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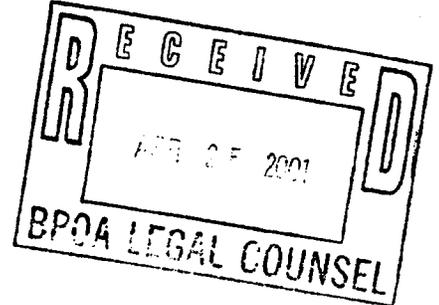
**NORTH PHILADELPHIA
HEALTH SYSTEM**
We care for the community.

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APR 27 11:55
BHTEN COMMISSION



April 23, 2001

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



RE: Regulations for Professional Counselors

Dear Attorney Cheyney:

I first wish to express my gratitude for efforts that the State Board has made in developing proposed Regulations for Professional Counselors. These efforts clearly reflect an intention to provide professional standards in order to 1) protect mental health consumers in PA; 2) provide a way for consumers to receive, and agencies to offer, more diverse services; and 3) to facilitate opportunities through which qualified, experienced practitioners can provide their services.

My professional counseling specialty is in the field of Creative Arts Therapy, having received my masters degree at New York University in 1993. This degree included an advanced specialty in drama therapy with subsequent certification as a Registered Drama Therapist.

I have worked as a therapist for 10 years for North Philadelphia Health System, at the Girard Medical Center, in the Rehabilitative Creative Arts Therapy Service. I have worked with in-patient clients in our dual-diagnosis intake, acute, extended acute, subacute, and forensic programs, as well as in our geropsychiatric program. I have also worked on our dual-diagnosis non-hospital and forensic male residential programs. In out-patient programs, I have conducted drama therapy groups in addictions and presently co-facilitate an out-patient Trauma Recovery and Empowerment Group (TREM), co-sponsored with BHTEN, for dual-diagnosed women survivors of abuse.

In my 11th year at Girard, I have taken the position of addictions counselor in the Out-patient/Addictions Program. As a consultant I have worked as a therapist in an early prevention program for children from households affected by domestic violence; and with dual-diagnosed geriatric residents at Elwyn Institute in Media.

--continued--



NORTH PHILADELPHIA
HEALTH SYSTEM
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State Licensing Board

Page Two

I have precepted masters' candidates in Psychiatric Nurse Practitioner from Hahnemann University, in group therapy process; and been a guest teacher at Chestnut Hill and Beaver Colleges, most recently with bachelors candidates in Psychology. I have co-presented in-services at Girard Medical Center and at several conferences, including those sponsored by NADT, ASGPP, and Hahnemann/MCP.

I do have some concerns about some of the provisions of the proposed regulations. I have been the Drama Therapy representative in the past to the Board of Directors of the PA Coalition of Creative Arts Therapy Associations, a member of the Pennsylvania Alliance of Counseling Professionals (PACP). I would like to inform you that I concur with PACP's most recent Letter of Response to the proposed Regulations, which takes the form of "Concerns" and "Suggestions." Their carefully considered remarks closely reflect my own concerns and suggestions.

Thank you in advance for your consideration of this matter.
Warm regards,

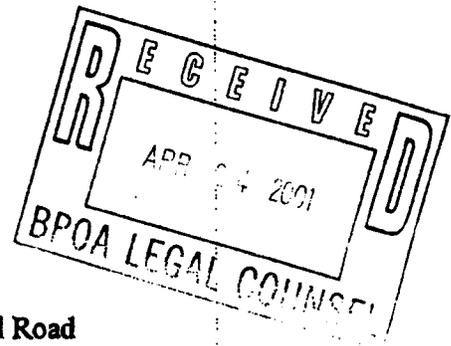
Isabel-Lee Malone, MA, RDT

ISABEL-LEE MALONE, MA, RDT
Out-patient Program/Addictions
3 Tower, Girard Medical Center

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MARCH 27 11:30 AM '85

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2001 APR 27 11:13:55
REVIEW COMMISSION



1302 Cromwell Road
Wyndmoor, PA 19038
Bushmartha@aol.com

April 23, 2001

BY FACSIMILE

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:

Subject: Proposed MFT Licensure Regulations (16A-694)

I have reviewed the proposed regulations for licensure of marriage and family therapists that were published in the Pennsylvania Bulletin on March 24, 2001. Thank you for your thorough attention to so many complex issues.

I am submitting these comments, as I am very concerned about several of the provisions. The core challenge that I invite the Board to consider in drafting these regulations is how to include a small but significant group of highly trained, long experienced AAMFT certified marriage and family therapist within the framework of these regulations.

I urge you to make clear that a pastoral counseling degree that contains a specialization in marriage and family therapy falls under the broader definition "masters degree in marriage and family therapy—a master's degree which is award upon successful completion of a program in marriage and family therapy which includes course work that meets the criteria in Section 48.2 or which fulfils the educational requirements of the American Association of Marriage and Family Therapists."

I also urge you to include the additional above underlined provision with regard to educational requirements. As you may know, some MFT programs were not COAMFTE certified, per se, but their course work meets the educational requirements for certification under AAMFT. LaSalle's pastoral counseling division with a specialization in MFT was one of these that graduated many, fulltime-practicing AAMFT certified therapist and AAMFT certified supervisors. These individuals are making an important contribution to society.

I am an AAMFT certified marriage and family therapist. I met the stringent requirement of AAMFT based on the educational curriculum required by LaSalle's Pastoral Counseling division with a specialization in Marriage and Family Therapy. The substance, if not the entire form of the degree, is a degree in marriage and family therapy. This needs to be made clear by the Board. If these provisions are not clarified, I (and many others) will not be licensable as a marriage and family therapist even though I (we) meet all of the other qualifications for licensure as it related to training, experience and supervision (but see below).

It makes no sense and serves no purpose that I can see, from a policy perspective, to exclude similarly situated individuals from licensing. Please make the changes necessary so that we will meet the requirements of the regulations.

With regard to supervision requirements as in section 48.13(b), I urge the Board to clarify that if the supervisor is one approved by AAMFT that supervision would meet regulatory supervision requirements for licensing. (AAMFT has two tracks for approved marriage and family therapy supervision, both of which include course and supervision requirements, for the person applying for certification as it pertains to their MFT supervision requirements.)

Finally, kindly clarify section 48.13(b)(1)(iv) to include individual therapy sessions, e.g., systems oriented sessions with a single parent without the children present when working with a family, can meet the requirement of "other systems interventions."

I have a long history of public service, including the last five years of providing marriage and family therapy through non-profit agencies to those who cannot otherwise afford therapy. I respectfully submit that these suggested changes are necessary, in order for me and many others like me to continue to provide this valuable service to the public. Further, in my opinion, the changes I suggest will not compromise the public interest in quality service delivered to consumers by well-trained individuals.

Sincerely,



Martha W. Bush, JD, MA, AAMFT Clinical Member

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

ORIGINAL: 2178

2001 APR 26 11:54 AM

John F. Gambale
4214 Lansing Street
Philadelphia, PA 19136

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

Dear State Board Members:

I am writing to address concerns I have regarding the grandfathering provisions of Act 136. As presently constituted, I believe harm will occur, particularly as it relates to culturally sensitive treatment of minorities suffering from chemical dependency.

My perception is that under the grandfathering provisions of Act 136, as written, current certified addictions counselors with Masters Degrees, particularly those who hold the MHS from Lincoln University, will effectively be excluded from grandfathering eligibility. I have only a moderate personal stake in this except for a wish that you do the right thing. I am already personally licensed as a Psychologist since 1984. I am also a Certified Employee Assistance Consultant for DuPont and have been in that role for nine years. I am also a CAC Diplomate. I do a lot of referring, but very little in Pennsylvania; however, I can tell you that I can count on my two hands the number of licensed professionals who really know addictions that I can count on in the geographical corridor, including Philadelphia south through Newark, Delaware, and Cherry Hill south to Vineland, New Jersey. This certainly restricts my ability to do my job effectively, especially with minority clients. Of course, the concern here is with Pennsylvania, but the problem is universal.

So, I will argue for the following with regard to the Act 136 grandfathering clause:

- (1) recognize CAC's with Master's Degrees, especially the MHS from Lincoln University; and
- (2) accept the IC and RC's (International Certification and Reciprocity Consortium) National Exam as fulfilling the examination prerequisite.

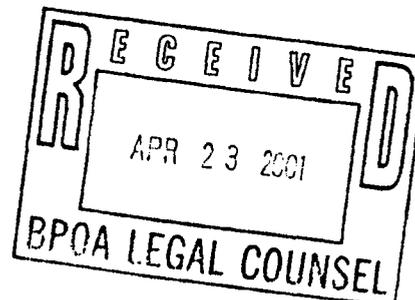
Thank you for your willingness to explore this issue.

Sincerely,



John F. Gambale, M.A., CAC
Diplomate, CEAP
DuPont Employee Assistance
Consultant

CC: Michael McGeehan
Michael J. Stack



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APR 23 2001

BPOA LEGAL COUNSEL

2001 APR 26 11:10:31

Mimi Mattern Scalia
16 Taylors Lane
Cinnaminson, NJ 08027 NEW COMMISSION

Reference #: 16A-964

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

Dear Attorney Cheney,

You have my appreciation and 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: a) protect PA mental health consumers; b) provide a way for consumers to receive more diverse services; c) 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 in Therapies, planning on completing my masters degree at MCP Hahnemann University in 2001. This degree includes an advanced sub-specialty in Art Therapy, with a subsequent certification as an art therapist. I have worked as an art therapy intern for two years in a number of mental health settings, working with a variety of populations, including adult patients in a crisis mental health unit of hospital, severely abused children and adults with drug and alcohol related issues at a homeless shelter in North Philadelphia, and currently am doing art therapy group and individual sessions with incarcerated youth in a treatment program housed in a detention center.

I am also involved in multicultural work in the Philadelphia area, working as a Diversity Workshop facilitator and trainer and creativity coach for the National Green Circle Program (a human relations program), supervisor of an after school program and art teacher. I designed and implemented an after-school Children's Creativity Workshop at Safe Haven, a program for children in crisis in West Philadelphia. Since I am finishing my masters degree in Philadelphia, have been working in Philadelphia, and plan to move to Philadelphia upon graduation this year, this is a serious concern.

Despite the excellent work done by you and the Licensure Board, I have some concerns about some of the provisions of the proposed regulations. I concur with the views expressed by the Pennsylvania Alliance of Counseling Professional (PACP) regarding the proposed Professional Counselor Regulations. PACP's most recent Letter of Response to the proposed Regulations (in the form of PACP "Concerns" and "Suggestions") closely reflects my own concerns and 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 Unfortunately, the category of Creative Arts Therapies has not been included. Creative Arts Therapists, i.e., Art Therapists, Dance/Movement Therapists and Music Therapists, need to be listed here.

Regulation #49.13b The Standards for Supervisors need to be more inclusive, specifically including Creative Arts Therapists.

Regulation #49.15 The Grandparenting clause, which provides exemption from Licensure Exam should be applied to the Creative Arts in Therapies as well.

Thank you, Attorney Cheney, in advance for your consideration of this urgent matter.

Sincerely,

Mimi Mattern Scalia
BA, Fine Arts
MA, Creative Arts in Therapy, Pending

Kathleen Stank
103 South Valley Road
Paoli, PA 19301

Reference # 16A-964
Eva Cheyney, 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

RECEIVED
APR 23 2001
BPOA LEGAL COUNSEL

Dear Attorney Cheney,

I am a Creative Arts Therapist and am writing to express my thanks for all of the effort expended by the State Board in developing the proposed regulations for Professional Counselors. I recognize that this effort reflects an intention to increase the professional standards of practitioners while protecting mental health consumers.

My professional specialty is in the Creative Arts Therapies with an advanced sub-specialty in Art Therapy. I have worked as a therapist for 10 years in different mental health settings, working with children, adolescents and adults. I currently work at the Crime Victims' Center of Chester County, where I work with clients who are having difficulties due to experiencing some type of traumatic event. I have also worked as an educator.

Despite the excellent work done by you and the Licensure Board, I have some 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 response to the proposed Regulations in the form of "Concerns" and "Suggestions" closely reflects my own concerns and recommendations. In particular, the Regulation provisions which are of concern to me, with suggested changes, are as follows:

Regarding Regulation # 49.1

My Concern: Many Professional Counselors, including the specialty of Creative Arts Therapies, are concerned that the current list of "fields closely related to the practice of professional counseling - *excludes* many well qualified and experienced professionals, such as the Creative Arts Therapies.

My Suggestion: Edit the definition of "Field closely related to Professional Counseling" to include the language: "Includes, but is not limited to...." Or "To a Master's degree in...." And to add the fields of: "Creative Arts Therapies, including Art Therapy, Music Therapy and Dance Therapy".

Sincerely,



Kathleen Stank MA ATR-BC

2001 APR 25 10:16 AM
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
HARRISBURG, PA 17105-2649

April 23, 2001

Eva Cheney, Counsel
116 Pine Street, P.O. Box 2649
Harrisburg, PA 17105
Reference# 16A-694

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2001 APR 26 11:13:31
PENNSYLVANIA LEGISLATIVE
REVIEW COMMISSION


Dear Ms. Cheney:

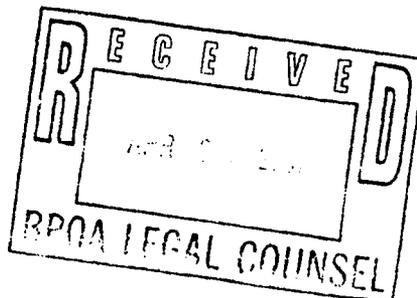
As a resident of Pennsylvania, a student of Lincoln University, and a CAC who is, and has been, working in the addiction-counseling field for the last 13 years, I am writing to express my concern.

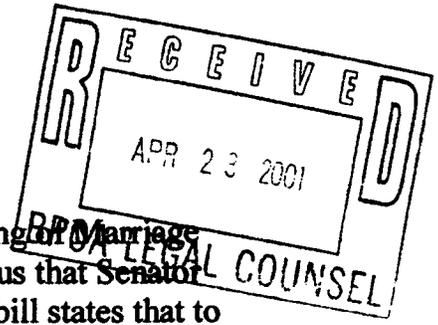
After reviewing the content of Act 136, the Professional Counselor Licensing Bill, I have to inform you of the prejudice that I perceive to be evident within the document. I would not presume to begrudge any other specialty-counseling groups their rightful place within this bill, but I do take exception to the blatant deletion of the specialty-counseling group in which I have participated for many years. My association with the addiction-counseling field was not an easy process, and required many hours of education and internship. To disallow this specialty is doing a disservice both to the people who have invested much of their lives to become a part of this field, and to the consumer who would be receiving the benefits of our service.

As a Certified Addiction Counselor in the state of Pennsylvania AND a Master of Human Services candidate, I am requesting a reconsideration of including the proposal of the PCB in the final regulations of Act 136, which includes the grandparenting in of those who hold the CAC and a Master's degree, as well as those who hold the MHS degree from Lincoln University.

Thank you for your consideration.

Donna Clark , CAC, MHS candidate





Dear Ms. Cheney, *Reference # 16A-964*

I am writing with reference to SB619 that deals with licensing of Marriage and Family Therapists and Counselors in Pa. It looks obvious that Senator Bell has not backed off from trying to nullify this bill. The bill states that to be eligible to take the Licensure Test, one must have a Doctorate or Masters' Degree in Marriage and Family Therapy. This may sound logical to most people, but to anyone in the field, the truth is that very few schools in Pa. offer a Masters' Degrees or Doctorates in Marriage and Family Therapy even though there are some. When I began my training for American Association for Marriage and Family Therapy 20 years ago, no schools offered a degree in Marriage and Family Therapy. Some schools had training in the field, but those were very few. Most of my training came from books that I could locate and Masters Degree training in the field of Counseling and Psychology and occasional courses that were available in Marriage and Family Therapy. In addition to the requirements of the American Association for Marriage and Family Therapy, which required me to work with an approved supervisor from their organization until I completed 2000 hrs.of professional experience and I had 200 hours of supervision, I have had ongoing seminars in counseling and psychology. I stopped counting counseling experience after the first four years of training. That was 16 years ago. The rigid requirements for a Masters Degree or Doctorate in Marriage and Family Therapy would exclude a large percentage of Pennsylvania's experienced, professional Marriage and Family Therapists. In addition, if most of the states marriage and family therapists are not allowed to at least take the licensure test, many of them will lose their jobs either immediately or within the next few years as managed care moves into the state. Not only will this hurt the therapists, but the citizens of Pennsylvania will be without a lot of therapists that they cannot afford to lose.

In addition, the Hours of Supervised Clinical Experience is too narrow. Many Marriage and Family Therapists work in agencies or centers where there no Marriage and Family Therapy Supervision offered. I completed my required supervision for AAMFT a long time ago, I am the only MFT in my agency. According to the proposed regs. I could not get my license because no MFT supervision is available where I work.

Continuing Education Requirements for Grandparenting is too restrictive because it recognizes training approved only by NBBCC,CRC, CBMT, or

ATCB. A lot of us have good continuing education provided by our own agencies but that doesn't count according to the bill.

Supervision Hours are too right as well. The bill proposes that the first 1800 hours of the 3600 hours of supervised clinical experience required for licensure be supervised by a licensed professional counselor, or until Jan. 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. Supervision by someone in a related field would not be acceptable even if they were proficient in marriage and family therapy. If the proposed regulations are adopted, many of us will have to throw away years of training and start all over again. The Board has Provided no waiver for applicants in exceptional circumstances who may be unable to find supervision within their job or discipline.

Please consider these needed issues and encourage the Senate Consumer Protection and Professional Licensure Committee to broaden the issues that I have enumerated.

Respectfully,

David I. Bowers, M.Div.

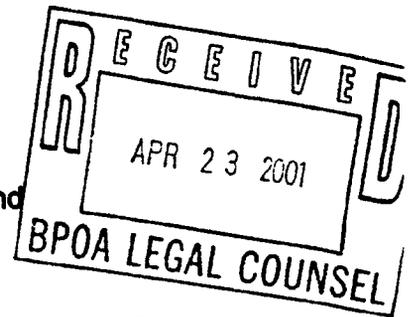
Clinical Member, American Association for Marriage and Family Therapy

*625 West Elm Ave.
Hanover PA 17331*

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APR 26 11 09 AM '05
REVIEW COMMISSION

ORIGINAL: 2178

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



RE: reference number 16A-964

Dear Ms. Cheney:

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

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

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

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

(a) degrees in the fields of creative arts therapy (art therapy, dance therapy, dance/movement therapy, drama therapy, music therapy), psychodrama, social work, clinical psychology,

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DIVISION

educational psychology, counseling psychology, child development and family studies, or;

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

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

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

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

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

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

6. Appraisal--studies that provide an understanding of individual and group approaches to assessment and evaluation.

7. Research and program evaluation--studies that provide an understanding of types of research

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methods, basic statistics, and ethical and legal considerations in research.

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

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

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

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

Sincerely,

Gloria L. Conical
Director of Student Services

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

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

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

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

Rep. Julie Harhart, House Professional Licensure Committee

Rep. Richard Grucela, District 137

Rep. T. J. Rooney, District 133

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01 APR 20 AM 9:36
HEALTH LICENSING
DIVISION

*Moravian Theological
Seminary*

1200 Main St.

Bethlehem, PA

18018-6650

ORIGINAL: 2178

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

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2001 APR 26 AM 10:35

APR 23 2001

REVIEW COMMISSION

BPOA LEGAL COUNSEL



Dear Miss Cheney,

I am writing this letter to you in response to my growing concern of the exclusion of certain members of the recovery field, due to the passage of the regulations in Act 136. I am a Counselor Assistant, working toward my BA in addictions, with aspirations to obtain a MSW. However my concerns are that of past exclusion of the PCB in the formulation of this act, and the recent developments which make it very difficult, if not impossible for some of my peers to be able to engage in a profession which is in need of said skilled helpers.

These developments include the exclusion of Addictions Specialists from the Bill, when other specialty-counseling groups (e.g. music, dance, art therapists, et. al) are. The most distressing of these issues concerns Clauses 4 and 5 of the grandparenting section, having to do with the discrepancy in the amount of credits needed for Master's programs versus the amount of credits needed to take the NBCC exam.

Finally the MHS degree "exclusion" which would deny experienced graduates, especially those who are Latino or African American and even those Caucasians who earned their MHS at Lincoln University, is the most damaging, since it would deny most of the recovering population with the culturally sensitive specialists they sorely need.

Therefore I urge you to advocate for the following inclusions into the regulations.

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

Sincerely

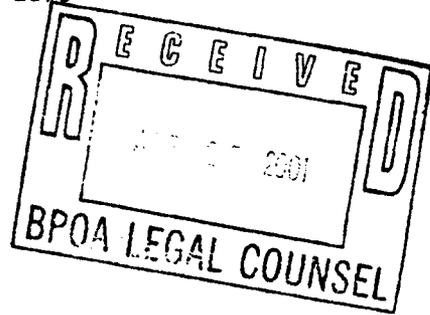
David Alfe
2948 Normandy Rd.
Ardmore, PA 19003
610.649.1927
cc :PCB Board



David C. Parenti, M.A.

ORIGINAL: 2178

RECEIVED
2001 APR 27 10:55
PENNSYLVANIA
REVENUE COMMISSION



April 23, 2001

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

Dear Attorney General:

Subject: Proposed Licensure Regulations (16A-694)

I have read the proposed regulations for licensure of marriage and family therapists 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 several of the provisions. I concur with the suggestions for specific changes in the proposed regulations for marriage and family therapists that have been submitted to you by the Pennsylvania Alliance of Counseling Professionals (PACP) and urge the Board to adopt them.

The section in the PACP comments entitled Continuing Education Requirements for Grandparenting 48.15 (5)(v) and 48.15 (5)(vi) is of particular concern to me personally. If the requirement for the aforementioned section is not changed, that is, precisely *documented* evidence of continuing education credits accumulated throughout the last ten years, I will not be licensable as a marriage and family therapist even though I meet all of the other qualifications for licensure.

I have been a clinical member with AAMFT since 1991 and a practicing marriage and family therapist for seventeen years, the last twelve years in a clinical private practice. Also, I have been a mental health consultant with Head Start and a Student Assistance Program consultant in another school district.

I am a well-qualified and experienced marriage and family therapist who deserves to be licensed.

Sincerely,

David C. Parenti M.A.

David C. Parenti M.A.

cc: Senator Michael O'Pake
Representative Sheila Miller

CALLOWHILL FAMILY THERAPY

244 North 5th Street • Reading, PA 19601 • Office (610) 372-8822

If you are otherwise qualified for grandparenting, you would be denied a license if you have fewer than 10 hours of direct client contact per week. Thus, if your case load has been reduced because of semi-retirement, family responsibilities, managed care, or because your responsibilities as a marriage and family therapist have shifted to teaching, supervision, administration, or consultation, you will not be licensable unless this section is changed. Incredibly, there is no direct client contact requirement for persons seeking to be grandparented as Licensed Clinical Social Workers.

Continuing Education Requirement for Grandparenting: § 48.15(5)(v) and §48.15(5)(vi) outline the educational requirements for grandparenting of marriage and family therapists who have master's degrees of less than 48 semester hours but not less than 36 semester hours. These individuals can use continuing education hours (at a ratio of 15 continuing education hours equaling 1 semester hour) to achieve a total of 48 semester hours. Unfortunately, all continuing education courses must be approved by AAMFT according to the proposed regulations. Since AAMFT does not approve continuing education offerings, marriage and family therapists needing to use CE hours will not be licensable under this section of the regulations as written.

- **Hours of Supervised Clinical Experience:** Two subsections of § 48.13(b) of the proposed regulations require that the first 1,800 of the 3,600 hours of supervised clinical experience required for licensure be supervised by a marriage and family therapist. The remaining 1,800 hours may be supervised by an individual who holds a license in a related field. This means that if you are employed by an agency or institution that does not provide an MFT supervisor, you would not be able to count any agency hours of supervision until you had completed the required 1,800 hours supervised by a marriage and family therapist supervisor.
- **Supervision of Clinical Experience:** § 48.13(b)(5) describes the nature of the supervision of the clinical experience for marriage and family therapists. It indicates that:

"The supervisor, or one to whom supervisory responsibilities have been delegated, shall meet with the supervisee for a minimum of 2 hours for every 40 hours of supervised clinical experience. At least 1 of the 2 hours shall be with the supervisee individually and in person, and at least 1 of the 2 hours shall be with the supervisee in a group setting and in person."

This changes the current AAMFT standard for both individual supervision (which can include 2 supervisees with one supervisor) and group supervision (which is optional under AAMFT standards). If you are not eligible for grandparenting and are currently working under supervision in order to meet licensure requirements, only "1 on 1" supervision hours would count for individual supervision (with a maximum of 90 hours). You would also have to complete 90 hours of group supervision.

[Go Directly to the Preamble and the Proposed Regs for Social Work](#)

[Go Directly to the Proposed Regs for Marriage and Family Therapy and Professional Counseling](#)

[[Top](#)]

Commenting on the Proposed Regulations

ORIGINAL: 2178

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

RECEIVED

APR 23 2001

RE: reference number 16A-964

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

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

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

Since our MAPC degree will meet these two major criteria for recognition of a professional counseling degree program as stated in the Board's regulations, I respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.i of the proposed regulations be amended to include all degrees which meet the state's standards for professional counselor education. I therefore concur with the suggested amendment proposed by the Pennsylvania Alliance of Counseling Professionals, which reads as follows:

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

(a) degrees in the fields of creative arts therapy (art therapy, dance therapy, dance/movement therapy, drama therapy, music therapy), psychodrama, social work, clinical psychology,

REVIEW COMMISSION
2001 APR 26 10:10:02

educational psychology, counseling psychology, child development and family studies, or;

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

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

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

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

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

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

6. Appraisal--studies that provide an understanding of individual and group approaches to assessment and evaluation.

7. Research and program evaluation--studies that provide an understanding of types of research

methods, basic statistics, and ethical and legal considerations in research.

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

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

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

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

Sincerely, *Charles Hargis*
Faculty, Moravian
College and Theological
Seminary

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

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

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

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

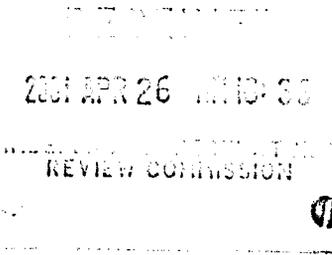
Rep. Julie Harhart, House Professional Licensure Committee

Rep. Richard Grucela, District 137

Rep. T. J. Rooney, District 133

ORIGINAL: 2178

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



RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Dear Ms. Cheney,

I am writing to you as a concerned Master's Level Addiction Counselor at the Wedge Medical Center in Philadelphia, Pennsylvania regarding the recent publication of the regulations related to Act 136, The Professional Counselor Licencing Bill. I am concerned about the regulations due to the fact that they could be an obstacle to substance abusers seeking treatment. Most Certified Addictions 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). The regulations are in addition discriminatory of minority populations due to the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American university. Many individuals holding this degree are working with minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within Pennsylvania and could impact services provided.

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

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

I urge your attention to this matter as a means of assuring that the residents of Pennsylvania are provided counseling services that meet our diverse community needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Caitlin Rose". The signature is fluid and cursive.

Caitlin Rose
10 Bank Avenue
Palmyra, NJ 08065
856-829-3864
cc: PCB board

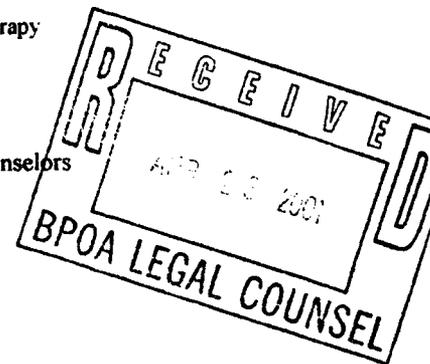
ORIGINAL: 2178

Andrew H. Johanson, Jr., D.Min.

Marriage and Family Therapy

Clinical Member & Approved Supervisor of American Association of Marriage and Family Therapy
Diplomate of American Association of Pastoral Counselors

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 have read the proposed regulations for licensure of marriage and family therapists 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 several of the provisions. I concur with the suggestions for specific changes in the proposed regulations for marriage and family therapists that have been submitted to you by the Pennsylvania Alliance of Counseling Professionals (PACP) and urge the Board to adopt them.

The section in the PACP comments entitled 49.1 educational requirements is of particular concern to me personally. I respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.1 of the proposed regulations be amended to include all degrees which meet the state's standards for professional counselor education. I therefore concur with the suggested amendment proposed by the Pennsylvania Alliance of Counseling Professionals, which reads as follows: ***Master's degree in a field closely related to the practice of professional counseling.*** If not changed, I will not be licensable as a marriage and family therapist even though I meet all of the other qualifications for licensure.

I have been a therapist for thirty years in the practice of individual, marriage and family therapy. My psychotherapy training was with the Philadelphia Mental Health Clinic for three years (1972-1975) with Medical Psychiatrists, where I studied psychodynamics of Human Development; I saw clients and was supervised by a psychologist and psychiatrists. Upon successful completion of that education which is generally provided for psychiatrists, I was awarded a Certificate of Applied Psychiatry. I earned my Doctoral of Ministry Degree at Eastern Baptist Theological Seminary. My emphasis was on marriage and family; with a doctoral thesis on enriching marriages. My latest training was at Penn Council for Relationships, Division of Family Study, Department of Psychiatry, University of Pennsylvania School of Medicine. I was awarded Certified in Marriage, Family and Sex Therapy (1992). In furthering my credentials I have also become a Diplomate in the American Association of Pastoral Counselors (highest level of membership). With all of this intensive education in Individual, Marriage, Family Therapy and hundreds of hours of supervision I am not qualified to sit for the exam for marriage and family therapy according to the current standards. I would appreciate your consideration so I would be able to take the marriage and family licensing exam. Potentially with this license, I would be pleased to help contribute to the field & support the efforts of our discipline. Thank you for your consideration.

Please find my Curriculum Vita enclosed.

Sincerely,

Andrew H. Johanson, Jr., D.Min.

- cc: Independent Regulatory Review Commission
- Senate Consumer Protection and Professional Licensure Committee
- House Professional Licensure Committee
- Senator Edwin Holl
- Representative Lawrence H. Curry
- File

2001 APR 25 AM 10:03
 REVIEW COMMISSION
 2001 APR 25 AM 10:03

Curriculum Vita
Andrew H. Johanson, Jr.

Present Position: **Private Practice in Child, Individual, Couple, Family, Sex
Therapy
Lansdale, Wyndmoor and Bethlehem, Pennsylvania.
Adjunct Professor at Moravian Theological Seminary
Teaching "Human Sexuality"**

**Supervisor at Pastoral Counseling Center; Group Therapy
Leader, Adult Survivors of Sexual Abuse; Minister's Support
Group; Therapy Group for Traumatized Adolescence;
Bethlehem, Pennsylvania**

**Business Consultant/ Executive Coach/Certified from the
Center for Creative Leadership's 'Benchmarks'**

Office Address: **North Penn Counseling Center
52 East Main Street
Lansdale, PA 19446
215-362-1780**

Home Address: **535 East Willow Grove Ave.
Wyndmoor, PA 19038**

EDUCATIONAL EXPERIENCE

**Certified in Marriage, Family and Sex Therapy 1992
Penn Council For Relationships, Philadelphia, PA (Post
Doctoral Work)
Division of Family Study, Department of Psychiatry
The University of Pennsylvania School of Medicine**

**Doctor of Ministry 1977
Eastern Baptist Theological Seminary, Philadelphia, PA
Thesis: Toward Development of a Marriage Enrichment
Program for Seminary Couples**

**Certificate of Applied Psychiatry
Psychoanalytical Psychotherapy 1972 - 1975
Philadelphia Mental Health Clinic, Philadelphia, PA**

**Bachelor of Divinity 1966
Master of Divinity 1970
Crozer Theological Seminary, Rochester, NY**

Andrew H Johanson Jr., D.Min

**Bachelor of Arts 1963
Davis & Elkins College, Elkins, WV
Major: Religion & Philosophy
Minor: Psychology, Speech**

**Supervision with:
Child Psychiatrist (over 40 hours).
[Personal Psychotherapist with same analyst (over 1050
hours).]
Marriage and Family Therapist of the School of Modern
Psychoanalysis (372 hours)
Penn Council For Relationships, Division of Family Study,
Department of Psychiatry, University of Pennsylvania School
of Medicine, Philadelphia, PA (260 hours)**

PROFESSIONAL MEMBERSHIPS & HONORS

**Clinical Member of American Association of Marriage &
Family Therapy
Diplomate, American Association of Pastoral Counselors
Approved Supervisor, American Association of Marriage &
Family Therapy
Distinguished Rotarian Award 2000
Past President of Blue Bell Rotary Club
Tower Award, Outstanding Alumni Award, Davis & Elkins
College 1995
Billy Edwards Memorial Award, Standing Sportsmen ,
Suitland High School, 1959**

**Some Of The
Presentations
Given**

**"Why Men and Women Do Not Understand Each Other."
"The Family, Past, Present, and Future."
"All Stressed Up And No Where To Go."
"Surviving And Thriving As A Single Parent."
"Stress And Ministry..Psychological Aspects."
"Male Spirituality And Masculine Sexuality."
"Adult Survivors Of Sexual Abuse: Individual And Group
Dynamics."
"Female & Male Sexual Myths"
"Spirituality And Inter Faith Couples."
"Human Sexuality And Disabilities."
"Looking at the whole person: An important way to treat
sexual disorders."
"The Challenges of Marital Relationship"
"How to Nurture Your Marital Relationship"**

ORIGINAL: 2178

**Amy L. Cardinal Cohen, M.F.T.
4716 Ellsworth Avenue, Suite 111
Pittsburgh, PA 15213
(412) 682-4355**

RECEIVED
2001 APR 23 PM 2:31
REVIEW COMMISSION

April 22, 2001

**Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and
Professional Counselors
124 Pine Street
Harrisburg, PA 17101**

RE: Reference #16A-964

Dear Ms. Cheney:

I am a Marriage and Family Therapist writing in response to the proposed licensure regulations for Professional Counselors and Marriage and Family Therapists.

I concur with PACP's comments to the Board regarding the regulations. My specific concerns involve the experience requirements for grandparenting. Under the proposed regulations I would be ineligible for a license because at present, I have fewer than ten direct client contact hours per week.

I have been providing marital and family therapy since 1983. I had been working full time until December of 1991 when I became partially disabled. My physical disability prohibits me from all but very limited writing, typing, depression of a Dictaphone and sitting in one position for more than two hours at a time. The disability necessitated my going to a part-time workweek, and not working more than approximately four hours per day. I worked in community mental health and my former employers made accommodations as best they could.

In 1996 I lost my job due to a reduction in work force. The fact that I did not have a license, and thereby could not generate revenue for the agency through managed care was the reason for this reduction.

Since that time, I have done some work for Gateway Rehabilitation Center on an as-needed basis, sought contracts with area programs, and worked privately.

After losing my job, I did not obtain employment with other mental health agencies, as they required licensure, and have no obligation to hire me on a part-time basis or make accommodations for my disability. Colleagues, networking and advertising have yielded inquiries about my services. Unfortunately, these potential clients want to use their insurance benefits, but can not get reimbursement because I am not licensed. So, my private practice yields me a trickle of clients every now and then.

I am raising two young children ages 2 ½ years and 10 months. I feel penalized for being primarily a stay-at-home mom after working steadily for all these years, and can't find regular part-time employment consistently to satisfy the ten-hour minimal requirement for client contact hours.

It is as if my M.F.T. from Hahnemann University, my clinical membership in the AAMFT, membership at the Philadelphia Family Therapy Institute and my work professionally since 1983 as an M.F.T. count for nothing.

I find myself in the proverbial "Catch 22." I can't work because I don't have a license, and I potentially won't be able to get a license because I am not working.

I think that the Bill needs to make provisions for seasoned clinicians who have consistently shown their dedication in the field by providing services, and are now at a distinct disadvantage because of the sluggishness of the State of Pennsylvania in granting licensure privileges to Marriage and Family Therapists.

Sincerely,



Amy L. Cardinal Cohen, M.F.T.

cc: IRRC, Senate Consumer Protection and Professional Licensure Committee, The House Professional Licensure Committee, Senator Clarence Bell, Representative Mario Civera Jr., Representative William Rieger, Senator Jay Costa Jr., Representative Paul Costa

FAX

Amy L. Cardinal Cohen, M.F.T.
4716 Ellsworth Avenue, Suite 111
Pittsburgh, PA 15213
(412) 682-4355

RECEIVED
2001 APR 23 PM 2:30
REVIEW COMMISSION

To: IRRC

From: Amy Cohen

Date: 4/23/01

Subject: Regulators for Marriage and Family Therapy License

Phone Number: (717) 783-2664

Number of Pages: 3 (includes cover sheet)

Additional Information: copy of

letter sent to Eva Cheney.

ORIGINAL: 2178

Gregory A. Krausz, BA, CAC
726 Pennsylvania Ave.
Bethlehem, PA 18018

RECEIVED

2001 APR 26 AM 8:51

April 22, 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

STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION

Re: reference number 16A-964

Dear Ms. Cheney:

I am writing to you as a Certified Addiction Counselor (#3957) as well as a concerned resident of the Commonwealth of Pennsylvania. I am a registered voter and take my right to vote very seriously. It has been brought to my attention that the proposed regulations for Licensure of Professional Counselors published by your Board in the March 24, 2001 issue of the Pennsylvania Bulletin may create serious problems for me as an addictions counselor and as a student in the Master of Arts in Pastoral Counseling degree program (MAPC) at Moravian Theological Seminary which is in Bethlehem, PA.

I have been working on my Masters Degree for the past four years and have been working in the counseling field since 1995. I will complete my MAPC degree in May 1995. The school has begun working on gaining CACREP approval for the degree. I have also been told that the degree is recognized by the Council for Higher Education as called for in the regulations. Since the degree program will meet the criteria for recognition of a professional counseling degree program as stated in the Boards regulations, I respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.1 of the proposed regulations be amended to include the phrase "but not limited to" following the word "includes" in the definition. It has been brought to my attention that this was in the original wording but it has been omitted in the newly published regulations. I believe that including this amendment would allow me to obtain licensure as I have been working for since I heard that there was a licensure bill. I believe that students who will graduate and those who already have deserve the opportunity to be included in licensure in order to serve the constituents of this Commonwealth. I believe that if this amendment is not completed it would create a financial burden for me as a professional and for the program, that I work for which is Renewal Centers, Inc. in Quakertown, PA. I also am advocating for the inclusion under the grandparenting regulations of individuals in possession of a MA degree and certified as an addictions counselor, as well as the inclusion in grandparenting regulations of the IC & RC national exam for addictions counselors as an acceptable exam. I have worked as an addiction counselor and worked diligently to become certified. I believe that these two inclusions would aid the citizens of this Commonwealth in receiving appropriate counseling services.

I am strongly concerned about consumer protection and I support strong standards for professional Counselors. I sincerely urge your consideration of these matters as a means of assuring that Consumers in the Commonwealth are provided counseling services that serve the diverse population as well as allow CAC's and graduates of Moravian Theological Seminary's MAPC program to receive the recognition we deserve as professional counselors.

If you have any further questions, do not hesitate to call me at (610) 954-0389 or e-mail at gkrausz@nni.com.

Sincerely,

Gregory A. Krausz, BA, CAC

April 22, 2001

Gregory A. Krausz, BA, CAC (610) 954-0389

CC: PCB, Glenn Asquith, Moravian Theological Seminary

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

Hon. TJ Rooney, 7 W. Fourth Street, Bethlehem, PA 18105

Hon. Steve Samuelson, 104 E. Broad St., Bethlehem, PA 18018

Sen. Clarence Bell, Chairman, Senate Consumer Protection and Professional Licensure Committee, Senate Box 203009, Harrisburg, PA 17120-3016

Sen. Charles Dent, Vice Chairman Senate Consumer Protection and Professional Licensure Committee, Senate Box 203016, Harrisburg, PA 17120-3016

Sen. Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee, Senate Box 203018, Harrisburg, PA 17120-3016

Hon. Mario J. Civera, Jr., Room 105, Ryan Office Building, Harrisburg, PA 17120-2020

ORIGINAL: 2178

April 22, 2001

Eva Cheney, Esq.
State Board of Social Workers,
Marriage and Family Therapists &
Professional Counselors
PO Box 2649
Harrisburg, PA 17105

RECEIVED
2001 APR 27 11:10:56
REVIEW COMMISSION

Dear Eva Cheney, Esq.,

I am a Certified Addictions Counselor and a Nationally Certified Addiction Counselor. In two weeks' time I will have a Masters degree in Social Work from Temple University. I have been doing direct outpatient counseling with individuals, couples and families for the past eleven years. Prior to that I worked as a counselor in an inpatient setting for four years. I write you as a concerned Pennsylvanian who read the recent publication of the regulations related to Act 136.

The problem with the regulations involves the grandparenting issues. The regulations fail to recognize Master's level addiction specialists who represent the largest specialty treatment population in the Commonwealth. Why is a Certified Addiction Counselor with a Masters degree not recognized by these regulations? In getting my C.A.C. I achieved a competency based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC). Surely, the board you serve, recognizes that we deal with complex substance abuse and mental health issues on a daily basis, and that we are qualified to do so. In fact, it is often hard to find non-drug and alcohol therapists who are even willing to do substance abuse work. It is our job to have the knowledge and skills of a professional serving the public. Our clients and we need your support.

I am advocating for the inclusion under the grandparenting regulations of individuals in possession of a Master's degree and Certified as an Addiction Counselor (C.A.C.). I am also advocating for inclusion under the grandparenting regulation of the IC&RC national exam for addiction counselors as an acceptable exam.

I urge your consideration in this matter as a means of assuring that the individuals and families continue to receive the best possible counseling services.

Respectfully yours,

Matthew C. Leisure
C.A.C., N.C.A.C.
Wellspan, H.A.P.

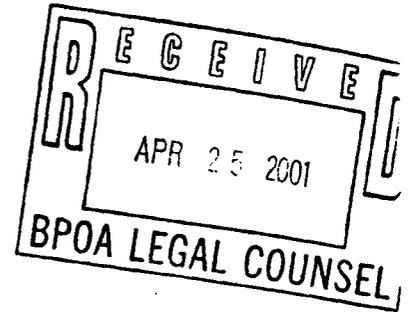
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RECEIVED
APR 24 2001
BPOA LEGAL COUNSEL

666 LAUREL VIEW DRIVE
MANHEIM, PA 17545

ORIGINAL: 2178

Gregory A. Krausz, BA, CAC
726 Pennsylvania Ave.
Bethlehem, PA 18018



APR 27 11:10:53
APR 22, 2001

Eva Cheney, Board Counsel

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

Re: reference number 16A-964

Dear Ms. Cheney:

I am writing to you as a Certified Addiction Counselor (#3957) as well as a concerned resident of the Commonwealth of Pennsylvania. I am a registered voter and take my right to vote very seriously. It has been brought to my attention that the proposed regulations for Licensure of Professional Counselors published by your Board in the March 24, 2001 issue of the Pennsylvania Bulletin may create serious problems for me as an addictions counselor and as a student in the Master of Arts in Pastoral Counseling degree program (MAPC) at Moravian Theological Seminary which is in Bethlehem, PA.

I have been working on my Masters Degree for the past four years and have been working in the counseling field since 1995. I will complete my MAPC degree in May 1995. The school has begun working on gaining CACREP approval for the degree. I have also been told that the degree is recognized by the Council for Higher Education as called for in the regulations. Since the degree program will meet the criteria for recognition of a professional counseling degree program as stated in the Boards regulations, I respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.1 of the proposed regulations be amended to include the phrase "but not limited to" following the word "includes" in the definition. It has been brought to my attention that this was in the original wording but it has been omitted in the newly published regulations. I believe that including this amendment would allow me to obtain licensure as I have been working for since I heard that there was a licensure bill. I believe that students who will graduate and those who already have deserve the opportunity to be included in licensure in order to serve the constituents of this Commonwealth. I believe that if this amendment is not completed it would create a financial burden for me as a professional and for the program, that I work for which is Renewal Centers, Inc. in Quakertown, PA. I also am advocating for the inclusion under the grandparenting regulations of individuals in possession of a MA degree and certified as an addictions counselor, as well as the inclusion in grandparenting regulations of the IC & RC national exam for addictions counselors as an acceptable exam. I have worked as an addiction counselor and worked diligently to become certified. I believe that these two inclusions would aid the citizens of this Commonwealth in receiving appropriate counseling services.

I am strongly concerned about consumer protection and I support strong standards for professional Counselors. I sincerely urge your consideration of these matters as a means of assuring that Consumers in the Commonwealth are provided counseling services that serve the diverse population as well as allow CAC's and graduates of Moravian Theological Seminary's MAPC program to receive the recognition we deserve as professional counselors.

If you have any further questions, do not hesitate to call me at (610) 954-0389 or e-mail at gkrausz@nni.com.

Sincerely,

Gregory A. Krausz, BA, CAC

Gregory A. Krausz, BA, CAC (610) 954-0389

CC: PCB, Glenn Asquith, Moravian Theological Seminary

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

Hon. TJ Rooney, 7 W. Fourth Street, Bethlehem, PA 18105

Hon. Steve Samuelson, 104 E. Broad St., Bethlehem, PA 18018

Sen. Clarence Bell, Chairman, Senate Consumer Protection and Professional Licensure Committee, Senate Box 203009, Harrisburg, PA 17120-3016

Sen. Charles Dent, Vice Chairman Senate Consumer Protection and Professional Licensure Committee, Senate Box 203016, Harrisburg, PA 17120-3016

Sen. Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee, Senate Box 203018, Harrisburg, PA 17120-3016

Hon. Mario J. Civera, Jr., Room 105, Ryan Office Building, Harrisburg, PA 17120-2020

ORIGINAL: 2178

Nancy Gerber, M.S., ATR-BC
Director, Graduate Art Therapy Education
Assistant Professor
College of Nursing and Health Professions
Creative Arts in Therapy
Mail Stop 905 • 245 N. 15th Street • Philadelphia, PA 19102-1192
TEL 215.762.6928 • FAX 215.762.6933 • E-MAIL Nancy.Gerber@drexel.edu
www.mcp.hmu.edu



RECEIVED
001 APR 24 AM 10: 01
REVIEW COMMISSION

April 21, 2001

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

Reference #: 16A-964

Dear Ms. Cheney:

This letter is written 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.

I am a registered and board certified art therapist. I have 22 years of clinical art therapy experience working in an inpatient psychiatric facility with adults and adolescents. For the past 5 years (1996 to the present) I have worked as the Director of Graduate Art Therapy Education at MCP Hahnemann University in Philadelphia, Pa. Additionally for the past 20 years I have also been a supervisor for many beginning and experienced art therapists.

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 response to the proposed Regulations in the form of 'Concerns' and 'Suggestions' closely reflects my own concerns and recommendations.**

I would like to express some of my own concerns with regard to these recommendations. I will list them according to their regulation number.

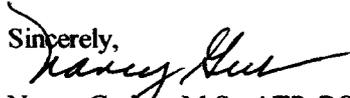
1. **49.15- Grandparenting-** This section does not allow for those, like myself, who have worked for many years as clinicians and are currently using that knowledge to teach other clinicians as educators and supervisors. I would suggest a provision here for those with this kind of experience.
2. **49.13- Supervision-** In this section I am assuming that the reference to "professional counselor" includes art therapists. If not this creates a problem for art therapists and other members of related Creative Arts Therapies professions. Art therapy has a requirement that they receive supervision from a "Registered Art Therapist". Perhaps this should be reworded to say "a member of your discipline who is also licensed as a professional counselor in the state of Pennsylvania".
3. **49.13(b)(5) Group Supervision-** There is no provision for group supervision. In art therapy and many other professions group supervision is considered equal in merit and value as a form of professional supervision. I would suggest inclusion of a provision for group supervision as

outlined by PACP. Also, a ratio of number of participants to the licensed professional providing the supervision may help. In AATA there is a provision for 7:1 (7 students/supervisees :1 registered art therapist).

4. **49.1 Field Closely Related:** Please explicitly list the Creative Arts Therapies professions in this section. I suggest the following. A field closely related "Includes, but is not limited to Creative Arts Therapist, including Art Therapy, Dance/movement Therapy, Music Therapy, and Drama Therapy."

Thank you for your consideration of these suggestions and for your dedication to this process.

Sincerely,



Nancy Gerber, M.S., ATR-BC
Director, Graduate Art Therapy Education

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

Joy S. Wassel, Ph.D.

ORIGINAL: 2178

RECEIVED 177 Heritage Drive
Collegeville, Pa., 19426

RECEIVED

2001 MAY -1 AM 8:41

2001 MAY -1 AM 8:36

joywassel@msn.com

610-891-5254

STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION

REVIEW COMMISSION

April 21, 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)

I have been a National Certified Counselor since 1985 and maintained a private counseling practice in Pennsylvania from 1980 until 1987. I retired from my practice in order to complete my doctoral internship and write my dissertation. After graduating from Temple University with a degree in Counseling Psychology, I moved to Georgia in 1995 and pursued my professional career in academia. In 1999 I became a Licensed Professional Counselor in the state of Georgia. Last year I returned to Pennsylvania and, after a period of time for personal transition and family concerns, I am in the process of returning to academic life.

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, given my circumstances, I am very concerned about a number of specific provisions that are included. Specifically, I am concerned about the following issues:

1. 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.
2. 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.
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 and urge the Board to adopt them.

Sincerely,



Joy s. Wassel, Ph.D.

cc: ✓ Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Richard A. Tilghman
Representative John A. Lawless

Dr. Branson E. Dunn
4523 Zane Place
Pittsburgh, PA 15214
412-931-4357

April 26, 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)

I have read the proposed regulations for licensure of marriage and family therapists 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 several of the provisions. I concur with the suggestions for specific changes in the proposed regulations for marriage and family therapists that have been submitted to you by the Pennsylvania Alliance of Counseling Professionals (PACP) and urge the Board to adopt them.

The sections in the PACP comments entitled "Closely Related Degrees" and "Experience Requirement" are of particular concern to me personally. I have enclosed a copy of PACP's comments and suggestions regarding this issue. If the requirement for only the six degree fields listed, the exclusion of highly trained clergy, and the lack of allowance for a part time practice are not changed, I will not be licensable as a marriage and family therapist even though I meet all of the other qualifications for licensure. In fact, I am licensed already (by Grandfathering) in Indiana and Kentucky as a Marriage and Family Therapist as well as a Licensed Mental Health Counselor in Indiana, but will not qualify for Pennsylvania licensure, my current residence. Also, as a Fellow in the American Association of Pastoral Counselors, I am highly trained in the blending of psychological and theological issues and have been accepted into the American Association of Marriage and Family Therapists with my credentials as a Doctor of Ministry. I have had a successful private practice in the past and have been on the allied medical staff of three psychiatric hospitals, providing marriage and family, individual, and group therapies. My hours of practice, supervision, and experience and American Association of Marriage and Family Therapists Clinical Membership well qualify me for licensure under the Grandparenting Provision in other states, but under current proposed regulations, I would not be qualified in Pennsylvania. I am also very concerned about the apparent bias and double standard regarding licensure pertaining to social work as compared with the MFT proposal. Finally, I would very much like to see a consideration of "reciprocity" in the regulations for those who are already licensed in other states and are clinical members of AAMFT. I hope you can add this issue to the proposed licensing regulations.

I urge your adoption of the PACP and PAMFT suggestions for marriage and family therapists, especially the sections noted above.

Sincerely,

Dr. Branson E. Dunn

cc: ~~Independent Regulatory Review Commission~~ ;
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Honorable David J. Mayernik
File

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2001 MAY -1 AM 8:41

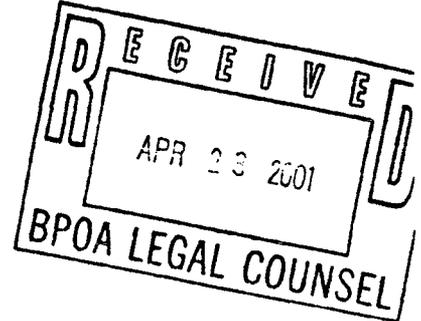
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION

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2001 MAY -1 AM 8:36

STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION

Terry Jackson, M.Mgt., M.Ed., C.A.C.
7026 Redcoat Drive
Flourtown, PA 19031
215-836-4941
terryj@concentric.net



April 21, 2001

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

Dear Ms. Cheney:

I am writing to you to express my deep concern about the oversight apparent in the recently published regulations related to Act 136, The Professional Counselor Licensing Bill. I am a life-long resident of the Commonwealth, a Board Member of the Pennsylvania Certification Board, hold two earned Master's degrees and two professional certifications: a Certified Addictions Counselor (C.A.C.) and a Certified Employee Assistance Professional (CEAP), and an evaluator for the oral exam portion of the C.A.C. testing process. Because of this, I am intimately aware of the skill set and unique qualifications of those possessing the C.A.C. credential.

As you may be aware, there is a serious oversight in this bill that is non-statutory in nature and that relates directly to the grandparenting clause. These regulations have completely overlooked the inclusion of Master's level Certified Addiction Counselors under Act 136. These professionals have earned a competency based, clinically supervised credential under very strict guidelines provided by the International Certification & Reciprocity Consortium (ICRC). These professionals currently provide professional treatment to the largest specialty treatment population in our Commonwealth, many are minority populations that reside in our urban centers. Failure to include them under Act 136 has very serious implications for those seeking substance abuse treatment, their families, and our communities.

I am asking that the following issues be included in the grandparenting regulations:

- individuals possessing the C.A.C. credential and a Master's Degree (including the Master's degree in Human Services offered by Lincoln University);
- the ICRC national exam for addictions counselors as an acceptable exam.

I urge you to consider this matter and to respond to the unique needs of our addicted population by including the above issues in the grandparenting portion of Act 136.

Sincerely,


Terry Jackson, M.Mgt., M.Ed., C.A.C.

CC: PCB

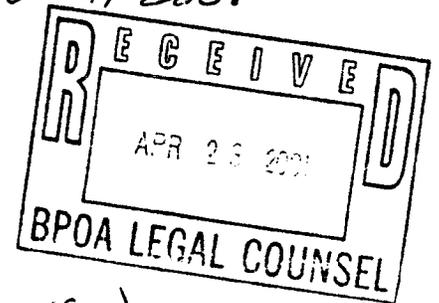
REVIEW COMMISSION
2001 APR 26 11:51 AM
OFFICE OF THE ATTORNEY GENERAL

Roberta Cobrin Eisenberg, MSW, LSW

Board Certified Diplomate in Clinical Social Work • Certified Group Psychotherapist

113 East Greenwood Avenue • Lansdowne, PA 19050-1625 • (610) 622-3109

April 21, 2001



Thomas f. Mattera, Chmn.
State Board of Social Workers, Marriage &
Family Therapists & Professional Counselors
P.O. Box 2649
Harrisburg, Penna. 17105 - 2649

re: Proposed Rulemaking (16a-694)
Licensure

Dear Dr. Mattera:

As a licensed clinical social worker for the past 34 yrs., in social agencies/hospitals/psychiatry/mental health, and now independent practice since 1996, I am proud to be licensed in the state of Penna. However, I have certain concerns about parts of the social work regulations in Chapters 47.12c + 47.12d.

My main concerns are around exclusion of certain social workers and the rigidity of the regulations for supervision, which I feel can be used in a punitive manner (especially if they are not broadened).

What happens to the LSW who has been out of school 1 or 2 yrs. & who was not supervised by a CSW & had not be grandparented in, but who was supervised by perhaps a psychologist or psychiatrist? What about the social workers in rural areas of Penna., where there is a dearth of CSW's let alone other professionals who could supervise? It would be important to allow other professionals to supervise social workers as well as an LSW with 5 yrs. of experience.



ORIGINAL: 2178

Nancy Gerber, M.S., ATR-BC
Director, Graduate Art Therapy Education
Assistant Professor

College of Nursing and Health Professions
Creative Arts in Therapy

Mail Stop 905 • 245 N. 15th Street • Philadelphia, PA 19102-1192
TEL 215.762.6928 • FAX 215.762.6933 • E-MAIL Nancy.Gerber@drexel.edu

www.mcphu.edu

April 21, 2001

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

RECEIVED

APR 23 2001

Reference #: 16A-964

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

This letter is written 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.

I am a registered and board certified art therapist. I have 22 years of clinical art therapy experience working in an inpatient psychiatric facility with adults and adolescents. For the past 5 years (1996 to the present) I have worked as the Director of Graduate Art Therapy Education at MCP Hahnemann University in Philadelphia, Pa. Additionally for the past 20 years I have also been a supervisor for many beginning and experienced art therapists.

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 response to the proposed Regulations in the form of 'Concerns' and 'Suggestions' closely reflects my own concerns and recommendations.

I would like to express some of my own concerns with regard to these recommendations. I will list them according their regulation number.

1. **49.15- Grandparenting-** This section does not allow for those, like myself, who have worked for many years as clinicians and are currently using that knowledge to teach other clinicians as educators and supervisors. I would suggest a provision here for those with this kind of experience.
2. **49.13- Supervision-** In this section I am assuming that the reference to "professional counselor" includes art therapists. If not this creates a problem for art therapists and other members of related Creative Arts Therapies professions. Art therapy has a requirement that they receive supervision from a "Registered Art Therapist". Perhaps this should be reworded to say "a member of your discipline who is also licensed as a professional counselor in the state of Pennsylvania".
3. **49.13(b)(5) Group Supervision-** There is no provision for group supervision. In art therapy and many other professions group supervision is considered equal in merit and value as a form of professional supervision. I would suggest inclusion of a provision for group supervision as

outlined by PACP. Also, a ratio of number of participants to the licensed professional providing the supervision may help In AATA there is a provision for 7:1 (7 students/supervisees :1 registered art therapist).

4. **49.1 Field Closely Related:** Please explicitly list the Creative Arts Therapies professions in this section. In suggest the following. A field closely related "Includes, but is not limited to Creative Arts Therapist, including Art Therapy, Dance/movement Therapy, Music Therapy, and Drama Therapy.'

Thank you for your consideration of these suggestions and for your dedication to this process.

Sincerely,



Nancy Gerber, M.S., ATR-BC
Director, Graduate Art Therapy Education

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

Joy S. Wassel, Ph.D.

ORIGINAL: 2178

**177 Heritage Drive
Collegeville, Pa., 19426**

joywassel@msn.com

RECEIVED

2001 APR 30 AM 8:52
640-891-5254

REVIEW COMMISSION

April 21, 2001

Eva Cheney, Board Counsel

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

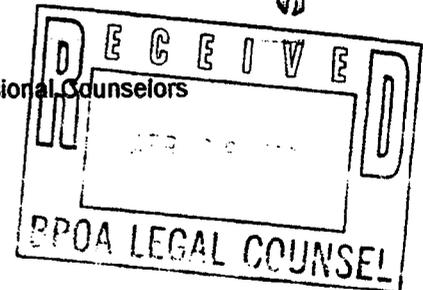
116 Pine Street

P.O. Box 2649

Harrisburg, PA 17105-2649

Dear Attorney Cheney:

Subject: Proposed Licensure Regulations (16A-694)



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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, given my circumstances, I am very concerned about a number of specific provisions that are included. Specifically, I am concerned about the following issues:

1. 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.
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limited period of time (perhaps 5 years), 6 semester hours of practicum/internship should be accepted in lieu of the proposed requirement.

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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,



Joy s. Wassel, Ph.D.

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Richard A. Tilghman
Representative John A. Lawless

ORIGINAL: 2178

April 21, 2001

Eva Cheney, Counsel
116 Pine Street, P.O. Box 2649
Harrisburg, PA 17105
Reference# 16A-694

Dear Ms. Cheney:

As a resident of Pennsylvania, a student of Lincoln University, and a CAC who is, and has been, working in the addiction-counseling field for the last 13 years, I am writing to express my concern.

After reviewing the content of Act 136, the Professional Counselor Licensing Bill, I have to inform you of the prejudice that I perceive to be evident within the document. I would not presume to begrudge any other specialty-counseling groups their rightful place within this bill, but I do take exception to the blatant deletion of the specialty-counseling group in which I have participated for many years. My association with the addiction-counseling field was not an easy process, and required many hours of education and internship. To disallow this specialty is doing a disservice both to the people who have invested much of their lives to become a part of this field, and to the consumer who would be receiving the benefits of our service.

As a Certified Addiction Counselor in the state of Pennsylvania AND a Master of Human Services candidate, I am requesting a reconsideration of including the proposal of the PCB in the final regulations of Act 136, which includes the grandparenting in of those who hold the CAC and a Master's degree, as well as those who hold the MHS degree from Lincoln University.

Thank you for your consideration.

Donna M. Clark CAC MHS c

Donna Clark, CAC, MHS candidate

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APR 23 2001
BPOA LEGAL COUNSEL

RECEIVED
APR 23 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178

GRADUATE ALUMNI CHAPTER LINCOLN UNIVERSITY

Graduate Alumni Chapter of Lincoln University, Pennsylvania
Sharman Lawrence, MHS
President
1439 East Mt. Pleasant Ave.
Philadelphia, PA 19150

April 20, 2001

John R. McGinley, Jr. Esq.
Chairman
Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101

RECEIVED
2001 APR 23 AM 10:05
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. McGinley,

As President of the Graduate Alumni Chapter of Lincoln University, I am deeply disturbed by the recently published proposed regulations affecting the Act 136 Licensure Bill. These regulations are discriminatory through the exclusion of the Master of Human Services Degree offered by such an **Historic** University. Furthermore, the proposed regulations appear neglectful and ignorant of the severe consequences it will cause minority consumers, as well as minority practicing professionals who are proud recipients of the Master of Human Services Degree. There are numerous other economic and social factors that will negatively impact the community if this decision is upheld.

Subsequently, the Graduate Alumni Chapter desires to formally appeal the proposed regulations at the designated public hearings. Please, promptly inform us of the date, time and location for rebuttal when decided upon.

Thanking you in advance,



Sharman Lawrence, MHS
President / Graduate Alumni Chapter of Lincoln University

CC: Chairman Manuel J. Manolios, LSW
Commissioner Albert H. Masland
President Ivory Nelson / Lincoln University

20 April 2001

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

Dear Mr. McGinley;

I am a counselor in the Drug and Alcohol field within the Commonwealth of Pennsylvania and I am concerned about the grand-fathering regulations in regards to act 136 (Professional Counselor Licensing Bill) The grand-fathering provision, excludes any professional counselors who work in drug addiction treatment. Surprisingly it excludes addiction specialist who currently hold both a Master's degree and are certified in the State of Pennsylvania as addiction counselors. Drug addiction is noted to be of epidemic proportions in the United States and it puzzles me why provisions were not made to grand-father these specialist in the addiction field.. It would seem that the State Board places more emphasis on ancillary therapies, such as art and dance then on therapies that treat the core of a problem, namely, drug addiction and having a person live a clean and sober life style. I strongly urge the State Board to re-evaluate their grand-fathering clause to include addiction specialists who treat a major health problem in the United States.

The obvious discrimination of those addiction specialist who hold a Master's Degree from Lincoln University is inexcusable. Any one who is familiar with the Lincoln's Master's Program will admit that it is an intense learning experience that surpasses most academic offering from local colleges. 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. The school also requires the student to have a supervisor throughout all his/her courses of study. This supervisor needs to be a professional holding a Master's Degree or Doctorate Degree..

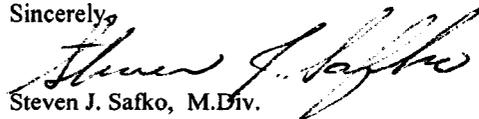
If the content of the educational material was considered instead of the academic jargon that is used, it would be found that the educational program at Lincoln University far surpasses the requirements of major reputable colleges.

To elevate the blatant exclusions of people working in an area that is a major health problem and those people who have been educated at Lincoln University, I strongly request that the state board include the following regulations for grand-fathering:

- 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 since these actions reflect on its credibility of being concerned for the quality of care that would benefit all people who treat the major health issue facing our communities today; that is, drug addiction.

Sincerely,



Steven J. Safko, M.Div.
723 South Main Street
Philipsburg, New Jersey, 08865
908.454.5482
cc: Pennsylvania Certification Board

RECEIVED
2001 APR 24 AM 10:05
INDEPENDENT REGULATORY
REVIEW COMMISSION



ORIGINAL: 2178

EDINBORO UNIVERSITY
OF PENNSYLVANIA

Counseling and Human Development Department
Butterfield Hall
Edinboro, PA 16444
(814) 732-2421 or 2424

April 20, 2001

Independent Regulatory Review Committee
33 Market Street
14th Floor
Harrisburg, PA 17101

RE: RESPONSE TO LICENSURE LAW (Reference # 16A-964)

All faculty from the (CACREP-and CORE-accredited) Department of Counseling and Human Development at Edinboro University have reviewed the licensure law and the PA Alliance of College Professionals' (PACP's) response. We share and support the concerns and recommendations noted by PACP.

On behalf of the Edinboro University faculty,

Salene J. Cowher

RECEIVED
2001 APR 23 11:09:05
REGULATORY REVIEW COMMISSION

April 20, 2001

Dr. Paul L. West
641 Wyncroft Lane, #3
Lancaster, PA 17603

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2001 APR 24 AM 9:59

STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION



Eva Cheney, Board of 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 Counselor Licensure Rules and Regulations (16A-694)

I am writing in regard to the proposed licensure regulations for Social Workers, Marriage and Family Therapists, and Professional Counselors that appeared in the March 24 edition of the Pennsylvania Bulletin. I am currently licensed as a Professional Counselor in Mississippi and am somewhat familiar with professional counselor licensure standards and other state promulgated regulations having researched and published articles on these topics.

Currently I run a small private research business focused on promoting the use of valid outcomes research in the human services. I also teach several graduate Counselor Education courses at a nearby University. My training and experience as a Professional Counselor and as a Counselor Educator provides the foundation for my comments to the proposed regulations referenced above.

First let me say that the proposed regulations represent a very good start toward the development of a fair and systematic process for licensing professional counselors in Pennsylvania. There are, however, several areas that I believe warrant review and revision.

As I read the proposed regulations I first looked for consistency in requirements across the 3 professional domains to ensure the absence of discrimination. The standards seemed consistent except in the area of counseling experience requirements for consideration of grandparenting. In the proposed regulations, social workers are required to have practiced 20 hours per week 5 of the previous 7 years [47.13b(4)]. Professional Counselors and Marriage and Family Therapists, on the other hand, are required to have practiced 15 hours per week 5 of the previous 7 years with 10 hours per week being committed to direct client contact [49.15 (4)]. The critical problem is the "direct contact" requirement for Professional Counselors and Marriage and Family Therapists that is absent from the Social Worker requirements. This stipulation has the potential to eliminate those Professional Counselors and Marriage and Family Therapists who have

emerged as leaders by becoming clinical supervisors or counselor educators while providing leaders in the Social Work arena to have access to licensure through exemption using standards that are more reflective of the nature of their job duties. To this end Social Work would be able to immediately field a group of licensed professionals through exemption thus establishing a core of supervisors much more rapidly than the other professional groups and gain an unfair advantage in the marketplace both at the practice level and in recruiting graduate students.

This disparity would have its greatest impact in sections 49.13(b)(2) and 49.13(b)(4)(i) which deals with supervised clinical experience for Professional Counselors. Social Workers who have long departed the counseling rooms for supervisory positions or positions in higher education would have access to licensure by exemption while Professional Counselors following the very same career path would be denied. New counselors to the field seeking supervision for licensure purposes would be unfairly delayed due to the lack of a sufficient pool of licensed Professional Counselors (by exemption) from which to receive clinical supervision. The "direct service" requirement for licensure by exemption for Professional Counselors and Marriage and Family Therapists should be eliminated.

Sections 49.13(b)(2) and 49.13(b)(4)(i) of the proposed regulations also present concerns and questions regarding the identification and availability of qualified supervisors. If a person is completing a second year of supervision from a licensed psychiatrist (due to the non-existence of licensure for counselors) does this person then have to complete a second supervision by a professional counselor to qualify, in part, for licensure as a Professional Counselor? Since there is such an overlap in the various disciplines within the human services and there is more similarity than differences in the application of training, how can such a distinction in supervision be made? It is reasonable to assume that, at some point, Professional Counselors will be supervised by licensed Professional Counselors. But until such time that a pool of licensed Professional Counselors emerges, these stipulations will unnecessarily stifle the progress toward protecting the public which was the cornerstone of Act 136. The ends simply do not justify the means.

Another concern I have regarding supervision is the lack of consideration for group supervision as an acceptable form of professional development. As a Counselor Educator I have seen the benefits of judiciously blending individual, face-to-face clinical supervision with group supervision. Supervisees vicariously experience a broader range of clinical experiences and are exposed to a wide range of appropriate interventions. Group supervision also provides a forum for addressing some ethical issues which may be common to many clinical settings.

My final concern regarding the proposed regulations is the limited sources of training allowed for continuing education for licensure by exemption [49.15(5)(iv)C]. I have received training through the American Medical Association as well as the American Psychological Association, two quality professional training organizations. To suggest that these training are of lesser quality or less rigorous than trainings offered by the few recognized organizations simply has no merit.

Again, let me commend you for your efforts in bringing forth a set of proposed rules and regulations that represent a conscientious effort to foster a firm foundation for licensure. This product clearly represents diligence and professional commitment on the part of the Licensure Board and I feel confident that the final product will address concerns presented from the field.

Sincerely,



Paul L. West Ed.D.,

cc: ✓ Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Gibson E. Armstrong
Representative Jere L. Strittmatter
File

ORIGINAL: 2178



Jane Strobino, DSW, ACSW
President

Rebecca S. Myers, LSW
Executive Director
exec@nasw-pa.org

April 20, 2001

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

Dear Ms. Cheney:

On behalf of the National Association of Social Workers and the 6,700 social workers our organization represents, we would like to take this opportunity to commend the board on its outstanding effort to generate draft regulations for the Licensed Clinical Social Worker. For the most part we are pleased with the regulations and we are looking forward to continuing to assist our members in their professional development. However we are concerned with the supervision requirements outlined in section 47.12c subsections 3-5, and 47.12d, subsection 11.

According to the aforementioned section "The supervision, or one to whom supervisory responsibilities have been delegated, shall meet individually and in person with the supervisee for a minimum of 1 hour for every 20 hours of supervised clinical experience." It is our opinion that this level of supervision is excessive and unattainable for many social workers. More than 40% of our members reside in rural Pennsylvania where social work supervisors are scarce. One can only infer that with social work supervisors being so scarce and the demand being so high, the quality of service may suffer. We certainly understand the need for ongoing professional development and commend the board's efforts to continue to protect the public, but we strongly feel that if clinical social workers were required to engage in person with a supervisor 1 and ½ hours for every 40 hours, both the supervisor's and supervisee's needs would be met. We would also support a group supervision for a portion of these hours.

We feel that requiring "supervisees to disclose the status of supervisees to each patient and obtain written permission to discuss the patient's case with the supervisor" is an unnecessary intrusion into the therapeutic alliance and furthermore we identify this practice as intrusive and disruptive to the teaching of psychotherapy.

We also share some concerns surrounding a "supervisors need to observe client/patient sessions of a supervisee on a regular basis". Clinical social work has a long-standing tradition of teaching with process recordings, case discussion, audio recordings where it is legally allowed, and direct observation where there is a one-way mirror. Physically being present during sessions is an intrusion and may interfere with the working alliance, affect the trust by the patient and interfere with the professional development of the supervisee. It is our suggestion that the supervisor review cases on a regular basis with the use of case discussion, process recordings, live recordings, and observation when possible.

We also can understand the board's allowances for disciplinary action and termination of services as they relate to supervision; however we feel that there needs to be a balance of power shared by both the supervisor and the supervisee. Currently the majority of the decision-making power lies with the supervisor, which in our opinion makes for a compromising working dynamic for all involved.

We also identify no provision for those social workers who graduated since this bill was passed but do not qualify for grandparenting. The type of supervision they will need in order to ascertain the clinical social work license is unclear and may result in them not meeting the supervision requirements. We feel that a provision for this group is necessary,

PENNSYLVANIA CHAPTER

National Association of Social Workers

1337 North Front Street • Harrisburg, PA 17102-2629 • (717) 232-4125 • (800) 272-6279 • FAX (717) 232-4140
www.nasw-pa.org

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REVIEW COMMISSION

which would include 3600 clinical hours, supervised by a licensed professional acceptable to the Board and having passed the clinical exam, until five years after the regulations are promulgated.

In closing thank you for reviewing our recommendations and taking them into consideration. We share in the board's enthusiasm to embark on this new plateau of social work development. If we can be of any assistance to you in the future, please do not hesitate to give us a call at 717-232-4125. We are convinced that our profession is only as strong as the individuals that guide us.

Thanks in advance for your consideration.

Sincerely yours,

A handwritten signature in cursive script, reading "Ebonnie L. Simmons-Hall".

Ebonnie L. Simmons-Hall
Government Relations Specialist
PA-NASW

CC. Honorable Mario Civera
Honorable Clarence Bell
Independent Regulatory Review Commission

ORIGINAL: 2178

Mindy Beamesderfer
112 Spruce Court
Annville, PA 17003
(717) 832-6163
msbeamesd@aol.com

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2001 APR 26 AM 8:57

STATE BOARD OF SOCIAL WORKERS, MARRIAGE & FAMILY THERAPISTS & PROFESSIONAL COUNSELORS
REVIEW COMMISSION



April 20, 2001

Eva Cheney, Counsel
State Board of Social Workers, Marriage &
Family Therapists & Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649
Reference # 16A-694

Dear Ms. Cheney:

I am writing to express concerns I have in the proposed rulemaking for the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors. First, I would like to thank the Board for going to great lengths in preparing the proposed regulations. The time and effort is greatly appreciated.

In February 2001, I wrote to the PA Counseling Association (PCA) regarding some concerns that colleagues and I have regarding the "grandfathering" clause in the regulations, specifically for Professional Counselors. I have attached the e-mail correspondence for your reference. In the letter, we inquired how the Board chose the exams and certifications that were mentioned in the regulations because there were several credentials left out of the regulations. Until recently, basically with the passing of Act 136, there was little reason for master level clinicians to seek out certain types of credentials except for wanting professional growth and development. Many people did not choose to sit for the National Board of Certified Counselor (NBCC) exam after graduating with their master's degree. Most of my colleagues sought out other opportunities that better met their interests. For example, with the growth of cognitive therapy and the rise of mental illness in prisons, many colleagues, myself included, chose to become Certified Cognitive Behavioral Therapists through the National Board of Certified Cognitive Behavioral Counselors or became Certified Forensic Counselors through the National Association of Forensic Counselors. Each of these requires an examination and are nationally recognized. Given the lack of incentive to obtain a "certain type" of certifications, it seemed the most appropriate to seek out and obtain credentials that would be useful in the field we entered and as a way to expand our knowledge and skills. However, with the proposed guidelines, neither of these certifications (or the certification for Addictions Counselor) would allow us to become licensed in the Commonwealth of Pennsylvania. This is despite the fact that many Managed Care Organizations accept counselors with these certifications.

Also, stated in the e-mail correspondence to PCA was the lack of standard curriculum at state schools in the Commonwealth that impedes most from sitting for the NBCC exam (the main exam and credential to obtain licensure). For those who graduated from one of the State System for Higher Education schools certain classes were not offered at the time of enrollment (many were not even developed at the time). As a result, a person needs to take a certain courses (i.e. multicultural therapy), despite the fact he/she may have been to many trainings or seminars over the years, or he/she cannot take the exam now in order to be "grandfathered" under the proposed regulations. I believe this regulation excludes many counselors unfairly who chose to go to a state school and who graduated before certain requisite courses was offered.

I understand that it is an impossible task for the Board to know of and about every credentialing body in the nation and the course curriculum at state schools in the past that now impede obtaining the NBCC. As a result, I believe it would be beneficial to the Board and to the counselors in the Commonwealth if the proposed regulation were

amended so the Board would look at other certifications at the time of licensing for individual counselors. I believe this is especially true for those counselors wanting to be "grandfathered." The motive for this is due to the outlined reasons above: there was little reason for master level clinicians to seek out certain types of credentials and that many sought out other credentials that better met their interests, and that state schools did not offer courses now necessary for the NBCC. At the time of licensure, it would be up to the individual seeking grandfathering to provide the Board with the information regarding the certification and the credentialing body. I believe this change would solve a large obstacle for many counselors.

A second major obstacle for many counselors, one that is being addressed by PCA, is the amount of weekly time a person would need to be in direct service with clients in order to be "grandfathered." The amount of weekly time is high for several reasons. First, some counselors work part time for numerous reasons (i.e. family, work only during summer, etc.). Second, many have been promoted to administrative or supervisory positions and are not able to do as much direct contact as a result. Lastly, with managed care many counselors do not qualify without having a license so many people have lost clients or jobs. I believe that the number of hours should be reduced as a result. Again, the proposed regulation excludes many competent, dedicated counselors as it is currently written.

While the Board has made much progress, I believe that the outlined changes are in order to better serve the Commonwealth. If additional comments or clarification is needed, I can be reached at the above address and telephone number. Thank you for your time and I look forward to reviewing the final regulations that will allow master level clinicians to finally be licensed.

Sincerely,



Mindy Beamesderfer, M.S., C.C.B.T.

Subj: Re: Fwd: licensure
Date: 2/23/2001 11:14:17 AM Eastern Standard Time
From: hall@UofS.edu (David W. Hall, Ph.D)
To: PAMFTPACP@aol.com
CC: hall@UofS.edu, MSBeamesd@aol.com

PAMFTPACP@aol.com wrote:

Dave, I too would like to read your answer to this for future reference. Sue

Subject: licensure
Date: Wed, 21 Feb 2001 21:00:42 EST
From: MSBeamesd@aol.com
To: PAMFTPACP@aol.com

After attending the last PA Community Providers Association meeting last month, I returned to my company (Edgewater Psychiatric Center in Harrisburg, PA) with the information regarding the status of the licensure bill. After meeting with most of our master level clinicians several questions have been raised regarding the exams or certifications for "grandfathering." Many of our staff have different certifications (i.e., from the National Association of Forensic Counselors, National Board of Certified Cognitive-Behavioral Counselors, Certified Addictions Counselors, etc...) We were wondering why other certifications, which require an examination, are being excluded?

This would be a question to raise with the Licensure Board and with the appropriate parties in the public comment period. I suspect, however, that those who support those credentials have not asked the Board to include them and/or have not provided the Board with any information about them. As a state branch of the American Counseling Association, the Pennsylvania Counseling Association has provided information to the Board on credentials that its membership is familiar with, as have the other organizations that make up the Pennsylvania Alliance of Counseling Professionals. I am not familiar with any of the credentials mentioned above (except, to some extent, for the CAC). Persons holding credentials such as those mentioned above, or groups supporting those credentials, would be well advised to provide information about those credentials and the accompanying exams to the Board and to other relevant parties in the public comment period. I would suggest that the appropriate information would focus on whether the credential and exam meets the statutory requirements of Act 136. Absent such information I would expect that the Board would have a difficult time knowing about the existence of or making a decision about the suitability of a credential and exam.

Many of our staff have graduated from PA State schools (i.e., Millersville, Kutztown, East Stroudsburg) and graduated from the school before multicultural counseling or career counseling were offered, yet alone required for graduation. As a result, many do not qualify for the National Board of Certified Counselor Exam due to lack of classes offered by the State System of Higher Education. Now they have been informed that they will not meet the grandfathering criteria and unless they go back to school to complete additional coursework they will not meet the licensing criteria. Is PCA looking into the matter of mature, experienced, graduates of state schools not qualifying for the grandfathering or licensure?

PCA is representing its membership, as PACP is representing its member organizations. PCA and PACP both have provided extensive information to the licensure board about the credentials and exams endorsed by its membership. Neither PCA or PACP has the requisite knowledge or the authority to advocate for the

Sunday, February 25, 2001 America Online: MSBeamesd

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2001 APR 26 PM 0:57
PAMFTPACP

credentials and exams favored by other individuals or groups.

Also, is PCA
looking into proposing alternative exams or certifications so more
experienced and dedicated clinicians can become licensed.

No, as mentioned above neither PCA or PACP has the knowledge of those credentials/exams or the authority to advocate for the preferences of those who support and advocate them. Neither PCA or PACP has any formal position on any of the credentials mentioned above. My personal view, not the official position of PCA or PACP, is that I would not oppose inclusion of any credential/exam for grandparenting that its supporters can demonstrate meets the requirements set forth in the statute (that the credential is a professional certification in professional counseling and that the exam be in professional counseling and be administered by a nationally recognized credentialing agency).

I appreciate your
time in responding to my staff's questions and await your reply. Thank you.

Mindy Beamesderfer
Director, Edgewater Children's Services

David W. Hall, Ph.D.
PACP President
PCA Government Relations Chair

----- Headers -----
Return-Path: <hall@UofS.edu>
Received: from rly-yc04.mx.aol.com (rly-yc04.mail.aol.com [172.18.149.36]) by air-yc05.mail.aol.com (v77_r1.21) with ESMTP; Fri, 23 Feb 2001 11:14:17 -0500
Received: from serval.uofs.edu (serval.uofs.edu [134.198.110.91]) by rly-yc04.mx.aol.com (v77_r1.21) with ESMTP; Fri, 23 Feb 2001 11:13:30 -0500
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Received: from scranton.edu ([134.198.36.93]) by SERVAL.UOFS.EDU (PMDF V6.0-24 #39402) with ESMTP id <01K0G4IH7REO00HG7@SERVAL.UOFS.EDU>; Fri, 23 Feb 2001 11:13:16 -0500 (EST)
Date: Fri, 23 Feb 2001 11:17:16 -0500
From: "David W. Hall, Ph.D" <hall@UofS.edu>
Subject: Re: Fwd: licensure
X-Sender: "David W. Hall, Ph.D" <@royalpo.uofs.edu>
To: PAMFTPACP@aol.com
Cc: hall@UofS.edu, MSBeamesd@aol.com
Message-id: <3A968D0B.23045C65@scranton.edu>
Organization: The University of Scranton
MIME-version: 1.0
X-Mailer: Mozilla 4.73 [en] (Win95; U)
Content-type: multipart/mixed; boundary="Boundary_(ID_87mlVOlvvWGijavh93mfzQ)"
X-Accept-Language: en
References: <db.1097bd20.27c6afdb@aol.com>

Sunday, February 25, 2001 America Online: MSBeamesd



Stephen R. Treat, DMin
Director and CEO

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Oxford Valley
Voorhees, NJ

ORIGINAL: 2178

April 20, 2001

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

RECEIVED
2001 APR 27 AM 10:52
REVIEW COMMISSION

Re: Proposed Licensure Regulations (16A-694)

Dear Ms. Cheney:

I have reviewed the proposed regulations for licensure of marriage and family therapists as published in the PA Bulletin, and am writing to address a specific concern about the degrees which are listed in the section entitled "Fields closely related to the practice of Marriage and Family Therapy." As has been noted by numerous of my colleagues at this agency and elsewhere, this list is far more restrictive than the degrees deemed acceptable by our professional organization, the American Association of Marital and Family Therapists (AAMFT). Our field has been a multi-disciplinary one since its inception, and the experience of Penn Council is that the ability to bring multiple perspectives to understanding issues in the family is one of the field's great strengths. It is difficult to understand how the therapy consuming public or our profession is served by excluding these highly trained, experienced and skilled professionals from eligibility for licensure.

In particular, my degree which is in law has been considered acceptable to qualify me for clinical membership in AAMFT, which membership I have held since 1989. My decade-long practice of family law and divorce mediation prior to my marital and family therapy training have given me an invaluable perspective on the therapeutic issues facing families undergoing the crisis of divorce. I am able to use this expertise not only to help individual and family clients, but also to

supplement the training offered in our program to trainees, as well as in training and consultation with other therapists at the agency and elsewhere, and in developing educational programs sponsored by the agency for families of divorce.

I urge your considered understanding of the inter-disciplinary nature of our profession, and the role of the very specific training requirements which ensure a common conceptual and practice base among the diverse professionals. I believe that the public and the profession are best served by an eligibility process which takes these factors fully into account.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Southworth". The signature is fluid and cursive, with a long horizontal stroke at the end.

MICHELE SOUTHWORTH, J.D.

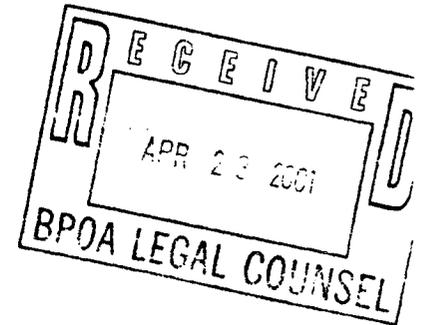
cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee

ORIGINAL: 2178

RECEIVED
2001 APR 26 7:19:14

REVIEW DIVISION

William Blumenthal
13 Creek Rd
Chalfont, Pa 18914
Phone & Fax: (215) 822-5739
Email: willyblu@enter.net



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 20, 2001

Ref.: 16A-694

Dear Board Members,

I am writing you to express my concerns, both professionally and personally, related to The Professional Counselor Licensing Bill as it is currently being considered. My concerns are centered on the bill's impact on the professionals who provide substance abuse treatment as well as on the quality of treatment itself. As a Masters-level Certified Addictions Counselor and a consumer of services in the state 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 Masters Degree in Human Services, as offered by Lincoln University from the grandparenting regulations is unjustified and directly impacts the provision of services, particularly in minority communities. Lincoln University is the nation's oldest African American university.

I am a graduate of the MHS program, (I am Caucasian), and I can tell you first hand that the program is intense, professional, innovative, rigorous and effective. I am the Associate Director of a Dual Diagnosis treatment center and provide both direct counseling as well as administrative functions. Lincoln University provided me with a theoretical and practical framework to perform both my counseling and administrative duties. More than that, I learned what it felt like to be in a minority situation and had open and honest dialogue for a two year period with a culture that I was, at best, somewhat familiar with. This program prepared me for working with a diverse and challenging population in a way that no other could.

I want to be clear that my concern over the limitations of the licensure bill does not directly impact on me. Personally, at my stage of life and employment, I have little need for licensure. Professionally, however, the potential impact is great. As the Associate Director, I continue to struggle to keep a balanced, culturally diverse staff that can provide the treatment needed for the multi-disadvantaged heterogeneous population we deal with.

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 and I am willing to provide additional information in writing or in person.

Sincerely,

William Blumenthal MHS, CAC Diplomat

William Blumenthal, MHS CAC Diplomat
Associate Director
the Recovery Center of Penn Foundation

ORIGINAL: 2178
4/20/01

Elizabeth A. Thomas, M. A.
428 W. 15th Street
Tyrone, PA 16686

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

RECEIVED
2001 APR 24 AM 10:00
HARRISBURG STATE BOARD OF SOCIAL WORKERS,
MARRIAGE AND FAMILY THERAPISTS,
AND PROFESSIONAL COUNSELORS
REVIEW COMMISSION

Subject: Proposed Licensure Regulations Pertaining to Grandparenting for Licensed
Professional Counselors
#16A-964

Dear Attorney Cheney:

Thank you for the opportunity to respond to professional counselor licensure regulations. I personally would like to comment on a situation that I face. I believe graduates from other Commonwealth institutions of several years ago (who may also have years of counseling experience) will face this problem, too. As a 1983 alumna of (IUP) Indiana University of PA, with a M. A. in Counselor Education, who resides in a rural county of Pennsylvania (Blair), I have concerns with the grandparenting regulation that stipulates a program must have required an arbitrary number of credits. At the time of my studies (1982-1983), I could not have predicted that there would be a minimum program requirement of 36 credits for licensure. I have continued my education in the 80's, 90's and into this decade, but the way the grandparenting regulations are written, I'm penalized in that my 33-credit program fell one course (3 credits) short of this new legislation. I feel that I'm unfairly being held back from career opportunities if not able to pursue grandparenting. I would also like to continue to be able to serve area residents in this rural, high need area of Pennsylvania.

My M. A. degree in Counselor Education is from IUP and I hope that the board will take into consideration that this was a typical program available during that time. My understanding of grandparenting is that it is to include those who have earned bona fide degrees and present years of experience in the field. I am requesting an exemption under grandparenting as an LPC, as I will meet the other requirements set forth, including the 48-credit requirement. However, it is impossible for me to change the number of credits that were in my program almost twenty years ago. I have continued to take courses and attend professional development programs to keep up to date in the mental health/counseling field.

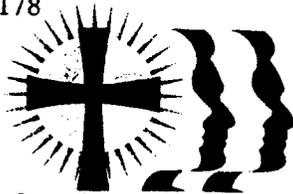
Please advise me on this request for an exemption to grandparenting. Thank you for your time to consider this matter that greatly affects my future!

Sincerely,



Elizabeth A. Thomas, M. A.
IUP '83

C: IRRC



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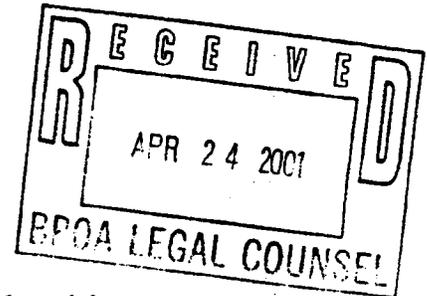
Caring for the youth of today, the hope of tomorrow.

Andrew M. Varzaly, MSW, LSW
Executive Director



April 20, 2001

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



Dear Attorney Cheney:

Subject: Proposed Licensure Regulations (16A-694)

I am a professional counselor and clinical supervisor in a residential partial hospitalization program in northeastern Pennsylvania. I currently supervise four masters level counselors and 4 bachelors level social workers. I returned to Pennsylvania after living in Ohio for 4 years, where I secured my clinical license as a Professional Counselor. Counseling licensure will allow me to provide high quality mental health counseling services to our children and adolescents by ensuring that those individuals hired to provide direct service, Counselors, Social Workers and Marriage and Family Therapists, meet the minimum requirements established by the licensure board. 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] does a relatively good job of identifying those professional degrees that are generally accepted in the training of "Professional Counselors". I believe that to include Social Work Degrees is not appropriate as there is an accepted professional training curriculum outlined by the NASW and subsequent licenses as a Social Worker (LSW) already in existence through the board. Consequently, social work is recognized as a separate, unique profession with established professional training through the NASW, and licensure as an LSW through the board. Social Work Degrees applicants should be licensed as an LSW if they meet the requirements set forth by the board for that license.



PCCYFS

Hoban Heights, P.O. Box 370 • Tunkhannock, Pennsylvania 18657-0370
570-388-6155 • Fax: 570-388-6979 • Email: stmikes@epix.net
www.dioceseofscanton.org

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. 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.
4. Exposure to group supervision for professional counselors is not allowed by the proposed regulations [§ 49.13(b)(5)]. Group supervision should be permitted.
5. 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.

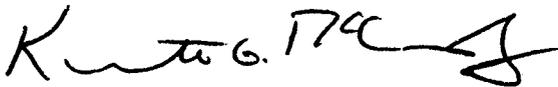
Furthermore, the board should include continuing education requirements in counselor supervision to insure that clinical supervisors have the training and knowledge to be effective supervisors and not just experience as a practitioner. Often times, professionals in human services are promoted to supervisory positions due to clinical performance, without any training in supervision theory, techniques and research. If [§§ 49.13(b)(2) and 49.13(b)(4)(i)] mandates specific licensed individuals as clinical supervisors, the board must take the necessary steps to assure that these clinical supervisors are not just competent clinicians but trained and competent clinical supervisors. The National Board of Certified

Counselors has a professional certification, the Approved Clinical Supervisor, that requires training and experience as both a professional counselor and clinical supervisor. The board could utilize this credential as a requirement for supervisors of Professional Counselors.

6. 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 many of these concerns more thoroughly and that provide concrete suggestions for changes in the proposed regulations. I concur with most of those suggestions and urge the Board to carefully examine them.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth G. McCurdy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth G. McCurdy, Ph. D. Candidate, NCC, ACS
Director of Social Services

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

20 April 2001

Eva Cheney, Counsel
State Bd of Social Workers, Marriage & Family Therapists & Prof. Counselors
PO Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649
Ref # 16A-694

2001 APR 25 11 54 AM
REVIEW COMMISSION

Dear Ms Cheney;

I am a counselor in the Drug and Alcohol field within the Commonwealth of Pennsylvania and I am concerned about the grand-fathering regulations in regards to act 136 (Professional Counselor Licensing Bill) The grand-fathering provision, excludes any professional counselors who work in drug addiction treatment. Surprisingly it excludes addiction specialist who currently hold both a Master's degree and are certified in the State of Pennsylvania as addiction counselors. Drug addiction is noted to be of epidemic proportions in the United States and it puzzles me why provisions were not made to grant-father these specialist in the addiction field.. It would seem that the State Board places more emphasis on ancillary therapies, such as art and dance then on therapies that treat the core of a problem, namely, drug addiction and having a person live a clean and sober life style. I strongly urge the State Board to re-evaluate their grand-fathering clause to include addiction specialists who treat a major health problem in the United States.

The obvious discrimination of those addiction specialist who hold a Master's Degree from Lincoln University is inexcusable. Any one who is familiar with the Lincoln's Master's Program will admit that it is an intense learning experience that surpasses most academic offering from local colleges. 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. The school also requires the student to have a supervisor throughout all his/her courses of study. This supervisor needs to be a professional holding a Master's Degree or Doctorate Degree..

If the content of the 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.

To elevate the blatant exclusions of people working in an area that is a major health problem and those people who have been educated at Lincoln University, I strongly request that the state board include the following regulations for grand-fathering:

- 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.

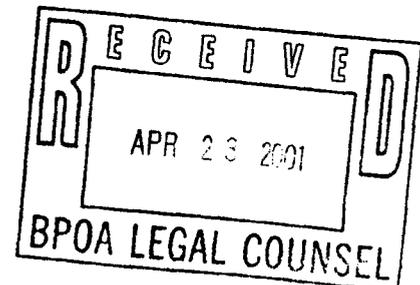
I would certainly hope that the board would reconsider this matter since these actions reflect on its credibility of being concerned for the quality of care that would benefit all people who treat the major health issue facing our communities today; that is, drug addiction.

Sincerely,



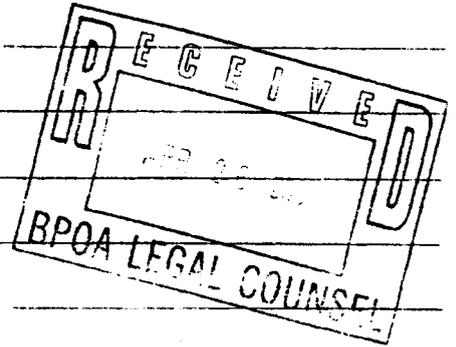
Steven J. Safko, M.Div
723 South Main Street
Philipsburg, New Jersey, 08865
908.454.5482

cc: Pennsylvania Certification Board



April 20, 2001

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



RECEIVED
2001 APR 30 AM 8:51
REVIEW COMMISSION

Dear Ms. Cheney:

I am writing to express my concern regarding several regulations.

First I would like to apologize for not typing this letter, my computer is having problems - but I wanted to make sure my voice was heard on this matter.

Regulation 48.15 + 49.15 Exemption from
licensure examination - Definition of the
practice of marriage and family therapy...
There are many senior clinicians who
have shaped the field and continue to
make significant contributions to the profession
who do not see 10-15 hours a week.

2

Many therapists work full-time jobs and have a ^{small} private practice. The way the regulation is written, it will exclude a significant number of senior clinicians. The regulation also discriminates against professionals who may be at a child rearing stage of their life and work part-time.

Regulation 48.1 Definition

The way the regulation is written it excludes Clergy, Psychiatrist, Psychiatric nurses & education. Again there are many individuals some of whom Direct Programs, Developed the field with these credentials. It would be helpful if the regulation could be written in such a way that was more inclusive of the above professions.

Thank you for your Consideration.

Sincerely,

Stephen Brown, MA, (S)

Associate Director, MET Program

McL Johnson University

ORIGINAL: 2178

2001 APR 26 11:54:33

REVIEW COMMISSION



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

Father John S. Krafchak

Gary Lennon

Maureen Reimiller

Joseph J. Stochla

Susan Thier

Clem-Mar House, Inc.

PO Box 2028

Kingston, PA 18704-7038

(570) 288-0403 FAX (570) 288-4403

April 20, 2001

Commonwealth of Pennsylvania, Department of State
Bureau of Professional and Occupational Affairs
State Board of Social Workers, Marriage and Family Therapists
and Professional Counselors
P. O. Box 2649
Harrisburg PA 17105-2649

ATTN: Thomas F. Matta, Ph.D.
Chairman

Dear Dr. Matta,

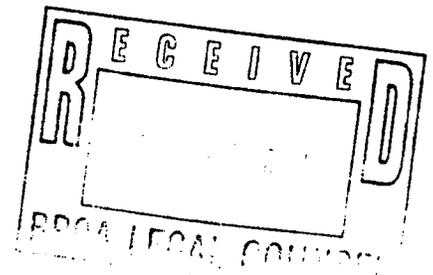
Clem-Mar House, Inc. is a State licensed Halfway House for the treatment of chemically dependent adult males. On behalf of the clinical staff, I am requesting a copy of the final-form rulemaking delivered to the House Professional Licensure Committee, the Senate Consumer Protection and Professional Licensure Committee and the Independent Regulatory Review Commission.

This ruling will have a profound affect on my staff and I appreciate your providing a copy for my staff to personally review.

Sincerely,

Paulette Capwell, CAC

Paulette Capwell, CAC
Clinical Director



ORIGINAL: 2178

April 20, 2001

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

RECEIVED
2001 APR 27 11:56
REVIEW COMMISSION

Dear Ms. Cheney:

As Coordinator of Drug and Alcohol Services at Danville State Hospital and, as a Certified Addictions Counselor holding a Masters Degree, I write you about proposed Act 136, The Professional Counselor Licensing Bill. I ask you, from a professional and personal perspective, to please consider my views.

I appreciate the many days and weeks and years that have evolved with the developing of Act 136, however, I ask you to include, not exclude, an important segment of treatment providers, the CAC's.

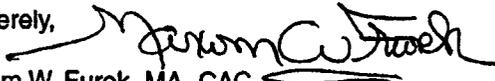
Certified Addictions Counselors, possessing a Masters Degree, represent those individuals best able to identify and treat consumers dealing with chemical dependency. We represent the largest group of treatment specialists in the Commonwealth. Our group of professionals has a body of knowledge not possessed by other therapists and deal with the ongoing problem of substance abuse in our nation and in our Commonwealth.

Substance abuse, including alcoholism, continues to take a deadly toll on our society. Substance abuse has reached increased levels of destruction destroying families, extended families and valuable support networks in the community. Drugs such as heroin, once shunned as being too addictive and dangerous, are the current rage of Generation X. Other designer substances such as Ecstasy, have increased in popularity in what has been called an "epidemic." The date-rape substances (Rohypnol, GHB, ketamine) are drugs used to facilitate sexual assault. These issues impact on every one of us, but only Certified Addictions Counselors deal with these life and death problems in an ongoing treatment specific, goal directed manner.

Issues of abuse, addiction, overdose, irrational behaviors and mental illness are all part of the above mentioned scenario. As a CAC, proactive in my profession, I believe that our profession must be included as part of an overall, comprehensive approach to issues of treatment. Please do not ignore the ongoing, professional work that we do. We need to be included as an important part of proposed Act 136.

Thank you for your time and energies. I am encouraging you to include under the grandparenting regulation those individuals who have attained a CAC and possess a Master's Degree, including the Master's Degree in Human Services as provided by Lincoln University. I look forward to your response to this matter of significance and encourage you to contact me personally should you have additional questions or concerns .

Sincerely,



Maxim W. Furek, MA, CAC

Maxim W. Furek, MA, CAC
57 Jeanette Street
Mocanaqua, PA 18655 - 1403

(570) 542-7946 (H)
(570) 271-4624 (W)

RECEIVED
APR 24 2001
BPOA LEGAL COUNSEL



Stephen R. Treat, DMin
Director and CEO

4025 Chestnut Street
1st Floor
Philadelphia, PA 19104
215-382-6680
215-386-1743 Fax
www.pcfcr.org

Offices:
University City &
Center City, Phila
Wynnewood
Paoli
Lionville

Concordville
Spring House
Doylestown
Oxford Valley
Voorhees, NJ

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APR 23 2001

BPOA LEGAL COUNSEL

ORIGINAL: 2178

April 20, 2001

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

2001 APR 26 11:19:29
REVIEW COMMISSION

Re: Proposed Licensure Regulations (16A-694)

Dear Ms. Cheney:

I have reviewed the proposed regulations for licensure of marriage and family therapists as published in the PA Bulletin, and am writing to address a specific concern about the degrees which are listed in the section entitled "Fields closely related to the practice of Marriage and Family Therapy." As has been noted by numerous of my colleagues at this agency and elsewhere, this list is far more restrictive than the degrees deemed acceptable by our professional organization, the American Association of Marital and Family Therapists (AAMFT). Our field has been a multi-disciplinary one since its inception, and the experience of Penn Council is that the ability to bring multiple perspectives to understanding issues in the family is one of the field's great strengths. It is difficult to understand how the therapy consuming public or our profession is served by excluding these highly trained, experienced and skilled professionals from eligibility for licensure.

In particular, my degree which is in law has been considered acceptable to qualify me for clinical membership in AAMFT, which membership I have held since 1989. My decade-long practice of family law and divorce mediation prior to my marital and family therapy training have given me an invaluable perspective on the therapeutic issues facing families undergoing the crisis of divorce. I am able to use this expertise not only to help individual and family clients, but also to

supplement the training offered in our program to trainees, as well as in training and consultation with other therapists at the agency and elsewhere, and in developing educational programs sponsored by the agency for families of divorce.

I urge your considered understanding of the inter-disciplinary nature of our profession, and the role of the very specific training requirements which ensure a common conceptual and practice base among the diverse professionals. I believe that the public and the profession are best served by an eligibility process which takes these factors fully into account.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michele Southworth".

MICHELE SOUTHWORTH, J.D.

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

ORIGINAL: 2178



RECEIVED
2001 APR 26 11:13:20
REVIEW COMMISSION

**30 and 90 Day
Inpatient Drug and Alcohol Treatment**
"... taking the time to get it right"

April 20, 2001

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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

I am writing to you as a Certified Addictions Counselor as well as a concerned citizen of the state of Pennsylvania. According to a recent publication regarding Act 136, concerns are raised for the health and welfare of substance abusers seeking counseling services. The Bill fails to make reference to Addiction Specialists and a Master's Degree in "Human Services" in the grandparenting regulations. The Professional Licensure Bill would potentially impact all CACs regardless of educational experiences.

At Lincoln University, the nations oldest African American university, fully accredited students are approximately 95% non-whites. The vast majority of individuals holding this Master's degree are working with minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will directly and indirectly impact these services to the minority population.

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

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

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

Respectfully,

Marilynn Rhoades CAC
Executive Director
COLONIAL HOUSE, INC.
cc: PCB



ORIGINAL: 2178

Marlene F. Watson, Ph.D.
Director, Graduate Programs in Couple and Family Therapy
College of Nursing and Health Professions
Mail Stop 905 • 245 N. 15th Street • Philadelphia, PA 19102-1192
TEL 215.762.6782 • FAX 215.762.6933 • E-MAIL marlene.f.watson@drexel.edu
www.mcphu.edu

April 20, 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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

I am writing on behalf of the Graduate Programs in Couple and Family Therapy at MCP Hahnemann University. Both the Master of Family Therapy Program and the Doctoral Program in Couple and Family Therapy hold accreditation with the Commission on Accreditation for Marriage and Family Therapy Education of the American Association for Marriage and Family Therapy. Since accreditation and licensure are both attempts to ensure that the highest standards of education and practice are met, we ask that you carefully consider the following remarks concerning the proposed regulations for licensure published in the Pennsylvania Bulletin dated March 24, 2001.

Section 48.15 (The Experience Requirement for Exemption). The regulation as printed in the Pennsylvania Bulletin (March 24, 2001) would require 15 hours of practice as a marriage and family therapist for 5 of the 7 years prior to application for licensure, with 10 of those hours consisting of direct client service. As constructed, a significant number of highly qualified marriage and family therapists and senior members of the field would be penalized for working in academic institutions where they are involved in the education, supervision and training of marriage and family therapy students. There is a grave inequity and injustice in this regulation that would severely compromise the profession. We would therefore suggest that 5 of the 15 hours be devoted to direct client service. Another suggestion would be to expand the definition of direct service to include supervision, teaching, and staff training or consultation.

Thank you in advance for your attention to this important matter.

Sincerely,

Marlene F. Watson, Ph.D.
Director, Graduate Programs in Couple
& Family Therapy

REVIEW COMMISSION

2001 APR 25 11:04 AM



Marlene F. Watson, Ph.D.
Director, Graduate Programs in Couple and Family Therapy
College of Nursing and Health Professions
Mail Stop 905 • 245 N. 15th Street • Philadelphia, PA 19102-1192
TEL 215.762.6782 • FAX 215.762.6933 • E-MAIL marlene.f.watson@drexel.edu
www.mcphu.edu

April 20, 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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

I am writing on behalf of the Graduate Programs in Couple and Family Therapy at MCP Hahnemann University. Both the Master of Family Therapy Program and the Doctoral Program in Couple and Family Therapy hold accreditation with the Commission on Accreditation for Marriage and Family Therapy Education of the American Association for Marriage and Family Therapy. Since accreditation and licensure are both attempts to ensure that the highest standards of education and practice are met, we ask that you carefully consider the following remarks concerning the proposed regulations for licensure published in the Pennsylvania Bulletin dated March 24, 2001.

Section 48.15 (The Experience Requirement for Exemption). The regulation as printed in the Pennsylvania Bulletin (March 24, 2001) would require 15 hours of practice as a marriage and family therapist for 5 of the 7 years prior to application for licensure, with 10 of those hours consisting of direct client service. As constructed, a significant number of highly qualified marriage and family therapists and senior members of the field would be penalized for working in academic institutions where they are involved in the education, supervision and training of marriage and family therapy students. There is a grave inequity and injustice in this regulation that would severely compromise the profession. We would therefore suggest that 5 of the 15 hours be devoted to direct client service. Another suggestion would be to expand the definition of direct service to include supervision, teaching, and staff training or consultation.

Thank you in advance for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Marlene F. Watson".

Marlene F. Watson, Ph.D.
Director, Graduate Programs in Couple
& Family Therapy

2001 APR 26 11:08:22
RECEIVED
BPOA LEGAL COUNSEL

ORIGINAL: 2178

April 20, 2001

State Board of Social Workers, Marriage & Family Therapists
and Professional Counselors

Attn. Eva Cheney, Counsel
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105
Ref. #16-A-694

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Dear Ms. Cheney:

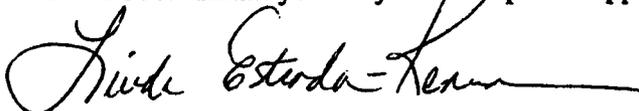
It is with great concern that I write this letter regarding the PA ACT 136 Professional Counsel Licensing Bill proposed regulations to eliminate those of us with a degree of Master in Human Services from Lincoln University, from practicing as licensed professional counselors.

For your consideration and information, for the past seven years, as the Director of four Family Centers in the Bethlehem Area School District in Bethlehem PA, I have served as a member of the Marywood University, MSW Curriculum committee. I have also supervised seven Marywood University MSW students through one year of internship each, at the family centers throughout a period of seven years.

As a field supervisor of an MSW program and as a graduate of Lincoln University, I feel strongly in pointing out that the degree of MHS fits well within the licensure requirements to perform therapeutic services. The master degree program at Lincoln University is a 54 Credit program, and over 90 percent of its alumni are people of color and of diverse cultural background. As a Latina, I am able to direct and manage the delivery of services to the community, and also bring the cultural and educational background to the profession. Please consider this very important point when making any decision regarding grandfathering issues of ACT 136.

I am advocating and requesting your support in the inclusion of the Master of Human Services degree from Lincoln University under the grandfathering regulations of ACT 136 in the State of PA.

If you have any question, I can be contacted at 610-868-7126 or my home number at 610-562-3080. Thank you for your anticipated support.



Linda Estrada-Kenna, MHS
161 Constitution Drive
Hamburg, PA 19526

REVIEW COMMISSION

2001 APR 25 11:13:05

10



LA SALLE UNIVERSITY

OFFICE OF THE PROVOST
PHILADELPHIA, PA 19141 • 215-951-1015 • FAX 215-951-1602

RECEIVED
2001 APR 27 10:55
REVIEW COMMISSION

April 20, 2001

Ms. 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:

I would like to urge you to consider the following recommendation before the licensing regulations for Professional Counselors and Marriage and Family Therapists are adopted.

In the section of the regulations on "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 the second, Pastoral Counseling, adds knowledge of and sensitivity to the client's religious orientation to the traditional education of a counselor. Many graduates of La Salle University and other universities have obtained degrees in these programs. They have become experienced professional counselors providing valuable services to the citizens of Pennsylvania. I believe these fields should be recognized as appropriate preparation for professional licensing.

Thank you for your attention to this recommendation.

Sincerely,

Richard A. Nigro
Provost

RAN:dm

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APR 25 2001
BPOA LEGAL COM

ORIGINAL: 2178

4/20/01

Elizabeth A. Thomas, M. A.
428 W. 15th Street
Tyrone, PA 16686

2001 APR 26 PM 10:23

REVIEW COMMISSION

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APR 23 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

Subject: Proposed Licensure Regulations Pertaining to Grandparenting for Licensed
Professional Counselors
#16A-964

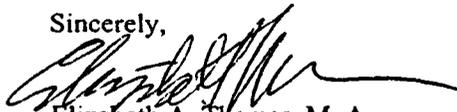
Dear Attorney Cheney:

Thank you for the opportunity to respond to professional counselor licensure regulations. I personally would like to comment on a situation that I face. I believe graduates from other Commonwealth institutions of several years ago (who may also have years of counseling experience) will face this problem, too. As a 1983 alumna of (IUP) Indiana University of PA, with a M. A. in Counselor Education, who resides in a rural county of Pennsylvania (Blair), I have concerns with the grandparenting regulation that stipulates a program must have required an arbitrary number of credits. At the time of my studies (1982-1983), I could not have predicted that there would be a minimum program requirement of 36 credits for licensure. I have continued my education in the 80's, 90's and into this decade, but the way the grandparenting regulations are written, I'm penalized in that my 33-credit program fell one course (3 credits) short of this new legislation. I feel that I'm unfairly being held back from career opportunities if not able to pursue grandparenting. I would also like to continue to be able to serve area residents in this rural, high need area of Pennsylvania.

My M. A. degree in Counselor Education is from IUP and I hope that the board will take into consideration that this was a typical program available during that time. My understanding of grandparenting is that it is to include those who have earned bona fide degrees and present years of experience in the field. I am requesting an exemption under grandparenting as an LPC, as I will meet the other requirements set forth, including the 48-credit requirement. However, it is impossible for me to change the number of credits that were in my program almost twenty years ago. I have continued to take courses and attend professional development programs to keep up to date in the mental health/counseling field.

Please advise me on this request for an exemption to grandparenting. Thank you for your time to consider this matter that greatly affects my future!

Sincerely,


Elizabeth A. Thomas, M. A.
IUP '83

C: IRRC

ORIGINAL: 2178
April 20, 2001

Dr. Paul L. West
641 Wyncroft Lane, #3
Lancaster, PA 17603

Eva Cheney, Board of 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 Counselor Licensure Rules and Regulations (16A-694)

I am writing in regard to the proposed licensure regulations for Social Workers, Marriage and Family Therapists, and Professional Counselors that appeared in the March 24 edition of the Pennsylvania Bulletin. I am currently licensed as a Professional Counselor in Mississippi and am somewhat familiar with professional counselor licensure standards and other state promulgated regulations having researched and published articles on these topics.

Currently I run a small private research business focused on promoting the use of valid outcomes research in the human services. I also teach several graduate Counselor Education courses at a nearby University. My training and experience as a Professional Counselor and as a Counselor Educator provides the foundation for my comments to the proposed regulations referenced above.

First let me say that the proposed regulations represent a very good start toward the development of a fair and systematic process for licensing professional counselors in Pennsylvania. There are, however, several areas that I believe warrant review and revision.

As I read the proposed regulations I first looked for consistency in requirements across the 3 professional domains to ensure the absence of discrimination. The standards seemed consistent except in the area of counseling experience requirements for consideration of grandparenting. In the proposed regulations, social workers are required to have practiced 20 hours per week 5 of the previous 7 years [47.13b(4)]. Professional Counselors and Marriage and Family Therapists, on the other hand, are required to have practiced 15 hours per week 5 of the previous 7 years with 10 hours per week being committed to direct client contact [49.15 (4)]. The critical problem is the "direct contact" requirement for Professional Counselors and Marriage and Family Therapists that is absent from the Social Worker requirements. This stipulation has the potential to eliminate those Professional Counselors and Marriage and Family Therapists who have

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APR 23 2001

BPOA LEGAL COUNSEL

2001 APR 26 11:10:19

REVIEW COMMISSION



emerged as leaders by becoming clinical supervisors or counselor educators while providing leaders in the Social Work arena to have access to licensure through exemption using standards that are more reflective of the nature of their job duties. To this end Social Work would be able to immediately field a group of licensed professionals through exemption thus establishing a core of supervisors much more rapidly than the other professional groups and gain an unfair advantage in the marketplace both at the practice level and in recruiting graduate students.

This disparity would have its greatest impact in sections 49.13(b)(2) and 49.13(b)(4)(i) which deals with supervised clinical experience for Professional Counselors. Social Workers who have long departed the counseling rooms for supervisory positions or positions in higher education would have access to licensure by exemption while Professional Counselors following the very same career path would be denied. New counselors to the field seeking supervision for licensure purposes would be unfairly delayed due to the lack of a sufficient pool of licensed Professional Counselors (by exemption) from which to receive clinical supervision. The "direct service" requirement for licensure by exemption for Professional Counselors and Marriage and Family Therapists should be eliminated.

Sections 49.13(b)(2) and 49.13(b)(4)(i) of the proposed regulations also present concerns and questions regarding the identification and availability of qualified supervisors. If a person is completing a second year of supervision from a licensed psychiatrist (due to the non-existence of licensure for counselors) does this person then have to complete a second supervision by a professional counselor to qualify, in part, for licensure as a Professional Counselor? Since there is such an overlap in the various disciplines within the human services and there is more similarity than differences in the application of training, how can such a distinction in supervision be made? It is reasonable to assume that, at some point, Professional Counselors will be supervised by licensed Professional Counselors. But until such time that a pool of licensed Professional Counselors emerges, these stipulations will unnecessarily stifle the progress toward protecting the public which was the cornerstone of Act 136. The ends simply do not justify the means.

Another concern I have regarding supervision is the lack of consideration for group supervision as an acceptable form of professional development. As a Counselor Educator I have seen the benefits of judiciously blending individual, face-to-face clinical supervision with group supervision. Supervisees vicariously experience a broader range of clinical experiences and are exposed to a wide range of appropriate interventions. Group supervision also provides a forum for addressing some ethical issues which may be common to many clinical settings.

My final concern regarding the proposed regulations is the limited sources of training allowed for continuing education for licensure by exemption [49.15(5)(iv)C]. I have received training through the American Medical Association as well as the American Psychological Association, two quality professional training organizations. To suggest that these training are of lesser quality or less rigorous than trainings offered by the few recognized organizations simply has no merit.

Again, let me commend you for your efforts in bringing forth a set of proposed rules and regulations that represent a conscientious effort to foster a firm foundation for licensure. This product clearly represents diligence and professional commitment on the part of the Licensure Board and I feel confident that the final product will address concerns presented from the field.

Sincerely,



Paul L. West Ed.D.,

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Gibson E. Armstrong
Representative Jere L. Strittmatter
File

ORIGINAL: 2178

April 20, 2001

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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Re: Ref # 16A-694

Dear Ms. Cheney,

I am writing to you in regard to Act 136, The Professional Counselor Licensure Bill and issues relating to regulations involving grandparenting. The current legislation does not include Certified Master level Addictions Specialists. These individuals have already demonstrated themselves in the field and have achieved a competency based and clinical based credential under strict guidance provided by the International Certification and Reciprocity Consortium.

In 1985, I obtained a Master of Arts degree in Rehabilitation Counseling from Edinboro State University of Pennsylvania and have maintained certification as an Addictions Specialist for 13 years. With over 15 years of clinical experience, I have seen more and more emphasis being placed on professional credentials to maintain a standard necessary for employment. At present, I work in a setting that services a majority of African Americans and other minorities and I am concerned that the exclusion of this credential, Certified Addictions Specialists, (CAC) from the Professional Counselor Licensure Bill will impact the delivery of services to those individuals within the Commonwealth of Pennsylvania.

As a result, I am strongly advocating of those individuals who are already in possession of a Master's degree and Certification as an Addictions Counselor be included in the grandparenting clause of Act 136.

Sincerely,



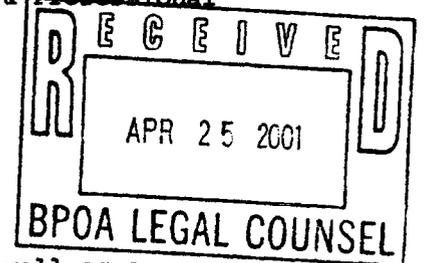
Edward P. Kechisen
614 1/2 Kate Street
Osceola Mills, PA 16666-1518
814-339-7821

cc: PCB Board

2001 APR 25 10:08:29
BPOA LEGAL COUNSEL

ORIGINAL: 2178
April 20, 2001

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



Re: Professional Licensure Bill #16A-694

Dear Eva Cheney, Counsel & Members of the Board;

I am writing to you as a Certified Addictions Counselor, as well as a concerned resident of Pennsylvania regarding the legislation of Act 136. As I was reading the publication of the proposed regulation of act 136, The Professional Counselor Licensing Bill, I became concerned with the proposal of such a bill and it's affect on the people who seek treatment for substance abuse. I feel that the problem with the regulation lies with the grandparenting issues which are non-statutory in nature. I am concerned that the regulations fail to acknowledge the Master's Level Addiction Specialists who represent a large speciality treatment population in our state. Certified Addiction Counselors with a Master's degree do not appear to be recognized by these regulations. People in my field that have worked hard to achieve this credential have done so by strict guidelines through the International Certification Reciprocity Consortium and I feel that this should be acknowledged.

I am also concerned that the regulations are seemingly discriminatory of minority populations by the exclusion of the Master's Degree in Human Services from Lincoln University; which has greatly served the African American community with higher education. The exclusion of this degree from the grandparenting regulations I feel would be a great disservice in providing culturally sensitive counseling services of minorities in our state.

I strongly advocate for the inclusion of the regulations in this bill to:

- * Include under the grandparenting regulations of individuals that posses a Master's Degree and Certification as an Addiction Counselor.
- * Include under the grandparenting regulations of the I.C.& R.C. national exam for addiction counselors as an acceptable exam.
- * Include under grandparenting regulations of persons that posses the Master's Degree in Human Services from Lincoln University.

I urge your consideration regarding the Licensing Bill- Act 136 as a means of assuring the citizens of our state are provided counseling services that serve our diverse communities.

Respectfully Submitted,
Dixie L. Tillia C.A.C., C.C.J.S., B.C.R.P.S.
Dixie L. Tillia C.A.C., C.C.J.S., B.C.R.P.S.
3937 Hill Alley
Adamsville, PA 16110
(724) 932-3536
cc: PCP Board

RECEIVED
01 APR 24 PM 2:20
HEALTH LICENSING
DIVISION

ORIGINAL: 2178



RECEIVED
2001 APR 27 10:57
REVIEW COMMISSION

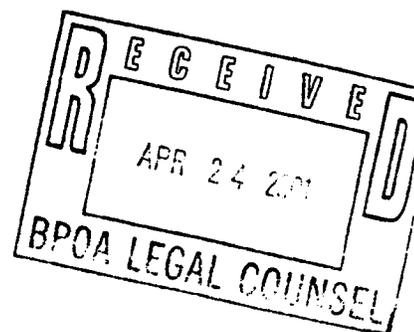
COUNTRYSIDE HAVEN FOR HEALTH

11 SALLY ANN ROAD
MERTZTOWN, PENNSYLVANIA 19539

• (610) 682-2246 •

STAFF

MARY J. BONNER, M.D.
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BETSY RIDER, M.A.



Eva Cheney, Counsel
State Board of Social Workers
P.O. Box 2649
Harrisburg, PA 17105-2649

4/20/01

Dear Attorney Cheney,

I am writing to comment on some proposed changes to the Social Workers' Practice Act. As you know, any act that lends credence to the services given by people who deal with the mind and situational problems of others must be crafted with great care. In licensing people who will intervene in the lives of others in a "helping" capacity, a main concern should be the quality of that service. In the proposed regulations The Board declared concern about the length and expense to an educational institution about obtaining program accreditation. This certainly fails to reflect a prime interest in program quality. Since The Board makes a certain minimal level of education a requirement for licensure, they must believe it has something to do with the quality of service rendered. Thus the quality of the education the potential licensee receives should axiomatically become of great concern to The Board. Being concerned about the length and expense to an educational institution caused by an evaluation of its educational offerings does not evidence interest in the quality of its educational program. In fact this could be seen as quite an opposite concern.

Further, viewing program accreditation as "not necessary" because of "limiting the availability of programs for students" again shows a lack of concern for educational quality. It only speaks to educational availability. Actually limiting program availability could be a form of good quality control. For the publics' sake good quality education for professional licensees should be a far greater concern than program availability.

On three separate occasions I have had the opportunity to evaluate the quality of service of "licensed" social workers. I can assure you that in all three cases the poor quality of service could be directly attributed to either insufficient or poor education. It would be too lengthy to detail all the examples, so I hope, for now at least, one will suffice. A client told a "licensed" social worker he went to for help that he has gotten so angry at his department chair that sometimes he could kill him. Despite the fact that he said this in a tone that indicated this was a figurative expression, the social worker

immediately called up the department chair and told him this! Upon my learning about the situation, I asked the social worker if this was the only time the client said this, and he said it was. I then asked if he had ever heard of the Shaw vs. Glickman court case in Maryland., and he said that he had not. In this court case it was decided that a psychologist's lips are sealed no matter what they are told by a client. I then mentioned to him that this decision was in direct opposition to the Tarasoff case in California which he had also never heard about! Not having knowledge of the Tarasoff decision is like an electrician not knowing what an ohm is, a plumber a washer, or a psychologist the name Pavlov! In view of disastrous consequences that eventuated from the social worker's revelation to the department chair and his ignorance of fundamental laws that speak to the matter of disclosure, could we trust that this "licensed" social worker would be an adequate supervisor for an aspiring licensee?

It is risking peril to the public if any law disregards the quality of a lawfully licensed person's preparation to serve them. It is not in the public's best interest to make sure that the number of licensees to help the public are plentiful, if at the same time there is a failure to insure that the quality of service is the best that can be statutorily insured. Every mental health therapist performs an extremely important professional intervention and should be eminently qualified if he or she is licensed to do this.

Sincerely,

A handwritten signature in cursive script that reads "Constance P. Dent". The signature is written in dark ink and is positioned above the typed name.

Constance P. Dent, Director

ORIGINAL: 2178

306 Lakeside Ofc
Lakeside & Street
Roads
Southampton, PA
18966
215-3655-7985

Relationships
2001 APR 26
REVIEW COMMISSION

Cheryl H. Litzke, M.F.T.
Marital and Family Therapist
specializing in
Individuals, Families and Couples

Park Terrace
Offices
Suite # 10
275 S. Main
Doylestown,
Pennsylvania
18901

April 20, 2001

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

RECEIVED
APR 23 2001
BPOA LEGAL COUNSEL

Dear State Board,

This letter is written to personally inform you of my concerns about the new regulations for professional licensing as set forth in the *Pennsylvania Bulletin*, March 24, 2001. The are focused in the following two areas:

Section 48.1 Closely Related Degrees

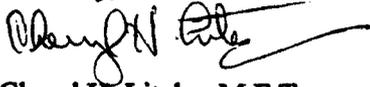
The degrees as they are stated exclude some very important categories of professionals which have been the backbone of the establishment of family therapy as a distinct profession for the past 50 years or so. I am asking that psychiatrists, psychiatric nurses, degrees in education as well as theology (ministry) be considered as eligible to sit for licensing if they meet all the other important educational and training (clinical) requirements.

Section 48:15 The Experience Requirement for Exemption.

The regulation as it is printed in the March 24, 2001 PA Bulletin requires 15 hours of practice as an MFT for 5 of the 7 years preceding application for licensure, with 10 of those hours consisting of direct client service. My problem with this requirement as it is stated is that it would exclude those who would be the most experienced and qualified in our profession of marriage and family therapy. These would be the senior members of the profession who are now mainly teaching, supervising or administering programs. Please note this concern about the inequity involved here. May I suggest a more practical number of 5 hours per week of direct client service or expanding the definition of direct service to include supervision, teaching and staff training. The number of years, 5 of the past 7 could remain the same. The stipulation of 15 hours of practice per week again does not include those who have been promoted to positions of increased responsibilities for administering clinical service delivery as well as training programs.

I would also ask that you let members of the House committee know of this concern.

Sincerely,

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

Cheryl H. Litzke, M.F.T.

Clinical Member and Approved Supervisor

American Association for Marriage and Family Therapy

ORIGINAL: 2178

RECEIVED
Friday, April 20, 2001
2001 APR 20 11:15:29

Carl E. Marshall, M.A. C.A.C. Diplomate
695 Green Street
California, PA 15409
(724) 938-7231
schuylercoalfax@hotmail.com

REVIEW COMMITTEE

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

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

Dear Ms. Cheney & The Board of Social Workers,

I felt disappointed, but not surprised, by the Social Worker Board's plan to exclude Pennsylvania Certified Addiction Counselor Diplomats with reciprocal credentialing with the International Board of Addiction Counselors, from the grand parenting process involving Licensed Professional Counselors.

I believe this blatant prejudice toward persons working in the field of addiction has historically existed since at least the end of probation. Indeed, these fields avoided treating addicts as if their malady was highly contagious until insurance carriers started to pay for treatment in the seventies. In my personal, professional and educational work, in the arena of chemical dependency, I have anecdotally experienced this angry bias by Social Workers, Psychologists and Psychiatrists for the work of addiction professionals more times than I care to remember. This distaste for the methods of chemical dependency therapists is deeply ingrained and interwoven with horrific untreated counter transference issues held by Social Workers, Psychologists and Psychiatrists (and society as a whole) toward the addicted.

Further, these counter transference problems, when untreated, not only sabotage any possibility of a positive therapeutic relationship with a human being struggling to recover from and incurable, progressive, to often fatal illness, but make the symptoms of the malady worse through the process of enabling.

An interesting anecdotal experience I had to demonstrate this is the Psychiatrist who informed me I was not really alcoholic, and Alcoholics Anonymous was a farce for weak stupid people, and blackouts were not real, my ex-wife just made up all those stories of things I did while intoxicated to get me to slow down on my drinking. He then prescribed forty milligrams of Valium a day and advised me to moderate my alcohol consumption. Needless to say at the time I was highly relieved to learn that I simply had a Valium deficiency and not alcoholism. Unfortunately, several years later, when I was withdrawing cold turkey (a D & A term meaning all at once and without help) from a dependency of 100 to 150 milligrams per day of Valium this story was not as amusing. It nearly cost me my life.

A psychologist I saw for my disease used a combination of hypnosis and regression therapy. I gained some marvelous insights into the source of pain buried deep in childhood's repressed memories, but did not miss a beat with the drinking. I will give this person credit they suggested I abstain from alcohol use while in therapy. Alas, this professional had absolutely no idea of what steps I could take to do this. That is until he heard Nancy Ragen speak then he told me to just say no.

The Psychiatrist that diagnosed my Valium deficiency referred me to a social worker for counseling. After one session he asked my ex-wife to come to the sessions. After one couples session he started seeing her individually on a regular basis. That is until she terminated treatment when he invited her for drinks and dinner.

I could provide you with endless stories of insufficient, unethical, even illegal treatment by social workers, psychologists, and psychiatrists. I am equally sure the board could give my reports of similar behavior by C.A.C.'s. My point is that licensing and credentialing is no guarantee against abuse of power and trust by the professional. The code of ethics governing social workers is no more stringent or effective than the one I swear to adhere to as a Certified Addictions Counselor. In fact, I believe in the area of dual relationships the CAC's code is more stringent. The social workers and other treatment professionals who can ethically and adequately treat people did not become effective by education or training alone. Empathy, compassion, wisdom, strong moral principles, are not taught in either graduate schools of social worker or counseling. Truly effective therapists are born not made. The most loving, compassionate, effective and successfully therapists I have known in my life did not even know what they were doing was therapy. That had no credits toward a degree in social work. They had no credentials that could be measured. They were lay therapists, and counseled from their hearts not there training.

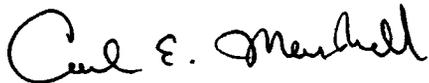
In regards to what is measurable when deciding on weather a person should be a licensed or not is education, training and experience. I will put my college transcripts, certificates of training, and professional experience up against any social worker in the Commonwealth, and am confident I will measure up to there level of skill. This exclusion from the grand parenting process of licensing counselors, of CAC's with master's degrees in counseling, stems from the malignant belief that has grown like a tumor through the social work field over the past thirty years. That belief is that CAC's are former addicts and therefore still sick. The malicious mindset continues by questioning why should a piece of the dwindling monetary pie go to "those people"

As a board you may posture, and pretend all you want about the pros and cons of a social work degree as opposed to one in counseing with a CAC. By the way of the three students that washed out of the Counseling Program at WVU where I matriculated my graduate degree credits, two transferred in to social work and were conferred degrees.

I am highly educated, extremely well rounded in professional experience, and have continued to refine my counseling skills through training. I earned and deserve the right to by grand parented into the Professional Counselors License. I resent the petty political turf war and egotistical one-upmanship stance adopted by those entrusted to oversee the process of professional licensing. I see it as nothing more than peeing on the bushes to mark your territory. Regardless of what you decide is the proper way to grandparent people into licensing I am as professional, skilled and effective as anyone with a degree in social work or psychology. I am more talented that most in those fields. Finally, I can provide my clients with something very few in the fields of social work or psychology can. I can lead them to a place they have never been before. I can do this because I have already been there.

Thank you for your attention to this matter, and may God bless you all.

Sincerely,

A handwritten signature in cursive script that reads "Carl E. Marshall". The signature is written in black ink and is positioned above the typed name.

Carl E. Marshall. M.A., C.A.C., Diplomat.

ORIGINAL: 2178

RUDYARD L. CRIDER
438 Parkside Road
Camp Hill, Pennsylvania 17011

April 19, 2001

RECEIVED

2001 APR 23 AM 9:41

PROFESSIONAL COUNSELORS
REVIEW COMMISSION



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 believe professional licensure is a necessary benefit to the consumer and to our profession. Currently, I am working at Holy Spirit Hospital Community Mental Health Center and have been with the Outpatient Service, now called Behavioral Health Service, since 1978. My titles are Senior Psychotherapist and Program Supervisor. I hold a Master's degree in Community Counseling from Shippensburg University and graduated in 1978 from a 36-hour program. I have two certifications:

- Certified Clinical Mental Health Counselor (CCMHC) certification from the Academy of Certified Clinical Mental Health Counselors (ACCMHC) and I have passed the credentialing examination given by ACCMHC. This is considered to be a specialty certification of the NBCC.
- National Certified Counselor certification from the National Board for Certified Counselors (NBCC).

I have had many years of clinical experience and over the years have supervised graduate students from Shippensburg University in their field experience. As I read the proposed regulations for licensure for professional counselors published in the Pennsylvania Bulletin on March 24, 2001, I am very concerned about some of the experience requirements for Licensure by Exemption (Grandparenting). The following are my concerns:

1. The definition of Professional Counselors is too narrowly defined. As I read the definition, it does not include the field of Community Counseling or Mental Health Counseling. My Community Counseling degree included course work in Human Growth and Development, Helping Relationships, Group Work, Appraisal, Research Personal Adjustment, Supervised Clinical Experience and other pertinent courses to the field. After I graduated and worked in the Mental Health field, I attained my specialty by meeting the requirements and passing a national examination and was certified as a Clinical Mental Health Counselor. In my way of thinking, the Professional Counselor Licensure Regulations definition should have the word "counseling" and include the fields of Community Counseling and Mental Health Counseling.
2. I am concerned that the first 1800 hours of supervised clinical experience is to be done by a professional counselor. As I prepared for my certification in 1981-1982, I

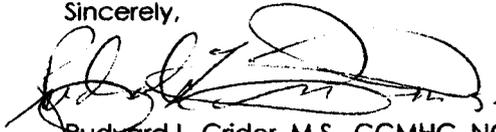
completed 3,500 hours of clinical supervision by a Licensed PhD. Psychologist, which met the Certification Board's guidelines for approved supervision to acquire my certification. I have also had many hours (years) of Supervision by Board Certified Clinical Psychiatrists and continue to have this supervision. I strongly believe this needs to be included as valid supervision to be accepted as part of the professional counselor licensure regulations in the grandparenting provision.

3. The experience requirement of requiring a qualifying practice of 15 hours per week with 10 hours of direct client contact can be unfair to clinicians like myself who continue to do direct client contact but have recently taken on program supervision duties in his service that diminishes the direct client time. I feel since I have worked as a direct client contact clinician for years (1978), have acquired a Master's level degree in Counseling, have passed the NBCC Examination for Clinical Mental Health Counseling and continue to be supervised by clinical psychiatrists—this experience should enable me to become licensed under the grandparenting provision.
4. The requirements for continuing education for the purpose of grandparenting are too restrictive. I have kept up with the continuing education requirement to keep my certifications in good standing. But, I do attend workshops put on by pharmaceutical companies to educate practitioners on the latest effects of psychotropic medications and it does not say approved by NBCC. That is just one example—I have attended other workshops over the years where the provider did not apply for NBCC approval. I would recommend some provision for the acceptance of such seminars to be counted toward continuing education.

I am familiar with the Pennsylvania Alliance of Counseling Professionals and share their suggestion for changes in the proposed regulations. I do hope you will consider my suggestions and the PACP suggestions and urge the Board to accept them.

Thank you for taking this matter into consideration.

Sincerely,



Rudyard L. Crider, M.S., CCMHC, NCC
Senior Psychotherapist

Cc: Independent Regulatory Review Commission ✓
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Harold F. Mowery, Jr.
Representative Patricia H. Vance

ORIGINAL: 2178

Patricia M. Dwyer, D.Min.

956 Moravia Street
Bethlehem, PA 18015

April 19, 2001

RECEIVED

2001 APR 30 AM 8:49

ATTORNEY GENERAL'S OFFICE
LAW REVIEW COMMISSION



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

Dear Attorney Cheney:

Subject: Proposed Licensed Regulations (16A-694)

I have read the proposed regulations for licensure of marriage and family therapists 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 several of the provisions. I concur with the suggestions for specific changes in the proposed regulations for marriage and family therapists that have been submitted to you by the Pennsylvania Alliance of Counseling Professionals (PACP) and urge the Board to adopt them.

Section 48.1 is of particular concern to me personally. I have enclosed a copy of PACP's comments and suggestions regarding this issue. If the degree requirement is limited to the degrees listed in 48.1 (social work, counseling psychology, clinical psychology, educational psychology, counseling and child development) and are not amended, I will not be licensable as a marriage and family therapist even though I meet all the other qualifications for licensure.

I received a master degree from LaSalle University in Pastoral Counseling with a speciality in Marriage and Family Therapy. At the time I attended LaSalle University, they offered two degrees: Pastoral Counseling with a speciality in marriage and family therapy, or Human Service Psychology. Since my interest was marriage and family therapy, I choose the Pastoral Counseling degree. Am I to be denied a license because LaSalle University, at that time, did not offer any of the above mentioned master degrees? I certainly hope not. I wanted to expand my marriage and family therapy knowledge based and received a D.Min. Degree from The Eastern Baptist Theological Seminary in Couples and Family Therapy. Since there were no other marriage and family therapy doctoral program in Philadelphia, Easter Baptist Seminary was my only choice. Am I again to be denied a license because I could not leave my family and chronically ill husband to move to another state to complete a doctoral degree in marriage and family therapy?

My master degree from LaSalle was a 55 credit degree with 49 of those credits in marriage and family therapy. Because of the degree work I did at LaSalle University, I was accepted by AAMFT as an Associate Member. Once I completed the required post-degree clinical work and supervision, I was accepted as a Clinical Member of AAMFT. I was later accepted as an AAMFT Approved Supervisor and two years after that, my course in Supervision was accredited by AAMFT as an AAMFT Approved Supervision Course. I have been a marriage and family therapist since 1982, a supervisor since 1985, and since 1987 have been teaching and training supervisors. I am currently adjunct faculty in the family therapy, counseling psychology, clinical psychology, and pastoral counseling master programs at Moravian Theological Seminary, LaSalle University, and Chestnut Hill College. I also am currently adjunct faculty in the doctoral programs at Hahnemann University and Chestnut Hill College.

I have been the president of the Pennsylvania Association for Marriage and Family Therapy and was the founder and first president of the Pennsylvania Alliance of Counseling Professionals. When I helped write the current Act, we never intended to deny a license to anyone who did not meet the academic and clinical requirements, nor did we intend to limit the title of degrees colleges, universities and seminaries could offer as long as they met the "60 planned program" requirement. It was never our intention to limit the programs beyond marriage and family therapy "acceptable to the Board" as being those limited to the field of psychology, social work, and sociology. I suggest adding "but not limited to" to the list of degrees in Section 48.1 or accept the wording as suggested on page 4 of PACP's response to the proposed regulations. See Attachment I.

Section 48.13(b)(1) restricts marriage and family therapists from working with individuals or groups. Many of my clients are individuals working on family issues, some are widows and widowers, orphaned single adult children without siblings, and adults who are geographically distanced from their families. Am I to tell these individuals when they seek therapy that I cannot work with them because the Regulations state I can only work with couples and families? I certainly hope not. Just because I am a marriage and family therapist, it does not mean I am not trained and competent to work with individuals and groups. Such a restriction makes it clear that there is a common misunderstanding about what marriage and family therapist do and are trained to do. My hope is that the Board that represents my discipline is more informed about the practice of marriage and family therapy and the training of marriage and family therapists. I recommend the Board add "Individual and Group therapy" to the list of services in section 48.3(b)(1). See Attachment II.

Section 48.15(5)(v) mandates three requirements for continuing education. Since AAMFT does not approve continuing education courses, it is impossible for marriage and family therapists to comply with this requirement. I propose eliminating AAMFT from Section 48:15(5)(v). See Attachment III.

Section 48.13(b)(5) mandates one out of every two supervision hours be in group supervision. As a director of The Family Institute of Philadelphia, an COAMFTE Approved Program, I find

this requirement impossible. Because of the limited number of AAMFT Approved Supervisors working in agencies, my students would be required to seek additional supervision beyond what the Institute offers and COAMFTE requires. In addition to students' tuition, they would be required to pay for additional supervision. I believe this requirement would be grossly unfair to beginning clinicians. I suggest the language be changed from "shall" to "may" as suggested on page 9 of PACP's response to the proposed regulations. See Attachment IV.

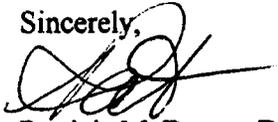
Section 48.15(4) requires me to demonstrate proof of that in my practice I am delivering at least 15 hours of direct client contact hours per week. As a director of an COAMFTE Approved Program, I am unable to meet this requirement. My position requires me to be at the Institute for 30 hours a week. Two days each week I am at the Institute until after 7pm. I teach at least one graduate level course per semester and those courses are taught in the evening hours. That now leaves one other weekday evening and one night and a day a per weekend to see 15 clients. The question then remains, when I am I suppose to have a life? Be with my family? Strange that a family therapist cannot be with her family because the regulations required her to work "at least 15" more hours per week with clients. When therapists, counselors, or social workers deliver 15 hours of direct client contact hours, they also deliver another four (4) to five (5) hours of paperwork and phone time. Now I am required, by law, to add to my work a full-time job and teaching job 20 additional hours per week. I strongly suggest this requirement be eliminated. I am not even in favor of the compromise PACP suggested of "at least 10 hours per week". Working full time and teaching one course per semester and having five (5) to six(6) direct client contact hours per week is more than enough. Full-time professors have the luxury of teaching as part of their work load and can teach during day-time hours. Adjunct professors teach during the evening hours as additional work to their full time jobs. Requiring us to work beyond what we can physically, mentally, and ethically do is asking too much. I suggest you drop the hour requirement completely.

As the director of The Family Institute of Philadelphia, I am well aware that my faculty is working full time doing direct client contact hours. The faculty at the Institute teach one night a week and supervise one to two hours a week. They will have not trouble with the 10 or 15 hour requirement. I, on the other hand, as the director do not have that ability. Am I to be denied a license because I am the director? I certainly hope not.

It would be a devastating blow to me personally to be denied a license since I was the person who was the founder PACP, helped write the current Act, and worked for five (5) years to get the bill passed. I do not understand how what we wrote to be inclusive has become exclusive.

I urge your adoption of PACP's suggestions, except the 10 hour direct contact hours, for marriage and family therapists, especially the sections I noted above.

Sincerely,



Patricia M. Dwyer, D.Min

cc:: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Lisa Boscola
Representative T. J. Rooney
File

Pennsylvania Alliance of Counseling Professionals
Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

**FIELD CLOSELY RELATED TO THE PRACTICE OF MARRIAGE AND
FAMILY THERAPY**

Concern:

Marriage and family therapists are extremely concerned about the limited number of fields included in the following definition in § 48.1:

Field closely related to the practice of marriage and family therapy - Includes the fields of social work, counseling psychology, clinical psychology, educational psychology, counseling and child development and family studies.

Limiting the degrees that are acceptable for licensure to the six listed above will exclude from licensure many well-qualified and experienced marriage and family therapists who meet all of the other licensure requirements.

Marriage and family therapy developed and continues to operate as a multi-disciplinary field with much of its training at a post-Master's degree level. Individuals with graduate degrees in a wide range of the service professions later choose to pursue specialized training in marriage and family therapy. The specific courses an individual has taken and the nature of the supervised clinical experience one has obtained are the definitive training experiences for marriage and family therapists at the present time, not the specific graduate degree one has completed. Three of the four accredited marriage and family therapy training programs in Pennsylvania are postgraduate programs that accept applicants from a variety of backgrounds, including such fields as medicine, nursing, the ministry, education, and psychology as well as the fields listed in the proposed regulations. Training of marriage and family therapists may shift entirely to degree programs in a university setting at some future date, but that is not where most of the training occurs today in Pennsylvania. Since the proposed regulations for marriage and family therapists include a detailed outline in § 48.2 of the specific coursework required for licensure, a broader definition of *closely related fields* would maintain protection for the public without excluding qualified professionals from licensure.

Suggestion:

Change the definition of "*Field closely related to the practice of marriage and family therapy*" in § 48.1 to read as follows:

Field closely related to the practice of marriage and family therapy--Includes the fields of social work, ~~counseling psychology, clinical psychology,~~

educational psychology, counseling, and child development and family studies, medicine, nursing, ministry/theology, education, or any other field acceptable for entry into postgraduate training in marriage and family therapy.

Pennsylvania Alliance of Counseling Professionals
Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

ACCEPTABLE SERVICES FOR CLINICAL EXPERIENCE

Concern:

Individual and group therapy are excluded from the list of services that can be provided by marriage and family therapists as part of their supervised clinical experience in §48.13(b)(1). This subsection reads as follows:

At least one-half of the experience shall consist of providing services in one or more of the following areas:

- (i) Assessment.
- (ii) Couples therapy.
- (iii) Family therapy.
- (iv) Other systems interventions.
- (v) Consultation.

The exclusion of individual therapy in § 48.13(b)(1)'s listing of services provided by marriage and family therapists supports the common stereotype that marriage and family therapists provide only marriage and family therapy services. Working with individuals from a family systems perspective is an important part of the training and ongoing practice of marriage and family therapists. Omitting individual therapy from this listing unduly restricts the supervised clinical experience for marriage and family therapists and will greatly increase the difficulty of accumulating 1,800 hours of direct client contact in order to meet the licensure requirements. The act defines the practice of marriage and family therapy as "the delivery of psychotherapeutic services to *individuals*, couples, families and *groups* (italics added)." The listing of services that marriage and family therapists can provide as part of their supervised experience must reflect the full range of services outlined in Act 136.

Suggestion:

Change the list of services in § 48.13(b)(1) to read as follows:

- (i) **Assessment.**
- (ii) **Individual therapy.**
- (iii) **Couples therapy.**
- (iv) **Family therapy.**
- (v) **Group therapy.**
- (vi) **Other systems interventions.**
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Pennsylvania Alliance of Counseling Professionals
Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

CONTINUING EDUCATION REQUIREMENTS

Concern:

The requirements for acceptable continuing education hours outlined in subsections §48.15(5)(v) and §48.15(5)(vi) effectively eliminate the use of continuing education hours to meet the educational requirements for licensure under the grandparenting provision for marriage and family therapists. These two subsections include the following statement:

Continuing education satisfactory to the Board shall meet the following requirements:

- (A) Masters level difficulty.
- (B) Excludes courses in office management or practice building.
- (C) Any course approved by AAMFT.

AAMFT does not approve continuing education offerings for marriage and family therapists. Since no other source of approved continuing education hours is included in these sections, marriage and family therapists would apparently not be able to use continuing education hours they have completed to meet the education requirement as allowed by these subsections. § 48.15(5)(v)(C) and §48.15(5)(vi)(C) need to be rewritten so that marriage and family therapists may take advantage of this option.

Suggestion:

Change § 48.15(5)(v)(C) and §48.15(5)(vi)(C) to read as follows:

(C) Any course which is related to the practice of marriage and family therapy that has been approved by AAMFT for continuing education credit for Licensed Psychologists or Licensed Social Workers, has been approved by NBCC, CRC, CBMT, AATA, ADTA, or NADT, or has been offered by AAMFT or PAMFT and any other course which is related to the practice of marriage and family therapy.

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Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

SUPERVISION IN A GROUP SETTING

Concern:

Supervision in a group setting is required for marriage and family therapists in § 48.13(b)(5) which reads:

The supervisor, or one to whom supervisory responsibilities have been delegated, shall meet with the supervisee for a minimum of 2 hours for every 40 hours of supervised clinical experience. At least 1 of the 2 hours shall be with the supervisee individually and in person, and at least 1 of the 2 hours shall be with the supervisee in a group setting and in person.

Supervision of clinical experience in a group setting is a valuable part of the training for marriage and family therapists; our concern is with *requiring* one of every two hours of supervision to be in this form. Because of the limited numbers of marriage and family therapy supervisors in agency and institutional settings, many marriage and family therapists will have to privately contract for at least half of their required hours of supervision. The number of appropriate supervisors is also limited. To put an additional restriction on the form of the supervision creates an undue hardship on those seeking to fulfill this requirement. In large urban areas it may be feasible to access and schedule group supervision. In the rest of the state where there are few supervisors, a finite number of potential supervisees, and where individuals from a wide variety of work settings are spread over a large geographic area, forming groups and coordinating schedules for group supervision could be extremely difficult, if not impossible. *Allowing* rather than *requiring* group supervision will encourage it while maintaining needed flexibility.

Suggestions:

- Change the wording in § 48.13(b)(5) to read as follows:

At least 1 of the 2 hours shall be with the supervisee individually and in person; ~~and at least 1 of the 2 hours shall~~ may be with the supervisee in a group setting and in person.

- If the Board cannot endorse the above suggestion, it is imperative that this group supervision requirement be added to the pipeline adjustments suggested in a preceding section headed "Transition Language for Supervised Clinical Experience."

ORIGINAL: 2178

MARY LOUISE BROSS
258 East Market Street

April 19, 2001

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

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ATTORNEY
REVIEW COMMISSION



Dear Attorney Cheney:

Subject: Proposed Licensed Regulations (16A-694J)

I have read the proposed regulations for licensure of marriage and family therapists 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 several of the provisions. I concur with the suggestions for specific changes in the proposed regulations for marriage and family therapists that have been submitted to you by the Pennsylvania Alliance of Counseling Professionals (PACP) and urge the Board to adopt them.

Section 48.1 is of particular concern to me personally. I have enclosed a copy of PACP's comments and suggestions regarding this issue. If the degree requirement is limited to the degrees listed in 48.1 (social work, counseling psychology, clinical psychology, educational psychology, counseling and child development) and are not amended, those who majored in marriage and family therapy in pastoral counseling programs will not be licensed. Presently many practicing marriage and family therapists who got their degrees in pastoral counseling programs will not be able to continue their careers even though they met all educational and clinical requirements. It would be a mistake to deny a license to anyone who did not meet the academic and clinical requirements, or to limit the title of degrees colleges, universities and seminaries could offer as long as they met the "60 planned program" requirement. I suggest adding "but not limited to" to the list of degrees in Section 48.1 or accept the wording as suggested on page 4 of PACP's response to the proposed regulations. See Attachment I.

Section 48.13(b) (I) restricts marriage and family therapists from working with individuals or groups. Family therapy is not only a technique for helping families relate better to each other, it is a perspective of the individual personality defined in part by the individual's embeddedness in family and community. When I relate to a client in a individual session I use all my family therapy knowledge to understand this person. Many of my clients are individuals in foster care whose main concern is reconciling family issues. Many teenagers are working on family issues, some clients are divorced and are considering creating a blended family, some are widows and widowers, and adults who are geographically distanced from their families. It would be very short-sighted to refuse to treat individuals because the Regulations state I can only work with couples and families? One important use of family therapy techniques has been to assist difficult group relationships in corporate settings. Would it not be strange if a marriage and family therapists would not be able to deliver this service. My hope is that, the Board that represents my discipline is more informed about the practice of marriage and family therapy and the training of marriage and family therapists. I recommend the Board add "Individual and Group therapy" to the list of services in section 48.3(b)(1). See Attachment H.

Section 48.15(5)(v) mandates three requirements for continuing education. Since AAMFT does not approve continuing education courses, it is impossible for marriage and family therapists to comply with this requirement. I propose eliminating AAMFT from Section 48:15(5Xv). See Attachment III.

Section 48.13(bX5) mandates one out of every two supervision hours be in group supervision. This requirement would be impossible to execute. Because of the limited number of AAMFT Approved Supervisors working in agencies, students would be required to seek additional supervision beyond what the Institute offers and COAMFTE requires. In addition to

Bross 2

students' tuition, they would be required to pay for additional supervision. I believe this requirement would be grossly unfair to beginning clinicians. I suggest the language be changed from "shall" to "may" as suggested on page 9 of PACP's response to the proposed regulations. See Attachment IV.

Section 48.15(4) requires me to demonstrate proof that in my practice I am delivering at least 15 hours of direct client contact hours per week. Since I am not a licensed professional I must work in a agency where I may only work part-time. I may not always get 15 hours of direct client contact hours per week. Therefore, as a fee-for-service therapist I am unable to meet this requirement. Along with face-to-face contact I may spend another 10 hours using all my professional skills in telephone conversations, writing treatment plans, conferring with treatment teams, etc. This "clinical experience" ought to be valued.

I urge your adoption of PACP's suggestions, except the 10 hour direct contact hours, for marriage and family therapists, especially the sections I noted above.

Sincerely,



Mary Louise Bross, M.A., Ed.S.

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator Lisa Boscola
Representative Steve Samuelson

Pennsylvania Alliance of Counseling Professionals
Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

FIELD CLOSELY RELATED TO THE PRACTICE OF MARRIAGE AND FAMILY THERAPY

Concern:

Marriage and family therapists are extremely concerned about the limited number of fields included in the following definition in § 48.1:

Field closely related to the practice of marriage and family therapy - Includes the fields of social work, counseling psychology, clinical psychology, educational psychology, counseling and child development and family studies.

Limiting the degrees that are acceptable for licensure to the six listed above will exclude from licensure many well-qualified and experienced marriage and family therapists who meet all of the other licensure requirements.

Marriage and family therapy developed and continues to operate as a multi-disciplinary field with much of its training at a post-Master's degree level. Individuals with graduate degrees in a wide range of the service professions later choose to pursue specialized training in marriage and family therapy. The specific courses an individual has taken and the nature of the supervised clinical experience one has obtained are the definitive training experiences for marriage and family therapists at the present time, not the specific graduate degree one has completed. Three of the four accredited marriage and family therapy training programs in Pennsylvania are postgraduate programs that accept applicants from a variety of backgrounds, including such fields as medicine, nursing, the ministry, education, and psychology as well as the fields listed in the proposed regulations. Training of marriage and family therapists may shift entirely to degree programs in a university setting at some future date, but that is not where most of the training occurs today in Pennsylvania. Since the proposed regulations for marriage and family therapists include a detailed outline in § 48.2 of the specific coursework required for licensure, a broader definition of *closely related fields* would maintain protection for the public without excluding qualified professionals from licensure.

Suggestion:

Change the definition of "*Field closely related to the practice of marriage and family therapy*" in § 48.1 to read as follows:

Field closely related to the practice of marriage and family therapy--Includes the fields of social work, counseling psychology, clinical psychology,

educational psychology, counseling, and child development and family studies, medicine, nursing, ministry/theology, education, or any other field acceptable for entry into postgraduate training in marriage and family therapy.

Pennsylvania Alliance of Counseling Professionals
Response to Proposed Licensure Regulations (16A-694)

Marriage and Family Therapy Concerns

ACCEPTABLE SERVICES FOR CLINICAL EXPERIENCE

Concern:

Individual and group therapy are excluded from the list of services that can be provided by marriage and family therapists as part of their supervised clinical experience in §48.13(b)(1). This subsection reads as follows:

At least one-half of the experience shall consist of providing services in one or more of the following areas:

- (i) Assessment.
- (ii) Couples therapy.
- (iii) Family therapy.
- (iv) Other systems interventions.
- (v) Consultation.

The exclusion of individual therapy in § 48.13(b)(1)'s listing of services provided by marriage and family therapists supports the common stereotype that marriage and family therapists provide only marriage and family therapy services. Working with individuals from a family systems perspective is an important part of the training and ongoing practice of marriage and family therapists. Omitting individual therapy from this listing unduly restricts the supervised clinical experience for marriage and family therapists and will greatly increase the difficulty of accumulating 1,800 hours of direct client contact in order to meet the licensure requirements. The act defines the practice of marriage and family therapy as "the delivery of psychotherapeutic services to *individuals*, couples, families and *groups* (italics added)." The listing of services that marriage and family therapists can provide as part of their supervised experience must reflect the full range of services outlined in Act 136.

Suggestion:

Change the list of services in § 48.13(b)(1) to read as follows:

- (i) **Assessment.**
- (ii) **Individual therapy.**
- (iii) **Couples therapy.**
- (iv) **Family therapy.**
- (v) **Group therapy.**
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