

ORIGINAL:
300 North Swarthmore Avenue
Ridley Park, Pennsylvania 19078



(610) 532-9400 Church Office
(610) 532-0210 Fax
(610) 532-4848 Nursery School

The Ridley Park Presbyterian Church (U.S.A.)

Reverend Noel L. Allen, Pastor

April 18, 2001

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 pastor I am well aware of the need for qualified substance abuse counseling. The recent publication of the regulations related to act 136, the Professional Counselor Licensing Bill, raises some concern for the health and welfare of substance abusers seeking counseling services. The main 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 the largest specialty treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's Degree are not recognized by the regulations. These counselors have achieved a competency based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

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

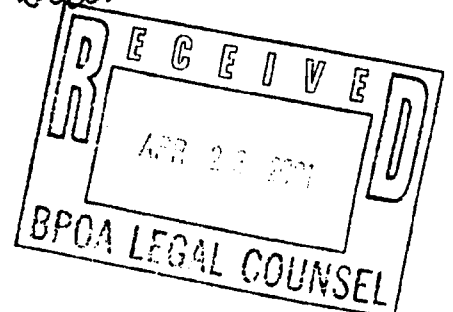
- . Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor.
- . Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.

I sincerely urge 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,

Rev. Noel Allen
Pastor

NA:wsb

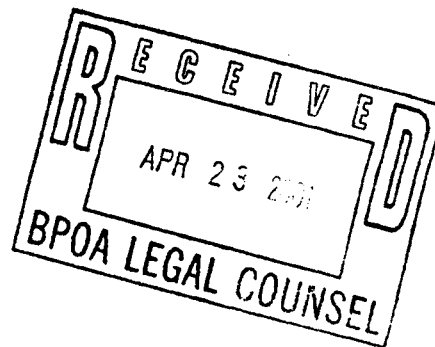


ORIGINAL: 2178

April 18, 2001

RECEIVED

REVIEW



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

Dear Ms. Cheney:

I am writing to urge you to petition the Board to specify both Human Services Psychology and Pastoral Counseling as M.A. degrees that are professional counseling degrees or are degrees in "a field closely related to the practice of professional counseling".

I graduated from LaSalle University in Philadelphia with a M.A. degree in Pastoral Counseling in the Marriage and Family Therapy tract. I have been practicing in the Marriage and Family Therapy field for 6 years. I thank you for taking this information to the Board.

Sincerely,

Mary Ann Delaplane, M.A.
8822 Duveen Drive
Wyndmoor, PA 19038-7462

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee

4113101

ORIGINAL: 2178

To Ms. Eva Cheney:

Re: commenting on proposed licensure regulations:

Please change the definition of fields related to professional counseling to include more of a variety: sex, health education; pastoral counseling, and others that involve counseling others.

Please be more reasonable with supervised hours and more flexible with allowing past counseling experience like in mental health agencies, whether individual, group, or family to be considered.

Please be more flexible in reviewing applicants who might have good experience, related certifications, who have completed approved family therapy programs to be able to sit for the test.

Please make licensure comparable to clinical membership in AAMFT.

*Thank you,
Mark Feltri, M.S.*

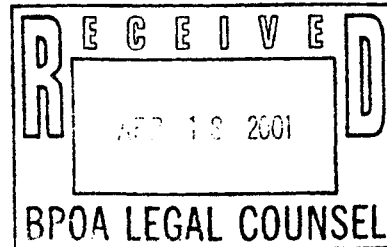
*1512-B Stoney Lane
Phila PA 19115
(215) 677-4302*

Ref# 16A-964

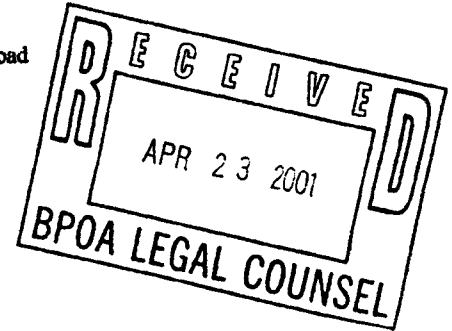
RECEIVED

2001 APR 20 11:11:06

REVIEW COMMUNICATIONS



128 Chestnut Ridge Road
Acme, PA 15610
April 18, 2001
(724) 542-7803



Eva Cheney, Counsel
State Board of SW, MFT, and Professional Counselors
PO Box 2649
116 Pine Street
Harrisburg, PA 17105-2649

Dear Ms. Cheney:

As a Master's level addiction counselor with a CAC, I am compelled to write to you to express my concern for the citizens of this Commonwealth who may be deprived of accessing capable, competent and experienced addictions counselors to assist them in the treatment of their chemical dependency as a result of Act 136, The Professional Counselor Licensing Bill. This bill does not recognize Master's level Certified Addictions Counselors (CAC) who specialize in the treatment of this malady and instead thrusts the client/patient into the care of professionals who may lack even the most basic knowledge of addiction and addiction treatment. Since chemical dependency has a life threatening aspect to its progression, I am challenged to understand how Master's level CACs would be excluded from licensure while other, perhaps quite well trained individuals in their specialty fields, could become licensed and thus provide treatment to a population that could die as a result of mistreatment/maltreatment. Many of my colleagues in addictions treatment can relate episodes of classic enabling behaviors our clients have been exposed to by well meaning, albeit, untrained professionals who are counseling addicts and alcoholics.

One of the basic core beliefs I hold is to know my limitations. I know that I am not a trained dance therapist or music therapist or a marriage and family therapist and I don't practice in those specialty areas. It would be unethical of me to mislead my clients to suggest that I can provide those particular therapeutic approaches and I believe it is inherently unethical for therapists/counselors who are not addictions counselors to mislead their clients/patients that they are addictions counselors. With the exclusion of Master's level CACs in this licensing bill, the opportunity for untrained professionals to provide treatment in areas beyond their expertise is enhanced, perhaps to the serious detriment of the client/patient.

So that the residents of this Commonwealth have the opportunity to access the most capable and competent practitioners of drug and alcohol treatment services, I ask that the following be included in Act 136 language:

- A. Include Certified Addictions Counselors, holding the credential from the Pennsylvania Certification Board, who have passed the Addiction Counselor Examination given by the International Certification and Reciprocity Consortium and who have earned a Master's degree.
- B. Since Clauses 4 and 5 of the grandparenting section do not coincide with one another in reference to the number of credits required in an individual's Master's program, adopt the proposed suggestion above in A to rectify this discrepancy.
- C. There are Master's programs in "Human Services" which should be considered as acceptable in the grandparenting regulations.

I believe that those of us in the helping professions are in this work because we believe that we can make a difference in the lives of our clients/patients. We need to give our clients/patients every opportunity to have optimum treatment services so that they can improve their lives. Inclusion of Master's level CACs in this bill will enhance the client/patient's opportunity for quality care.

Yours truly,

Nancy R. Milliron

Nancy R. Milliron MS CACII

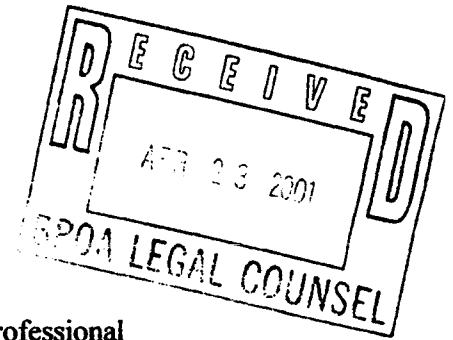
RECEIVED
2001 APR 25 10:16:03
STATE BOARD OF PROFESSIONAL AND SEMI-PROFESSIONAL COUNSELORS

ORIGINAL: 2178

Linda L. Lyons M.S.,NCC
426 Harrison Ave
Scranton, PA 18510
April 18, 2001

2001 APR 26 AM 9:36

REVIEW COMMITTEE



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

Dear Attorney Cheney:

Subject: Proposed Licensure Regulations (16A-694)

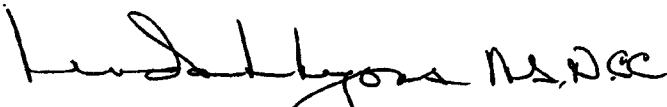
I am a National Certified Counselor. I have read the proposed regulations for licensure of professional counselors that were published in the Pennsylvania Bulletin on March 24, 2001. Even though I am generally pleased with the proposed regulations, I am very concerned about a number of specific provisions that are included. Specifically, I am concerned about the following issues:

1. The limited number of fields included in the proposed definition of a "field closely related to the practice of professional counseling" [in § 49.1] will exclude from licensure many well-qualified and experienced professional counselors who meet all of the other licensure requirements. The list should be expanded to include more degree titles and a list of course work that would define a degree as being related to the practice of professional counseling should be developed.
2. The proposed experience requirement for grandparenting [§ 49.15(4)] is unfair. By requiring that qualifying practice consist of 15 hours per week with 10 hours of direct client contact, the proposed regulations for licensure by exemption (grandparenting) would unfairly and unnecessarily deny licensure to many well-qualified, experienced practitioners. Among those persons who would unfairly and unnecessarily be eliminated under this proposed regulation are: an experienced counselor who has been promoted to a supervisory or administrative position; an experienced counselor who is now an educator, someone, such as a school counselor or college counselor, who works 9 months per year; an experienced retired counselor who maintains a part-time practice; an experienced counselor who has voluntarily cut back on practice (perhaps to raise a family or care for an elderly parent; and an experienced counselor who has been reassigned to less direct client contact because of being unable to get a license in the past. The proposed requirement needs to be significantly reduced, or preferably eliminated.

3. Many current graduate students and recent graduates will be unable to meet the internship requirements set forth in § 49.2(9) of the proposed regulations because many counselor preparation programs will be unable to provide these experiences in a timely fashion. For a limited period of time (perhaps 5 years), 6 semester hours of practicum/internship should be accepted in lieu of the proposed requirement.
4. Under the proposed regulations [§ 49.15(5)(iv)(C)] legitimate continuing education hours will be disallowed for licensure by exemption (grandparenting) if they were not approved by one of a very few organizations named in the proposed regulations. The regulation should be changed to include a greater variety of qualifying continuing education.
5. Exposure to group supervision for professional counselors is not allowed by the proposed regulations [§ 49.13(b)(5)]. Group supervision should be permitted.
6. The proposed regulations that require that the first 1800 hours of supervised clinical experience required for licensure be done by a professional counselor [§§ 49.13(b)(2) and 49.13(b)(4)(i)] disallows quality supervision that may already be being provided by a professional in a related discipline. This proposed requirement is unfair to all those who are currently working in the field and receiving supervision from someone other than a professional counselor. There is no reason that that supervised clinical experience should not count toward licensure. The requirement that the first 1800 hours of supervised clinical experience be supervised by a professional counselor should be stricken. Also, until people are licensed, it is not clear who would be regarded as a professional counselor. Clarification is needed.
7. The proposed regulations that require that the first 1800 hours of supervised clinical experience to be provided by a professional counselor [§§ 49.13(b)(2) and 49.13(b)(4)(i)] is likely to have an adverse effect in rural areas of the state where there are limited numbers of professionals and where supervision by professionals in related fields is the norm rather than the exception. Provision for a waiver of this requirement should be provided for those in rural areas or in other extraordinary circumstances.

The Pennsylvania Alliance of Counseling Professionals has submitted comments that address each of these concerns more thoroughly and that provide concrete suggestions for changes in the proposed regulations. I concur with those suggestions {you may want to attach copies here} and urge the Board to adopt them.

Sincerely,



Linda L. Lyons M.S., NCC

**cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Bob Mellow
Representative Fred Belardi
File**

ORIGINAL: 2178

18 April 2001

2001 APR 26 11:09:47

REVIEW COMMISSION

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

Dear Ms Cheney;

As a Certified Addiction Counselor I am concerned about the grand-fathering regulations in regards to act 136 (Professional Counselor Licensing Bill) The grand-fathering provision, as I read it does not include any professional counselor working in the drug and alcohol field. Most noticeably absent is the recognition of addiction specialist who currently hold both a Master's degree and are certified in the State of Pennsylvania as addiction counselors. Since drug addiction is noted to be of epidemic proportions in the United States the lack of provisions for grand-fathering these specialist is unforgivable. It would seem that the State Board considers a person's ability to draw or dance more important then having a person live a clean and sober life style. I strongly urge the State Board to re-evaluate their grand-fathering clause to included addiction specialists who treat a major health problem in the United States.

Another disturbing factor in regards to the grand- fathering regulations is the obvious discrimination of those addiction specialist who hold a Master's Degree from Lincoln University. These Lincoln graduates have not only earned 54 credits from an accredited college, but as part of the schools requirements all students must be gainfully employed in the Human Service Field for at least five years prior to attending school, and throughout their graduate studies. Another one of the schools requirements is that the student must have supervision from a professional holding a Master's Degree or Doctorate Degree throughout all his/her courses of study. This preceptor must sign off on all projects submitted to the school to ensuring that the student conducted all assignments independently and professionally.

I personal believe that if the content of educational material was considered instead of the academic jargon that is used, it would be found that the educational program at Lincoln University far surpasses the requirements of major reputable colleges who grant master degrees.

I am strongly requesting that the state board include the following regulations:

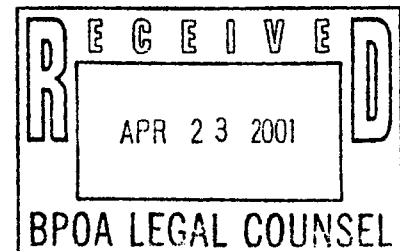
- a. Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor.
- b. Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- c. Inclusion under the grandparenting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

I would certainly hope that the board would reconsider this matter to ensure that licensing would also benefit the people who treat the major health issue facing our communities today; that is, drug addiction.

Sincerely,

LaRue Carrigan-Houser, MHS, CAC

LaRue Carrigan-Houser, MHS, CAC
1905 Glendale Avenue
Bethlehem, PA 18018
610.865,4662
cc: Pennsylvania Certification Board



Ref. # 16A-694

114 Airport Road
P.O. Box 5052
Limerick, PA
19468

ORIGINAL: 2178

April 18, 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

REVIEW COMMISSION



Dear Sir or Madam:

I am writing regarding ACT 136. I am an LSW, MSW, and CAC Diplomat as well as a concerned resident of the Commonwealth of Pennsylvania. Recently I became aware of proposed changes related to ACT 136 that bring forth my concerns for the health and welfare of substance abusers seeking counseling services. The proposed regulations do NOT recognize Master's level addiction specialists. Certified Addiction Counselors with a Master's degree represent a large population of counselors with skills specifically focused on treating substance abuse. Individuals with this credential have gained a wealth of necessary knowledge that is not provided in other areas of study. I propose it be necessary to hold a Certified Addiction Counselor credential from the Pennsylvania Certification Board (PCB), the Addiction Counselor Examination given by the International Certification & Reciprocity Consortium (IC&RC) be passed, and the individual must hold a Master's degree.

Secondly, the regulations are discriminatory toward minority populations by exclusion of recognizing the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American University. A great number of counseling professionals who work with minority populations in our urban areas hold this degree. Exclusion of this degree from the grandparenting regulations alienates those providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and could impact the services provided to minorities.

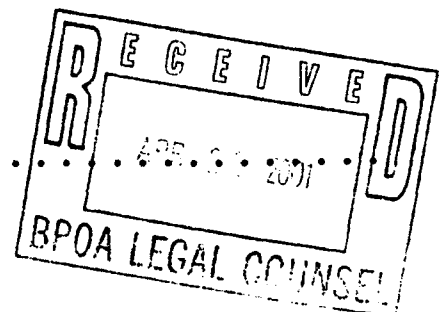
I strongly advocate including within the regulations the following:

- Include individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC) under the grandparenting regulations.
- The IC&RC national exam for addiction counselors be accepted as an exam and included as necessary under the grandparenting regulations.
- Individuals in possession of the Master's Degree in Human Services as provided by Lincoln University be included under the grandparenting regulations.

I sincerely hope you consider these proposals as a means of assuring that the citizens of our great Commonwealth receive counseling services to serve ALL specialty and diverse communities.

Sincerely,

Judy K. Gustafson
MSW, LSW, CACD
610-495-6219
cc: PCB Board



ORIGINAL: 2178



At the Point of Healthcare's Future

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

April 18, 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

Re: Public Comment Ref. Number 16A-694
Pennsylvania Bulletin, Vol. 31, No. 12, March 24, 2001

Dear Ms. Cheney:

I am responding on behalf of the members of Case Management Society of America, a national not-for-profit professional society. Our membership is multidisciplinary including nurses, social workers, and counselors who are engaged in the practice of case and care management.

My comments are directed to the above referenced bulletin, **Chapter 49.11 Licensure**.

We note that within this section, you include NCE, NBCC, CRC, ATCB, CBMT as acceptable prerequisite credentials. However, the Certified Disability Management Specialist (CDMS) is notably missing.

The CDMS credential is administered by the same credentialing organization which supports the CRC. I have attached copies of an overview of the CDMS description, eligibility requirements, and the value of the certification. However, for additional information, please contact Susan Gilpin, Esq. Executive Director, Certified Disability Management Specialist Commission, 1835 Rohlwing Road, Suite E, Rolling Meadows, IL 60008, Phone 847-394-2106 or email: info@cdms.org. The Certified Disability Management Specialist Commission is accredited by the National Commission for Certifying Agencies.

It would seem that excluding this highly qualified and significant certified population from eligibility for licensure in Pennsylvania would unfairly lead to their eventual exclusion from practice. Surely it would be appropriate to permit this group to take the exam and to permit the exam to be the including or excluding threshold, thus eliminating any who are not competent to pass the exam.

Thank you for your serious consideration of this comment.

Sincerely,

Jeanne Boling, MSN, CRRN, CDMS, CCM
Executive Director
cc: Susan Gilpin, Esq.

2001 APR 26 11:19:20
CERTIFIED DISABILITY MANAGEMENT SPECIALIST COMMISSION



- [Value of CDMS Certification](#)
- [Eligibility at a Glance](#)
- [Steps to Certification](#)
- [Renewal Information](#)
- [Ethics](#)
- [Find a Certified Professional](#)
- [The Commission](#)
- [CDMSC - Background](#)
- [Recent Publications](#)
- [Organizational Approval](#)
- [Contact Us](#)
- [Name/Address Change](#)
- [Home](#)

Certified Disability Management Specialists contribute to workplace productivity by providing services to accommodate the medical and vocational needs of ill and injured workers and minimize the cost impact of disabilities and absences for employers

Through the use of Certified Disability Management Specialists, employers and insurers can be confident their disability management cases are being handled by professionals held to the highest standards, including a mandatory Code of Professional Conduct.

Certified Disability Management Specialists:

- Provide direct services
- Develop return-to-work programs
- Conduct vocational assessments
- Administer and evaluate disability programs
- Provide organizational consultation
- Give expert testimony
- Coordinate benefits

APR 25 11:13 21
 RECEIVED
 COMMUNICATIONS
 DIVISION

For example, Certified Disability Management Specialists identify essential job functions, recommend reasonable accommodations, and consult regarding implementation of legislation such as the Americans with Disabilities Act (ADA), the Family and Medical Leave Act and, and other disability discrimination regulations.

Disability management is a bottom-line issue, from the cost of workers' compensation and reduced productivity to low employee morale and litigation. For that reason, disability management is best handled by certified specialists who possess the education, experience, and knowledge to achieve certification.



- [Value of CDMS Certification](#)
- [Eligibility at a Glance](#)
- [Steps to Certification](#)
- [Renewal Information](#)
- [Ethics](#)
- [Find a Certified Professional](#)
- [The Commission](#)
- [CDMSC - Background](#)
- [Recent Publications](#)
- [Organizational Approval](#)
- [Contact Us](#)
- [Name/Address Change](#)
- [Home](#)

Eligibility at a Glance

Value of CDMS Certification

[Eligibility at a Glance](#) | [Steps to Certification](#) | [Application and Guide](#)

A CDMS designation communicates professional credibility. Your credential:

- Validates specialized knowledge of disability management through examination
- Verifies requisite levels of education and experience
- Demonstrates commitment to upgrading skills
- Requires adherence to a code of professional conduct

The Certification of Disability Management Specialists Commission (CDMSC) has been operating as an independent, not-for-profit organization since 1984. CDMSC is the only national certification organization for disability management professionals accredited by the National Commission for Certifying Agencies.



1835 Rohlwing Road, Suite E • Rolling Meadows, IL 60008 • (847) 394-2106 • info@cdms.org

The CDMSC is accredited by the National Commission for Certifying Agencies



[Value of CDMS Certification](#) | [Eligibility at a Glance](#) | [Steps to Certification](#) | [Renewal Information](#) | [Ethics](#)
[Find a Certified Professional](#) | [The Commission](#) | [CDMSC - Background](#) | [Recent Publications](#) | [Organizational Approval](#)
[Contact Us](#) | [Name/Address Change](#) | [Home](#)



- [Value of CDMS Certification](#)
- [Eligibility at a Glance](#)
- [Steps to Certification](#)
- [Renewal Information](#)
- [Ethics](#)
- [Find a Certified Professional](#)
- [The Commission](#)
- [CDMSC - Background](#)
- [Recent Publications](#)
- [Organizational Approval](#)
- [Contact Us](#)
- [Name/Address Change](#)
- [Home](#)

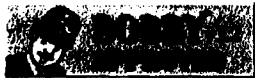
Value of CDMS Certification

Eligibility at a Glance

Steps to Certification | Application and Guide

1A	Masters in Rehabilitation Counseling	12 months' employment or internship/practicum in the field of disability management
1B	Current certification as a Certified Rehabilitation Counselor (CRC)	12 months' employment under in the field of disability management
2	Current license as an RN	24 months' employment, with 12 months under the supervision of a CDMS or CRC
3A	Master's degree and license or certification in a field that promotes the physical, psychosocial or vocational well-being of the persons being served. License must be achieved through passing of an examination.	12 months' employment, with 12 months under the supervision of a CDMS or CRC
3B	Bachelor's degree and license or certification in a field that promotes the physical, psychosocial or vocational well-being of the persons being served. License must be achieved through passing of an examination.	24 months' employment, with 12 months under the supervision of a CDMS or CRC
4	Bachelors, Master's or Doctoral Degree with five of the following nine courses:	36 months' employment, with 12 months under the supervision of a

	CDMS or CRC
1. Medical Aspects of Disability	
2. Psychosocial Aspects of Disability	
3. Vocational/Occupational Information	
4. Theories of Counseling	
5. Assessment	
6. Managerial and Organizational Behavior	
7. Human Resource Management	
8. Health Care Administration	
9. Case Management	



1835 Rohlwing Road, Suite E • Rolling Meadows, IL 60008 • (847) 394-2106 • info@cdms.org

The CDMS is accredited by the National Commission for Certifying Agencies



[Value of CDMS Certification](#) | [Eligibility at a Glance](#) | [Steps to Certification](#) | [Renewal Information](#) | [Ethics](#)
[Find a Certified Professional](#) | [The Commission](#) | [CDMS - Background](#) | [Recent Publications](#) | [Organizational Approval](#)
[Contact Us](#) | [Name/Address Change](#) | [Home](#)

ORIGINAL: 2178



LA SALLE UNIVERSITY

Graduate Clinical-Counseling Psychology

1900 West Olney Avenue • Box 268
Philadelphia, Pennsylvania 19141-1199

RECEIVED

APR 23 2001

April 18, 2001

BPOA LEGAL COUNSEL

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

Reference number 16A-964

Dear Ms. Cheney:

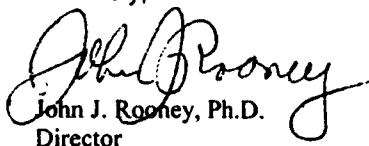
As the Director of the Clinical Counseling Psychology program at LaSalle University, I strongly support the changes in the regulations proposed by PCAP. I would also like to urge you to consider the following additional points, which need to be addressed before the regulations are adopted:

1. In fields closely related to professional counseling, Human Services Psychology, and Pastoral Counseling are two programs that should be specified. The first is a combination of Counseling and Clinical Psychology, and a program in Pastoral Counseling adds knowledge of and sensitivity to the clients' religious orientation to the traditional education as a counselor. A large number of our graduates (and those of other universities) have obtained these degrees and have become experienced professional counselors with excellent credentials.
2. The distinction between practicum and internship hours is unclear, as is what would be required of a counselor who has 600 (or 700) hours of internship but no practicum hours.
3. The qualifications of a supervisor are vague. Without licensure, what constitutes a "professional counselor"?
4. For counselors with an MA of less than 48 hours, the deficit should be able to be made up by additional hours of graduate study as well as by CE credits.

We have all worked diligently to pass a sound licensure bill I hope we can make the needed changes in the regulations that will best serve the professions, the clients, and the Commonwealth.

Thanks for the excellent work you have done.

Sincerely,


John J. Rooney, Ph.D.
Director

2001 APR 25 11:19:02
REVIEW COMMISSION

ORIGINAL: 2178

Eva Cheney
Counsel State Board of Social Workers,
Marriage and Family Therapist.
P.O. Box 2649
116 Pine St
Harrisburg PA 17105-2649

RECEIVED
2001 APR 18 AM 11:50
BPOA LEGAL COUNSEL

Jared Young, MSW, LSW, CAC Diplomate
447 Highlawn Ave
Elizabethtown PA 17022

Dear Eva Cheney,

I am writing to you as a Licensed Social Worker and 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 grand-parenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addictions 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. In fact, the regulations do not recognize the field of addictions treatment. I was extremely disturbed when reviewing the proposed regulations that did not include addictions therapy. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC). I firmly believe that addictions counselors need to be included in the new regulations.

The regulations are also notably discriminatory of minority populations through the exclusion of professionals that are Certified Addiction Counselors and hold a masters degree that is not recognized by the regulations. A vast majority of individuals holding masters degrees do not fall under the grand-parenting are working with minority populations in our urban centers. The exclusion of these professionals is a disservice to the cause of providing racial, ethnic and culturally diverse counseling services within the Commonwealth of Pennsylvania. I believe the regulations need to recognize diversity within the field of addictions. Clearly this will 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 grand-parenting regulations of individuals in possession of a master's degree and Certification as an Addiction Counselor (CAC).
- Inclusion under the grand-parenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- Inclusion under the grand-parenting regulation of individuals in possession of a Master's degree.

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,

Jared Young, MSW, LSW, CAC Diplomate

RECEIVED
APR 18 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178

RECEIVED

2001 APR 18 11:58

Janet Barkowsky
2151 Brintons Bridge Road
West Chester, Pa. 19382 (610) 418-1127 beeper

REVIEW COMMISSION



Eva Cheney, Counsel
State Board of Social Workers, Marriage and Family Therapists
And Professional Counselors
PO Box 2649
116 Pine St.
Harrisburg, Pa 17105-2649 Re: #16A-694

Dear Eva Cheney, Counsel,

I am writing you as a Master's Level Certified Addiction 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 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. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

In addition, I contend that the other disciplines mentioned (professional counselors, marriage and family therapist, and social workers) do not have my minimal requirements. My requirements are four years of paid field placement, four hundred hours of education, case presentation, oral and written test and Master degree to acquire my Certified Addiction Counselor certificate. In addition, a requirement for recertification is 50 credit hours every two years, which I have maintained for the last 25 years!

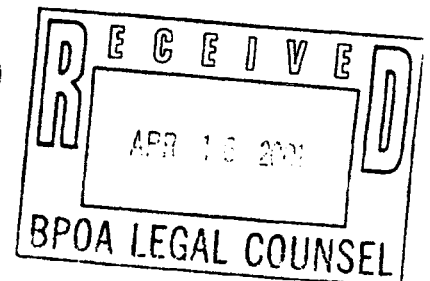
I am strongly advocating for the inclusion within the regulations of the following:

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.

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 a population that require a special expertise.

Sincerely,
Janet Barkowsky
Janet Barkowsky MSA, CAC

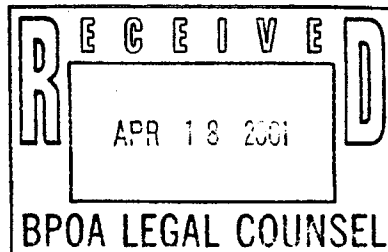


Crisis Management Services Incorporated

GAIL PERKIN
7839 NIXON ST.
Philadelphia PA. 19128

Reference # 16A-96A

To EVA CHEYNE BOARD Council
STATE BOARD OF SOCIAL WORKERS
MARRIAGE & FAMILY THERAPISTS
PROFESSIONAL COUNSELORS
HARRISBURG PA.



I would like to express my thanks to the State Board in developing the proposed Regulations for Professional Counselors. I am a board certified Art Therapist & Certified Addiction Counselor. I have worked in the field for eight years covering a wide variety of ages & populations. I am presently working in a 15 bed subacute dually diagnosed mental health unit. The clients we work with are often dealing with a wide variety of trauma & loss with a history of multiple hospitalizations. Art Therapy is often an important part of their road to recovery.

Despite the excellent work done by you & the License Board in developing standards for the proposed regulations, I have some concerns regarding the proposed Professional Counselor Regulations. PACP's most recent response to the proposed Regulation "concerns & suggestions" closely reflects my own concerns & recommendations.

In regards to Regulation 49.1 Please include (add) Creative Arts Therapies to the list of qualified professionals

In regards to Regulation 49.13b(2) Please delete the word "first" in reference to 800hrs of licensed clinical supervision, & please add provision for us to be supervised by our own C.A.T. professional. We would also like our C.A.T. supervisor to meet personally or

Edward C. Mintzer Jr. Esq.
President

William A. Morton
Vice President

Rita Rufo
Secretary

Emilio Matticoli, ED.D
Treasurer

Crisis Management Services Incorporated

to meet their supervisees in a "group" for their weekly supervision of one hour per week for every 20 hrs of clinic experience.

In 49.136(7) I believe 60 days written notice is an ~~unobtainable~~ goal for a supervisor to notify a supervisee in case of serious illness or a death in the family etc.

In regards to regulation 49.15 we would like C.A.T. who have completed their licensure exam ~~and~~ become board certified to be grandfathered in.

Thank you for your consideration on these matters.

Sincerely,

Gail Pefri

A.T.R.^{bc.} C.A.C.

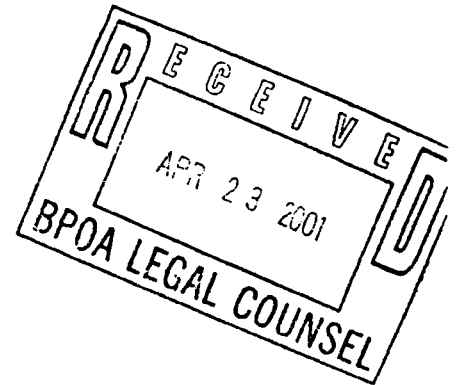
ORIGINAL: 2178

Peniel

The Offices of

Drs. Harold & Marion M. Spellman

April 18, 2001



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

Re: #16A-694

Dear State Board Representative:

I am concerned about the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. Of particular concern to me are the nonstatutory grandparenting issues. As a Pennsylvania resident and the President of a drug/alcohol program in this Commonwealth, I respectfully urge your office to include under the grandparenting regulations the following:

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

I see the inclusion of the above-bulleted items as contributing to our collective ability to competently serve the hurting in our Commonwealth with professionalism and excellence.

Thank you for your continued support of and commitment to the good service of those who have been entrusted to our care.

Sincerely,

Dr. Marion Spellman

**Dr. Marion Spellman
Founding President**

cc: PCB Board

MMS:sh



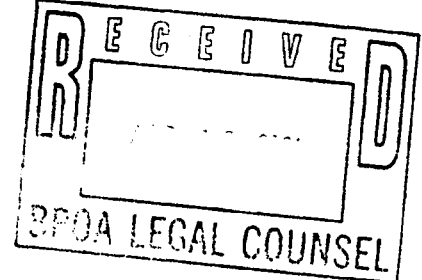
ORIGINAL: 2178

Lighting the Way to Quality Behavioral Health Services

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

REF #: 16A-694

Dear Ms. Cheney:



I am writing to express my concerns regarding some of the proposed regulations for licensing counselors under the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors. I have included possible suggestions for your consideration as well. Thank you for your attention to these issues and I look forward to your response.

1)CONCERN: 47.12c (3) disclosure of supervisee status to patients with written permission to discuss case

EXPLANATION: This would not be necessary if the supervisor was employed by the same agency as the supervisee.

SUGGESTION: Indicate that this is not necessary if both parties are employed by the same agency.

2)CONCERN: 47.12c (5) supervision requirements

EXPLANATION: The expectation of 1 hour for every 20 worked is unrealistic if one were to supervise the maximum of 6 (as outlined), supervision requirements would take up almost 50% of a standard work week. I believe individuals will not be willing to supervise many future L.C.S.W.'s if this is expected and, with the limited number of L.C.S.W.'s there will be fewer options available to supervisees.

SUGGESTION: Change expectations to 2 hours of supervision per month for those in full time status (30-40 hours per week) and 1 hour of supervision per month for those in part time status (below 30 hours per week)

3)CONCERN: 47.12d (2) dual relationship

EXPLANATION: It is unclear if a "dual relationship" indicates that one cannot supervise the employee on the job and also provide the required supervision for licensure. In many agencies there may be only one person who meets the requirements of a supervisor as you have outlined, and this person is often the only supervisor at many agencies. This does not appear to be a dual relationship because in both roles one would be providing clinical direction and case review.

SUGGESTION: Clarify that the above situation does not constitute a dual relationship

1330 W 26th St.
Erie, PA 16508

Clinic Services • 814/459-9300 • FAX 814/456-5145
Crisis Services • 814/456-2014 • 800-300-9558 • FAX 814/455-9802

4)CONCERN: 47.12d (14) quarterly reports

EXPLANATION: The expectation of supervisors having to write quarterly reports for each supervisee may be overwhelming. Most agencies have a 6 month and/or an annual evaluation process. Adding more expectations of supervisors to prepare reports more frequently than is required for the work setting may well lessen the likelihood that supervisors would be willing to supervise many candidates, thereby again lessening the opportunities for future L.C.S.W.s.

SUGGESTION: Change to twice or once per year reports, including the acceptance of work site evaluations if available.

Thank you again for your attention to these issues.

If I can be of further assistance or provide any clarification of the above, please feel free to contact me at (814) 459-9300.

Sincerely,

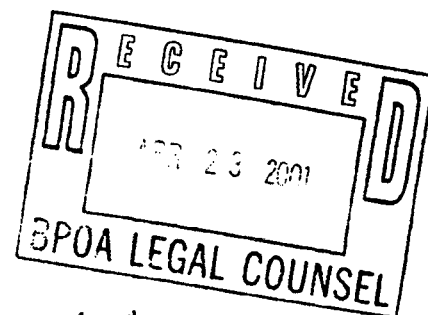

Yvonne Eaton, L.C.S.W.

RECEIVED
2001 APR 19 PM 12:00
REVIEW COMMISSION

ORIGINAL: 2178

RECEIVED
2001 APR 25 11 09 47
REVIEW COMMISSION

Chase E. Kneeland, M.Div.
Individual, Marriage & Family Therapy
Norrington Commons
2900 Germantown Pike
Trooper, PA 19403
610-635-2545



April 18th, 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

Dear Attorney Cheney:

Subject: Proposed Licensure Regulations (16A-694)

My name is Chase E. Kneeland, M. Div., and I have been in private practice doing marriage & family therapy for almost 30 years. I have read the proposed regulations for licensure of professional counselors that were published in the Pennsylvania Bulletin on March 24, 2001. Even though I am generally pleased with the proposed regulations, I am very concerned about a number of specific provisions that are included. Specifically, I am concerned about the following issues:

1. The limited number of fields included in the proposed definition of a "field closely related to the practice of professional counseling" [in § 49.1] will exclude from licensure many well-qualified and experienced professional counselors who meet all of the other licensure requirements. The list should be expanded to include more degree titles and a list of course work that would define a degree as being related to the practice of professional counseling should be developed. Take my case in particular: I went to a large accredited seminary in Massachusetts, Gordon-Conwell Theological Seminary, and graduated in 1975. My degree is in Pastoral Ministries & Pastoral Counseling. I took every counseling course the seminary offered and fully intended to enter the discipline of marriage & family therapy following graduation. Please note that these counseling courses were psychology courses, not religion; they are simply being offered at a religious institution. Following graduation I continued my training in the Philadelphia area and after three more years of clinical training became certified by the AAMFT, the American Association for Marriage and Family Therapy. However, under the currently proposed "closely related fields" my Master's degree from seminary will not qualify and I will not be licensable, even though I am AAMFT certified since February of 1980 and have been in active practice for almost 30 years. In addition to that, I designed and taught a Behavioral

Clinical Member, American Association for Marriage & Family Therapy
Clinical Certification No. 005921

Sciences curriculum at the Montgomery Hospital Family Practice Residency Program from 1980 to 1987, and also was qualified as an Expert in the Montgomery County Courts in October 1985.

2. The proposed experience requirement for grandparenting [§ 49.15(4)] is unfair. By requiring that qualifying practice consist of 15 hours per week with 10 hours of direct client contact, the proposed regulations for licensure by exemption (grandparenting) would unfairly and unnecessarily deny licensure to many well-qualified, experienced practitioners. Among those persons who would unfairly and unnecessarily be eliminated under this proposed regulation are: an experienced counselor who has been promoted to a supervisory or administrative position; an experienced counselor who is now an educator, someone, such as a school counselor or college counselor, who works 9 months per year; an experienced retired counselor who maintains a part-time practice; an experienced counselor who has voluntarily cut back on practice (perhaps to raise a family or care for an elderly parent; and an experienced counselor who has been reassigned to less direct client contact because of being unable to get a license in the past. The proposed requirement needs to be significantly reduced, or preferably eliminated.

3. Many current graduate students and recent graduates will be unable to meet the internship requirements set forth in § 49.2(9) of the proposed regulations because many counselor preparation programs will be unable to provide these experiences in a timely fashion. For a limited period of time (perhaps 5 years), 6 semester hours of practicum/internship should be accepted in lieu of the proposed requirement. Under the proposed regulations [§ 49.15(5)(iv)©] legitimate continuing education hours will be disallowed for licensure by exemption (grandparenting) if they were not approved by one of a very few organizations named in the proposed regulations. The regulation should be changed to include a greater variety of qualifying continuing education.

4. Exposure to group supervision for professional counselors is not allowed by the proposed regulations [§ 49.13(b)(5)]. Group supervision should be permitted. The proposed regulations that require that the first 1800 hours of supervised clinical experience required for licensure be done by a professional counselor [§§ 49.13(b)(2) and 49.13(b)(4)(i)] disallows quality supervision that may already be being provided by a professional in a related discipline. This proposed requirement is unfair to all those who are currently working in the field and receiving supervision from someone other than a professional counselor. There is no reason that that supervised clinical experience should not count toward licensure. The requirement that the first 1800 hours of supervised clinical experience be supervised by a professional counselor should be stricken. Also, until people are licensed, it is not clear who would be regarded as a professional counselor. Clarification is needed.

5. The proposed regulations that require that the first 1800 hours of supervised clinical experience to be provided by a professional counselor [§§ 49.13(b)(2) and 49.13(b)(4)(i)]

is likely to have an adverse effect in rural areas of the state where there are limited numbers of professionals and where supervision by professionals in related fields is the norm rather than the exception. Provision for a waiver of this requirement should be provided for those in rural areas or in other extraordinary circumstances.

The Pennsylvania Alliance of Counseling Professionals has submitted comments that address each of these concerns more thoroughly and that provide concrete suggestions for changes in the proposed regulations. I concur with those suggestions and urge the Board to adopt them.

Sincerely,

Chase E. Kneeland M. Div.

Chase E. Kneeland, M.Div.

cc:

Independent Regulatory Review Commission
Senator Edwin G. Holl
Representative John A. Lawless
Representative John W. Fichter

ORIGINAL: 2178

235 E. Baltimore Street
Apt. B
Greencastle, PA 17225

April 17, 2001

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

RECEIVED

2001 APR 23 AM 11:09

LABORATORY
REVIEW COMMISSION

RE: 16A-964 PA Counselor's Licensure Proposals

Dear Ms. Cheney:

I am writing to express my concerns and desires regarding the proposed licensure regulations (16A-964). Since my degrees are in psychology, and I am a nationally certified psychologist, my comments will be directed concerning the grandparenting requirements concerning NAMP members and other psychologists.

First, I believe section 49.1 "field closely related to the practice of professional counseling" is too narrow in its definitions. I would like the degree of "PSYCHOLOGY" to also be added to the list of closely related fields. For example, I attended Shippensburg University and obtained my Master of Science degree in psychology. Shippensburg University's counseling program is NBCC approved, and since the counseling and psychology courses are closely related and are often taught by the same professors, I believe it is vital to recognize "PSYCHOLOGY" as a sufficient title within itself. To deny the title of "Psychology" would be to deny competent professionals, e.g., Shippensburg University's course work in psychology is specifically designed for the student to go on for a doctorate degree thereby demonstrating the integrity and strength of its professional mental health program.

Second, I believe section 49.15(5)(iv) "continuing education requirements for grandparenting" are too restrictive, as many people like myself sought to obtain continuing education courses to meet the 48 semester hour requirements for licensure without specific guidelines having been established. Therefore, I would like to

propose that continuing education course work and credits be inclusive of any college, university, institution, agency, etc., that awards college credit or CEU's that are APPROVED by the AMERICAN PSYCHOLOGICAL ASSOCIATION and in accordance to their guidelines. For example, I spent the last three years of my life pursuing continuing education requirements through a doctorate program in psychology that is not NBCC approved but is in pre-membership status for the AABC and has been APPROVED by the AMERICAN PSYCHOLOGICAL ASSOCIATION TO OFFER CONTINUING EDUCATION FOR PSYCHOLOGISTS. I would like to see APA approved course work (graduate & doctorate classes) and CEU credits recognized for psychologists for grandparenting purposes. To ignore the AMERICAN PSYCHOLOGICAL ASSOCIATION would be a travesty indeed -- as many qualified professionals would be excluded from licensure.

Thank you Board Counselwoman Cheney for your time and energy and receiving and reviewing my letter and comments.

Sincerely,


Robin W. Myers, MS, NCP

CC: Independent Regulatory Review Commission

Read

- **Supervision Hours:** Two subsections of § 49.13 of the proposed regulations would require that the first 1,800 of the 3,600 hours of supervised clinical experience required for licensure be supervised by a licensed professional counselor, or, until January 1, 2006, a professional counselor with 5 years experience as a professional counselor. If you are not eligible for grandparenting and are currently working under supervision in order to meet licensure requirements, your supervision will not be acceptable to the Board unless it is being provided by a professional counselor. Supervised clinical experience with supervision provided by anyone in a related discipline would be disallowed until 1,800 of hours of that experience is supervised by a professional counselor. If the proposed regulations are adopted, you might have to begin your supervised clinical experience all over again. Also, while it seems reasonable to require that half (but not the first half) of one's supervised clinical experience be under the supervision of a professional in one's own discipline, the Board has not provided any possibility of a waiver for applicant's in exceptional circumstances who may be unable to obtain within-discipline supervision (such as those living and working in rural areas).

Read

Read

- **Internship Requirements:** § 49.2(9) sets forth clinical instruction requirements that must be included in the planned graduate program that would be required for licensure (not grandparenting). This section reads:

"(9) Clinical instruction--(Includes 100 clock hours of supervised practicum experience and 600 clock hours of supervised internship experience). The supervised internship experience shall begin after completion of the supervised practicum experience."

Six hundred hours of internship is the recognized standard of preparation in professional counseling and should be retained. However if you are a recent graduate of or current student in a program that offers less than a 600 hour internship you may be unable to find a college/university to provide you with the opportunity to take additional internship courses. Counselor educators know that these courses, with very low faculty-to-student ratios and the need for extensive development of appropriate field placement sites, are very expensive and difficult to offer. If you are in this situation or if you are a counselor educator in a program with less than 600 hours of internship we think you should argue for a grace period to develop clinical instruction that meets recognized national standards. PACP is going to suggest that that grace period last for 5 years, and that during that time 6 semester hours of practicum/internship be sufficient to meet the requirement in § 49.2(9).

Read

- ✓ • **Field closely related to the practice of professional counseling:** § 49.1 of the proposed regulations defines "Field closely related to the practice of professional counseling" as follows:

"Includes the fields of social work, clinical psychology, educational psychology, counseling psychology and child development and family studies."

Don't Know Who Your Legislators Are?

Contact Information:



Independent Regulatory Review Commission

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

Senate Consumer Protection and Professional Licensure Committee

Republicans:

Democrats:

[Empty rectangular box]

House Professional Licensure Committee

If your degree is not specifically in counseling or one of the fields defined as being closely related, but you would otherwise qualify, you would be denied a license. PACP believes that this definition must be changed and/or the list expanded.

Read

- **Continuing Education Requirements for Grandparenting:** § 49.15(5)(iv) recognizes only courses approved by approved by NBCC, CRC, CBMT or ATCB as suitable to meet continuing education requirements that some applicants will need to meet for grandparenting. If some of your continuing education is from agency-sponsored programs not approved by a named group, from courses approved by related disciplines, or offered by colleges/universities that have not obtained approval from one of the named groups, it would not be recognized. PACP believes that this proposed requirement is, at least for the purposes of grandparenting, far too restrictive.

Read

- **No Provision for Group Supervision:** Despite the fact that both individual and group supervision is highly valued in professional counseling, group supervision is not allowed by the proposed regulations [see § 49.13(b)(5)]. If you obtain, or expect to obtain, supervision in a group setting, that supervision will not count. PACP believes that group supervision should be allowed as an option for at least some of the supervision that is required.

Read

Credentials and Examinations for Grandparenting: PACP has received numerous complaints from various groups who are disappointed that the credentials and examinations that their members hold have not been recognized in the proposed regulations as suitable for grandparenting of professional counselors. Some of those groups are now implying that they have been excluded from the process. The fact is that PACP has not and does not now oppose the recognition for grandparenting of any credential and/or examination that can be shown, to the satisfaction of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, to meet the criteria established in the licensing law. PACP believes, however, that the responsibility for demonstrating the appropriateness of any credential and/or examination lies with those groups that support and whose members hold the credential and use the examination in question. PACP represents its member organizations and has been diligent in providing information to the Board about the credentials and examinations supported by them. At least one other group not affiliated with PACP, the Northamerican Association of Masters in Psychology (NAMP) has been successful in having its credential and examination recognized by the Licensing Board and included in the proposed regulations. Other professional groups must put forth similar efforts on behalf of their memberships. PACP did not oppose NAMP's efforts and has no plans to oppose the efforts of other groups. But, failure of other groups to work on behalf of their membership is not the responsibility of PACP.

Technical Comments: PACP has also submitted, as an addendum, technical comments on the proposed regulations. Some of the technical comments may be rendered moot if the Board adopts PACP's substantive suggestions. Read the submitted by PACP that are related to professional counseling.



Technical Comments: PACP has also submitted, as an addendum, technical comments on the proposed regulations. Some of the technical comments may be rendered moot if the Board adopts PACP's substantive suggestions. Read the _____ submitted by PACP that are related to marriage and family therapy.



RECEIVED
2001 APR 23 AM 11:10
REVIEW COMMISSION

[]

Commenting on the Proposed Licensure Regulations (Where To Write)

Comments on proposed regulations should be directed to:

✓
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
Please reference number 16A-964 when submitting comments.

PACP suggests that you also do the following (contact information is provided below):

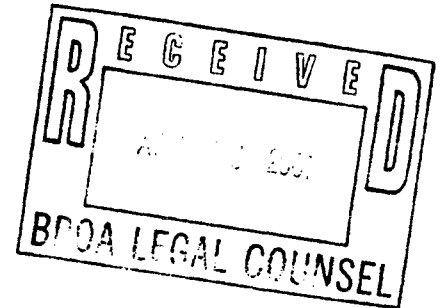
- Send a copy of your comments to the Independent Regulatory Review Commission (IRRC).
- Send a copy of your comments to the Senate Consumer Protection and Professional Licensure Committee. If your State Senator is a member of the Senate Consumer Protection and Professional Licensure Committee contact her or him directly. If your Senator is not a member of the that committee, send your comments to Senator Bell. You may also ask your own Senator to let Chairman Bell and the Senate Consumer Protection and Professional Licensure Committee know about your concerns.
- Send a copy of your comments to the House Professional Licensure Committee. If your State Representative is a member of the House Professional Licensure Committee contact her or him directly. If your Representative is not a member of the that committee, send your comments to Representative Civera. You may also want to ask your own Representative to let Chairman Civera and the House Professional Licensure Committee know about your concerns.

ORIGINAL: 2178

Cynthia Blumenthal, M.S.
13 Creek Road
Chalfont, PA 18914
Phone & Fax: (215) 822-5739
Email: willylyblu@enter.net

RECEIVED
RECEIVED
RECEIVED

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



April 17, 2001

Ref.: 16A-694

Dear Board Members,

I am writing you to express my deep concerns related to The Professional Counselor Licensing Bill as it is currently being considered and its impact on substance abuse treatment in the future. As a Masters-level Addictions Counselor and a concerned resident of Pennsylvania, I support the initiatives to provide licensure for professional counselors. However, I have the following concerns:


1. Regulations fail to recognize Masters-level Addiction Counselors who represent, by far, the largest specialty treatment population in the Commonwealth.
2. The exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American university, from the grandparenting regulations is unjustified and may directly (and indirectly) impact the provisions of services, particularly in our minority communities. The MHS program at Lincoln University is rigorous, innovative and effective. I have worked closely with graduates of this program, who are among the most highly qualified, dedicated and effective in the field of addictions counseling.

I am urging you to include the following within the regulations:

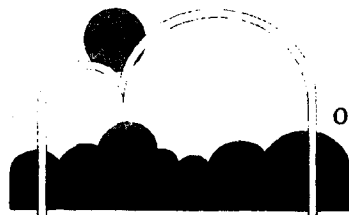
- The grandparenting of Masters-level Addictions Counselors and recognition of CAC (Certification as an Addiction Counselor) as clinical credentialing.
- The grandparenting of the Master's Degree in Human Services as provided by Lincoln University.

I strongly urge your consideration in this matter.

Sincerely,


Cynthia Blumenthal, M.S.

Cc: PCB Board



ORIGINAL: 2178

SERENTO GARDENS

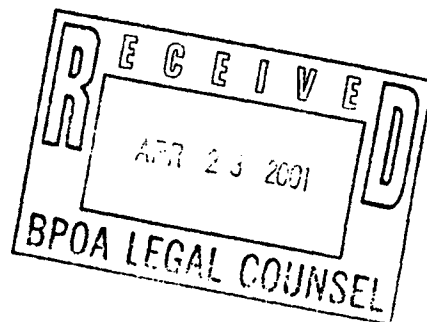
145 West Broad Street
Second Floor
Hazleton, PA 18201

ALCOHOLISM & DRUG SERVICES

570-455-9902
FAX 570-455-9452
Serento@intergrafix.net

April 17, 2001

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



To the members of the Board:

This letter is regarding Act 136, the Professional Counselor Licensing Bill, and the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors, Proposed Rulemaking as recently published in the Pennsylvania Bulletin.

I want to express my deep concerns regarding the non inclusion of Certified Addictions Counselors with Masters Degrees in the proposed standard. As currently written, the standard excludes this very substantial portion of the counseling profession. Furthermore, it ignores the nationally recognized certification standard of the Pennsylvania Certification Board.

Substance abuse counseling is a specialized and specific counseling skill area. While certainly related to the work of our colleagues in the Mental Health fields, a specialized body of knowledge has distinguished it. The characteristics of the client population are unique. Degreed individuals in this field are comparable in every aspect to those you have already included in the proposed Bill.

Substance abuse, including alcoholism, is widely regarded as this country's largest health problem. Costs to industry because of the problem run into the hundreds of billions of dollars. Blue Cross estimates that someone who presents with a substance abuse related medical condition occupies one of every five hospital beds. The incidence of substance abuse as a causative factor in Child Abuse is estimated at more than 80 percent. The United States has the largest criminal justice population in the world, more than 60 percent of whom committed crimes of a substance abuse nature, or crimes while under the influence of alcohol or drugs.

Surely you can see the glaring nature of an oversight that would not acknowledge individuals specialized in this critically important area of behavioral health care.

"Dedicated to the Dignity of Life"

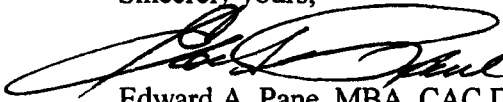


page 2

This letter is to urge you to accept the Certified Addictions Counselor with Masters Degrees into the list of professions recognized in this legislation. Furthermore, I am requesting that you include current Certified Addictions Counselors with appropriate Masters Degrees into the grandparenting portion of the legislation. Finally, I ask that you familiarize yourself with, and accept the ICRC (International Certification and Reciprocity Consortium's) national exam as fulfilling the examination prerequisite. Once you examine the current hurdle criteria to earn Certified Addiction Status in Pennsylvania, I am certain you will discover that the Pennsylvania Certification Board is, in fact, the national leader in this field.

Thank you for your time. I am available at your convenience to discuss the issue further.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Edward A. Pane', written in a cursive style.

Edward A. Pane, MBA, CAC Diplomate
President and Chief Executive Officer

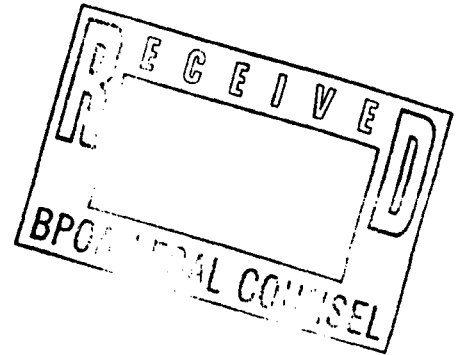
cc: Representative Todd Eachus
Senator Raphael Musto
Pennsylvania Certification Board

ORIGINAL: 2178

235 E. Baltimore Street
Apt. B
Greencastle, PA 17225

April 17, 2001

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



RE: 16A-964 PA Counselor's Licensure Proposals

Dear Ms. Cheney:

I am writing to express my concerns and desires regarding the proposed licensure regulations (16A-964). Since my degrees are in psychology, and I am a nationally certified psychologist, my comments will be directed concerning the grandparenting requirements concerning NAMP members and other psychologists.

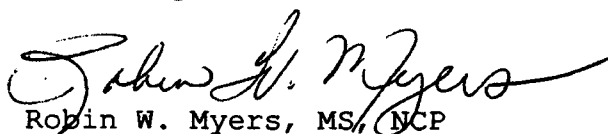
First, I believe section 49.1 "field closely related to the practice of professional counseling" is too narrow in its definitions. I would like the degree of "PSYCHOLOGY" to also be added to the list of closely related fields. For example, I attended Shippensburg University and obtained my Master of Science degree in psychology. Shippensburg University's counseling program is NBCC approved, and since the counseling and psychology courses are closely related and are often taught by the same professors, I believe it is vital to recognize "PSYCHOLOGY" as a sufficient title within itself. To deny the title of "Psychology" would be to deny competent professionals, e.g., Shippensburg University's course work in psychology is specifically designed for the student to go on for a doctorate degree thereby demonstrating the integrity and strength of its professional mental health program.

Second, I believe section 49.15(5)(iv) "continuing education requirements for grandparenting" are too restrictive, as many people like myself sought to obtain continuing education courses to meet the 48 semester hour requirements for licensure without specific guidelines having been established. Therefore, I would like to

propose that continuing education course work and credits be inclusive of any college, university, institution, agency, etc., that awards college credit or CEU's that are APPROVED by the AMERICAN PSYCHOLOGICAL ASSOCIATION and in accordance to their guidelines. For example, I spent the last three years of my life pursuing continuing education requirements through a doctorate program in psychology that is not NBCC approved but is in pre-membership status for the AABC and has been APPROVED by the AMERICAN PSYCHOLOGICAL ASSOCIATION TO OFFER CONTINUING EDUCATION FOR PSYCHOLOGISTS. I would like to see APA approved course work (graduate & doctorate classes) and CEU credits recognized for psychologists for grandparenting purposes. To ignore the AMERICAN PSYCHOLOGICAL ASSOCIATION would be a travesty indeed -- as many qualified professionals would be excluded from licensure.

Thank you Board Counselwoman Cheney for your time and energy and receiving and reviewing my letter and comments.

Sincerely,



Robin W. Myers, MS, NCP

CC: Independent Regulatory Review Commission

Read

- **Supervision Hours:** Two subsections of § 49.13 of the proposed regulations would require that the first 1,800 of the 3,600 hours of supervised clinical experience required for licensure be supervised by a licensed professional counselor, or, until January 1, 2006, a professional counselor with 5 years experience as a professional counselor. If you are not eligible for grandparenting and are currently working under supervision in order to meet licensure requirements, your supervision will not be acceptable to the Board unless it is being provided by a professional counselor. Supervised clinical experience with supervision provided by anyone in a related discipline would be disallowed until 1,800 of hours of that experience is supervised by a professional counselor. If the proposed regulations are adopted, you might have to begin your supervised clinical experience all over again. Also, while it seems reasonable to require that half (but not the first half) of one's supervised clinical experience be under the supervision of a professional in one's own discipline, the Board has not provided any possibility of a waiver for applicant's in exceptional circumstances who may be unable to obtain within-discipline supervision (such as those living and working in rural areas).

Read

Read

- **Internship Requirements:** § 49.2(9) sets forth clinical instruction requirements that must be included in the planned graduate program that would be required for licensure (not grandparenting). This section reads:

"(9) Clinical instruction--(Includes 100 clock hours of supervised practicum experience and 600 clock hours of supervised internship experience). The supervised internship experience shall begin after completion of the supervised practicum experience."

Six hundred hours of internship is the recognized standard of preparation in professional counseling and should be retained. However if you are a recent graduate of or current student in a program that offers less than a 600 hour internship you may be unable to find a college/university to provide you with the opportunity to take additional internship courses. Counselor educators know that these courses, with very low faculty-to-student ratios and the need for extensive development of appropriate field placement sites, are very expensive and difficult to offer. If you are in this situation or if you are a counselor educator in a program with less than 600 hours of internship we think you should argue for a grace period to develop clinical instruction that meets recognized national standards. PACP is going to suggest that that grace period last for 5 years, and that during that time 6 semester hours of practicum/internship be sufficient to meet the requirement in § 49.2(9).

Read

- ✓ • **Field closely related to the practice of professional counseling:** § 49.1 of the proposed regulations defines "Field closely related to the practice of professional counseling" as follows:

"Includes the fields of social work, clinical psychology, educational psychology, counseling psychology and child development and family studies."

Don't Know Who Your Legislators Are?

Contact Information:



Independent Regulatory Review Commission

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

Senate Consumer Protection and Professional Licensure Committee

Republicans:

Democrats:

[Empty rectangular box]

House Professional Licensure Committee

If your degree is not specifically in counseling or one of the fields defined as being closely related, but you would otherwise qualify, you would be denied a license. PACP believes that this definition must be changed and/or the list expanded.

Read

- **Continuing Education Requirements for Grandparenting:** § 49.15(5)(iv) recognizes only courses approved by approved by NBCC, CRC, CBMT or ATCB as suitable to meet continuing education requirements that some applicants will need to meet for grandparenting. If some of your continuing education is from agency-sponsored programs not approved by a named group, from courses approved by related disciplines, or offered by colleges/universities that have not obtained approval from one of the named groups, it would not be recognized. PACP believes that this proposed requirement is, at least for the purposes of grandparenting, far too restrictive.

Read

- **No Provision for Group Supervision:** Despite the fact that both individual and group supervision is highly valued in professional counseling, group supervision is not allowed by the proposed regulations [see § 49.13(b)(5)]. If you obtain, or expect to obtain, supervision in a group setting, that supervision will not count. PACP believes that group supervision should be allowed as an option for at least some of the supervision that is required.

Read

Credentials and Examinations for Grandparenting: PACP has received numerous complaints from various groups who are disappointed that the credentials and examinations that their members hold have not been recognized in the proposed regulations as suitable for grandparenting of professional counselors. Some of those groups are now implying that they have been excluded from the process. The fact is that PACP has not and does not now oppose the recognition for grandparenting of any credential and/or examination that can be shown, to the satisfaction of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, to meet the criteria established in the licensing law. PACP believes, however, that the responsibility for demonstrating the appropriateness of any credential and/or examination lies with those groups that support and whose members hold the credential and use the examination in question. PACP represents its member organizations and has been diligent in providing information to the Board about the credentials and examinations supported by them. At least one other group not affiliated with PACP, the Northamerican Association of Masters in Psychology (NAMP) has been successful in having its credential and examination recognized by the Licensing Board and included in the proposed regulations. Other professional groups must put forth similar efforts on behalf of their memberships. PACP did not oppose NAMP's efforts and has no plans to oppose the efforts of other groups. But, failure of other groups to work on behalf of their membership is not the responsibility of PACP.

Technical Comments: PACP has also submitted, as an addendum, technical comments on the proposed regulations. Some of the technical comments may be rendered moot if the Board adopts PACP's substantive suggestions. Read the _____ submitted by PACP that are related to professional counseling.



Technical Comments: PACP has also submitted, as an addendum, technical comments on the proposed regulations. Some of the technical comments may be rendered moot if the Board adopts PACP's substantive suggestions. Read the _____ submitted by PACP that are related to marriage and family therapy.



[]

Commenting on the Proposed Licensure Regulations (Where To Write)

Comments on proposed regulations should be directed to:

✓ 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
Please reference number 16A-964 when submitting comments.

PACP suggests that you also do the following (contact information is provided below):

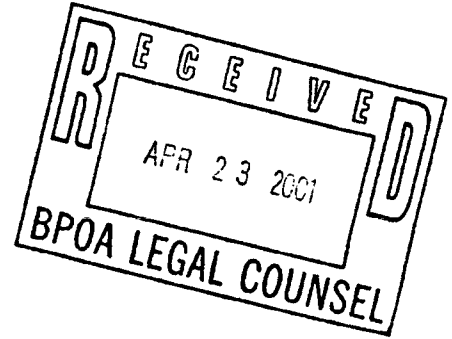
- Send a copy of your comments to the Independent Regulatory Review Commission (IRRC).
- Send a copy of your comments to the Senate Consumer Protection and Professional Licensure Committee. If your State Senator is a member of the Senate Consumer Protection and Professional Licensure Committee contact her or him directly. If your Senator is not a member of the that committee, send your comments to Senator Bell. You may also ask your own Senator to let Chairman Bell and the Senate Consumer Protection and Professional Licensure Committee know about your concerns.
- Send a copy of your comments to the House Professional Licensure Committee. If your State Representative is a member of the House Professional Licensure Committee contact her or him directly. If your Representative is not a member of the that committee, send your comments to Representative Civera. You may also want to ask your own Representative to let Chairman Civera and the House Professional Licensure Committee know about your concerns.

ORIGINAL: 2178

Robert T. Waddington, M.A., C.A.C.
92 Whetstone Road
Horsham, PA 19044-1928 phone: 215-773-0691

4/17/2001

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



Dear Eva Cheney:

I am writing to you as a Certified Addictions Counselor with a Master's Degree, as well as a concerned resident of the Commonwealth of Pennsylvania. It has come to my attention that Act 136, The Professional Counselor Licensing Bill, has excluded persons of my qualification from the grandparenting regulations. I find this a discriminatory omission.

While I have worked in the field of Chemical Addiction Counseling, I have worked with a licensed social worker, who did not know the first thing about counseling chemically addicted clients. I had to spend hours training her. Yet she had to sign off on my paperwork for one insurance company. I have counseled clients, whose primary care doctors have prescribed them addictive medicines, even when they have known about the client's addictive history.

The omission of grandparenting Master's level addiction specialists, I see as a grave mistake. I also see it as an insult to those who occupy the same level of education in a profession, in which I take pride.

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

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

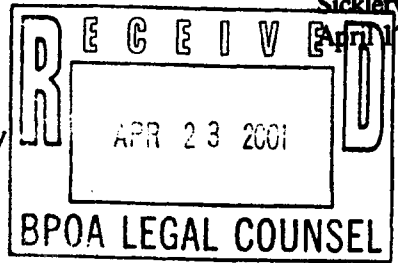
I strongly urge your consideration in this matter as a mean of assuring the citizens of Pennsylvania qualified and competent services, as well as avoiding, in my opinion, a highly discriminatory decision.

Sincerely,

Robert T. Waddington M.A., CAC
Robert T. Waddington, M.A., C.A.C.

RECEIVED
APR 23 2001
BPOA LEGAL COUNSEL

Megan Charney
13 Fletcher Blvd.
Sicklerville, NJ 08081
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

Dear Attorney Cheney,

This letter is to express my gratitude for efforts that the State Board has made in developing the proposed Regulations for Professional Counselors. These efforts clearly reflect an intention to provide professional standards in order to: protect Pennsylvania 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 counseling specialty is in the field of the Creative Arts Therapies, attending MCP Hahnemann University for my Master's Degree. I will be graduating in May of 2002, with a degree in Art Therapy. I have interned at a County Hospital and an Adolescent Center.

Despite the excellent work done by you and the Licensure Board, I have some sincere concerns about some of the provisions of the proposed regulations. I concur with the views expressed by the Pennsylvania Alliance of Counseling Professionals (PACP), regarding the proposed Professional Counselor Regulations. PACP's most recent Letter of Response to the proposed Regulations closely reflects my own concerns/suggestions.

In anticipating applying for state licensure, I am particularly concerned about the following Regulation provisions and share my suggestions for Regulation adjustments, 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. My concern is that many well-qualified and experienced professionals, such as the Creative Arts Therapies are excluded. My suggestion is to edit the definition to include the CATs and specifically list Art Therapy, Dance/Movement Therapy, and so on.

Regulation # 49.15 - This 'Grand-parenting' section should not require restrictive direct client contact hours. Hourly requirements should be limited to 'practice' hours only.

Thank you in advance for your consideration on this matter.

Sincerely,
Megan A. Charney, BA.
Megan Charney, BA.

Cc: mlc

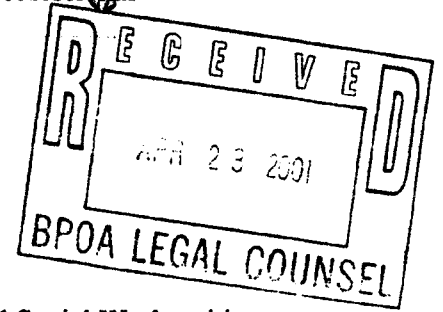
201 APR 23 10:00 AM
RECEIVED
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS
116 PINE STREET
HARRISBURG, PA 17105-2649

ORIGINAL: 2178

April 17, 2001

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

RECEIVED
2001 APR 26 11:31:53
REVIEW COMMISSION



Dear Ms. Cheney:

I am an LSW and a member of the Pennsylvania Society for Clinical Social Work writing to thank you for the work you have done on social work licensing, and to share with you some thoughts on the proposed regulations for the LSCW bill. As a professional, I am interested in seeing high standards set for the clinical social work license, and support much of what has been proposed. However, aspects of the proposed regulations seem to me unreasonable given the personnel resources available in many social work settings. Because our clients are often unable to pay for our services themselves, social work agencies are frequently staffed by the fewest number of people possible, with each staff member carrying large caseloads. Out of necessity, supervision is kept to a bare minimum when it is available at all. In very few settings would a supervisor be available to provide the kind of oversight for which the proposed regulations call.

Specifically, it is not reasonable to ask a supervisor to observe sessions. I currently work as the domestic violence social worker for a group of hospitals in suburban Philadelphia. My boss oversees 17 social workers in three different locations. No supervision is provided in my place of work. I have sought outside supervision to promote my own professional growth, and my situation is hardly unique. Many of my colleague social workers find it necessary to pay a private clinician in order to get adequate – or any – supervision. Obviously, it would be extremely difficult – and in most cases impossible – for a supervisor unconnected with the agency in which the social worker practices to observe sessions. I can imagine that there might be many agencies that would not allow such an intrusion for reasons related to liability and confidentiality. A feasible alternative might include the supervisor reviewing the new clinician's work through the use of process recordings, which are written verbatim scripts of client-social worker interactions that allow for analysis of the session.

In addition, the demands on the profession may necessitate greater flexibility in regard to the modality of supervision. Group supervision is a viable alternative to individual supervision. It is less expensive and more time efficient, and supervisees benefit from hearing cases presented by their colleagues.

Finally, I would suggest that licensed PhD or PsyD level psychologists be eligible to supervise LCSW candidates. In clinical practice, the disciplines are close together, and social workers and psychologists frequently work side by side in agency settings. Indeed, a psychologist may be an LCSW candidate's only supervisor in an agency.

High standards for clinical licensure will promote professionalism and ethical practice. However, if the regulations governing the LCSW are unreasonably burdensome, new social workers may not be able to find agencies in which the licensing requirements can be met. Standards should be high enough to encourage expertise and accountability, but not so high as to prevent entry to all but the few lucky enough to find the kind of supervision described in these regulations.

Thank you again for your work on this important matter.

Regards,



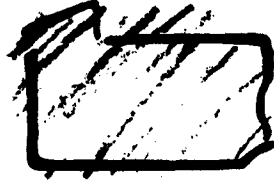
Lisa A. Mullins, MIA, MSW, LSW
2509 Pine Street
Philadelphia, PA 19103
215/772-0202
e-mail: lamsw@bellatlantic.net

cc:

Sen. Vincent Fumo
Hon. Babette Josephs

ORIGINAL: 2178

2001 APR 26 11:04:17
REVIEW COMMISSION



PCB
PENNSYLVANIA
CERTIFICATION BOARD

April 17, 2001

Thomas F. Matta, Ph.D., Chairman
State Board of Social Workers, Marriage & Family
Therapists & Professional Counselors
Department of State, Bureau of Professional
And Occupational Affairs
PO Box 2649
Harrisburg, PA 17105-2649

Dear Dr. Matta:

I would like to receive a copy of the final-form rulemaking regarding the licensure of professional counselors, reference number 16A-694. When available, please mail to me at the above address.

Thank you.

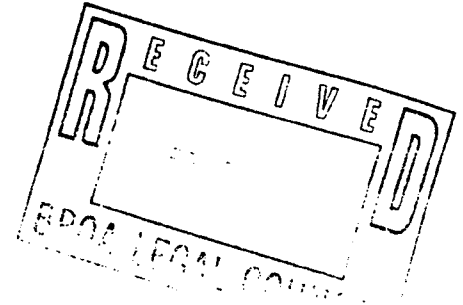
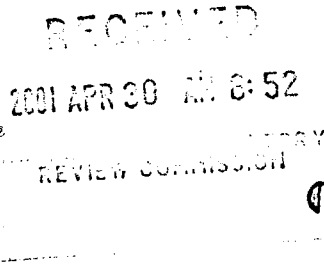
Sincerely,

Mary Jo Mather
Executive Director

RECEIVED
01 APR 19 AM 11:14
HEALTH LICENSING
DIVISION

RECEIVED
APR 23 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178



April 17, 2001

Ms. 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

Re: Proposed amendments to 49 Pa. Code Chapters 47-49; 16A-694

Dear Ms. Cheney,

KidsPeace would like to submit the following comments to the proposed amendments to the regulations on licensure of Social Workers, Marriage and Family Therapists and Professional Counselors.

Overall, the regulations appear to have been written primarily from the perspective of practitioners in private practice and do not reflect the different reality of working within an organization like KidsPeace. Please note the following:

§47.12c(b) (2) (page 1578); §48.13(b)(2) (page 1582); §49.13(b)(2) (page 1586) – The requirement that one half (1,800) of the hours of the required supervised clinical experience be supervised by an individual in the same category of licensure will be extremely limiting in an organization like KidsPeace which, while it employs a variety of types of mental health professionals in supervisory roles, may not have the capacity to provide the specified type of licensed supervisor required by the candidates within the scope of their work duties for the number of hours required. The goals of providing a broad experience and making it easier to locate a supervisor would, however, be enhanced by giving greater flexibility in this area.

§47.12c(b) (3) (page 1578); §48.13(b)(3) (page 1582); §49.13(b)(3) (page 1586) – The requirement that a supervisee obtain the written permission of a patient to discuss his/her case with the supervisor seems burdensome and unnecessary in the circumstances of an organization such as KidsPeace, where both the supervisor and supervisee are staff clinicians working together for the benefit of the patient. In this situation, the expectation that such cases will be discussed as part of the course of treatment should be an obvious assumption by the patient and covered by the consent to treat given at the time of admission. A separate, specific consent should not be required under these circumstances.

§47.12c(b) (5) (page 1579); §48.13(b)(5) (page 1582); §49.13(b)(5) (page 1586) – The supervision regulations for social workers and professional counselors require that the minimum 1 hour of in person supervision shall be on an individual basis while the regulation for marriage and family therapists require that, of the minimum 2 hours of supervision, one must be on an individual basis and one in a group setting. These are not consistent, and the reason for the difference in requirements is not clear. Requiring that all of the minimum hours be on an individual basis would be burdensome within an organization such as KidsPeace where a supervisor will likely be supervising numerous candidates within the scope of their employment of providing care.

§47.12c (b) (6) (page 1579); §48.13(b)(6) (page 1582); §49.13(b)(6) (page 1586) – The limitation of a supervisor for supervised clinical experience to 6 supervisees at one time could cause hardship within an organization like KidsPeace. It could require the organization to obtain the services of additional licensed individuals to supervise within certain programs depending upon the number of prospective candidates among employed social workers at a given time.

§47.12c(b) (7) (page 1579); §48.13(b)(7)(page 1582); §49.13(b)(7)(page 1586) – this provision makes no allowances for sudden extenuating circumstances such as a health emergency or an employment change on the part of the supervisor. Within an organization such as KidsPeace, this could be addressed by allowing the transfer of supervisory responsibilities to another qualified individual within the organization. There should, however, be some provision for exceptions for supervisors in any setting.



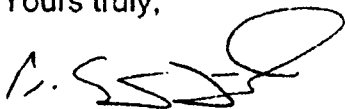
In addition to the regulations noted above, I am especially concerned with the following:

§47.13(b) (4) (page 1580); – This requirement for exemption from licensure examination states that the required clinical social work practice must have taken place within the Commonwealth of PA. The experience requirements of §48.15(4) and §49.15(4) for marriage and family therapists and professional counselors do not contain this same restriction. This provision for social workers, therefore, seems to be unduly restrictive and some reciprocity for proof of applicable practice in other states is recommended.

Two years ago, I was recruited by KidsPeace to be their Vice President of Programs. I have been a Licensed Social Worker since 1985 and a Licensed Clinical Social Worker since 1994. I also have the Qualified Clinical Social Worker credential from the National Association of Social Workers. However, in spite of these credentials and licenses, I would not be eligible to be licensed in Pennsylvania without passing an examination. I cannot believe this is necessary. Please give this regulation further consideration.

I appreciate the opportunity to respond to these draft regulations and have input prior to promulgation.

Yours truly,



B. Scott Finnell, Ph. D, LSW, QCSW
Senior Vice President of Programs

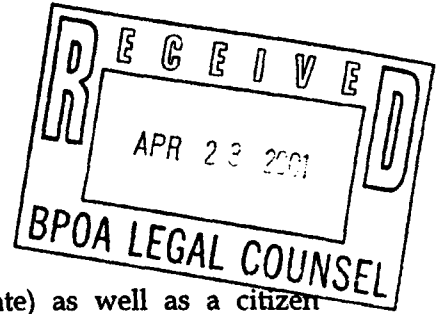


ORIGINAL: 2178

April 17, 2001

2001 APR 25 11:54:47

REVIEW COMMISSION



Dear Ms. Cheney:

I am writing as a certified addictions counselor (Diplomate) as well as a citizen concerned with the substance abuse problem in this country. I have some concerns that some of the criteria related to Act 136 and licensure may have an adverse effect on persons seeking treatment for addiction issues. Of most concern is that Certified Addiction Counselors with a Master's Degree (mine being in Counseling Psychology) are excluded in the grand-fathering regulations. I, like a large group of my colleagues, represent a large segment of the specialty treatment providers in the state. We have completed an accredited Master's degree program, passed both written and oral competency exams, and are required to accumulate 20 - 25 hours of ongoing education per year to maintain our certifications and to remain updated on the latest news in the field of addiction.

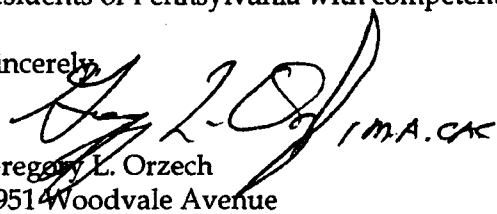
In a related matter, the licensing guidelines exclude a large number of minority counselors who have obtained a Master's Degree in Human Services from Lincoln University. These people perform an important service for many members of minority populations fighting addiction in urban areas and can provide culturally competent services.

In closing, I am strongly in favor of the following inclusions to the proposed Act 136 regulations:

- Allowing individuals holding a Master's Degree and Certified Addictions Counselor (CAC) certification to be eligible for grand-fathering licensure.
- Accepting the IC.RC national exam as part of the grand-fathering process.
- Allowing individuals with a Master's Degree in Human Services from Lincoln University to be eligible for grand-fathering regulations.

I sincerely ask you to seriously consider these additions to Act 136 in order to provide residents of Pennsylvania with competent treatment services.

Sincerely,


Gregory L. Orzech
1951 Woodvale Avenue
Reading, PA 19606
(610) 374-4907

Cc: PCB Board



APR 23 2001

BPOA LEGAL COUNSEL

ORIGINAL: 2178

Ellen Schelly Hill, MMT, ADTR, NCC
Assistant Professor, Clinical Coordinator
College of Nursing and Health Professions
Creative Arts in Therapy Program
Mail Stop 905 • 245 N. 15th Street • Philadelphia, PA 19102-1192
TEL 215.762.7851 • FAX 215.762.6933 • E-MAIL Ellen.Schelly-Hill@drexel.edu

Eva Cheyney, Board Counselor
State Board of Social Workers, Marriage and Family Therapists,
and Professional Counselors
116 Pine Street/ P.O. Box 2649
Harrisburg, Pa. 17105-2649

April 17, 2001

Dear Attorney Cheyney,

I have just reviewed the proposed Regulations for Professional Counselors. I am impressed with and grateful for the conscientious work of the State Board. However, I concur with the Pennsylvania Alliance of Counseling Professionals (PACP) "Concerns" and "Suggestions" in their most recent letter of response. I want, in particular, to detail my concerns about the Grandfathering requirements set forth in 49.15 and to suggest a revision which will insure that Mental Health consumers, students, and agencies continue to benefit from the experienced contributions of the Grandparents of the professional counseling field.

I am a "grandparent". My professional counseling specialty is in Creative Arts Therapies, with a specialty in Dance/Movement Therapy. I received my masters degree in 1979. I am an advanced clinician with 22 years of clinical experience, 16 years supervisory experience, 9 years of university teaching experience, who has published and presented professionally. However, under the currently proposed terms of grandparenting I would not qualify for licensure as a professional counselor in the State of Pennsylvania. For the past 5 years my principle work has been as Assistant Professor and Clinical Coordinator of the Creative Arts in Therapy Graduate Education Program and previously as the Associate Director of the Behavioral Counseling Sciences Program at MCP Hahnemann University. Although I have kept my foot in direct clinical practice by providing a weekly therapy group (and hope to continue), the demands of my primary faculty and administrative roles have limited the number of hours I can currently spend in direct clinical contact. I do not meet the hour requirements set forth for Grandparenting in 49.15:

"(4) 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 involving direct client contact"

There is no similar restrictive direct client contact requirement for persons seeking grandparenting as Licensed Clinical Social Workers under the same bill. I believe that there are many excellent professional counselors who have moved into administrative or academic roles following lives of primary clinical practice who continue to devote a small number of hours to direct service. I believe the Grandfathering regulations need to insure that these counselors may continue to practice and their clients benefit from their experienced service. I recommend revision of Grandparenting clause 49.15 to read:

Must have completed at least three years or 3,600 hours of clinical experience and 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 a week as a professional counselor in a clinical, supervisory, administrative and/or educational role.

Please give thoughtful consideration to my concerns and suggestion for revision. I believe the revision would serve the needs of consumers, students, agencies and professional counselors alike. And thank you again for the hard work of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Schelly Hill". The signature is written in black ink and is positioned below the word "Sincerely,".

Ellen Schelly Hill, MMT, ADTR, NCC

Curriculum Matrix of Lincoln University and Three Major Schools of Social Work in Pennsylvania

Independent Regulatory Review Committee
C/o John R. McGinley, Jr., Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

ORIGINAL: 2178

April 17, 2001

Dear Mr. Chairman and Review Committee:

I'm writing in response to the Pennsylvania Bulletin that was posted March 23, 2001 regarding MFT Licensure Standards. It is with great passion I submit this letter regarding my position to the proposed standard Act 136.

I am a 1997 graduate of a COAMFTE approved school called Penn Council for Relationships of Thomas Jefferson University, which required me to practice as an intern during my 3 years as a student. Prior to that, I have practiced as a therapist and administrator for 3 years, while studying for my Master's degree from Lincoln University, which I received 5/1990. Now, I am finishing my training to receive my AAMFT supervision certification from Penn Council for Relationships. As of 6/2001, I will finish my didactic and interaction requirements. My full requirements will be over by 9/2002 or sooner. My commitment and perseverance in this work is evident; therefore, I am asking you to include the Master of Human Services degree from Lincoln University in the regulations because according to the posted standard, I will not be able to test for Licensure in Pennsylvania.

The graduate **54 hours** coursework in Lincoln University Master's of Human Services Program is comparable to NBCC/ CACREP standards, which includes the following content areas and work behaviors;

Human Growth and Development
Social and Cultural Foundations
Helping Relationships
Group Work
Career and Lifestyle Development
Appraisal
Research and Program Evaluation
Professional Orientation & Ethics
Practicum and Thesis development are incorporated in this curriculum each (5) semester

In Addition I have completed all my coursework, clinical hours and supervision and obtained clinical membership in AAMFT. With all this attention and commitment I gave to this work, I importune you to include the Master of Human Services degree to the guidelines to be included for Licensure in the State of Pennsylvania.

RECEIVED
2001 APR 23 AM 11:02
INDEPENDENT REGULATORY
REVIEW COMMISSION

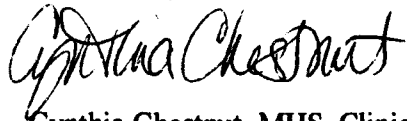
Curriculum Matrix of Lincoln University and Three Major Schools of Social Work in Pennsylvania

Please refer to the **Curriculum Matrix** of three major Schools of Social Work in Pennsylvania and Lincoln University Curriculum, and you will notice no major difference.

If you allow this proposed bill to be passed as law as is, you will participate in a major injustice to the vast majority of individuals holding this Master's degree who are working with minority population in our urban centers and have contributed to change that enhances the well being of our suffering communities.

I sincerely urge your consideration to this matter and I thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink that reads "Cynthia Chestnut". The signature is written in a cursive style with a large initial "C".

Cynthia Chestnut, MHS, Clinical Member AAMFT

c.c. State Board of Social Workers, Marriage and Family Therapist & Professional Counselors

Curriculum Matrix of Lincoln University and Three Major Schools of Social Work in Pennsylvania

**Lincoln University
Master in Human Services Program
54 credits**

**Temple University
MSW Program**

**University of PA
MSW Program**

**Bryn Mawr College
MSS Program**

Ethics for Human Services	Social Welfare Policy & Services	History and Philosophy Of Social Work and Social Welfare	Foundations Practice Seminar 1,2,3,4
Psychology for Human Services	Community Encounter	Individual Functioning in the Social Environment	Research and Evaluation for Social Work Practice
Sociology for Human Services: Introduction to Systems	Practice of Social Service Delivery	American Racism and Social Work Practice	Human Behavior and the Social Environment 1, 2, 3
Communication Skills for Human Service Practitioners	Intro to Social Research	Foundations of Social Work Practice	Issues of Cultural Diversity
Constructive Action Thesis Development (5 semesters)	Human Behavior & Social Environment 1	Contemporary Social Policy	Field Instruction 1,2,3,4
Professional Ethics	Field Practicum (5 Semester)	Group, Organizational, and Community Dynamics	Electives 2
Psychology /Theories of Helping	Social Welfare Policy & Services 2	Promoting Social Change: Issues of Race and Gender	Social Welfare Policy
Human Systems & Helping Relationships	Practice of Social Service Delivery 2	Social Work Practice 3 x (s)	
Helping and Problem Solving Skills	Human Behavior & Social Environment 2	Introduction to Social Work Research	
Ethics and Groups	Social Program Evaluation	Research (option)	
Psychology / Dynamics of Face to Face Groups	Service Delivery Practice Individual & Family 3 x (s)	Practice (option)	
Social Analysis of Human Systems	Organizational Change or Supervision, Staff Development & Training	2 electives	
Skills in Social Research, Statistics & Problem Solving 1	Advanced Human Behavior & Social Environment		
Community Program and Management & Social Justice	Advanced Social Welfare Policy		
Strategies for Community and Program Development	Practice of administration & social planning 1, 2		
Social Planning and Organizational Management Systems	Financial management 1,2		
Skills in Social Research, Statistics 2	Organization theory		
Ethics of Intervention and Change	Personnel administration or community planning & consultation		
Psychology of Planned Change			
Planned Change in Organizations and Social Systems			

Curriculum Matrix of Lincoln University and Three Major Schools of Social Work in Pennsylvania

Program Evaluation Skills			
Theory and Practicum Integration 5 semesters			

ORIGINAL: 2178

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

RECEIVED

2001 APR 18 AM 11:55

REVIEW COMMISSION



Dear Ms Cheney,

I am writing as a Master Level therapist and CAC for the past twenty-five years as well as a concerned consumer 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 problems with the regulations involve the grand parenting issues. The regulations fail to take into account the special nature of addiction counseling leaving out the Master's level addiction specialist. Certified Addiction counselors with Master's level are not recognized by the regulations. These individuals have undergone training, testing and supervision, which exceed the standards of the clinicians, which will be grandfathered according to the regulations. It is imperative to note that Addiction counseling requires specific training due to the nature of the client and the federal and state mandates, which are unique to the AoD field. The Certified Addiction Counseling board has assured that all therapist certified under there they are deemed competent and maintained this standard of competency. It would be short sided to ignore this level of professionalism in coping with a disease, which affects multiple clients.

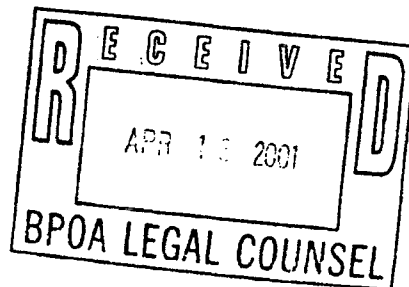
- I am strongly advocating for the inclusion within the regulations of grand parenting regulation of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- I would also like to advocate for the inclusion of the International Certification & Reciprocity Consortium (IC&RC) national exam for addiction counselors as an acceptable exam under the grand parenting regulations.

I am in agreement with your stance on the Master's Degree in Human Services. Although I recognize the possible impact on the various racial and ethnic groups, I would not want to lower the standards that are profession has come to expect from the therapist. I would suggest possible financial assistance to allow recovering individuals to achieve the level of education that we have come to expect from therapist in Pennsylvania.

I sincerely urge your consideration in this matter as a means of assuring that the citizens of our Commonwealth are provided the highest standard of care that is possible.

Sincerely,

Timothy R. Munsch, MS, CAC Diplomat
850 Juniper Rd.
Hellertown, Pa. 18055



ORIGINAL: 2178

Marguerite L. Babcock, M.Ed., M.A.C., C.A.C., N.C.C.

**R.R.1, Box 138 Acme PA 15610
724-593-7139 allele@lhtc.net**

April 16, 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: Response to Proposed Licensure Regulations,
16A-694

Dear Ms. Cheney:

I extend my thanks to the Board for their hard work on regulations for Act 136. The extension of licensing in Pennsylvania is much needed, for both clients and professionals.

This letter outlines my concerns with the regulations in their present draft. I write from the perspective of someone who has been working in the addictions field for over 22 years. As you know, this field has no specific licensing currently available in Pennsylvania.

1. Grandparenting:

- A. As stated by the Pennsylvania Alliance of Counseling Professionals, the minimum weekly hourly practice and direct client contact requirement should be dropped from the regulations. Due to merited job promotions, many of the most accomplished counselors in addictions work have been employed in supervisory or administrative positions for several years, and could not meet the client contact requirements. Discouraged by managed care requirements for licensing, many other long-term addictions counselors have moved into related fields such as education or consulting. To keep the presently proposed client contact requirement would mean that less, rather than more, experienced addictions counselors would be eligible for grandparenting under Act 136.
- B. Concerning sources for continued education hours to meet grandparenting requirements, it is not clear from the present draft of regulations whether courses approved by NBCC, CRT, CBMT or ATCB would just automatically be accepted (barring those on office management or practice building) -- or whether *only* courses approved by those sources would be accepted. If the latter is the case, then this list is too restrictive. An alternative would be that suggested by PACP, including any training related to professional counseling.

RECEIVED
2001 APR 19 AM 09:53
PENNSYLVANIA
STATE BOARD OF
SOCIAL WORKERS,
MARRIAGE AND
FAMILY THERAPISTS,
AND PROFESSIONAL
COUNSELORS

2. **"Field closely related to the practice of professional counseling"**:

This is mentioned in the requirements for educational degrees. As defined in §49.1 of the present draft of regulations, the list of related fields may be too restrictive. If the word "includes" in the definition means "includes but not restricted to," then the list is only suggestive. However, if "includes" means "only," then several important fields seem to be left out. I am not at all sure that my Master's degree in Counselor Education would fit into this list, and many accomplished counselors in addictions work hold this degree.

It is extremely commendable that major goals of Act 136 are to improve professional competency and to protect consumers. However, the issues I have noted above will, unless addressed, create significant barriers to very able addictions counselors becoming licensed under this Act. Due to the demands of managed care for licensing, many of us in the addictions field have lost our jobs to clinicians who were licensed but otherwise unprepared for work with addicted clients. This is grossly unfair to us, and dangerous for our consumers. However, we do not want an act that primarily encourages less experienced addictions workers to be licensed. That would also be unfair to veterans in the addictions field and harmful for our clients.

Addictions counselors, and especially the more experienced ones, need licensing in this State. Although several of us in the addictions field have pushed to have licensing enacted for our specific work, that has not happened in Pennsylvania. Act 136 is a wonderful opportunity to correct this situation, if the regulations are modified to fit the need.

Thank you very much for your attention to my remarks.

Sincerely,



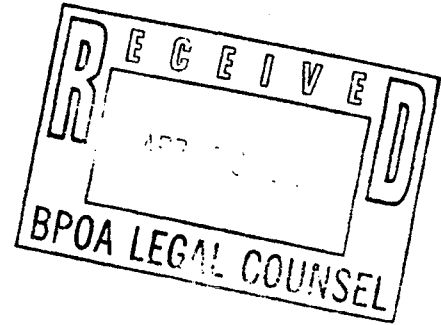
Marguerite Babcock, M.Ed., M.A.C., C.A.C., N.C.C.

CC: Independent Regulatory Review Commission
PA Senate Consumer Protection and Professional Licensure Committee, Bell and
Kukovich
PA House Professional Licensure Committee, Civera

ORIGINAL: 2178

April 16, 2001

Sharon Vucina Seidel, MA, CAC Diplomat
134 Jacqueline Drive
Johnstown, PA 15904



State Board of Social Workers
116 Pine Street
P. O. Box 2649
Harrisburg, PA 17105
Attn: Eva Cheney

Dear Eva:

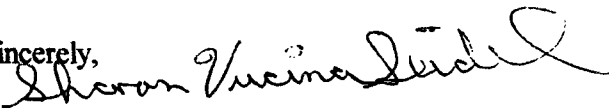
I am writing to you as a Master's level CAC Diplomat as well as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to ACT 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues. The regulations fail to recognize Master's level addiction specialists. Certified Addictions Counselors with a Master's degree are not recognized by the regulations. I have worked hard to achieve a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC). My skills are continually supervised by Doctoral level personnel and my skills are improved via yearly continuing education. My skills are honed and utilized every bit as professionally as other professional counselors.

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

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

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

Sincerely,


Sharon Vucina Seidel, MA, CAC Diplomat
134 Jacqueline Drive, Johnstown, PA 15904
Phone: (814) 266-5236

cc: PCB Board

RECEIVED
APR 16 2001
04/16/01
BPOA LEGAL COUNSEL

To State Board of Social Workers &
Family Therapist & Professional
Counselors:
Reference # 16A-694

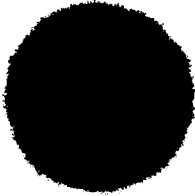
I am writing to express concern regarding Act 136. My name is Rachel Roundtree. I am a certified addictions counselor (CAC) and I hold a Master's in Human Services degree from Lincoln University since 1988. For the past two years I have worked toward a Ph.d in Community Health at Walden University. I held employment for 13 years (1975-1988) as a mental health counselor in Fort Washington a suburb of Phila. I have worked for the past 12 years as a counselor in a methadone clinic in North Philadelphia. According to Act 136 I am excluded from the licensure process. I am excluded as a trained professional counselor, I am excluded as a scholar, I am excluded as an African American I am excluded..... Act 136 from my perception and others I have spoken with is clearly not inclusive and is detrimental to the community at large. Did you talk to communities who would be affected by this effort? Did you ask us what our needs were? I am requesting that you include Lincoln's MHS. degree as well as the Certified addiction counselor for grandfathering opportunities. I am positive that we will bring expertise heightened awareness and diversity to the licensure effort.

Rachel Roundtree
459 E. Wister St.
Phila 19144

RECEIVED
2001 APR 25 11:10:02
REVIEW COMMITTEE

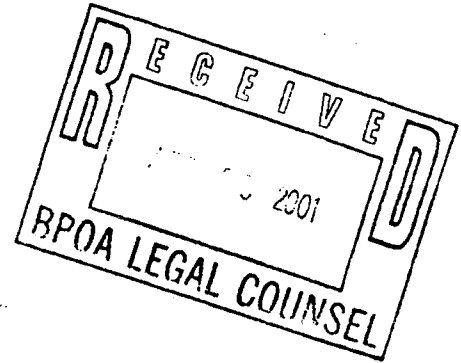
ORIGINAL: 2178

PRO•A



PENNSYLVANIA RECOVERY
ORGANIZATIONS ALLIANCE

RECEIVED
2001 APR 27 AM 10:53
REVIEW COMMITTEE



April 16, 2001

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

Re: Reference #16A-694

I am writing this letter in regard to the recent publication of regulations related to Act 136 of The Professional Counselor Licensing Bill. Unfortunately, these regulations fail to include regulations for those in possession of a Masters Degree and Certification as an Addiction Counselor; acceptability of the IC&RC national exam for addition counselors and inclusion of the Masters Degree in Human Services currently provided by Lincoln University.

Individuals in the field of addiction treatment work tirelessly in their efforts assisting those suffering from the disease. They worked hard to achieve a high level of credentialing through the PA Certification Board and are expected to meet the guidelines set forth by the International Certification & Reciprocity Consortium (IC&RC). Many of these professionals in the drug and alcohol field have turned their life around to get where they are today. This was done by intense effort and perseverance on their part. Addiction counselors are extraordinary individuals conscientiously performing as do other professional therapists. I urge you to recognize their accomplishments as a licensed professional such as you do for dance or drama therapists.

I am a graduate of the Master Degree in Human Services program at Lincoln University, which is an accredited program through the Department of Higher Education. It is important to recognize the Human Services degree and not dismiss what all of us have achieved. I sincerely hope you will also consider the fact that the majority of students attending Lincoln University are African Americans and/or minority students and this exclusion could greatly impact the services currently available to our minority populations throughout the Commonwealth.

My hope is that this is an honest oversight instead of blatant disregard for the professionals currently working as addiction counselors. I encourage you to take steps to include the above mentioned as an integral part of your "Licensed Professional Counselors". Thank you for your prompt attention to this matter.

Sincerely,

Dona M. Dmitrovic, MHS
Executive Director

500 NORTH PROGRESS AVENUE
SUITE B
HARRISBURG, PA 17109
717.541.9313.9314
717.652.9303 FAX
RECOVERY@EZONLINE.COM