT III	COMPETENCY UNIT IV	COMPETENCY UNIT V
	Self-Directed Learning	Helping Relationships	Group Processes	Community Planning & Program Management	Planned Change and Organizational Development
VALUES	HUS 611 Ethics for Human Services	HUS 621 Professional Ethics	HUS 631 Ethics and Groups	HUS 641 Community Program Management & Social Justice	HUS 651 Ethics of Intervention and Change
SELF/OTHERS	HUS 612 Psychology for Human Services	HUS 622 Theories of Helping	HUS 632 Dynamics of Face-to-Face Groups	HUS 642 Strategies for Community and Program Development	HUS 652 Psychology of Planned Change
SYSTEMS	HUS 613 Sociology for Human Services: Introduction to Systems	HUS 623 Human Systems and Helping Relationships	HUS 633 Social Analysis of Human Systems	HUS 643 Social Planning & Organizational Management Systems	HUS 653 Planned Change in Organizations and Social Systems
SKILLS	HUS 614 Communication Skills for the H.S. Practitioner	HUS 624 Helping and Problem Solving Skills	HUS 634 Skills in Social Research & Problem Solving I: Foundations	HUS 644 Skills in Social Research & Problem Solving II	HUS 654 Program Evaluation Skills
FIELD INTEGRATION	HUS 615 Theory & Practice Integration	HUS 625 Theory & Practice Integration	HUS 635 Theory & Practice Integration	HUS 645 Theory & Practice Integration	HUS 655 Theory & Practice Integration
CONSTRUCTIVE ACTION	HUS 616 Constructive Action	HUS 626 Constructive Action	HUS 636 Constructive Action	HUS 646 Constructive Action	HUS 656 Constructive Action

LINCOLN UNIVERSITY MASTER OF HUMAN SERVICES PROGRAM

COURSE DESCRIPTIONS

HUS 611 Values: Ethics for Human Services (2 credits)

The course focuses on the theoretical and historical background of ethics for human services with primary attention given to philosophical traditions. Approaches to values are distinguished, such as philosophical, psychological and interdisciplinary.

HUS 612 Psychology for Human Services (2 credits)

Psychology for human services focuses upon general psychological theories as they relate to the field as well as an awareness of the prerequisite skills a developing individual must have already mastered in order to successfully learn and apply a new set of operations.

HUS 613 Sociology for Human Services (2 credits)

The systems that humans use in personal and interpersonal functioning are identified and surveyed by use of General Systems Theory (GST). Emphasis is placed on General Systems Theory concepts as tools and upon their usefulness in examining both the interface of self and other systems using GST along with other sociological theories and processes.

HUS 614 Communications Skills for the Human Services Practitioner (2 credits)

This course focuses on the writing process and writing skill development through student participation in peer teaching groups, lecture/discussions, and a variety of writing exercises. Students will identify, analyze and practice the basic writing skills necessary for graduate work and for human services professional practice. Students will also be introduced to the philosophy and terminology of social research with special emphasis given to American Psychological Association format.

HUS 615 Theory and Practice Integration Seminar (2 credits)

Students will meet in small groups at a central field location to review theory from Saturday classes, integrate this learning, and apply it to professional experience. The student will also work on a Constructive Action project.

HUS 616 Constructive Action (2 credits)

As a Constructive Action project for this competency, the student will develop a portfolio which includes a work history, assessment of human services skills, and documentation of skills and experiences cited. The student will also complete a learning plan, based on this portfolio, outlining the student's proposed field projects for the remainder of the graduate program.

HUS 631 Ethics and Groups (1 credit)

The course considers the ethical questions of social groups and small groups. Social groups are examined in terms of issues of racism, sexism, classism, etc. Models are viewed from an ethical perspective, including, for example, rights of minority members, and cooperation versus competition.

HUS 632 Dynamics of Face-to-Face Groups (1 credit)

The course focuses on theories of group dynamics in face-to-face groups with respect to styles of leadership, facilitation of group processes, and conflict resolution.

HUS 633 Social Analysis of Human Systems (1 credit)

This course will provide students with a theoretical and applied understanding of the social forces and systems that operate within and surround a variety of group activities. Conceptual tools from systems theory, communications sciences, social anthropology, and sociology will be employed to both explicate and execute various behavioral options within the different group settings. Emphasis will be placed upon group interaction, intergroup relations, and linkage between groups and larger social systems.

HUS 634 Skills in Social Research and Problem-Solving I: Foundation (1 credit)

This course will introduce the student to basic human services and social science research terminology and methods. The class will focus on providing useful vocabulary and critical awareness of the processes of social research including problem definition, literature review, assessment of needs, project planning and implementation, and evaluation.

HUS 635 Theory and Practice Integration Seminar (1 credit)

The field seminar focuses on the students' work and professional experiences from the perspective of theories presented in the other dimensions in the competency unit: Values, Self and Others, Systems and Skills. The field seminar will serve as a workshop in which students will practice group skills by serving as participants and observers in their field groups.

HUS 636 Constructive Action (1 credit)

The student will carry out a project with a group external to the program. The students will become either group leaders or participant observers. Students will meet in small groups at a central field location to review theory from Saturday classes, integrate this learning, and apply it to professional and personal experience. The student will also work on a Constructive Action project.

HUS 651 Ethics and Intervention and Change (2 credits)

The course focuses on the ethics of membership and management in organizations, as well as the organization's and agent's responsibilities and rights regarding social change in communities. Some attention is given to historical aspects of social change.

HUS 652 Psychology of Planned Change (2 credits)

This course focuses on theories, strategies, models and roles for effecting planned change. Materials from previous competency units will be integrated in the development of an overall conception of individual, organizational and social change strategies.

HUS 653 Planned Change in Organizations and Social Systems (2 credits)

This course will focus on the various properties and implications of planned change. Change and innovation will be fully explored within both organizations and larger social systems. Material from political science, economics, communications, marketing, systems theory, organizational development, and conflict resolution will be employed.

HUS 654 Program Evaluation Skills (2 credits)

The third of three courses in the final project skills sequence, this course will focus on social change in organizational development, and is designed to synthesize and put into practice all materials covered in the previous four competency units. In addition, it refines evaluation skills as the final project is developed. The major task will be to carry out and write the research and evaluation component of the change project. Students will work from a basic evaluation question to collect supporting data and proceed through the final project.

HUS 655 Theory and Practice Integration Seminar (2 credits)

The field integration seminar focuses on the integration of the student's professional and pragmatic experience with relevant concepts drawn from the various academic seminars.

HUS 656 Constructive Action (2 credits)

The final Constructive Action seminar focuses on preparing the student to complete the final change project. Emphasis is placed on the final steps of the change process including evaluations and recommendations.



ORIGINAL: 2178

LINCOLN UNIVERSITY

RECEIVED
2001 MAR -8 AM 9:00
INDEPENDENT
REVIEW COMMISSION

February 28, 2001

Office of the President

Mr. Manuel J. Manolios, LSW, Chairman
Pennsylvania State Board of Social Workers,
Marriage and Family Therapists and Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Mr. Manolios:

As President of Lincoln University, I am pleased to be affiliated with an institution known globally for its history and excellent record of educating African Americans. Since 1977, Lincoln's Master of Human Services Graduate Study Program has produced graduates who have excelled and achieved eminence in the areas of mental health, family services, mental retardation, corrections, health and human sexuality, and bereavement. In all of these areas, Master of Human Services graduates have carried out helping interventions and engaged in-service delivery with individuals, groups, families and larger social systems, thereby demonstrating their professional competencies on the front line of practice.

It is encouraging to know that professional standards and qualities for licensure are being defined, and that appropriate measures will assure quality care for those consumers who must utilize family, mental health, and substance abuse services. However, it is of grave concern that the Human Services discipline was omitted as a Core Field and that family services, substance abuse and mental health professionals (Master of Human Services degree holders) may not be grandfathered under the Proposed Regulations of Act 136. For this reason, we implore the Licensure Board members to consider modification of the aforementioned Proposed Regulations.

We assume that one of the reasons for moving toward licensure in the state of Pennsylvania, is to ensure professional competence and rectitude throughout the State. The Lincoln University Master of Human Services Graduate Study Program is predicated upon the significance of professional competence. As a competency-based program, it inculcates professional skills, as well as a sound theoretical grasp of social science theories salient to all counseling and helping interventions. The program's curriculum includes courses in human development, sociology of human services, helping intervention personality theory, ethics of counseling and helping, community intervention, group dynamics and facilitation, supervision and research. Further, all degree candidates are required to complete a human service field practicum, which extends throughout the entire program and is supervised by

Mr. Manuel J. Manolios
February 28, 2001
Page 2

qualified professionals from social work, psychology and other social sciences. Lincoln University's Master of Human Services Graduate Study Program is in the process of extending its current curriculum to include additional courses in assessment and psychopathology, based upon increased needs and our commitment to academic excellence.

Over 1600 students have graduated from the Master of Human Services Graduate Study Program with a high proportion of those working as counselors in family services, substance abuse and mental health agencies throughout Pennsylvania. It is important to emphasize that these are not people who merely aspire to become counselors, but they are practitioners already working in the field who have established themselves as competent and astute professionals. Subsequently, these practitioners have already made an impact and have established significant helping relationships throughout the State.

Because of the recognized accomplishments of Lincoln's Master of Human Services Graduate Study Program and its graduates, I am petitioning the Licensure Board to carefully consider any decision that does not include Human Services as a Core Field. I am also asking the Licensure Board to revise the grandfathering provisions in order to deem Master of Human Service graduates eligible. We believe that it would be detrimental and disruptive to thousands of consumers if they were to be deprived of the expert counsel and care of our graduates by default, for lack of licensure. Moreover, a thorough review will reveal that the Master of Human Services curriculum has substantial social content. I am enclosing, for your information, Lincoln University's MHS Program Course Descriptions and the requested changes to Act 136 Proposed Regulations.

In view of the excellent reputation and sound curriculum of our Human Services Program and the proven professional contributions and achievements of our graduates, I petition the members of the Licensure Board to give highest consideration to our appeal and incorporate the necessary modifications to the Act 136 Proposed Regulations.

Very truly yours,



Ivory V. Nelson, Ph.D.
President

IVN/dmb
Enclosures

c: Dr. Szabi Ishtai-Zee, Director, Master of Human Services
Alumni Association of Lincoln University~Graduate Alumni Chapter
Mr. William Scott, President, Alumni Association of Lincoln University
✓ John R. McGinley, Jr., Esq.

PA Licensure State Board Members

1. Manuel J. Manolios, LSW, Chairman
Licensed Social Worker Member
Pittsburgh, (Allegheny County)
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Public Member
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Marriage and Family Therapy Member
Ridgeway (Elk County)
4. Michael J. DeStefano, LSW
Licensed Social Worker Member
Ridgeway (Elk County)
5. Frank R. Grady
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Licensed Social Worker Member
Mount Joy (Lancaster County)
7. Raymond W. Hoover
Professional Counselor Member
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Profession Counselor Member
New Castle (Lawrence County)
11. Dorothy Childress, Commissioner
Bureau of Professional and Occupational Affairs
Staff:
12. Jude Walsh, Esq.
Counsel
13. Mark Greenwald, Esq.
Prosecutor
14. Clara Flinchum
Administrator

ORIGINAL: 2178

SARA MOORE-HINES
NCC, MCAT, ADTR
PSYCHOTHERAPY SERVICES
Drexel Hill, Pa. 19063
610-626-3127

January 21, 2001

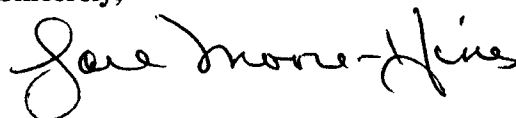
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pa. 17101

Dear IRCC,

Attached is a letter to Eva Cheney, Board Counsel for the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors. I have some strong concerns about changes that need to be made to the Professional Counselor Regulations.

Thank you for your consideration of this matter.

Sincerely,



Sara Moore-Hines, MCAT, ADTR, NCC
PCATA, Government Affairs Chair

RECEIVED
2001 APR 26 AM 10:04
INDEPENDENT REGULATORY
REVIEW COMMISSION
10

SARA MOORE-HINES
NCC, MCAT, ADTR
PSYCHOTHERAPY SERVICES
Drexel Hill, Pa. 19063
610-626-3127

RECEIVED
2001 APR 26 AM 10:04

REVIEW January 20, 2001

Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA. 17105-2649

Re: Proposed Licensure Regulations (16A-694)

Dear Attorney Cheney,

Thank you for the efforts you have made in developing the proposed Regulations for Professional Counselors. Your efforts seem to reflect the important intention to provide professional standards that will help: 1. Protect Pa. mental health consumers 2. Provide a way for consumers to receive more diverse, qualified services and 3. Facilitate opportunities whereby experienced practitioners can increasingly provide their qualified services.

As I write to you, I serve two roles: 1. As a counselor/therapist who has worked in the Delaware County community for almost 20 years, serving local mental health clients by combining traditional counseling/therapy approaches with approaches drawn from Dance/Movement Therapy, an advanced sub- specialty of the Creative Arts Therapies - a specialty of Professional Counseling. 2. Also, As the Government Affairs Chair of PCATA (Pa. Coalition of Arts Therapies Associations) – which represents Pa. Creative Arts Therapists.

I received my Masters degree in Creative Arts Therapy in 1978 from Hahnemann Medical College and Hospital, which has had an excellent Creative Arts Therapy program for about 20 years. Creative Arts Therapists have in-depth training in psychology, as well as specialty training on how to integrate the creative arts in the therapy process. As have my colleagues, I have worked as a therapist in several local mental health organizations over the years, helping many types of child and adult mental health clients with a variety of mental health problems - including those with schizophrenia, depression, anxiety, or childhood trauma (See enclosed resume). In my private practice, over time, I have gotten several calls from insurance providers, inviting me, because of my good reputation in the community as a mental health provider, to join their insurance provider panels. Naturally, I've been interested, but, inevitably, when I inform these providers that I am not yet "state licensed", they subsequently withdrew the invitation! As a result, many of my private practice clients (unless they are fairly wealthy) continue to be burdened with not having the option to be reimbursed by their insurance companies for my services, which they value. Some have had to attend therapy sessions less often; this is unfortunate. I referred others clients, after an initial phone intake, to licensed providers, through whom they could receive needed reimbursement in order to afford therapy.

I am excited for Pa. consumers as well as qualified mental health practitioners that the Professional Counselor regulations are being finalized; as you know, the process has been a 'long time coming'. I truly believe that this process, though arduous for us all, when complete, will contribute greatly to solidifying high mental health standards for Pennsylvania.

I do, however, have some deep concerns about some of the *Professional Counselor* Regulations, as they stand. I am particularly concerned about the following issues:

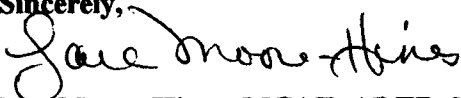
1. Reg.49.1: There are a very limited number of fields that are currently listed in the *proposed definition* of a "field closely related to the practice of professional counseling". This will exclude many well-qualified and experienced professional counselor specialties – such as the Creative

Arts Therapies - that meet all of the other licensure requirements. Please expand this list to include more degree titles – including the field of “Creative Arts Therapy (art therapy, dance/movement therapy, music therapy, and drama therapy), AND also please include a list of course work that would define a degree as being related to the practice of professional counseling. I concur with PACP (Pa. Alliance of Counseling Professionals) suggested language.

2. Reg. 49.15(4): This proposed experience requirement for ‘*grandparenting*’ is of great concern and seems unfair. This Reg. Requires that one’s qualifying practice consist of 15 hours per week including 10 hours of direct client contact; this unnecessarily denies licensure to many well-qualified, experienced practitioners (For examples, see Concerns and Suggestions of PACP). This requirement needs to be eliminated.
3. Reg. 49.2(9): Many counselor programs are unable to currently provide the *internship* requirements required herein. I agree with PACP’s recommended 5-year ‘*pipeline*’ suggestion, to allow programs some time to develop internship programs which meet this requirement.
4. Reg. 49.15(5)(iv)(C): Under this regulation, legitimate *continuing education* hours will be prohibited if they were not approved by this restrictive list of organizations. Please expand this list to include a greater variety of qualifying organizations that provide continuing education, including: AATA (American Art Therapy Association), ADTA (American Dance Therapy Association) and NADT (National Association of Drama Therapy). PACP’s Regulations’ Suggestion language is recommended.
5. Reg. 49.13(b)(5): *Group supervision* should be permitted.
6. Reg.49.13(b)(2) and 49.13(b)(4)(i): This requirement that the first 1800 hours of *supervised clinical experience* be supervised by a professional counselor is of concern, overly limiting, and should be eliminated. Also, it is not clear, prior to licensing, who would be regarded as a professional counselor; here, expanded language is needed which is more inclusive. Again, I recommend the language suggested by PACP that would, for instance, allow Creative Arts Therapists to be supervised by qualified, experienced professional Creative Arts Therapists. I support PACP’s idea to include a provision for a waiver of this requirement, both for professionals in rural areas of the state, as well as where supervision by professionals in related fields is the norm.

The Pennsylvania Alliance of Counseling Professionals has submitted comments that, in detail, address each of these Concerns and that provide well thought-out Suggestions for changes in the proposed regulations. *PCATA strongly concurs with PACP’s “Suggestions” language.* We urge you and the State Licensure Board to adopt PACP’s Suggestions. Thank you for your consideration of this important matter.

Sincerely,



Sara Moore-Hines, MCAT, ADTR, NCC
PCATA –Government Affairs Chair

3 Attachments

cc: IRCC

Senate/House Licensure Committees

Senator Ted Erickson/ Rep.Nicholas Micozzie

Sara Moore-Hines, NCC, MCAT, ADTR

320 Riverview Avenue, Drexel Hill, Pennsylvania 19026

Telephone: 610 626-3127

OCCUPATION: PSYCHOTHERAPIST and CONSULTANT

EXPERIENCE: **Private Practice** – Media and Drexel Hill, Pa. – 1981 – Present

Conducts and Integrates Verbal Therapy and Movement Psychotherapy for Individuals and couples. Assessments/Consultations. Specialties include: Women's Issues; Trauma Issues, including Sexual Abuse; Eating Disorders; Depression; Anxiety.

The Belmont Center - Philadelphia, Pa.- 1998 – 10/00. Psychotherapist on Eating Disorders Unit, specializing in leading Survivors' Groups and Movement Therapy Groups. Supervises graduate students.

Family Support Line – Media, Pennsylvania – 1997-1999. Agency which specializes in treating Survivors of Sexual Abuse. Group Psychotherapist and Consultant. Supervised Graduate Students. On-going member of FSL 'Therapy Network' to receive Referrals For Therapy as well as Co-Parenting.

Women Against Rape – Delaware County, Pennsylvania – 1981 – 1988

Psychotherapist: Provided therapy for individuals, couples, and groups. Clinical Supervisor: Trained and Supervised all counselors. Public speaking regarding sexual abuse. Co-ordinator: Crisis Intervention. Developed, evaluated, and implemented client treatment plans. Provided direct service to victims of sexual assault and to significant others. Victim advocacy. Case Consultations. Ran Incest Survivors Program, including all Survivors' Groups, and Mothers of Incest Survivors' Groups. Assisted in training programs for volunteers; Agency representative to Children and Youth Services' Multi-disciplinary Team.

Northwest Community Mental Health Center – Philadelphia, Pennsylvania – 1978-1981
Verbal and Movement Therapist for Partial Hospital Day Program – Treated approximately 120 clients per week in large groups and individual therapy. Age range: 17-87. On-going team treatment responsibilities with verbal therapists and creative arts therapists. Supervised Hahnemann graduate students.

Crum Creek Guidance Center – Newtown Square, Pennsylvania – 1978 –1981
Verbal and Movement Therapist; Consultant. Treated Individuals/Families.

Devereux Foundation – Devon, Pennsylvania – 1977 – 1978

Summer work while attending Graduate school at Hahnemann Medical College & Hospital. Movement Therapy and Recreational Therapy with adolescents who had emotional disturbances and Borderline to normal IQ.

Board of Education – Philadelphia, Pennsylvania – 1973 – 1976

Teacher – Social Studies and History – Junior and Senior High School levels. Human Relations organizer for staff and students; coordinated with Bd. of Ed. Office of Community Affairs.

Self-Employed - Philadelphia / Lehigh Valley, Pennsylvania – 1972 - 1973

Manager: Retail franchise; 8 employees

EXPERT

TESTIMONY: *Testimony* – Pa. Senate Judiciary Committee, regarding the ‘Negative Effects of Pornography’ in Communities. 1996
Testimony – Pa. Senate Subcommittee on Licensure and Consumer Protection, regarding Mental Health Professionals Act – 1995. This Licensure Act 136 passed in 12/98, setting Professional Licensure Qualifications’ Standards for Professional Counselors and eligible specialties - including the specialty of Creative Arts Therapies. State Licensure applications will be available most probably in 2001, after Regulations are passed .
Testimony – Expert Witness: In areas of Psychotherapy and Sexual Abuse – Delaware County Courts – Delaware County, Pa. 1990 – Present
Testimony - United States Attorney General’s Task Force on Domestic Violence: Issue addressed: Incest: Dynamics and Treatment. 1985

PROFESSIONAL

AFFILIATIONS: **Pennsylvania Alliance of Counseling Professionals (PACP)** – Board Member representing Pa. Coalition of Arts Therapies Associations (PCATA) regarding State Legislative and Licensure issues. 1995 – Present

Pennsylvania Coalition of Arts Therapies Associations (PCATA) – Former Chair (1995 – 2000). Government Affairs Chair (GAC) and Consultant to Chair (2000-Present)

American Dance Therapy Association (ADTA) - Columbia, Maryland. Professional Member Since 1978. Government Affairs Committee Member, 1998 - Present

REFERENCES: Upon Request

National Coalition of Arts Therapies Associations (NCATA)

The National Coalition of Arts Therapies Associations (NCATA), founded in 1979, is an alliance of professional associations dedicated to the advancement of the arts as therapeutic modalities.

NCATA represents over 8000 individual members of six creative arts therapies associations. The organizations belonging to NCATA are:

- The American Art Therapy Association
- The American Association for Music Therapy
- The American Dance Therapy Association
- The American Society for Group Psychotherapy & Psychodrama
- The National Association for Drama Therapy
- The National Association for Poetry Therapy

The creative arts therapies include art therapy, dance/movement therapy, drama therapy, music therapy, psychodrama, and poetry therapy. These therapies use arts modalities and creative processes during intentional intervention in therapeutic, rehabilitative, community, or educational settings to foster health, communication, and expression; promote the integration of physical, emotional, cognitive, and social functioning; enhance self-awareness; and facilitate change.

Each member association has established professional training standards including an approval and monitoring process, a code of ethics and standards of clinical practice, and a credentialing process. Annual conferences, journals, and newsletters for each association foster professional development, as well as educate the public and allied professionals about each discipline.

Although unique and distinct from one another, the creative arts therapies share related processes and goals. Participation in all the creative arts therapies provides people with special needs ways to express themselves that may not be possible through more traditional therapies.

For over 50 years, art, dance/movement, drama, music, poetry therapists, and psychodramatists have provided meaningful therapeutic opportunities for people of all ages in a wide variety of treatment settings and schools.

**For further information contact:
NCATA
2000 Century Plaza, Suite 108
Columbia, MD 21044
410/997-4040**

CLINICAL SUPERVISOR: 1978 -Present - has Supervised Graduate Students from a variety of clinical programs in the Philadelphia and Delaware County areas.

EDUCATION: **Hahnemann Medical College and Hospital – The Graduate School – Phila., Pa. - 1976 –1978**
Completed *Master's Degree in Creative Arts Therapy*; Advanced Specialty: Dance/Movement Therapy. Extensive Clinical Internship Training (See 'Internships' below). *Curriculum* included: Psychological Theories; Psychopathology; Developmental Psychology; Family Therapy; Child Psychiatry; Diagnosis; Group Dynamics; Adult and Child Supervision; Movement Observation and Analytic techniques; Developmental Body Movement; Case Presentation; Anatomy; other Psychology and Research-related courses. Thesis requirement.

Swarthmore College – Swarthmore, Pa. – Graduated 1972. B.A. in Sociology with Teaching Certificate in Secondary Education.

International School (Ecole Internationale de Geneve) – Geneva, Switzerland - Graduated 1967
High School Diploma, as well as with International Baccalaureate advanced degree credits.

CLINICAL

INTERNSHIPS: **Friends Hospital – Philadelphia, Pa. – 10/77 – 6/78**
Short-term, private, psychiatric hospital. Movement Therapy Intern working with adult and adolescent patients, with varying diagnoses. Conducted in-service trainings and research presentations.

Philadelphia Geriatrics Center – Philadelphia, Pa. 1/77 – 6/77

Developmental Center for Autistic Children – Philadelphia, Pa. 9/76 – 12/76

Spring Garden Street Mental Health Clinic – Philadelphia, Pa. 9/76 – 12/76

PROFESSIONAL

CREDITS: **M.C.A.T. – Masters in Creative Arts Therapy from Hahnemann Medical College & Hospital - The Graduate School - Philadelphia, Pa. 1978**
D.T.R. – Dance/Movement Therapist Registered (Registry through ADTA: American Dance Therapy Association - Columbia, Maryland). 1983
A.D.T.R. – Academy of Dance Therapists Registered – highest level of Registry with the ADTA . This credential approves private practice work in the U.S. and internationally. 1984
N.C.C. – National Certified Counselor - Received from the National Board for Certified Counselors (N.B.C.C.). (Note ADTA and NBCC have affiliated to develop an advanced Board Certification Exam exclusively for ADTRs as an advanced specialty of Professional Counseling).

Teaching Certificates: Certificat de Nancy – French Teaching Certificate – 1965
Secondary Education Teaching Certificate (U.S.A.) – 1972

RESEARCH: **Clinical Research – Friends Hospital – Research clarified how personality traits in clients are revealed in Movement Profiles, based on advanced movement observation techniques. This research confirmed and expanded prior research done in England by M. North. Thesis Research while attending Hahnemann Medical College and Hospital – 1978.**

SPECIALIZED TRAINING:

Sexual Abuse Assessment and Intervention Strategies - This therapist has studied with Suzanne M. Sgroi, Ann W. Burgess, and A. Nicholas Groth, as well as having done in-depth reading of these Experts' writings in the field of sexual abuse – 1981-1988
Kestenberg Movement Profile Training – 'KMP' is an advanced, formalized system of Movement notation and analysis, used to code and interpret nonverbal/movement behavior and for psychological assessment - developed by Dr. Judith Kestenberg - 2000
Family Dance/Movement Therapy – Advanced use of movement for Family Therapy purposes- 1993 and 2001.

2001 APR 26 AM 13:20

REVIEW COMMISSION

Kathryn M. King
306 Cantrell Street
Philadelphia, PA 19148
215-755-7373
Zetella@yahoo.com

RECEIVED

APR 23 2001

EPOR LEGAL COUNSEL

April 15, 2001

Ms. Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors
116 Pine Street / P.O. Box 2639
Harrisburg, PA 17105-2649

Dear Ms. Cheney,

Thank you for the efforts that the State Board has made in developing the proposed Regulations for Professional Counselors. These efforts reflect an intention to provide professional standards in order to protect PA mental health consumers; provide a way for consumers to receive more diverse services; and to facilitate opportunities through which qualified, experienced practitioners can increasingly provide their services.

My professional specialty is in the Creative Arts Therapies, with an advanced sub-specialty in Art Therapy. I am graduating in May, 2001 and have had internships in a homeless shelter, medically monitored inpatient substance abuse treatment center, an intensive outpatient program and methadone program through Thomas Jefferson University. I have also worked as a teacher in the Philadelphia School System and a volunteer counselor for the Salvation Army for 5 years.

Despite the excellent work done by you and the Licensure Board, I have some sincere concerns about the provision of the proposed regulations. I concur with the views expressed by the Pennsylvania Alliance of Counseling Professions (PAPC), regarding the proposed Regulations in the form of 'Concerns' and 'Suggestions' closely reflects my own concerns and recommendations.

In particular, the Regulation provisions which are of concern to me with suggested changes are as follows:

Regulation #49.1 I concur with the PACP's view that 'Creative Arts Therapies - including Art Therapy, Dance/Movement Therapy, Music Therapy, and Drama Therapy should be listed in the PC Definition section as a 'Field closely related to the practice of professional counseling'".

Regulation #49.13 It is my opinion that this PC Regulations sections is too restrictive re: Supervision requirements. Further I support PAC's positive that in sub-section 49.15(5)(C) the "American Dance Therapy Association (ADTA) needs to be added to the list of organizations that approve de hours.

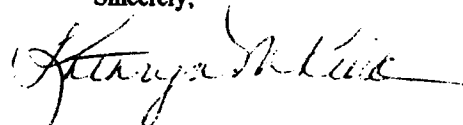
Regulation #49.15 The grandparenting section should no require restrictive direct client hours. Hourly requirements should be limited to 'practice hours' only.' "

Regulation 16A-674 - Rather than defin as 'a field closely related to professional counseling'. I encourage instead ' a masters degree in a field closely related to the practice of professional counseling.'

Regulation 15(5)(iv)(C) Instead 'any course approved by NBCC, CRC, CBMT, or AATA, ADTA, NADT, or which is related to the practice of professional counseling and which does not include a course in office management or practice building.

Thank you in advance for your consideration in this matter.

Sincerely,



Dear Ms. Cheney,

I am writing regarding the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. I am a concerned resident of the Commonwealth of Pennsylvania and a Baccalaureate level Certified Addiction Counselor. The Bill aforementioned raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations as they are written fail to recognize Master's level addiction specialists who represent, by far, the largest speciality treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International certification & Reciprocity Consortium (IC&RC).

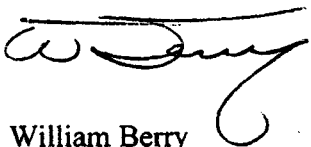
These regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American university. The vast majority of individuals holding this Master's degree are working with minority populations in our state's urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth and may directly and indirectly impact the provision of services to minorities.

I am strongly advocating for inclusion within the regulations of the following:

- ◆ Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- ◆ Inclusion under the grandparenting regulations of the IC&RC national exam for the addiction counselor as an acceptable exam.
- ◆ Inclusion under the grandparenting regulations of individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

I appreciate your attention to these important matters and strongly urge your support as a means of assuring that the citizens of our Commonwealth are provided counseling services that serve our diverse communities.

Sincerely,



William Berry
1370 Knorr St. Phila. PA. 19111
(215) 745-7381
cc: PCB Board

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

10

PROCESSED BY FAX

APR 23 93 11 10 2001

11 11 11

ORIGINAL: 2178

Independent Regulatory Review Committee
c/o John R. McGinley, Jr., Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101
Reference: # 16A-694

RECEIVED

2001 APR 23 AM 11:33

INDEPENDENT REGULATORY
REVIEW COMMISSION



Dear Review Committee;

I am a citizen of the Commonwealth of Pennsylvania. I am writing this letter expressing concerns with the Act 136 Law for Professional Counselors. It was brought to my attention that persons' in possession of a Human Services Master's Degree were excluded from being grandfathered under the regulations that were recently published. As a consumer receiving treatment from professionals with this degree, I am urging you to reconsider MHS graduates to be eligible to participate for the Professional Counselor License.

I advocate for the MHS degree and petition the members of the Licensure Board to highly consider changes to Act 136 Proposed Regulations, so MHS will not be excluded and I will not be deprived of the counsel and care given by professionals with the MHS degree.

Sincerely,

Miriam Rosario
2541 N. Marshall Street
Philadelphia, PA. 19133

DONALD LeLAND
427 WEST WINONA STREET
PHILADELPHIA, PA 19144

2001 APR 26 11:10:30

REVIEW COMMISSION

April 6, 2001

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Ms. Eva Cheney, Counsel
State Board of Social Workers, Marriage
& Family Therapists, & Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105

Dear Ms. Cheney:

As a practicing psychotherapist and resident of this Commonwealth, I am writing to express my deepest concern regarding the current regulations as denoted in Act 136, the Professional Counselor Licensing Bill.

This Bill, without question, raises serious concerns for the health and welfare of Pennsylvania residents with addictive disorders who will be seeking professional counseling services subsequent to this Bill being fully enacted. In its present form, the Bill's regulations present fundamental issues with respect to the grandparenting process, and furthermore, are exclusionary with respect to Master's level Certified Addiction Counselors (CACs). The current regulations fail to recognize Master's level CACs who represent, by far, the largest speciality group of treatment professionals in the State. These professionals, who have successfully passed a national examination, are not deemed qualified, yet professionals who counsel other, significantly smaller populations (e.g., art, movement, music, etc.) are deemed acceptable. This makes no common or clinical sense, and will undoubtedly seriously and negatively impact the delivery of addiction services.

In addition, the regulations in their current form are clearly discriminatory. At present the regulations clearly exclude Lincoln University Master of Human Service graduates from eligibility. The vast majority of these graduates are African American and Latino. Exclusion of these professionals would cause undo harm to minority consumers of counseling services. Additionally, exclusion of MHS graduates would seriously impact the accessibility of culturally similar counseling services for a group of consumers who are already experiencing this problem.

I would strongly suggest you consider amending the regulations to include:

1. Inclusion of the Addictions ICRC examination as an acceptable examination for licensing

2. Inclusion of the Master's level Certified Addiction Counselor (CAC) as an acceptable degree and certification for licensure eligibility.
3. Inclusion of the Lincoln University Master's in Human Services (MHS) degree as an acceptable degree for license eligibility.

I sincerely urge you to consider these changes, due to the significant harm residents of this Commonwealth would be exposed to should you choose to adopt the regulations in their current form.

Sincerely,

A handwritten signature in black ink that reads "Donald LeLand". The signature is written in a cursive style with a long horizontal flourish extending to the right.

DONALD LeLAND
427 WEST WINONA STREET
PHILADELPHIA, PA 19144

RECEIVED
MARCH 30 11:05 AM
REVIEW COMMISSION

THOMAS SMITH
507 North 7th Avenue
Royersford, PA 19468

RECEIVED
APR 20 2001
BPOA LEGAL COUNSEL

April 6, 2001

Ms. Eva Cheney, Counsel
State Board of Social Workers, Marriage
& Family Therapists, & Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105

RE: #16A-694

Dear Ms. Cheney:

As a resident of this Commonwealth, I am writing to express my deepest concern regarding the current regulations as denoted in Act 136, the Professional Counselor Licensing Bill.

This Bill, without question, raises serious concerns for the health and welfare of Pennsylvania residents with addictive disorders who will be seeking professional counseling services subsequent to this Bill being fully enacted. In its present form, the Bill's regulations present fundamental issues with respect to the grandparenting process, and furthermore, are exclusionary with respect to Master's level Certified Addiction Counselors (CACs). The current regulations fail to recognize Master's level CACs who represent, by far, the largest speciality group of treatment professionals in the State. These professionals, who have successfully passed a national examination, are not deemed qualified, yet professionals who counsel other, significantly smaller populations (e.g., art, movement, music, etc.) are deemed acceptable. This makes no common or clinical sense, and will undoubtedly seriously and negatively impact the delivery of addiction services.

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I would strongly suggest you consider amending the regulations to include:

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2. Inclusion of the Master's level Certified Addiction Counselor (CAC) as an acceptable degree and certification for licensure eligibility.
3. Inclusion of the Lincoln University Master's in Human Services (MHS) degree as an acceptable degree for license eligibility.

My personal experience with other, non-certified professionals, has clearly shown that CACs are, by far, the most competent professionals to treat those who suffer from chemical dependency. Allowing other, less, or in some cases, even non-qualified professionals treat such a complex disorder is, without doubt, clinically inappropriate and places these individuals at unnecessary risk of harm.

In the best interest of the recovering citizens of this state, I sincerely urge you to consider the changes I have outlined in my letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Smith", with a long horizontal flourish extending to the right.

TOM SMITH
507 North 7th Avenue
Royersford, PA 19468
610-792-0178

IRRC: #2178

Agency: Workers, Marriage & Family Therapist &
Professional Counselors

Title: Licensure

(Form D)		
NAME	ADDRESS	DATE of CORRESPONDENCE
Daniel Grieb	Room 403 Court House Bellefonte, PA 16823	April 17, 2001
Ravi Ganeshan	175 Stratford Avenue, Suite 1 Wayne, PA 19087	April 13, 2001
Joseph Robinson	122 Ebelhare Road Pottstown, PA 19464	April 12, 2001
Deiveche Brewington	2332 Cross Street Philadelphia, PA 19146	April 6, 2001
Julia Costello	14 Saw Birch Circle Horsham PA 19044	April 9, 2001
Kesha Bond	1600 W. Godfrey Avenue, 2 nd Floor Philadelphia, PA 19141	April 6, 2001
John J. Beirne III	100 Roboda Blvd. Royersford, PA 19468	April 13, 2001
Gerald Poole	5760 North 5 th Street Philadelphia, PA 19120 215-924-0790	April 13, 2001
Kristie Knight	736 Beech Street Pottstown, PA 19464 610-705-9240	April 12, 2001
Doug Jones	229 Goshen Road Schwenksville, PA 19473	April 12, 2001
Portia Celeste Ashmeade	7650 Sherwood Road Philadelphia, PA 19151	April 13, 2001
Paul Perkins	624 New Street Spring City, PA 19475 610-792-0686	April 13, 2001
Latasha Ray	1539 N. 55 th Street Philadelphia, PA 19131	April 6, 2001
Ms. Ruth Bennett	5737 Walton Street Philadelphia, PA 19143	April 13, 2001
Rebecca Ramos	320 East Ashdale Street Philadelphia, PA 19120	April 13, 2001
Colletta Robinson	122 Ebelhare Road Pottstown, PA 19464	April 12, 2001
Don Otto	116 Hess Road Collegeville, PA 19426	April 12, 2001
Mr. Charles Gill	711 West Bridge Street, Apt A34 Phoenixville, PA 19460	April 12, 2001
	161 Hall Street	April 12, 2001

Tracey Palmen	Spring City, PA 19475	
George Steiner	P.O. Box 338 Eagleville, PA 19408	April 13, 2001
Mary Lu Ramos	507 West 67 th Avenue Philadelphia, PA 19126	April 13, 2001
Sue Bender	318 Griffin Road Phoenixville, PA 19460	April 13, 2001
Al Miles	5643 Larchwood Avenue Philadelphia	April 11, 2001
Patricia Wilson	1322 South Wilton Street Philadelphia, PA 19143	April 12, 2001
Bon Walsh	PO Box 14934 Philadelphia, PA 19149	April 17, 2001
Sharon Taylor	199 N. Main Street Washington, PA 15301	April 11, 2001
Cynthia Cardenas	2206 Tyson Avenue Philadelphia, PA 19149	April 12, 2001
Paul Bennett	5737 Walton Street Philadelphia, PA 19143	April 13, 2001
Theresa Dawson	11003 Lindsay Street Philadelphia, PA 19116	April 16, 2001
Donna Rheem	25 Miller Avenue Doylestown, PA 18901	April 12, 2001
Lloyd Woodward	907 West Street Pittsburgh, PA 15221 412-247-6364	April 11, 2001
Howard Morton	5720 Wissahickon Ave E-18 Philadelphia, PA 19103	April 17, 2001
Elizabeth Ann Jackson	PO Box 65213 Philadelphia, PA 19155	April 16, 2001
Diane Grant	1773 S. Avondale Street Philadelphia, PA 19142	April 11, 2001
Cora Sotingco	5202 North Howard Street Philadelphia, PA 19120	April 6, 2001
Tonya Saville	194 Abbey Drive Royersford PA 19468	April 6, 2001
Joseph Reyes	979 Anchor Street Philadelphia, PA 19124	April 6, 2001
Edmond Rozew	615 West Coal Street Shenandoah, PA 17976	April 6, 2001
Mr. Fernando Dacanay	3720 Rosemont Avenue Drexel Hill, PA 19026	April 6, 2001
William Rosew	328 W. Lloyd Street Shenandoah, PA 17976	April 6, 2001
Patricia Hanlon	200 East Coal Street Shenandoah, PA 17976	April 6, 2001
Margot Ramos	507 West 67 th Avenue Philadelphia, PA 19126	April 6, 2001
Nadine Deshazor	7650 Sherwood Road Philadelphia, PA 19151	April 6, 2001
Christine Cucchiaro	444 North Main Street, Telford, PA 18969	April 6, 2001

Takisa Edmondson	5824 Lebanon Avenue Philadelphia, PA 19131	April 6, 2001
Deborah Council	4240 N. 6 th Street Philadelphia, PA 19140	April 19, 2001
Linda Montgomery	948 Brill Street Philadelphia, PA 19124	April 19, 2001
Ms. Lita Manguba	1992 Merlin Road Philadelphia, PA 19116	April 6, 2001
Rafael Bermudez	2527 E. Ann Street Philadelphia, PA 19134	April 12, 2001
Jose A. Rendi	304 South 10 th Street, Apt. D Philadelphia, PA 19107	April 11, 2001
Dominic Eckley	2049 W. Market Street Pottsville, PA 17901	April 13, 2001
Margie Weber		
Caprice Cropper	3123 N. 35 th Street Philadelphia, PA 19132	April 13, 2001
Tom Brighter	15 Flower Lane Levittown, PA 19055	April 19, 2001
Tania Zerbe	1 Richland Lane Camp Hill, PA 17011	April 13, 2001
Michael Worthington	1292 Telegraph Road West Chester, PA 19380	April 12, 2001
Kathleen Pisani	426 Second Avenue, Apt. C Tarentum, PA 15084	April 19, 2001
Stephen Minick	4315 Longview Avenue Erie, PA 16510	April 19, 2001
Stephen Vajda	York County Juvenile Probation 100 W. Market Street, York, PA 17401	April 19, 2001
Isaac Goldman	102 Hampden Road Upper Darby, PA 19082	April 19, 2001
Margarita Graber	1504 McKinley Street Philadelphia, PA 19149	April 19, 2001
Maryanne Bosio	3408 Saw Mill Road Newtown Square, PA 19073	April 19, 2001
Laurie Hague	725 Wayne Avenue West Reading, PA 19611	April 19, 2001
Jeff Nartowicz	725 Rostravir Street, Apt. B Monissin, PA 15062	April 19, 2001
Don Barn	340 N. 12 th Street, #303 Philadelphia, PA 19107, 215-629-3839	April 19, 2001
Ken Porter	315 S. Wayne Street Orwigsburg, PA 17961	April 19, 2001
Melvin Iartor		
Ashley Lyons-Valenti		
Gloria Beasley	1839 Plymouth Street Philadelphia, PA 19126	April 6, 2001
Cheryl Wells	2820 N. Taylor Street Philadelphia, PA 19132, 215-288-0312	April 6, 2001
Lyzabeth Santiago	4634 N. Shelbourne Street Philadelphia, PA 19124, 215-743-2709	April 6, 2001

Alicia Reid	1616 West 67 th Avenue Philadelphia, PA 19126	April 6, 2001
Selena D. DeShazor	7650 Sherwood Road Philadelphia, PA 19151	April 6, 2001
Cheryl H. Litzke	306 Lakeside ofc Southampton, PA 18966	April 20, 2001
Sharon Melendez	105 Muirfield Road Royersford, PA 19468	April 6, 2001
Patricia Conrad	7 Shannon Way Royersford, PA 19468	April 8, 2001
Thomas Smith	507 North 7 th Avenue Royersford, PA 19468	April 6, 2001
Beth Smith	507 North 7 th Avenue Royersford, PA 19468	April 6, 2001
Betty Weeks	1002 Horseshoe Drive Royersford, PA 19468	April 8, 2001
Paul Weeks	1002 Horseshoe Drive Royersford, PA 19468	April 8, 2001
Skip Voluntad	543 East Locust Avenue Philadelphia, PA 19144	April 13, 2001
Vannette Voluntad	543 East Locust Avenue Philadelphia, PA 19144	April 13, 2001

04-18-01

State Board Of Social Workers;

Dear Eva Cheney;

I am writing you as a concerned resident of the Commonwealth of Pennsylvania and as a Certified Addiction Counselor. I have a serious concern for the health and well being of substance abusers seeking or needing counseling services because of the Professional Counselor Licensing Bill. The basis problems with the regulations involve the grand parenting issues and that they are non-statutory in nature. The Master's level addiction specialist represent the largest specialty treatment population in Pennsylvania and yet is not recognized by the regulations. Most of all the regulations doesn't recognize Certified Addiction Counselors with a Master's degree. These counselors have earned their credentials under tough guidelines placed by the International Certification and Reciprocity Consortium.

Minority populations such as individuals with Master Degrees in Human Services as offered by an African American University such as Lincoln University are very much discriminated against by the regulations. Most of the people with this Master's degree are working with minority populations in urban treatment centers. Excluding this degree from the grand parenting regulations will greatly affect and hinder the counseling services to minorities within Pennsylvania such as the racial, ethnic and culturally sensitive.

I strongly advocate that the regulations include the following:

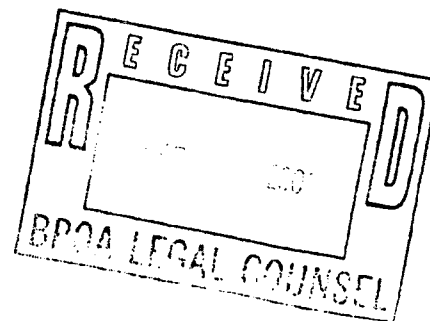
- * Inclusion under the grand parenting regulations of people with the Master's Degree in Human Services provided by Lincoln University etc.
- * Inclusion under the grand parenting regulations of individuals with a Master's Degree and Certification as a Addiction Counselor (CAC).
- * Inclusion under the grand parenting regulations of the IC & RC national exam for addiction counselors as an acceptable exam.

I sincerely appreciate your consideration in this matter to help assure the delivery of quality counseling services to our diverse communities in the Commonwealth of Pennsylvania.

Sincerely,



Marvin H. Anderson
343 Omega Street
Pittsburgh, Pa 15206
(412) 361-3428
cc: PCB Board



RECEIVED
MAY 27 11:03 AM '01
COMMUNICATIONS

State Board of Social Workers,
Marriage & Family Therapists, & Professional Counselors
C/O Eva Cheney, Counsel
116 Pine St., PO Box 2649
Harrisburg, PA 17105
Ref. # 16A-694

Dear Ms. Cheney,

I am writing this letter as a family member of a Certified Addictions Counselor, Diplomate, and also as a concerned citizen of the Commonwealth of Pennsylvania. I am appalled that Act 136 does not recognize counselors with a Master's degree, especially the Master's degree offered by Lincoln University in Human Services. This program is modeled after a program offered by Harvard University. It appears to me, that this oversight could be perceived as discriminatory.

My family member has actively worked as an Addiction Counselor for eight years and has dedicated herself to providing quality care in a culturally sensitive manner to minority populations. She has continually educated herself and set a goal towards licensure. It would indeed be a travesty to not permit her to obtain licensure in order to continue to provide this needed service to our community.

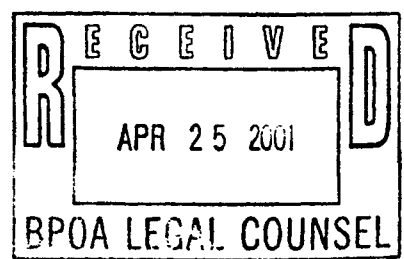
I strongly advise for the inclusion within the regulations of the following:

- ✓ Under the grandparenting regulations, to include individuals with a Master's degree and Certification as an Addiction Counselor (CAC).
- ✓ Under the grandparenting regulations to include the International Certification & Reciprocity Consortium (IC&RC) national exam as an acceptable exam.
- ✓ Under the grandparenting regulations to include the individuals who possess the Master's Degree in Human Services, as provided by Lincoln University.

Your urgent consideration in this matter is appreciated. These considerations are necessary in order to continue to provide counseling services to the diverse communities of the Commonwealth.

Sincerely, *Aida E. Seda*
1957 N. 4 St.
Riverside, Pa. 19122

cc: PCB Board



IRRC: #2178

Agency: Workers, Marriage & Family Therapist &
Professional Counselors

Title: Licensure

(Form E)

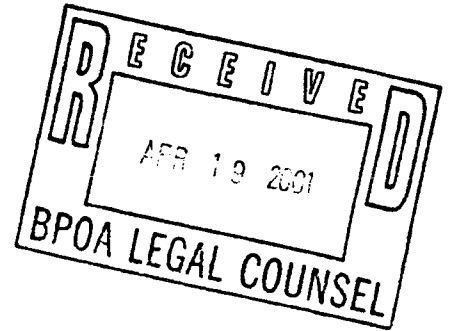
NAME	ADDRESS	DATE of CORRESPONDENCE
Vance Anderson III	5849 Ashland Avenue Philadelphia, PA 19143, 215-471-6846	April 23, 2001
Daniel Bermudez	2527 E. Ann Street Philadelphia, PA 19134	April 23, 2001
Myila Cebollero	724 E. Westmoreland Street Philadelphia, PA 19134	April 23, 2001
Marlow Barksdale	724 E. Westmoreland Street Philadelphia, PA 19134	April 23, 2001
Aida E. Seda	1957 N. 4 th Street Philadelphia, PA 19122	April 25, 2001
Hiriam Rivera, Jr.	3559 Tulip Street Philadelphia, PA 19134	April 25, 2001
Toni Anderson	5849 Ashland Ave Philadelphia, PA 19143	April 25, 2001
Theresa L. Holland	139 E. Albanus Street Philadelphia, PA 19120	April 25, 2001
Anastasia Rivera	3559 Tulip Street Philadelphia, PA 19134	April 25, 2001
Gilberto Chalberry	1949 N. Manchester Philadelphia, PA 19122	April 25, 2001
Alfredo Seda	1957 N. 4 th Street Philadelphia, PA 19122, 425-2196	April 25, 2001
Leanna Cuevas	1803 Mutter Street Philadelphia, PA 19122, 215-203-8433	April 25, 2001
Aida Cebollero	1949 N. Mascher Street Philadelphia, PA 19122	April 25, 2001
Lourdes Seda	1803 N. Mutter Street Philadelphia, PA, 215-203-8433	April 25, 2001

ORIGINAL: 2178



MORAVIAN COLLEGE

April 17, 2001



**Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and
Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649**

RE: reference number 16A-964

Dear Ms. Cheney:

The purpose of this letter is to ask for your help in correcting an unfortunate situation that could result from the proposed regulations for Licensure of Professional Counselors published by your Board in the March 24, 2001 issue of the Pennsylvania Bulletin. If enacted as currently written, these regulations would seem to exclude from licensure the current students and graduates of our Master of Arts in Pastoral Counseling (MAPC) degree program at Moravian College and Theological Seminary in Bethlehem, PA.

Since 1980, our school has been offering this degree, which is accredited by the Association of Theological Schools in the United States and Canada and by the Commission on Higher Education of the Middle States Association of Colleges and Schools. Our degree is thus recognized by the Council for Higher Education as called for in the regulations. The Moravian Theological Seminary Board of Trustees has also approved, as a highest priority goal, our achievement of accreditation for the MAPC degree by the Council for the Accreditation of Counseling and Related Programs (CACREP) by the year 2005.

Since our MAPC degree will meet these two major criteria for recognition of a professional counseling degree program as stated in the Board's regulations, I respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.1 of the proposed regulations be amended to include all degrees which meet the state's standards for professional counselor education. I therefore concur with the suggested amendment proposed by the Pennsylvania Alliance of Counseling Professionals, which reads as follows:

Master's degree in a field closely related to the practice of professional counseling--Includes either:

(a) degrees in the fields of creative arts therapy (art therapy, dance therapy, dance/movement therapy, drama therapy, music therapy), psychodrama, social work, clinical psychology, educational psychology, counseling psychology, child development and family studies, or;

(b) any degree in any applied behavioral science that includes a supervised clinical experience (such as practicum or internship) and that includes at least a two semester hour or 3 quarter hour course in any five (5) of the following areas:

1. Human growth and development--studies that provide an understanding of the nature and needs of individual at all developmental stages.

2. Social and cultural foundations--studies that provide an understanding of issues and trends in a multicultural and diverse society.

3. Helping relationships--studies that provide an understanding of counseling and consultation processes.

4. Group work--studies that provide an understanding of group development, dynamics, counseling theories, group counseling methods and skills and other group approaches.

5. Career and lifestyle development--studies that provide an understanding of career development and related life factors.

6. Appraisal--studies that provide an understanding of individual and

group approaches to assessment and evaluation.

7. Research and program evaluation-- studies that provide an understanding of types of research methods, basic statistics, and ethical and legal considerations in research.

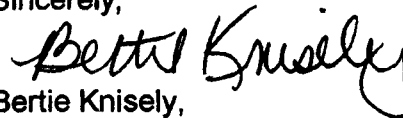
8. Professional orientation--studies that provide an understanding of all aspects of professional functioning including history, roles, organizational structures, ethics, standards and credentialing.

This amendment would allow our students and graduates, as well as many other graduates from a variety of duly accredited counseling related degree programs, to function within the standards and guidelines intended by your board and to receive appropriate recognition as professional counselors.

Along these lines, I also concur with, and fully support, the other suggested amendments to the regulations regarding grandparenting, supervision requirements, internships, and continuing education that were recently sent to your Board by the Pennsylvania Alliance of Counseling Professionals.

I share the Board's concern for consumer protection and a guaranteed standard for professional counselors, and I applaud the excellent work your Board has already done in preparing these regulations in a relatively short period of time. I sincerely hope that you will give every possible consideration to these proposed amendments at your next meeting of the Board. If you have further questions, do not hesitate to call me at _____ or contact me by e-mail at _____.

Sincerely,



Bertie Knisely,
Director Alumni Relations

Cc: Independent Regulatory Review Commission [333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101]

Sen. Clarence Bell, Chairman, Senate Consumer Protection and Professional Licensure Committee

Sen. Charles Dent, Vice Chairman, Senate Consumer Protection and Professional Licensure Committee

Sen. Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee

Rep. Julie Harhart, House Professional Licensure Committee

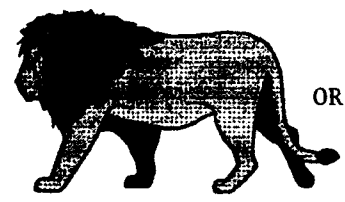
Rep. Richard Grucela, District 137

Rep. T. J. Rooney, District 133

RECEIVED

APR 16 11 04 AM '01

REVIEW COMMITTEE



ORIGINAL: 2178

1523-25 West Erie Ave.
PO Box 38127
Philadelphia, PA 19140

America BEATS Addictions
A subsidiary of AB-Associates, Inc.

President/Director:
Patrick O.J. Anyanwu

April 4, 2001

Attorney:
Obra S. Kornodel, III

Dear Ms. Eva Cheney:

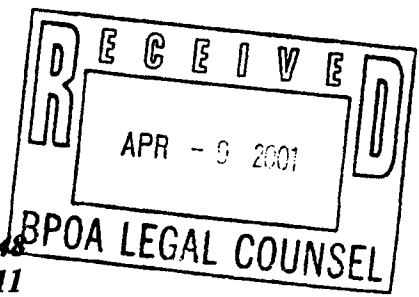
Executive Director
C. Anyanwu, CEO

Directors
Carmita Johnson
Cheryl Hall
Fr. McGowen, CSSP
Diane Moxley
Mary M. Suttles
Antonette Ziegler
Vernard Johnson
Veronica Joyner
Arthur Gordon, MD.
Natona Brown
Lamont E. Purnell
Ira S. Davis

Advisory Board
Gwen Winfrey
E.E. Chukwueke
Kate M. Chukwueke
Catalina Rosado

I am writing to you as a Pennsylvania Certified Addictions Counselor, No. 2020, as well as a resident of the Commonwealth of Pennsylvania. The recent publication of the Regulations related to Act 136, The Professional Counselor Licensing Bill raises lots of concerns about the health and welfare of Alcohol and other drug abusers seeking counseling services. The fundamental problems with the regulations involve the grand-parenting issues and are non-statutory in nature. The regulation fails to recognize Master's level addiction specialists who represent, by, far, the largest specialty treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree achieved. These individuals holding this Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

The regulations are also notably discrimination of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American institution. This institution has catered to mostly for minority workers in human services with a desire for higher education. The vast majority of individuals holding this Master's degree are working with minority population in our urban centers. The exclusion of this degree from the grand parenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impact the provision of services to the minorities.



**"Let us beat drug & alcohol addictions..... Telephone 215-228-4848
Rehabilitation < Treatment - New Life....." Fax 215-225-1111
E-Mail aba/c@YAHOO.COM**

I am strongly advocating for the inclusion within the regulations of the following:

- Inclusion under the grandparenting regulations of individual in possession of a Master's Degree and Certification as an Addictions Counselor(CAC).
- Inclusion under the grandparenting regulations of IC&RC national exam for addictions counselor as acceptable exam.
- Inclusion under grandparenting regulations of individuals in possession of Mater's Degree in Human Services as provided by Lincoln University.

I sincerely urge your consideration in this matter as a means of assuring that citizens of our Commonwealth are provided counseling services that serve our diverse communities.

Sincerely Your:


Cyprian P. Anyanwu
Chief Executive Officer



**Greenbriar
Treatment Center**

800 Manor Drive
Washington, PA 15301
(412) 225-9700
1-800-637-4673
FAX (412) 225-9764

RECEIVED

2001 APR 20 10:00

REVIEW COMMISSION



April 11, 2001

Eva Cheney, Counsel
State Board of Social Workers
MFT's and Professional Counselors
P. O. Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649

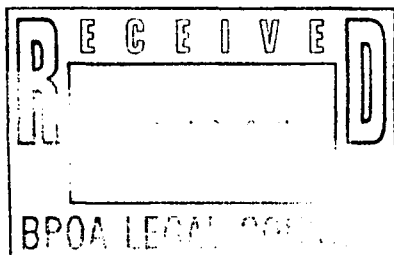
Dear Members of the Board:

I am writing with some concern about the regulations and parameters of professional inclusion related to Act 136, the Professional Counselor Licensing Bill. I am a doctoral level marriage and family therapist, a clinical member and approved supervisor in the American Association for marriage and family therapy. I am pleased on behalf of my profession and the consumers of the state of Pennsylvania that certain essential standards will be applied to the practice of marital and family therapy in this state as it has been applied in most other states. This regulation is overdue. However, I also practice as a therapist in the drug and substance abuse field. I am acutely aware of the systemic/family ramifications inherent in the treatment of chemical dependency addiction. I am also aware of many counseling professionals who do not have the expected qualifications to adequately provide needed treatment for chemically dependent persons. I find that the regulations of Act 136 do not include at a minimum master's level addiction specialists. I do not find this regulation of an important profession at a licensing level to exist anywhere else in the state of Pennsylvania.

I realize that there exists a certification process; but I need not convince you that a license in regulation carries far more weight in professional practice and for the consumer. I would suggest that a license be extended to include the CAC credential, passing the IC and RC examination and holding a master's degree in human services. I would not think it is necessary to expand the minimum 36 credits at a master's level to 48 credit for eligibility to take the NBCC exam. I might add that in terms of minority eligibility, Lincoln, the nation's oldest African-American University offers a master's level degree in human services. It would be difficult for me to comprehend how particular academic credentials would not be included in grandparenting regulations.

Sincerely,

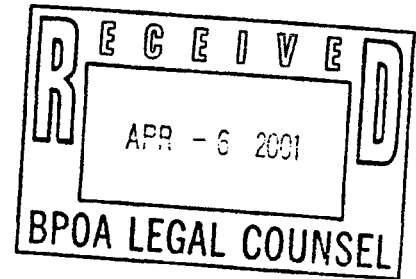
Dr. Walter Szymanski D. Min.
CAC Diplomate, PCB
Life Member/Supervisor Amer. Assoc. for MFT



ORIGINAL: 2178
April 4, 2001

RECEIVED
2001 APR 11 01:59:37
REVENUE COMMISSION
Q

State Board of Social Workers, Marriage & Family Therapists, & Professional
Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105



Re: #16A-694

Attn: Eva Cheney, Counsel

Dear Ms. Cheney:

I am directing this letter to you in your capacity as Counsel for the State Board of Social Workers, Marriage & Family Therapists, & Professional Counselors (the "Board"). This correspondence constitutes my written comments regarding the proposed regulations to Act 136, the Professional Counselor Licensing Bill.

I am a Certified Addictions Counselor (CAC) and hold a 42 credit Masters of Education degree (six more credits than are required for license-eligibility pursuant to Clause 4 of the Act, but six credits less than are required by Clause 5) in Counselor Education from The Pennsylvania State University. I am currently employed as a therapist in a mental health community outpatient center in Centre County. I treat clients suffering from mental illness and substance abuse problems. Most clients seen today suffer from both of these problems. Many therapists' caseloads consist of 85% of these dually diagnosed individuals. Many clients who suffer from mental illness are also abusing street drugs, alcohol and even their prescription medications. The CAC certification qualifies me to treat these individuals for both issues. This means that clients do not have to have two therapists and thus, health costs are decreased.

At this time, the Addictions and Mental Health fields are coming back into alliance. The Office of Mental Health and Substance Abuse Services have joined the Bureau of Drug and Alcohol Programs (BDAP) to provide information to health care providers to help them in their work with the Mental Illness and Substance Abuse (MISA) population. This is occurring because of the fact that the vast majority of the clients seen by therapists' today are dually diagnosed.

I wish to express to you and to the Board in the strongest terms, my dismay and concern that the proposed regulations to Act 136 fail to recognize and include Masters level Certified Addictions Counselors under the "grandparenting" provisions of the Act. The guidelines for a CAC are provided by the International Certification & Reciprocity Consortium.

I'm certain that the Board is fully aware that addiction counselors are the front line troops in the Commonwealth's efforts to provide meaningful and effective treatment to those Pennsylvania citizens who suffer from the physical and emotional trauma of addictions. These same addiction counselors represent the largest group of specialty treatment providers in the state. Failure to include this critical group under the "grandparenting" provisions of Act 136 is an oversight that may well jeopardize the quality of care that Pennsylvania can offer to its citizens who suffer from both mental illness and substance abuse. I am certain this cannot be the Board's intent.

I strongly urge the Board to include under the "grandparenting" provisions of Act 136 all individuals who possess both a Masters Degree from a fully accredited college or university and are CAC certified. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Deb Goldberg".

Deb Goldberg
109 Cherry Ridge Road
State College, PA 16803
814-234-3727
cc: PCB Board

NY #16A-964

Erin Lynn Gibbons

808 Elizabeth Court, Collegeville, PA 19426 (610) 831-1229

ORIGINAL: 2178

April 10, 2001

Independent Regulatory Review Commission

Senator Edwin Holl, State Representative

Senator Clarence Bell, Chairman of the Senate Consumer Protection and Professional Licensure Committee

Senator Mario Civera, Republican Chairman of the House Professional Licensure Committee

Eva Cheney, Board Counsel, State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors

To Whom It May Concern:

As a professional counselor intending to apply for licensure in Pennsylvania, I wish to congratulate you on the tremendous amount of work you have done on the behalf of this profession. After careful review of the proposed regulations I have some comments, I would like to share with you.

- I am in full support of the comments previously made by the Pennsylvania Counseling Association.
- I have been working in the capacity of a master's level counselor since 1998. From that time until October of 2000, a Master's level Licensed Psychologist had supervised me. According to the way the subsections of the act are written, that experience would not count because that person was not a licensed professional counselor. However, that supervision experience was adequate to meet the requirements for the National Counselor Certification. There needs to be some flexibility in what constitutes an acceptable supervisor. Supervisors should be allowed to be anyone in a related discipline.
- In terms of Practicum/Internship Requirements, while I agree a high standard for experience needs to be set, the standard being set by your committees are higher than even then National Certification. The university I attended followed standards set for the National Counselors Examination because at the time Pennsylvania had no licensure. The National standards only require six semester hours. Your committee is suggesting nine semester hours. There needs to be a grace period until educational programs can adjust to the new requirement. Otherwise many students who are currently in school or have recently graduated will not meet this criterion and be forced to go back to school. While I see that there is no harm in additional education, I see the financial hardships this places on many counselors. During internships and practicum times many students are forced to quit their jobs, go without health benefits, find alternate day care, etc. to just complete their hours. It would be very taxing for counselors who already completed this very trying aspect of their career to start again.
- Lastly, in reference to Continuing Education Requirements, courses would have to be approved by the following organizations: NBCC, CRC, CBMT or ATCB. I believe the committee left out some very important groups such as APA, the American Psychological Association, and NASP, the National Association of School Psychologists. Both of these groups are very well respected and considered authorities in many circles. These two groups frequent offer continuing education opportunities, which are very pertinent in the realm of counseling. By leaving these groups off the list as approved sources of information, counselors will avoid their courses and miss out on excellent training opportunities.

I would like to thank you for your time and consideration in these very important matters. Again, I congratulate you on the work you have done on behalf of the profession and urge you to take into consideration those of us who will be applying for licensure.

Respectfully,

Erin Lynn Gibbons

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 2001 APR 17 AM 9:11
 INDEPENDENT REGULATORY REVIEW COMMISSION

ORIGINAL: 2178
April 11, 2001

Arlene L. Prentice, M.S., CAC Diplomate
2608 Catherine Drive
Harrisburg, PA 17109-3451

Ms. Eva Cheney, Counsel
State Board of Social Workers, Marriage &
Family Therapists and Professional Counselors
116 Pine Street, P.O. Box 2649
Harrisburg, PA 17105

RE: Act 136 / #16A-694

Dear Ms. Cheney:

I am a life resident of Pennsylvania, a graduate of Susquehanna Township High School, B.S.W. from West Virginia State College, M.S. in Counseling Psychology with a specialization in Addiction from Chestnut Hill College, a continuing Education Certificate in Chemical Dependency from Penn State University, employed by the Juvenile Court Judges' Commission as a Juvenile Court Consultant, Executive Offices.

The current regulations as spelled out in Act 136, the Professional Counselor Licensing Bill appears to be a slap in the face to the Certified Addiction Counselors (CACs) who have earned a Master's Degree in any Human Service Field. How can anyone in good conscience actually feel a person with a degree in art, music and other related studies are qualified to engage in drug and alcohol counseling? It even appears to be irresponsible. Certified Addiction Counselors have been educated, trained and are skilled to provide a wide range of specialized drug and alcohol services.

The content of this bill does not appear to have the intent for a Culturally Competent System of Care, nor does it appear to include a population of Certified Addiction Counselors that is reflective of a population seeking services in the drug and alcohol field. The proposed regulations exclude the graduates of Lincoln University who earned a Master's Degree in Human Services. It is no secret that the majority of those graduates are people of color.

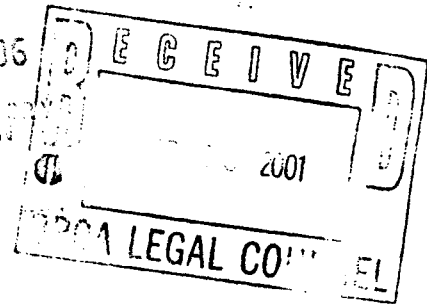
The Department of Public Welfare (DPW), Office of Mental Health and Substance Abuse Services (OMHSAS) has a statewide Culturally Competency Advisory Committee that advises and makes recommendations to Deputy Secretary Charlie Curie and OMHSAS staff on a wide range of concerns throughout the state of Pennsylvania. I have served on this committee since 1992. How many people of color served on the committee that developed the Professional Counselor Licensing Bill?

I strongly suggest you that you that you reconsider submitting Act 136 with the current content.

RECEIVED

2001 APR 20 11:06

REVIEW COMMISSION



Sincerely,



Arlene L. Prentice
M.S., CAC Diplomate
First Vice President, PCB

Cc: PCB

Hon. Jeffrey E. Piccola
Hon. LeAnna Washington
Hon. Mark McNaughton
Ted Darcus, Executive Director of Governor's Advisory
Commission on African American Affairs
Pedro A. Cortes, Esq., Executive Director of Governor's Advisory
Commission on Latino Affairs
Paula Harris, President, Harrisburg Chapter NAACP
Charles Stokes, State President NAACP

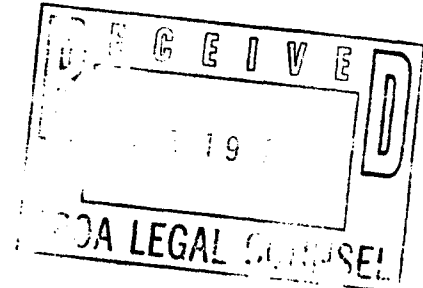
ORIGINAL: 2178

April 10, 2001

State Board of Social Workers, Marriage & Family Therapists, & Professional Counselors -
c/o Eva Cheney, Counsel
116 Pine Street
PO Box 2649
Harrisburg, PA 17105

RE: Act 136

Dear Ms. Cheney,



I am writing to you as a Certified Addictions Counselor, as well as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialists who serve the largest specialty treatment population in Pennsylvania. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the IC&RC.

The regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nations oldest African American university. Exclusion of this degree discriminates against African American CAC's and would serve to severely limit culturally sensitive counseling to minority populations.

I am strongly advocating for the inclusion within the regulations of the following:

- Inclusion under the grandparenting regulations of those in possession of a Masters Degree and a CAC credential.
- Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam
- Inclusion under the grandparenting regulations of individuals in possession of the Masters Degree in Human Services as provided by Lincoln University

I sincerely urge your consideration in the matter.

Sincerely,

[Handwritten Signature] BS-CAC

cc: PCB Board

APR 10 2001
11:00 AM
STATE BOARD OF SOCIAL WORKERS, MARRIAGE & FAMILY THERAPISTS, & PROFESSIONAL COUNSELORS
HARRISBURG, PA 17105



765 Skippack Pike, Suite 300
Blue Bell, PA 19422
(215) 643-5826
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2001 APR 16 AM 9:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

April 10, 2001

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear IRRC Administrator,

I am responding to you regarding the Proposed Licensure Regulations for Professional Counselors and Marriage and Family Therapists. (reference number 16A-964) As a certified Pastoral Counselor with the American Association of Pastoral Counselors (AAPC), I strongly urge these recommendations to the proposed regulations:

- 1) In naming fields "closely related to the practice of professional counseling" §49.1 expand the list to include: pastoral counseling.
- 2) In approving "continuing education requirements for grandparenting" §49.15(5)(iv) include: courses approved by AAPC (American Association of Pastoral Counselors).
- 3) In recognizing certification through national counseling organizations, include certification as a Fellow or a Diplomate through the American Association of Pastoral Counselors.
- 4) In recognizing national licensing examinations for counselors, include the Pastoral Counselors Examination administered through the Pastoral Counselors Examination Board (PCEB).

Thank you for your attention to these recommendations. I have also included for your information:

- a copy of another state's (Arkansas) law recognizing AAPC as a qualified credentialing body for their licensed professional counselors
- sample questions from the Pastoral Counselor Examination to demonstrate its clinical rigor

As a full-time therapist with the Samaritan Counseling Center since 1995, I provide competent professional counseling to many individuals. It is appropriate that I - and others in my profession - have the opportunity to be licensed as professional counselors in the state of Pennsylvania.

Sincerely,

A handwritten signature in cursive script that reads "Mary Dyer Hubbard".

Mary Dyer Hubbard, M.S.
Pastoral Counselor



Samaritan Counseling Center

Interfaith Counseling Services of Southeastern Pennsylvania
444 Old York Road, Jenkintown, PA 19046
32 N. York Road, Hatboro, PA 19040

Mary Dyer Hubbard
Pastoral Counselor

Fellow, AAPC

Jenkintown (215) 887-8092
Hatboro (215) 675-8646