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Cynthia K. Montgomery  
Regulatory Counsel  
Department of State  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Re: Proposed Regulation 16A – 6921: Qualifications for Licensure  
State Board of Social Workers, Marriage/Family Therapists and Professional Counselors

Dear Ms. Montgomery:

I appreciate the opportunity to comment on the proposed Regulation 16A – 6921: Qualifications for Licensure for Social Workers, Marriage and Family Therapists and Professional Counselors.

As noted in the proposed regulation, Act 17 of 2012 revised qualifications for licensed clinical social workers, licensed marriage and family therapists and licensed professional counselors. Specifically, Act 17 of 2012 amended the regulation that allowed an applicant with less than a 48 semester-hour master's degree to qualify for licensure if the degree was completed on or before June 30, 2009. The additional hours needed to reach the required 60 semester-hours or 90 quarter-hours in a planned program may be completed after the granting of the master's degree.

Amongst other things, the legislative intent of Act 17 is to allow those who have completed a master's program (regardless of number of credits in the program) to qualify for licensure, I propose the language in the regulation be amended as follows to clarify this intent:

- (i) An individual meeting the educational requirements of paragraph (2)(i) or (ii) must have completed at least 3,000 hours of supervised clinical experience, acceptable to the board as determined by regulation, obtained after the completion of ~~48 semester hours or 72 quarter hours of graduate coursework~~ a qualifying master's degree.

This is an important distinction because someone, like me, who obtained a master's degree in counseling psychology in 1998 from a 45 semester-hour program and completed supervised clinical experience in the years soon after obtaining a master's degree, can qualify for licensure. The way the regulation is currently written, the clinical supervision I completed, although it exceeded the required hours and the experience was relevant to the field, does not qualify me for licensure because I did not take 3 additional credits (to reach the required 48) until after the supervision was completed. The timing of the supervised clinical experience is the only thing that stands in the way of my becoming a licensed professional counselor.

Thank you for your consideration.

Sincerely,

*Donna Mengle, MA, NCC*  
Donna E. Mengle, MA, NCC