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October 8, 2012

The Honorable Silvan B. Lutkewitte, III, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation
Bureau of Professional and Occupational Affairs
16A-6917

Dear Chairman Lutkewitte:

The Pennsylvania Association of Marriage and Family Therapy (PAMFT) appreciates the opportunity to comment as a Stakeholder in the proposed Independent Regulatory Review Commissions review of **Regulation #16A – 6917: Schedule of Civil Penalties - Social Workers, Marriage and Family Therapists and Professional Counselors**

Our Association agrees with the new schedule of civil penalties for unlicensed individuals who hold themselves out as licensed or use letters, words or symbols that would confuse the consumer in assuming the individual is licensed in their field of endeavor.

At this time we would ask the Commission to allow for the inclusion of clarifying language to the title of Marriage and Family Therapist, as stated in the social work section which makes it unlawful for an individual to hold oneself out as a Marriage and Family Therapist, use the title "marriage and family therapist," or use the abbreviation "MFT" unless the individual either holds a current license or has received a master's or doctoral degree from an accredited school or program completing the required educational coursework.

Presently, we recognize the use of the term "family therapist" across all areas of the human services and mental health fields. However, the use of this term does not guarantee that any education or training has occurred in this area. We would like to safeguard the consumer by using title protection language and licensing to assure that the choice made by the consumer is safe by clarifying the title protection language in our section of the Act similar to what was offered to the Social Workers.

Additionally, section 20(a.1) of the Social Workers, Marriage and Family Therapists and Professional Counselors Act, 63 P.S. §1920(a.1) makes it unlawful for an individual to hold oneself out as a social worker, use the title "social worker," or use the abbreviation "S.W." unless the individual either holds a current license or has received a bachelor's, master's or doctoral degree from an accredited school or program of social

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work or social welfare. Accordingly, the Commissioner is proposing a similar schedule of civil penalties for individuals who violate this section of the act. For first offenses the penalty would be \$500. Second and subsequent offenses would be subject to formal administrative action.

We thank you for this consideration at this time. We look forward to your response and will be willing to offer any further clarification you may require.

Sincerely,

Shelby Riley, LMFT
President

Rita Porreca, LMFT
Legislative Chair