



Original: 2458

**PENNSYLVANIA ALLIANCE
OF COUNSELING PROFESSIONALS**

RECEIVED

2005 MAR 11 PM 2:55

REGULATORY
REVIEW COMMISSION

February 25, 2005

Ms. Sandra Matter,
Administrative Assistant
State Board of Social Workers, Marriage and Family Therapists,
and Professional Counselors
P. O. Box 2649
Harrisburg, PA 17105-2649

The Pennsylvania Alliance of Counseling Professional (PACP) representing the PA Association for Marriage and Family Therapy and the Pennsylvania Counseling Association would like to respond to the information rendered in the *Pennsylvania Bulletin* on the proposed rulemaking. Reference No. 16A-698, Supervised Clinical Experience.

We concur with the suggested changes by the Board of Social Work, Marriage and Family Therapy and Professional Counselors on the regulation and recommend that this be approved as presently printed in the *Pennsylvania Bulletin*.

We appreciate the opportunity to respond to this information.

Sincerely,

Kurt L. Kraus, EdD., LPC
President

RECEIVED

FEB 28 2005

Health Licensing Boards



Pennsylvania Association for Marriage and Family Therapy
550 Pinetown Rd, Suite 301A, Ft. Washington, PA 19034
215-274-1340 ♦ ♦ Email: PAMFTPACP@aol.com
A Division of the American Association for Marriage and Family Therapy

(6)

April 8, 2005

John R. McGinley, Jr., Chairman
Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

RECEIVED
2005 APR 18 AM 10:57
INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Chairman McGinley:

The Pennsylvania Association for Marriage and Family Therapy strongly recommends IRRC's approval of Regulation 16A-898—proposed rulemaking of the State Board of Social Workers, Marriage and family Therapists and Professional Counselors relating to supervised clinical experience. The proposed regulation outlines an exception to the current regulations which states that "a supervisor shall supervise no more than six supervisees at the same time." The proposed exception would allow a supervisor to provide *group* supervision of therapists accumulating their supervised clinical experience in addition to the six therapists the supervisor might be working with in *individual* supervision.

This change in the supervision requirement is critically important to the availability of qualified MFT supervisors for marriage and family therapists accumulating their supervised clinical experience for licensure for the following reasons:

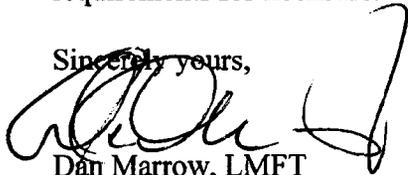
1. Newly trained marriage and family therapists find it very difficult to find employment in an agency or institution where they will be supervised by a LMFT. In order to complete the required supervised clinical experience for licensure, they usually have to accumulate their supervised clinical experience in a combination of on-the-job supervision by an individual licensed in another mental health profession and privately arranged off-site supervision by a LMFT. Limiting the number of supervisees per supervisor to six makes it difficult for a supervisor who provides any *group* supervision to also be available for *individual* supervision.
2. Marriage and family therapy is the only mental profession that has a national certification process for supervisors. The licensure regulations require that an MFT supervisor be certified as an Approved Supervisor by AAMFT in addition to being a LMFT. This requirement is an important one, but it limits the number of MFT supervisors available to work with marriage and family therapists completing their supervised clinical experience hours.

John R. McGinley, Jr., Chairman
April 5, 2005
Page 2

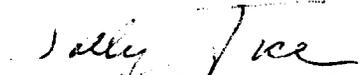
3. Three of the five AAMFT approved MFT training programs in the state are post-graduate programs for working professional. Thus, the majority of marriage and family therapists in Pennsylvania completes a master's degree in a related mental health field and then receives their MFT training in a post-graduate program. Since they have already completed a 48-hour master's degree, they often begin accumulating their supervised clinical experience for licensure as part of their post-graduate training. Group supervision is an important part of most family therapy training programs and supervisors often lead one or more supervision groups as well as providing *individual* supervision for several therapists. The six supervisee limit in the current licensure regulations restricts this common form of training and unduly limits the availability of qualified MFT supervisors for marriage and family therapists pursuing licensure.

The Pennsylvania Association for Marriage and Family Therapy feels the proposed regulation which would limit the number of *individual* supervisees per supervisor to six, while still allowing supervisors to lead supervision groups, would provide the flexibility needed for marriage and family therapists to meet the supervised clinical experience requirements for licensure.

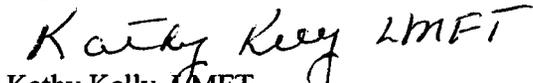
Sincerely yours,



Dan Marrow, LMFT
President



Sally J. Tice, Ph.D., LMFT
Legislative Consultant



Kathy Kelly, LMFT
Legislative Committee Chair

cc: House Professional Licensure Committee
Senate Consumer Protection and Professional Licensure Committee



Original: 2458

RECEIVED

2005 APR 11 AM 9:30

INDEPENDENT REGULATORY REVIEW COMMISSION

PENNSYLVANIA ALLIANCE OF COUNSELING PROFESSIONALS

April 4, 2005

John R. McGinley, Jr., Chairman
Independent Regulatory Review Commission
14th Floor, Harrisstown 2
333 Market Street
Harrisburg, PA 17101

Dear Chairman McGinley:

The Pennsylvania Alliance of Counseling Professionals would like to address the remarks of the House Professional Licensure Committee in its letter of March 16, 2005 in regard to Regulation 16A-898—proposed rulemaking of the State Board of Social Workers, Marriage and family Therapists and Professional Counselors relating to supervised clinical experience. The proposed regulation outlines an exception to the current regulations which states that “a supervisor shall supervise no more than six supervisees at the same time.” The proposed exception would allow a supervisor to provide *group* supervision of therapists/counselors accumulating their supervised clinical experience in addition to the six therapists/counselors the supervisor might be working with in *individual* supervision.

The Pennsylvania State Board of Psychology regulations provided the basis for the supervision regulations that were written for licensed clinical social workers, licensed marriage and family therapists and licensed professional counselors. Some changes were made because of differences in the professions themselves and the realities of their different work experiences. The six supervisee limit was drawn from § 41.58(c)(9) of the State Board of Psychology regulations, a section that applies only to the supervision of “unlicensed persons with graduate training in psychology.” Section (a) clearly states that “Section 41.58 does not apply to persons completing the experience requirement for licensure...” Thus, a limit was imposed on the supervision of social workers, marriage and family therapists, and professional counselors preparing for licensure that does not exist for the similar supervision of psychologists.

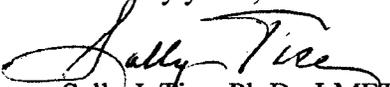
The six supervisee limit also presents difficulties for marriage and family therapists and professional counselors in meeting the supervised clinical experience requirements that would not exist for psychologists. The same differences in the professions and their work experience that led to the original changes in the regulations make the six supervisee limit untenable in the supervision of marriage and family therapists and professional counselors.

John R. McGinley, Jr., Chairman
Independent Regulatory Review Commission
Page 2
April 4, 2005

Newly trained psychologists are able to work in agencies and institutions where they will be supervised by a licensed psychologist as they complete their supervised clinical experience requirement for licensure. The required supervision occurs as part of their normal work experience. Marriage and family therapists and professional counselors, on the other hand, are very unlikely to be supervised by a LMFT or a LPC in their first work experience. Such supervisory positions tend to be held by Licensed Psychologists or Licensed Social Workers. Marriage and family therapists and professional counselors, therefore, out of necessity must often accumulate their supervised clinical experience in a combination of on-the-job supervision (by an individual licensed in another mental health profession) and privately arranged off-site supervision (by a licensed professional in their own field). The off-site supervision might be a part of their training beyond the completion of 48 semester hours of graduate coursework or it may be through privately arranged, paid supervision with a qualified supervisor. The on-site supervisor will have primary, general responsibility for the supervisee and his/her work. The off-site supervisor helps shape the professional identity of the supervisee and oversees the development of the perspective and skills unique to their profession.

Under the current regulations, any LMFT or LPC who leads supervision groups for individuals moving toward licensure in an educational, institutional or agency setting would have to limit the group size to six members. That is an acceptable limit, but the current regulation would then prohibit that supervisor from providing any *individual* supervision for therapists preparing for licensure during the same time period. Given the requirement for *individual* supervision and the limited number of MFT and PC supervisors available, the current limit of six supervisees per supervisor makes it very difficult for marriage and family therapists and professional counselors to arrange the appropriate supervision of their beginning experience. Limiting the number of *individual* supervisees per supervisor to six, while still allowing supervisors to lead supervision groups would provide the flexibility needed for marriage and family therapists and professional counselors to meet the supervised clinical experience requirements for licensure. We strongly recommend the approval of this proposed change in the licensure regulations.

Sincerely yours,


Sally J. Tice, Ph.D., LMFT
President

cc: House Professional Licensure Committee
Senate Consumer Protection and Professional Licensure Committee

National Association of Social Workers

Original: 2458

March 3, 2005

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and Family Therapists and Professional
Counselors
P. O. Box 2649
Harrisburg, PA 17105-2649

Re: Proposed Rulemaking – Supervised Clinical Experience

Dear Ms. Matter:

The National Association of Social Workers, Pennsylvania Chapter, supports the proposed changes to the regulations regarding Supervised Clinical Experience, amending §§ 47.12c.

We agree that group supervision hours received in educational, institutional and agency settings should count towards supervision for the clinical social work license regardless of how many people are in the group.

Thank you for this change to the regulations.

Sincerely,



Rebecca S. Myers, LSW
Executive Director

cc: Chairman McGinley, Independent Regulatory Review Commission
The Honorable Tom Gannon
The Honorable William Rieger
The Honorable Tommy Tomlinson
The Honorable Lisa Boscola

RECEIVED
2005 MAR 11 PM 1:34
INDEPENDENT REGULATORY
REVIEW COMMISSION