

<h1>Regulatory Analysis Form</h1> <p>(Completed by Promulgating Agency)</p> <p>(All Comments submitted on this regulation will appear on IRRC's website)</p>		<p>INDEPENDENT REGULATORY REVIEW COMMISSION</p> <p>RECEIVED</p> <p>Independent Regulatory Review Commission</p> <p>December 11, 2025</p> <p>IRRC Number: 3474</p>	
<p>(1) Agency</p> <p>Department of State, Bureau of Professional and Occupational Affairs, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors</p>			
<p>(2) Agency Number: 16A</p> <p>Identification Number: 6927</p>			
<p>(3) PA Code Cite:</p> <p>49 Pa. Code Chapters 47, 48 and 49:</p> <p>§§ 47.1a, 47.4, 48.1, 48.3, 48.13a, 48.21—48.25, 48.32, 48.35, 48.36, 48.38, 48.42, 48.51—48.55, 48.57, 48.58, 48.71, 49.1, 49.3, 49.13a, 49.21—49.25, 49.32, 49.35, 49.36, 49.38, 49.42, 49.51—49.55, 49.57, 49.58 and 49.71</p>			
<p>(4) Short Title: Associate MFT and PC and Supervision</p>			
<p>(5) Agency Contacts (List Telephone Number and Email Address):</p> <p>Primary Contact: Jacqueline Wolfgang, Senior Regulatory Counsel, Department of State, P.O. Box 69523, Harrisburg, PA 17106-9523 (phone 717-783-7200) (fax 717-787-0251) jawolfgang@pa.gov.</p> <p>Secondary Contact: Cathy Tully, Board Counsel, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, P.O. Box 69523, Harrisburg, PA 17106-9523 (phone 717-783-7200) (fax 717-787-0251) catully@pa.gov.</p>			
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input checked="" type="checkbox"/> Proposed Regulation</p> <p><input type="checkbox"/> Final Regulation</p> <p><input type="checkbox"/> Final Omitted Regulation</p>		<p><input type="checkbox"/> Emergency Certification Regulation;</p> <p><input type="checkbox"/> Certification by the Governor</p> <p><input type="checkbox"/> Certification by the Attorney General</p>	
<p>(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)</p> <p>This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.</p>			

(8) State the statutory authority for the regulation. Include specific statutory citation.

Section 6 of the act (63 P.S. § 1906) authorizes the board to pass upon the qualifications and fitness of applicants for licenses and to adopt and revise rules and regulations requiring applicants to pass examinations relating to their qualifications as a prerequisite to the issuance of a license; and to adopt and revise such rules and regulations as may be necessary to carry into effect the provisions of the act, including the standards of professional practice and conduct for licensed AMFTs and licensed associate professional counselors in this Commonwealth. Section 18(c) of the act (63 P.S. §1918(c)) provides that all fees required under the act shall be fixed by the board by regulation.

Section 8 of Act 4 of 2024 directs the board to promulgate regulations to implement this act, which provided for the licensure of AMFTs and associate professional counselors. Section 3 of the Act 4 of 2024 further set the application fee of associate licenses at \$75 (63 P.S. § 1907(e.1)(1)(vi) and (f.1)(1)(vi)) and the biennial renewal fee of associate licenses at \$95 (63.P.S. § 1907(e.1)(2) and (f.1)(2)).

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

Section 8 of Act 4 of 2024 directs the board to promulgate regulations for the licensure of AMFTs and professional counselors. Otherwise, the regulation is not mandated by any Federal or State law or court order or Federal regulation.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

Act 4 of 2024 directs the board to promulgate regulations for the licensure of AMFTs and associate professional counselors. By way of background, Act 4 of 2024 was enacted to create licensed AMFT and licensed associate professional counselor credentials for the Commonwealth to add crucial resources for mental health care providers. There is a mental health crisis in this Commonwealth with increased incidents of depression, anxiety, and suicidal thoughts in adults and children. The associate licenses will enhance access to mental health services by increasing employment opportunities for these professions. At least 26 states have established associate type licenses for these professions. This proposed regulation will help ensure that AMFTs and associate professional counselors are properly trained and pursuing full licensure while engaging with patients. Further, the proposed regulation will support emerging professionals who are pursuing licensure as an MFT or professional counselor. The associate license provides these professionals with a formalized way to practice while they accumulate the necessary experience to obtain full licensure. There are approximately 16,761 active MFTs and professional counselor licensees under the board including: 53 AMFTs, 1,144 associate professional counselors, 1,255 MFTs, 14,309 professional counselors.

Additionally, the board proposes to remove the requirement that licensed MFTs' supervisors shall have received certification as an approved supervisor or supervisor in training by the American Association for Marriage and Family Therapy (AAMFT). The board considers this requirement to be overly burdensome and discourages licensees from becoming supervisors. In its place, licensed MFTs would be required to have 5 years of relevant experience. Additionally, the board proposes the same educational requirements for all licensure categories under this board by adding the requirement that a supervisor must complete at least 6 continuing education (CE) clock hours on supervision prior to beginning as a supervisor. Supervisors who have already taken a graduate level course on supervision or who are certified as an approved supervisor or

supervisor-in-training by the AAMFT are considered to have met this requirement. This proposed amendment will put safeguards in place for supervisees, without being overly burdensome, to ensure proper supervision by supervisors.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

There are no federal standards applicable to the subject matter of the regulation.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

This regulation will not adversely affect Pennsylvania's ability to compete with other states. The associate licenses will enhance access to mental health services by increasing employment opportunities for these professions. Surrounding states also have similar laws and regulations for associate licensure in the marriage and family therapy and professional counseling fields. At least 26 states have established associate type licenses for these professions. Additionally, the board's proposed removal of the AAMFT supervisor certification requirement for licensed MFT supervisors will make receiving supervisor approval less burdensome and encourage more licensees to become supervisors. The board proposes the same educational requirements for all licensure categories under this board by adding the requirement that a supervisor must complete at least 6 continuing education (CE) clock hours on supervision prior to beginning as a supervisor.

In comparing the proposed regulation to other states, the board researched states in the Northeastern region of the United States, specifically Delaware, Maryland, New Jersey, New York, Ohio and West Virginia. The board researched whether other state boards for these professions have associate level licensure and the board compared the other states requirements, including continuing education and MFT supervisor qualifications.

Of the six states researched, all six states have some form of associate level licensure for MFTs and professional counselors after general and educational requirements are met, while applicants are obtaining supervised experience. Two states specify that a supervision plan is required for initial application. The duration of these associate level licenses vary by state with four states limiting the license duration to 2-3 years with two possible renewals or 2 years of extension allowed. Two states have no limits to the duration or renewals of the associate type license. Concerning CE, five states require CE hours for renewal, ranging anywhere from 20-40 hours each renewal period. For MFT supervisor qualifications, none of the six states require AAMFT training for the supervisor designation. Three of the six states incorporate AAMFT supervisor certification as one of the possible means for approval as a supervisor. All six states allow for other means outside of AAMFT supervisor certification such as a combination of current license status, experience and supervision training/CE hours for MFT supervisor approval.

Delaware

The Delaware Board of Mental Health and Chemical Dependency Professionals provide licensure as an AMFT (LAMFT) and associate counselor of mental health (LACMH). In Delaware, it is required that all the general and educational requirements for licensed MFTs and license counselors of mental health be completed, except the requirements dealing with required experience, for associate licensure. The Delaware board also requires a plan for professional direct supervision. The LAMFT and LACMH license is effective for a period of 2 years and may be renewed up to 2 times. Both associate licenses may apply

for Delaware board exams for non-associate licensure once proof of the required experience is submitted and approved. Associate license holders are not required to complete CE for renewal. For MFT supervisor approval, Delaware does not require AAMFT supervisor certification for obtaining the supervisor designation, but it is listed among other possible means for supervisor approval.

Maryland

The Maryland Board of Professional Counselors and Therapists provide licensure as a graduate MFT and graduate professional counselor for applicants that meet education requirements, such as a master's or a doctoral degree in a related field. Applicants for graduate MFT must have supervised clinical internship or practicum hours completed under supervision and hours of direct client contact with couples, families, and individuals to be approved. Applicants for graduate professional counselor must provide transcripts of prescribed coursework for Maryland board review. Upon review of the application, the Maryland board will determine if applicants are eligible to take the Association of Marital and Family Therapy Regulatory Boards (AMFTRB) exam or National Counselors Exam (NCE), and the Maryland Law Assessment (MLA). All applicants are requested to complete a criminal history records check (CHRC). Graduate license holders are required to take 40 CE units for each renewal. For MFT supervisor approval, Maryland does not require AAMFT supervisor certification but lists it among other possible means for obtaining the supervisor designation. Maryland also allows for CE hours to be used for supervisor approval.

New Jersey

The New Jersey State Board of Marriage and Family Therapy Examiners provide licensure as an AMFT for applicants that meet general, educational and experiential qualifications. Educational requirements include at least a master's degree in a related field of study or a closely allied field of a doctor of medicine. Experience requirements include 3 years of full-time counseling experience, or equivalent. The applicant shall submit the supervisor's resume or curriculum vitae and a written plan for supervision of the licensed AMFT, which must be approved by the New Jersey board prior to the performance of counseling. The applicant must complete a CHRC. An AMFT license can be renewed no more than two times. All licensed AMFTs shall complete 20 contact hours of CE for license renewal. For MFT supervisor approval, New Jersey does not require AAMFT training or specific CE hours for the supervisor designation but appears to focus on degrees, experience and other credentials to be approved as a supervisor.

The New Jersey Professional Counselor Examiners Committee provide licensure as an associate professional counselor for applicants that have completed a minimum of 60 graduate semester hours in a planned educational program, which includes a master's degree or doctorate in counseling with specific semester hours in prescribed areas, have passed the NCE and completed a CHRC. An associate professional counselor licensed for two or more biennial renewal periods, shall complete 40 contact hours of CE for all subsequent renewals of the associate license.

New York

The New York State Education Department, Office of the Professions has provisions for limited permits to applications who have satisfied all the requirements for licensure as a MFT or Mental Health Counselor except the examination and/or experience requirements. These limited permits allow applicants to practice Marriage and Family Therapy or Mental Health Counselor under the appropriate supervision while obtaining the needed full licensure requirements. Limited permits are only issued for specific practice sites in New York State under a qualified supervisor acceptable to the department. The limited permit is valid for a period of 2 years but may be extended for up to 2 additional one-year periods. Permit holders may be required to complete 36 CE units triennially for renewal. For MFT supervisor approval, New York

does not require AAMFT training or specific CE hours but appears to focus on degrees, experience and other credentials to be approved as a supervisor.

Ohio

The Ohio Counselor and Social Worker Board has provisions for initial licensure as a MFT or a professional counselor that are precursors to independent or clinical licensure types. Applicants are required to meet educational requirements, successfully complete the licensure examination, meet the Ohio board's requirements for criminal convictions and other general requirements, including completing a CHRC. This type of license is limited in scope without qualified supervision but may be used to obtain the 2 years of supervision required for an independent MFT license or a licensed professional clinical counselor license. Both are required to complete 30 CE hours for renewal. The Ohio board also has provisions for temporary licenses of one year for MFTs (and independent MFT) and 90 days for professional counselors while other events are pending for full licensure. For MFT supervisor approval, Ohio does not require AAMFT supervisor certification but lists it among other possible means for obtaining the supervisor designation. Ohio also allows for CE hours to be used for supervisor approval.

West Virginia

The West Virginia Board of Examiners in Counseling allow issuance of a provisionally license as a MFT or licensed professional counselor where licensees may practice only as part of obtaining supervised experience for the license requirement. A provisional license is required before the applicant may begin to obtain supervised experience. The applicant for a provisional license must meet all the licensure requirements, including the academic requirements and have passed the required examination. There are reporting requirements including any interruption in supervision of more than 6 weeks and any changes in supervision, to include change of approved supervisor and/or job positions. A provisional license is valid for 3 years but may be renewed once for an additional 2 years. Provisional license holders are required to complete 35 CE hours for renewal. For MFT supervisor approval, West Virginia does not require AAMFT training or specific CE hours but appears to focus on degrees, experience and other credentials to be approved as a supervisor.

Based on all of this information, the board does not believe that the proposed amendments will put Pennsylvania at a competitive disadvantage, but instead, will make Pennsylvania more competitive. At least 26 states have established associate type licenses for these professions. In addition, compared to the four Northeastern researched states with limits to the duration of the license, Pennsylvania will have a longer duration for associate licensees to acquire necessary supervised experience, with an initial duration of 2 years and a possibility for three renewals.

Act 4 of 2024 was enacted to assist in adding crucial resources for mental health care providers for this Commonwealth. The associate licenses will enhance access to mental health services for citizens of this Commonwealth by increasing employment opportunities for these professions. The proposed regulation will support emerging professionals who are pursuing licensure as a MFT and professional counselor by providing these professionals with a formalized way to practice while they accumulate the necessary experience to obtain full licensure. Also, this proposed regulation will help ensure that AMFTs and associate professional counselors are properly supervised, trained and pursuing full licensure while engaging with patients.

Additionally, the board's proposed removal of the requirement that licensed MFT supervisors have received supervisor related certification by AAMFT will make supervisor qualifications less burdensome and encourage more licensees to become supervisors. Of the six states researched in the Northeastern region, none require this for supervisor approval. The removal of this requirement will increase availability of supervisors for recent graduates and AMFTs in obtaining the required supervised experience hours. These proposed

amendments will not only make Pennsylvania more competitive with other states but will be a crucial mental health care benefit to the businesses, professionals and citizens of this Commonwealth.

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No, the regulation will not affect any other regulations of the promulgating agency or other state agencies.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The board discusses its regulatory proposals at regularly scheduled public board meetings. At the board's public meeting on April 23, 2024, the board discussed Act 4 of 2024 and began the work of drafting the regulations. The board continued to evaluate Act 4 of 2024 and draft the proposed regulations at the June 11, July 16, and October 25, 2024. On November 26, 2024, the board reviewed a draft of the proposal and directed that an exposure draft of the proposal be sent out to interested parties and stakeholders inviting them to comment. After a 30-day comment period, the board did not receive any comments.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

There are approximately 1,322 active associate licensees, including 66 AMFTs and 1,256 associate professional counselors. There are approximately 1,255 active MFTs and 14,309 professional counselors.

For purposes of this rulemaking, the board estimates that around 1,197 associate level applications will be received on an annual basis, including 1,144 individuals applying for associate professional counselor licenses and 53 individuals for AMFT licenses on an annual basis. These figures are the same as the number of applications the board has received in the first year since the effective date of Act 4 of 2024.

According to the Small Business Administration (SBA), there are approximately 1,169,008 small businesses in Pennsylvania, which is 99.6% of all Pennsylvania businesses. Of the 1,169,008 small businesses, 230,244 are small employers (those with fewer than 500 employees) and the remaining 938,764 are non-employers. Thus, the vast majority of businesses in Pennsylvania are considered small businesses.

According to the Pennsylvania Department of Labor and Industry in 2022 (the most recent year for which data is available) MFTs and professional counselors provide their services for a variety of private and public sector employers. It is reasonable to assume that associate licensees would also be working for these employers while obtaining supervised experience. The largest employers of counselors in the state were as self-employed workers being their primary job (40.25%), state government, excluding education and hospitals (35.03%), and local government, excluding education and hospitals (11.82%). The largest employers of MFTs in the state was for individual and family services (41.46%), outpatient care centers (17.60%), offices of other health practitioners (13.44%), and being self-employed workers, as a primary job (12.80%).

Small businesses are defined in Section 3 of the Regulatory Review Act, (71 P.S. § 745.3) which provides that a small business is defined by the SBA's Small Business Size Regulations under 13 CFR Ch. 1 Part 121. These size standards have been established for types of businesses under the North American Industry Classification System (NAICS). In applying the NAICS standards to the types of businesses where licensees may work, a small business in the category of offices of physicians, mental health specialists (code 621112) have \$13.5 million or less in average annual receipts. For those licensees who are employed in offices of mental health practitioners (except physicians) (code 621330), the small business threshold is \$9.5 million or less in average annual receipts. For those licensees who are employed in residential intellectual and developmental disability facilities (code 623210) and outpatient or residential mental health and substance abuse centers/facilities (code 621420 and 623220), the small business threshold is \$19.0 million or less in average annual receipts. For those licensees in home health care services (code 621610), the small business threshold is \$19.0 million or less in average annual receipts. For licensees in other individual and family services (code 624190), the small business threshold is \$16.0 million or less in average annual receipts. For licensees in all other outpatient centers (code 621498), the small business threshold is \$25.5 million or less in average annual receipts.

The NAICS codes do not include thresholds for Federal, State and local governments, and professionals who are self-employed would likely be considered a small business. Also, while many healthcare systems may not be considered small businesses according to the NAICS thresholds, the board does not collect information on the size of the businesses where its licensees are employed. In considering all of these small business thresholds set by NAICS, the board must assume that a large number of its licensees work for small businesses as that term is defined by the SBA and Pennsylvania's Regulatory Review Act.

This rulemaking affects individuals who apply for licensure as AMFTs and associate professional counselors. These individuals would be impacted by the \$75 fee to apply for licensure and \$95 fee for subsequent biennial renewals. The initial application and renewal fees are set under section 3 of Act 4 of 2024 (63 P.S. § 1907(e.1)(1)(vi), (e.1)(2), (f.1)(1)(vi) and (f.1)(2)). This is the same application fee amount as the application fee for a licensed bachelor social worker or licensed social worker and the same renewal fee for all licensees of the board. Whether small businesses will be impacted by the regulations depends on whether the businesses would pay the application fee for associate licensure and whether employers voluntarily pay the costs of completing associate licensure requirements. Because the application fees and other costs are incurred by individuals applying for any initial licensure or renewal, any business (small or otherwise) could avoid these costs by requiring employees to pay their own licensure costs.

Concerning amendments for supervision by supervisors, licensees seeking board approval as supervisors would be required to obtain 6 hours of CE related to supervision, however, these hours may be attributed towards the required 30 clock hours; therefore, the board does not anticipate additional costs for licensees.

The board believes that the proposed rulemaking will have a positive impact in that it is further implementing Act 4 of 2024. Like licensees, applicants and individuals who receive care from licensees, small businesses who employ licensees will benefit by clear and updated regulations relating to the licensure and practice of associate professionals.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

Applicants for AMFT and associate professional counselor licenses will have to comply with the board's proposed regulations with regard to requirements for licensure and practice. Supervisors seeking approval by the board would be impacted by the clarifications to supervision requirements. The board estimates

that it received approximately 1,144 associate professional counselor applications and 53 AMFT applications since the effective date of Act 4 of 2024. These associate licensees would also be impacted by biennial renewal fees and requirements should they choose to renew, similar to all other board licensees. The board also does not track the types of businesses where licensees are employed. Small businesses will only be impacted to the extent they voluntarily pay licensure fees and other costs for applicants.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The board believes that the proposed rulemaking will have a positive impact in that it is further implementing Act 4 of 2024. The citizens of this Commonwealth will benefit from the enhanced workforce and growth in available professionals while still having assurance of a level of competence. Like licensees, applicants and individuals who receive care from licensees, small businesses who employ licensees will benefit by clear and updated regulations relating to the licensure and practice of associate professionals.

The financial impact of the regulation falls primarily on the applicants and the board. Individuals seeking associate level licensure will incur costs associated with qualifying for and obtaining a license. As noted above, an applicant applying for associate licensure under Act 4 of 2024 would be required to pay the \$75 application fee, which covers the costs of processing the application and a \$95 biennial renewal fee should they choose to renew. This application fee is the same for other applicants applying for a license as a bachelor social worker or licensed social worker and is authorized under section 3 of Act 4 of 2024 (63 P.S. § 1907(e.1)(1)(vi) and (f.1)(1)(vi)) and the same biennial renewal fee as all licensees of the board (63.P.S. § 1907(e.1)(2) and (f.1)(2)).

However, individuals are not required to obtain or maintain the associate license and may continue to pursue full licenses without first obtaining the associate license. Those who obtain the associate license would be required to pay the application fee and renew their license, which would require completion of 30 clock hours of CE, including 2 hours of training in child abuse recognition. Additionally, supervisors would be required to obtain 6 hours of CE related to supervision. These supervision CE hours, however, may be attributed towards the required 30 clock hours; therefore, the board does not anticipate additional costs for licensees.

The board has been accepting and processing associate licensure applications since the effective date of Act 4 of 2024, March 28, 2024. Since that effective date, the board has received approximately 1,397 associate level licensure applications.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

As previously discussed, the associate licenses will enhance access to mental health services by increasing employment opportunities for these professions. This proposed regulation will help ensure that AMFTs and associate professional counselors are properly trained and pursuing full licensure while engaging with patients. Further, the proposed regulation will support emerging professionals who are pursuing licensure as a MFT and professional counselor. The associate license provides these professionals with a formalized way to practice while they accumulate the necessary experience to obtain full licensure. The citizens of this Commonwealth will benefit from the enhanced workforce and growth in available professionals while still having assurance of a level of competence. Like licensees, applicants and individuals who receive

care from licensees, small businesses who employ licensees will benefit by clear and updated regulations relating to the licensure and practice of associate level professionals. Also, individuals are not required to obtain or maintain the associate license and may continue to pursue full licensure without obtaining the associate license or acquiring the required 30 hours of CE for renewal, including 3 hours of mandatory child abuse recognition and reporting training.

Completing the mandatory child abuse recognition and reporting training will not have a negative fiscal impact if the applicant chooses a free training course. Requiring licensees to take this training will have a positive impact on the profession and for citizens in this Commonwealth because AMFTs and associate professional counselors will be educated on recognizing child abuse and will also have specific training on how to report child abuse in this Commonwealth. This is a requirement for all licensees of the board.

Concerning amendments for supervision by supervisors, the proposed rulemaking will put safeguards in place for supervisees, without being overly burdensome, to ensure proper supervision by supervisors. Supervisors would be required to obtain 6 hours of CE related to supervision, however, these hours may be attributed towards the required 30 clock hours; therefore, the board does not anticipate additional costs for licensees.

There are no adverse effects identified with this rulemaking. As for businesses, small or otherwise, they could avoid the costs associated with the rulemaking by requiring employees to pay for their own licensure and associated costs.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

An individual applying for licensure as an AMFT or associate professional counselor will incur some costs, including paying the \$75 application fee, \$95 for subsequent biennial renewal applications and the costs associated with meeting educational requirements for licensure. These are the same fees as other licenses regulated under the board. In the year following the effective date of Act 4 of 2024, the board had received approximately 1,197 associate level licensure applications and 565 biennial renewals. As of April 2025, the total costs incurred for initial associate application fees was \$89,775 and \$53,675 in associate renewal application fees. Since Act 4 of 2024 has only been effective for less than two years, the following estimates are impacted by the limited sample period and size of associate applicants. Based upon this information, the board estimates a possible 1,197 associate licensure applications per year and a possible increase of 1,130 associate biennial renewal applications in subsequent renewal years. This would result in approximate costs of initial associate applications in the amount of \$89,775 (1,197 initial applications x \$75 initial fee) annually and a possible increase of \$107,350 (1,130 renewal applications x \$95 renewal fee) biennially for renewal applications should the current count in the first year remain consistent in subsequent years.

The Board estimates the cost of CE to be approximately \$15 to \$35 per credit. While these costs vary based on the source and model for CE services, as some CE providers offer unlimited hours for a yearly subscription fee that may amount to less than an average cost presented, for the purposes of calculating an estimate of the approximate CE costs in this rulemaking an average cost of \$25 per credit is used. Thus the Board estimates the costs to obtain 30 hours of CE for associate license renewal, at an average cost of \$25 per credit, to be approximately \$750. As detailed previously, completing the mandatory child abuse recognition and reporting training will not have a cost if the applicant chooses a free training course. Again, these requirements apply to all licensees of the board.

It should be noted that the 2025 renewal of associate licenses for the first renewal were only required to complete 1 hour in Suicide Prevention and 2 hours in child abuse recognition and reporting training from an approved provider. This was the first renewal period since the effective date of Act 4 of 2024 and would have cost the regulated community approximately \$67,800 (\$95 renewal application fee + \$25 (1 credit hour of Suicide Prevention CE if free courses were selected for child recognition and reporting training, multiplied by 565 first time renewals).

For MFTs licensees seeking supervisor approval, there would be savings to the regulated community by removing the requirement for AAMFT supervisor certification. Currently, the AAMFT Approved Supervisor Application Processing Fee (non-refundable and includes initial dues) costs \$200 with subsequent dues for the Approved Supervisor designation costing \$100 annually. The AAMFT 30 hour supervisor training course costs AAMFT members \$750 and non-members \$850. Under the proposed regulations, supervisors would be required to obtain 6 hours of CE related to supervision, however, these hours may be attributed towards the required 30 clock hours; therefore, the board does not anticipate additional costs for licensees on this provision. That would amount to savings totaling \$950-\$1,050 per supervisor approval in startup costs and \$100 savings per supervisor annually to the regulated community.

Below are cost estimates for the application and biennial renewal fee and CE hours for AMFT and associate professional counselor licenses:

Applicants for AMFT and associate professional counselor licenses : \$75 initial application fee per applicant, multiplied by 1,197 applicants = \$89,775 annually.

Biennial renewal for AMFT and associate professional counselor licenses: \$95 renewal application fee + \$750 (30 CE credits x \$25 per credit) = \$845 per applicant, multiplied by 1,130 total possible applicants biennially = \$954,850 biennially.

For the first year since the effective date of Act 4 of 2024, the board has received approximately 1,197 associate level licensure applications. Should this count remain consistent in following years, the board could expect approximate costs to the regulated community to be \$89,775. If fewer than 1,197 applicants apply for associate level licensure under Act 4 of 2024 in a given year, then the combined annual costs would be lower.

For biennial renewal applications on associate level licenses under Act 4 of 2024, the costs to the regulated community would be a possible biennial increase of \$954,850 if all the licensees renew. If associate licensees completed the experience requirements for full licensure or chose not to renew associate licenses while still pursuing requirements for full licensure under the board's existing licensing provisions, then obviously the combined biennial total would be lower. Also, associate licenses are only eligible for no more than three renewals, which would also cause a rotation to costs depending on the date the associate license was issued. As stated previously, these application fees and continuing education requirements are the same for other licenses under the board.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

The regulation would not result in costs or savings to local government.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

There are no other costs or saving to state government associated with compliance with the proposed rulemaking.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

Applicants for licensure as an AMFT and associate professional counselor will be required to provide a written supervision plan for experience as prepared with their supervisor. The proposed regulation provides specific criteria that must be included, including a description of the work setting, a detailed job description of supervisee, including the nature of supervisee duties and responsibilities, a detailed description of the supervisor's responsibilities and qualifications, identification of each location where client/patient contact will occur, identification of each location where supervision will occur, and frequency of supervision planned. Requiring a written supervision plan will help ensure that supervision is purposeful, effective and consistent with licensure requirements. Currently, supervisors are already required to establish objectives to be achieved by the supervisee during supervision and many supervisors already utilize written plans or even contracts with supervisees. Should an associate licensee obtain a new supervisor, the associate licensee would be required to notify the board and provide the resume or curriculum vitae for the new supervisor. The board does not believe this requirement will create a burden to applicants, but rather, will provide for consistent standards.

(22a) Are forms required for implementation of the regulation?

Yes, applicants are required to submit an online application for initial licensure and renewals, similar to the forms already used by other board licensees.

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here**. If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

The board has been processing initial applications for associate level licenses since the effective date of Act 4 of 2024. At that time, the board-created applications are similar to existing initial and renewal application forms the board uses for its other licenses.

The Bureau of Professional and Occupational Affairs (Bureau) uses an online platform for the submission of applications for licensure and renewal through PALS, which also encompasses licensure and renewal applications for AMFTs and associate professional counselors. Within the online platform, applicants are asked a series of questions and required to pay the application fee (\$75 for initial and \$95 for renewal application). For the initial application, applicants are asked the type of license for which they are applying. Applicants who select license type 'associate marriage and family therapist' or 'associate professional counselor' will be directed to submit a copy of their written supervision plan for supervised clinical experience and the resume or curriculum vitae for each licensee who provides supervision. Applicants will be required to indicate and provide proof whether they have satisfied the general

requirements for licensure and one of the educational requirements specific to the regulations of the license type for which they are applying. Applicants are required to indicate whether they have been disciplined by any other jurisdiction in which they are licensed. Applicants with disciplinary history must upload appropriate documentation related to the discipline. As required under 63 Pa.C.S. § 3119, the Bureau requires all applicants for health practitioner licenses, including applicants of the board, to submit a full set of fingerprints to PSP for an FBI Criminal History Record Information (CHRI) report (approximately \$23) as a requirement for licensure.

For renewal applications, applicants will be required to indicate whether they have satisfied the CE requirements for license renewal and other requirements typical of all current board licenses. Applicants are required to indicate whether they have been disciplined by the jurisdiction in which they are licensed or any other jurisdiction. Applicants with disciplinary history must upload appropriate documentation related to the discipline.

The board attaches sample applications which represents the electronic licensure of AMFT or associate professional counselor initial and renewal applications. The board also attaches the amended Completion of Verification of Supervised Clinical Experience forms that reflect supervisory amendments in this rulemaking. (See Attachment “A”).

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY 24-25	FY +1 25-26	FY +2 26-27	FY +3 27-28	FY +4 28-29	FY +5 29-30
SAVINGS:						
Regulated Community	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Savings	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150	\$1,050- 1,150
COSTS:						
Regulated Community	\$89,775 (Initial apps) \$67,800 (initial renewals).	\$89,775 (initial apps)	\$89,775 (initial apps); \$954,850 (renewals)	\$89,775 (initial apps)	\$89,775 (initial apps); \$954,850 (renewals)	\$89,775 (initial apps)
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Costs	\$89,775 (initial apps); \$67,800 (initial renewals).	\$89,775 (initial apps)	\$89,775 (initial apps); \$954,850 (renewals)	\$89,775 (initial apps)	\$89,775 (initial apps); \$954,850 (renewals)	\$89,775 (initial apps)

REVENUE LOSSES:						
Regulated Community	N/A	N/A	N/A	N/A	N/A	N/A
Local Government	N/A	N/A	N/A	N/A	N/A	N/A
State Government	N/A	N/A	N/A	N/A	N/A	N/A
Total Revenue Losses	N/A	N/A	N/A	N/A	N/A	N/A

(23a) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3 2022-2023 (actual)	FY -2 2023-2024 (actual)	FY -1 2024-2025 (actual)	Current FY 2025-2026 (budgeted)
State Board of Social Workers, Marriage and Family Therapists and Professional Counselors	\$2,171,967	\$2,632,612	\$2,447,845	\$2,948,000

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation.
 - (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.
 - (c) A statement of probable effect on impacted small businesses.
 - (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.
-
- (a) The board does not track where licensees are employed; therefore, it does not know how many small businesses would be impacted. The board does not anticipate any adverse fiscal impact.
 - (b) There are no projected reporting, or recordkeeping costs required for compliance. There are no additional administrative costs required for compliance.
 - (c) The probable effect on impacted small businesses would be a positive one in that small businesses who employ licensees will benefit by clear and updated regulations relating to the licensure and practice of associate level professionals.
 - (d) The board did not consider any alternative regulatory provisions.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

No special provisions have been developed for any affected groups or persons.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

No alternative regulatory provisions were considered and rejected. The board believes this proposal represents the least burdensome acceptable alternative.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
 - b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
 - c) The consolidation or simplification of compliance or reporting requirements for small businesses;
 - d) The establishment of performance standards for small businesses to replace design or operational standards required in the regulation; and
 - e) The exemption of small businesses from all or any part of the requirements contained in the regulation.
- a) & b) The board did not consider less stringent reporting requirements or deadlines for small businesses or for licensees that work for small businesses. This proposed regulation does not impose additional reporting requirements on small businesses.
- c) There are no compliance or reporting requirements that could be consolidated or simplified. The application process is the same whether a particular licensee is employed by a small business or a large business.
- d) The regulations do not contain design or operational standards that need to be altered for small businesses.
- f) To exclude any licensees from the requirements contained in the regulation based on the size of their employers would not be consistent with the statute or the board's mandate.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

No data, studies or references were used to justify the regulation.

(29) Include a schedule for review of the regulation including:

A. The length of the public comment period:

30 days

B. The date or dates on which any public meetings or hearings will be held:

No public hearings are scheduled. The board discusses its regulatory proposals at regularly scheduled monthly meetings. This rulemaking was discussed at public board meetings on: April 23, 2024, June 11, 2024, July 16, 2024, October 25, 2024 and November 26, 2024.

C. The expected date of delivery of the final-form regulation:

Spring 2026

D. The expected effective date of the final-form regulation:

Upon publication as final.

E. The expected date by which compliance with the final-form regulation will be required:

Upon publication as final.

F. The expected date by which required permits, licenses or other approvals must be obtained:

N/A

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

The board continually reviews the efficacy of its regulations as part of its annual review process under Executive Order 1996-1. The board reviews its regulatory proposals at regularly scheduled public meetings. The board will meet on the following remaining dates in 2025: September 16, October 14 and November 25. More information can be found on the board's website.

ATTACHMENT A

**Social Work- Associate Professional
Counselor- Application
Initial**



BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

P. O. Box 2649

Harrisburg, PA 17105-2649

APPLICANT INFORMATION

PERSONAL INFORMATION							
Last Name				First Name			
Middle Name				Suffix			
Full Name							
SSN		Date Of Birth		Age		Gender	
ADDRESS DETAILS							
Street Address							
City/State/Zip							
County						Country	
CONTACT DETAILS							
Phone number				Mobile Phone number			
Primary Email Address				Secondary Email Address			
EDUCATION DETAILS							
School Name	School Type	School Address	Degree	Major	Attended From	Attended To	Graduation Date
CHECKLIST ITEMS							
Checklist name	Status				Submitted Date	Expiration Date	
Application							
Application Fee							
Child Abuse CE							
Databank Report							
Educational Transcripts							
FBI Background Check							
Letter of Good Standing (LOGS)							
Resume of Supervisor(s)							
Resume of Supervisor(s) - Judd Hultman							
Resume of Supervisor(s) - Sara Kahler							
Supervision Plan							

LEGAL QUESTIONS

Questions	Answer	Document Uploaded	File Name
1 Do you hold or have you ever held a license, certificate, permit, registration or other authorization to practice in any health-related profession in any state or jurisdiction?			
2 Please provide the profession and state or jurisdiction.			
3 Have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?			
4 Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
5 Have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
6 Do you currently have any criminal charges pending and unresolved in any state or jurisdiction?			
7 Have you ever been found guilty of immoral or unprofessional conduct?			
8 Have you ever violated standards of professional practice or conduct?			
9 Are you currently suffering from any condition for which you are not being appropriately treated that impairs your judgment or that would otherwise adversely affect your ability to practice (Social Work-Associate Professional Counselor) in a competent, ethical, and professional manner?			
10 Have you ever had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?			
11 Have you ever had practice privileges denied, revoked, suspended or restricted by a hospital or any health care facility?			
12 Have you ever been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?			

STANDARD QUESTIONS		
Questions		Answer
1	Will any of your supporting documents be submitted under another name or names?	
2	First Name	
3	Middle Name	
4	Last Name	
5	<p>Therefore, any of the following officially issued government documents should be accepted for the purpose of changing a licensee's name in records maintained by the various professional and occupational licensing boards and commissions:</p> <ol style="list-style-type: none"> 1. A birth certificate. 2. A marriage certificate (not a marriage license). 3. A divorce decree. 4. An official name change document issued by a court. 5. A passport. 6. A social security card. 7. A Pennsylvania driver's license or non-driver ID card. 8. A driver's license or official non-driver ID card issued by another state that complies with the federal REAL ID Act requirements (signified with a star on the front). 	
6	Are you a servicemember, veteran, or military spouse?	
7	Please upload documentation demonstrating your status as a Servicemember, veteran or military spouse.	

SUPERVISOR DETAILS			
Supervisor Name	Supervisor License No	Supervisor Profession/License Type	State

PA VETERANS REGISTRY		
Questions		Answer
1	Have you served in the U.S. Armed Forces?	
2	Thank you for your service. Would you like to register with the PA Veterans Registry? The PA Veterans Registry provides veterans with information about federal, state and local benefits, programs and services that are available to Pennsylvania veterans and links veterans with resources that can provide assistance. Registration is quick and easy, and provides the Department of Military and Veterans Affairs (DMVA) with a way to contact you regarding the benefits and services you may be eligible for. If you check "Yes," you will receive an email with instructions to assist you in registering.	

CONFIRMATION	
<input checked="" type="checkbox"/>	Any fees paid are non refundable. (02/26/2025 10:57:35)

**Social Work- Associate Professional
Counselor- Application
Renewal ()**



BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

P. O. Box 2649

Harrisburg, PA 17105-2649

APPLICANT INFORMATION

PERSONAL INFORMATION							
Last Name				First Name			
Middle Name				Suffix			
Full Name							
SSN		Date Of Birth		Age		Gender	
ADDRESS DETAILS							
Street Address							
City/State/Zip							
County						Country	
CONTACT DETAILS							
Phone number				Mobile Phone number			
Primary Email Address				Secondary Email Address			
CHECKLIST ITEMS							
Checklist name	Status			Submitted Date		Expiration Date	
Application							
Application Fee							
Child Abuse CE							

LEGAL QUESTIONS

Questions	Answer	Document Uploaded	File Name
1 Since your initial application or last renewal, whichever is later, have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?			
2 Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
3 Since your initial application or last renewal, whichever is later, have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
4 Since your initial application or last renewal, whichever is later, have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
5 Since your initial application or your last renewal, whichever is later, have you had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?			
6 Since your initial application or your last renewal, whichever is later, have you had practice privileges denied, revoked, suspended, or restricted by a hospital or any health care facility?			
7 Since your initial application or your last renewal, whichever is later, have you been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?			
8 Since your initial application or last renewal, whichever is later, are you currently suffering from any condition for which you are not being appropriately treated that impairs your judgment or that would otherwise adversely affect your ability to practice (Social Work-Associate Professional Counselor) in a competent, ethical, and professional manner?			

STANDARD QUESTIONS		
Questions		Answer
1	Have you met your continuing education requirements?	
2	Are you submitting a name change with this renewal?	
3	First Name	
4	Middle Name	
5	Last Name	
6	<p>You must submit a copy of a legal document verifying the name(s). The following are acceptable name change verification documents:</p> <p>(1) A birth certificate. (2) A marriage certificate (not a marriage license). (3) Divorce decree. (4) An official name change document issued by a court. (5) A passport. (6) A social security card. (7) A Pennsylvania driver's license or non-driver ID card. (8) A driver's license or official non-driver ID card issued by another state that complies with the federal REAL ID Act requirements (signified with a star on the front)</p>	
7	With the exception of the one you are currently renewing, do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice a profession or occupation in any state or jurisdiction?	
8	Are you a servicemember, veteran, or military spouse?	
Licenses/Certificates/Permits/Registrations in Any State/Jurisdiction		
Profession		State/Jurisdiction
PA VETERANS REGISTRY		
Questions		Answer
1	Have you served in the U.S. Armed Forces?	
2	<p>Thank you for your service. Would you like to register with the PA Veterans Registry? The PA Veterans Registry provides veterans with information about federal, state and local benefits, programs and services that are available to Pennsylvania veterans and links veterans with resources that can provide assistance. Registration is quick and easy, and provides the Department of Military and Veterans Affairs (DMVA) with a way to contact you regarding the benefits and services you may be eligible for. If you check "Yes," you will receive an email with instructions to assist you in registering.</p>	

ACKNOWLEDGEMENT OF DUTY TO SELF-REPORT DISCIPLINARY CONDUCT AND CERTAIN CRIMINAL ACTIVITY	
<input checked="" type="checkbox"/>	<p>I hereby acknowledge that in addition to any existing reporting requirement required by a specific board or commission, I am REQUIRED pursuant to Act 6 of 2018 to NOTIFY the Bureau of Professional and Occupational Affairs WITHIN 30 DAYS of the occurrence of any of the following:</p> <p>(1) A disciplinary action taken against me by a licensing board or agency in another jurisdiction; (2) A finding or verdict of guilt, an admission of guilt, a plea of nolo contendere, probation without verdict, a disposition in lieu of trial or an Accelerated Rehabilitative Disposition (ARD) of any felony or misdemeanor offense in a criminal proceeding. I further acknowledge that failure to comply with these mandatory reporting requirements may subject me to disciplinary action by the Board. I acknowledge my understanding that to self-report a disciplinary action or criminal matter as set forth above, I may log in to the Pennsylvania Licensing System (PALS) at www.pals.pa.gov and select "Mandatory Reporting by Licensee" under the heading "Your Licenses."</p> <p>(02/16/2025 18:54:34)</p>

CONFIRMATION	
<input checked="" type="checkbox"/>	Any fees paid are non refundable. (02/16/2025 18:54:34)



Any fees paid are non refundable. (02/16/2025 18:54:34)

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

2525 N 7th Street
Harrisburg PA 17110



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

P O BOX 2649
Harrisburg PA 17105-2649

**BUREAU OF PROFESSIONAL AND
OCCUPATIONAL AFFAIRS**

VERIFICATION OF SUPERVISED CLINICAL EXPERIENCE

The completed verification of supervised clinical experience forms must be completed by the supervisor and the supervisor must email the completed forms to the Board office at st-socialwork@pa.gov **OR** the supervisor may mail the forms to the Board Office.

****The Board will not accept the verification of supervised clinical experience forms provided by the applicant.****

Your qualified supervisor, as defined in Section 49.3 of the regulations, must complete the following verification of supervised clinical experience forms verifying completion of 3,000 hours of supervised clinical experience

PART A. Supervisor Qualifications and Verification

PART B. Report of Supervised Clinical Experience Hours

The information on these forms must be provided by the applicant's supervisor that provided supervision for clinical experience hours completed towards meeting the 3,000 total hours of supervised clinical experience defined in Section 49.13(b) and Section 49.14 of the regulations. This verification of supervised clinical experience forms should be photocopied and then completed by each supervisor that provided supervision towards the 3,000 hours of supervised clinical experience.

Hours required: 3,000 total hours of supervised clinical experience that meet the requirements defined in Sections 49.13(b) of the Regulations. 1,500 hours must be face-to-face direct client contact in person*. The other 1,500 hours may be other non-direct clinical work determined by the supervisor.

*For the purposes of § 49.13(b), supervision hours accumulated "in person" are not limited to those acquired while being physically present in the same room. Technological advances have enabled individuals to communicate in real-time, regardless of their geographic proximity to one-another. Therefore, the Board considers "in person" supervision to be met if a HIPAA-compliant electronic platform is used that allows for synchronous audio and video communication between the supervisor and supervisee. This would not include supervision by telephone, email, instant messaging, online chat, or other non-secure electronic communications that do not include real-time (synchronous) video and audio communications. The setting in which the supervisor and supervisee are located when using electronic supervision must be professional and secure and may not be conducted from public locations such as coffee shops, libraries, or other locations where inadvertent disclosures of confidential information could occur.

APPLICANT INFORMATION

NAME:	Last	First	Middle
OTHER NAME:			
DATE OF BIRTH :		LAST 4 DIGITS OF SSN:	
ADDRESS:			
CITY / STATE / ZIP:			

PART A: Supervisor's qualifications: Please check all that apply.

- ☐ I (supervisor) hold an active license as a professional counselor in the state where the supervision occurred **and** have 5 years of post- master's degree experience within the last 10 years as a professional counselor (Section 49.3(a)(1)).
- ☐ I (supervisor) hold an active license in a related field in the state where the supervision occurred **and** have a master's or doctoral degree in that related field. Additionally, I (supervisor) have 5 years of post-master's experience within the last 10 years in that related field (Section 49.3(a)(2)).
- ☐ I (supervisor) have practiced as a professional counselor **and** I have 5 years of experience within the last 10 years as a professional counselor (Section 49.3(a)(3)). *Only for applicant experience completed prior to January 1, 2006.*

I (supervisor) confirm that I have completed or intend to complete one of the following supervisor educational trainings by <date 2 years from effective date of subsection> as required under Section 49.3(b). Select one:

- ☐ Graduate level course specific to supervision
- ☐ A clinical supervisor certification program
- ☐ At least 6 continuing education clock hours on clinical supervision.

I (supervisor) confirm that I maintained an active state license throughout the entirety of the time I provided direct supervision to this individual.

I (supervisor) confirm that I have reviewed and understand the entirety of Sections 49.13(b) and 49.14 of the Pennsylvania Board Regulations.

I verify that the statements in this verification of Clinical Supervised Experience are true and correct to the best of my knowledge, information, and belief. I understand that false statements are made subject to the penalties of 18 Pa. C.S. Section 4904 (relating to unsworn falsification to authorities) and may result in the suspension or revocation of my license. I also verify that I have complied with Section 49.14 of Title 49 Standards for supervisors.

Supervisor's Name: _____
Please Print

Qualifying State Board License Number: _____

State of Licensure – Pennsylvania/Other: _____

PART B:

Dates of supervised experience worked under my supervision:

From: _____ To: _____
month / day / year month / day / year

Total number of clinical hours worked under my supervision: _____

I verify that _____ complied with the requirements of Section
Applicant's Printed Name

49.13(b) of the Regulations. I further verify that the supervised clinical experience verified on these forms was verified based on my records and will provide the records upon request by the Board.

Signature of Supervisor

Date of Signature

**Social Work- Associate Marriage and
Family Therapist- Application
Initial**



BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

P. O. Box 2649

Harrisburg, PA 17105-2649

APPLICANT INFORMATION

PERSONAL INFORMATION							
Last Name				First Name			
Middle Name				Suffix			
Full Name							
SSN		Date Of Birth		Age		Gender	
ADDRESS DETAILS							
Street Address							
City/State/Zip							
County						Country	
CONTACT DETAILS							
Phone number				Mobile Phone number			
Primary Email Address				Secondary Email Address			
EDUCATION DETAILS							
School Name	School Type	School Address	Degree	Major	Attended From	Attended To	Graduation Date
CHECKLIST ITEMS							
Checklist name	Status				Submitted Date	Expiration Date	
AAMFT Supervisor Verification							
Application							
Application Fee							
Child Abuse CE							
Databank Report							
Educational Transcripts							
Exam Eligibility							
FBI Background Check							
Letter of Good Standing (LOGS)							
Resume of Supervisor(s)							
Resume of Supervisor(s) - Christa Bush							
Resume of Supervisor(s) - Jennifer Guido							
Supervision Plan							

LEGAL QUESTIONS

Questions	Answer	Document Uploaded	File Name
1 Do you hold or have you ever held a license, certificate, permit, registration or other authorization to practice in any health-related profession in any state or jurisdiction?			
2 Please provide the profession and state or jurisdiction.			
3 Have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?			
4 Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
5 Have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
6 Do you currently have any criminal charges pending and unresolved in any state or jurisdiction?			
7 Have you ever been found guilty of immoral or unprofessional conduct?			
8 Have you ever violated standards of professional practice or conduct?			
9 Are you currently suffering from any condition for which you are not being appropriately treated that impairs your judgment or that would otherwise adversely affect your ability to practice (Social Work-Associate Marriage and Family Therapist) in a competent, ethical, and professional manner?			
10 Have you ever had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?			
11 Have you ever had practice privileges denied, revoked, suspended or restricted by a hospital or any health care facility?			
12 Have you ever been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?			

STANDARD QUESTIONS		
Questions		Answer
1	Will any of your supporting documents be submitted under another name or names?	
2	First Name	
3	Middle Name	
4	Last Name	
5	<p>Therefore, any of the following officially issued government documents should be accepted for the purpose of changing a licensee's name in records maintained by the various professional and occupational licensing boards and commissions:</p> <ol style="list-style-type: none"> 1. A birth certificate. 2. A marriage certificate (not a marriage license). 3. A divorce decree. 4. An official name change document issued by a court. 5. A passport. 6. A social security card. 7. A Pennsylvania driver's license or non-driver ID card. 8. A driver's license or official non-driver ID card issued by another state that complies with the federal REAL ID Act requirements (signified with a star on the front). 	
6	Are you a servicemember, veteran, or military spouse?	
7	Please upload documentation demonstrating your status as a Servicemember, veteran or military spouse.	

SUPERVISOR DETAILS			
Supervisor Name	Supervisor License No	Supervisor Profession/License Type	State

PA VETERANS REGISTRY		
Questions		Answer
1	Have you served in the U.S. Armed Forces?	
2	<p>Thank you for your service. Would you like to register with the PA Veterans Registry? The PA Veterans Registry provides veterans with information about federal, state and local benefits, programs and services that are available to Pennsylvania veterans and links veterans with resources that can provide assistance. Registration is quick and easy, and provides the Department of Military and Veterans Affairs (DMVA) with a way to contact you regarding the benefits and services you may be eligible for. If you check "Yes," you will receive an email with instructions to assist you in registering.</p>	

CONFIRMATION	
<input checked="" type="checkbox"/>	Any fees paid are non refundable. (07/24/2025 13:07:25)

**Social Work- Associate Marriage and
Family Therapist- Application
Renewal ()**



BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

P. O. Box 2649

Harrisburg, PA 17105-2649

APPLICANT INFORMATION

PERSONAL INFORMATION							
Last Name				First Name			
Middle Name				Suffix			
Full Name							
SSN		Date Of Birth		Age		Gender	
ADDRESS DETAILS							
Street Address							
City/State/Zip							
County						Country	
CONTACT DETAILS							
Phone number				Mobile Phone number			
Primary Email Address				Secondary Email Address			
CHECKLIST ITEMS							
Checklist name	Status			Submitted Date		Expiration Date	
Application							
Application Fee							
Child Abuse CE							

LEGAL QUESTIONS			
Questions	Answer	Document Uploaded	File Name
1 Since your initial application or last renewal, whichever is later, have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction or have you agreed to voluntary surrender in lieu of discipline?			
2 Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
3 Since your initial application or last renewal, whichever is later, have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?			
4 Since your initial application or your last renewal, whichever is later, have you had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?			
5 Since your initial application or your last renewal, whichever is later, have you had practice privileges denied, revoked, suspended, or restricted by a hospital or any health care facility?			
6 Since your initial application or your last renewal, whichever is later, have you been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?			
7 Since your initial application or last renewal, whichever is later, are you currently suffering from any condition for which you are not being appropriately treated that impairs your judgment or that would otherwise adversely affect your ability to practice (Social Work-Associate Marriage and Family Therapist) in a competent, ethical, and professional manner?			
STANDARD QUESTIONS			
Questions	Answer		
1 Have you met your continuing education requirements?			
2 Are you submitting a name change with this renewal?			
3 First Name			
4 Middle Name			
5 Last Name			
6 You must submit a copy of a legal document verifying the name(s). The following are acceptable name change verification documents: (1) A birth certificate. (2) A marriage certificate (not a marriage license). (3) Divorce decree. (4) An official name change document issued by a court. (5) A passport. (6) A social security card. (7) A Pennsylvania driver's license or non-driver ID card. (8) A driver's license or official non-driver ID card issued by another state that complies with the federal REAL ID Act requirements (signified with a star on the front)			
7 With the exception of the one you are currently renewing, do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice a profession or occupation in any state or jurisdiction?			
8 Are you a servicemember, veteran, or military spouse?			

PA VETERANS REGISTRY		
Questions		Answer
1	Have you served in the U.S. Armed Forces?	
2	Thank you for your service. Would you like to register with the PA Veterans Registry? The PA Veterans Registry provides veterans with information about federal, state and local benefits, programs and services that are available to Pennsylvania veterans and links veterans with resources that can provide assistance. Registration is quick and easy, and provides the Department of Military and Veterans Affairs (DMVA) with a way to contact you regarding the benefits and services you may be eligible for. If you check "Yes," you will receive an email with instructions to assist you in registering.	

ACKNOWLEDGEMENT OF DUTY TO SELF-REPORT DISCIPLINARY CONDUCT AND CERTAIN CRIMINAL ACTIVITY	
<input checked="" type="checkbox"/>	<p>I hereby acknowledge that in addition to any existing reporting requirement required by a specific board or commission, I am REQUIRED pursuant to Act 6 of 2018 to NOTIFY the Bureau of Professional and Occupational Affairs WITHIN 30 DAYS of the occurrence of any of the following:</p> <p>(1) A disciplinary action taken against me by a licensing board or agency in another jurisdiction;</p> <p>(2) A finding or verdict of guilt, an admission of guilt, a plea of nolo contendere, probation without verdict, a disposition in lieu of trial or an Accelerated Rehabilitative Disposition (ARD) of any felony or misdemeanor offense in a criminal proceeding. I further acknowledge that failure to comply with these mandatory reporting requirements may subject me to disciplinary action by the Board. I acknowledge my understanding that to self-report a disciplinary action or criminal matter as set forth above, I may log in to the Pennsylvania Licensing System (PALS) at www.pals.pa.gov and select "Mandatory Reporting by Licensee" under the heading "Your Licenses."</p> <p>(02/23/2025 15:29:25)</p>
CONFIRMATION	
<input checked="" type="checkbox"/>	<p>Any fees paid are non refundable. (02/23/2025 15:29:25)</p>

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

2525 N 7th Street
Harrisburg PA 17110



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

P O BOX 2649
Harrisburg PA 17105-2649

**BUREAU OF PROFESSIONAL AND
OCCUPATIONAL AFFAIRS**

VERIFICATION OF SUPERVISED CLINICAL EXPERIENCE

The completed verification of supervised clinical experience forms must be completed by the supervisor and the supervisor must email the completed forms to the Board office at st-socialwork@pa.gov **OR** the supervisor may mail the forms to the Board Office. The supervisor must sign over the sealed flap of the envelope for the forms to be accepted via mail.

****The Board will not accept the verification of supervised clinical experience forms provided by the applicant.****

Your qualified supervisor, as defined in Section 48.3 of the regulations, must complete the following verification of supervised clinical experience forms verifying completion of 3,000 hours of supervised clinical experience

PART A. Supervisor Qualifications and Verification

PART B. Report of Supervised Clinical Experience Hours

The information on these forms must be provided by the applicant's supervisor that provided supervision for clinical experience hours completed towards meeting the 3,000 total hours of supervised clinical experience defined in Section 48.13(b) and Section 48.14 of the regulations. This verification of supervised clinical experience forms should be photocopied and then completed by each supervisor that provided supervision towards the 3,000 hours of supervised clinical experience.

Hours required: 3,000 total hours of supervised clinical experience that meet the requirements defined in Sections 48.13(b) of the Regulations. 1,500 hours must be face-to-face direct client contact in person*. The other 1,500 hours may be other non-direct clinical work determined by the supervisor.

*For the purposes of § 48.13(b), supervision hours accumulated "in person" are not limited to those acquired while being physically present in the same room. Technological advances have enabled individuals to communicate in real-time, regardless of their geographic proximity to one-another. Therefore, the Board considers "in person" supervision to be met if a HIPAA-compliant electronic platform is used that allows for synchronous audio and video communication between the supervisor and supervisee. This would not include supervision by telephone, email, instant messaging, online chat, or other non-secure electronic communications that do not include real-time (synchronous) video and audio communications. The setting in which the supervisor and supervisee are located when using electronic supervision must be professional and secure and may not be conducted from public locations such as coffee shops, libraries, or other locations where inadvertent disclosures of confidential information could occur.

APPLICANT INFORMATION

NAME:	Last	First	Middle
OTHER NAME:			
DATE OF BIRTH :		LAST 4 DIGITS OF SSN:	
ADDRESS:			
CITY / STATE / ZIP:			

PART A: Supervisor's qualifications: Please check all that apply.

- ☐ I (supervisor) hold a current and active license as an MFT in the state where the supervision occurred **and** have 5 years of post-masters experience within the last 10 years as a marriage and family therapist (Section 48.3(a)(1)).
- ☐ I (supervisor) hold a current and active license in the state where the supervision occurred **and** have at least a master's degree in a related field **and** have 5 years of post-master's experience within the last 10 years in that related field (Section 48.3(a)(2)).
- ☐ I (supervisor) have practiced as a licensed marriage and family therapist **and** I have completed a 1-semester graduate course in MFT supervision (at least 30 contact hours) or the equivalent. I have 5 years of experience within the last 10 years as an MFT (Section 48.3(a)(3)). *Only for applicant experience completed prior to January 1, 2006.*

I (supervisor) confirm that I have completed or intend to complete one of the following supervisor educational trainings by <date 2 years from effective date of subsection> as required under Section 48.3(b). Select one:

- ☐ Graduate level course specific to supervision
- ☐ A clinical supervisor certification program
- ☐ At least 6 continuing education clock hours on clinical supervision.

I (supervisor) confirm that I maintained an active state license throughout the entirety of the time I provided direct supervision to this individual.

I (supervisor) confirm that I have reviewed and understand the entirety of Sections 48.13(b) and 48.14 of the Pennsylvania Board Regulations.

I verify that the statements in this verification of Clinical Supervised Experience are true and correct to the best of my knowledge, information, and belief. I understand that false statements are made subject to the penalties of 18 Pa. C.S. Section 4904 (relating to unsworn falsification to authorities) and may result in the suspension or revocation of my license. I also verify that I have complied with Section 48.14 of Title 49 Standards for supervisors.

Supervisor's Name: _____
Please Print

Qualifying State Board License Number: _____

State of Licensure – Pennsylvania/Other: _____

PART B:

Dates of supervised experience worked under my supervision:

From: _____/_____/_____
month day year

To: _____/_____/_____
month day year

Total number of clinical hours worked under my supervision: _____

I verify that _____ complied with the requirements of Section
Applicant's Printed Name

48.13(b) of the Regulations. I further verify that the supervised clinical experience verified on these forms was verified based on my records and will provide the records upon request by the Board.

Signature of Supervisor

Date of Signature

**FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU**

(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

December 11, 2025

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality. Attorney General</p> <p>Amy M Elliott BY: <u>Elliott</u> (DEPUTY ATTORNEY GENERAL)</p> <p>Digitally signed by Amy M Elliott Date: 2025.11.25 13:44:03 -05'00'</p> <p align="center">11/25/25 _____ DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable Copy not approved. Objections attached.</p>	<p>Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p>State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>16A-6927</u></p> <p>DATE OF ADOPTION: _____</p> <p>BY: <u>Michelle R. Santiago</u> Michelle Santiago, Psy.D., NCC, CCMHC, LPC</p> <p>TITLE <u>Chairperson</u> (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies.</p> <p>Cynthia K. Montgomery BY: <u>Cynthia K. Montgomery</u> (Deputy General Counsel) (Chief Counsel, Independent Agency) (Strike inapplicable title)</p> <p>Digitally signed by Cynthia K. Montgomery DN: cn=Cynthia K. Montgomery, o, ou, email=cymontgome@pa.gov, c=US Date: 2025.10.20 15:07:50 -04'00'</p> <p align="center"><u>October 20, 2025</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within 30 days after submission.</p>
--	--	--

NOTICE OF PROPOSED RULEMAKING

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS**

49 PA. CODE, CHAPTERS 47, 48 and 49

§§ 47.1a, 47.4; 48.1, 48.3, 48.13a, 48.21, 48.22, 48.23, 48.24, 48.25, 48.32, 48.35, 48.36, 48.38, 48.42, 48.51, 48.52, 48.53, 48.54, 48.55, 48.57, 48.58, 48.71; 49.1, 49.3, 49.13a, 49.21, 49.22, 49.23, 49.24, 49.25, 49.32, 49.35, 49.36, 49.38, 49.42, 49.51, 49.52, 49.53, 49.54, 49.55, 49.57, 49.58 and 49.71.

(Associate MFT and PC and Supervision)

The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes to amend Chapters 47, 48 and 49 (relating to State Board of Social Workers, Marriage and Family Therapist and Professional Counselors; State Board of Social Workers, Marriage and Family Therapist and Professional Counselors – Licensure of Marriage and Family Therapists; and State Board of Social Workers, Marriage and Family Therapist and Professional Counselors – Licensure of Professional Counselors) to read as set forth in Annex A.

Effective date

The amendments will be effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

Statutory Authority

Section 6 of the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) (63 P.S. § 1906) authorizes the board to pass upon the qualifications and fitness of applicants for licenses and to adopt and revise rules and regulations requiring applicants to pass examinations relating to their qualifications as a prerequisite to the issuance of a license; and to adopt and revise such rules and regulations as may be necessary to carry into effect the provisions of the act. Section 18(c) of the act (63 P.S. § 1918(c)) provides that all fees required under the act shall be fixed by the board by regulation.

Section 8 of the act of March 28, 2024 (P.L. 11, No. 4) (Act 4 of 2024) directs the board to promulgate regulations to implement the amendments to the act, which provided for the licensure of associate marriage and family therapists (AMFT) and associate professional counselors. Act 4 of 2024 (63 P.S. § 1907(e.1)(1)(vi) and (f.1)(1)(vi)) further sets the application fee for associate licenses at \$75 and the biennial renewal fee of associate licenses at \$95 (63.P.S. § 1907(e.1)(2) and (f.1)(2)).

Background and Need for the Amendments

Act 4 of 2024 requires the board to promulgate regulations for the licensure of AMFTs and associate professional counselors. By way of background, Act 4 of 2024 was enacted to create licensed AMFT and associate professional counselor credentials for the Commonwealth to add crucial resources for mental health care providers. There is a mental health crisis in this Commonwealth with increased incidents of depression, anxiety and suicidal thoughts in adults and children. The associate licenses enhance access to mental health services by increasing employment opportunities for these professions. At least 26 states have established associate licenses for these professions. This proposed regulation will help ensure that AMFTs and associate professional counselors are properly trained and pursuing full licensure while engaging with patients. Further, the proposed regulation will support emerging professionals who are pursuing licensure as a marriage and family (MFT) therapist and professional counselor. The associate license provides these professionals with a formalized way to practice while they accumulate the necessary experience to obtain full licensure.

At the board's public meeting on April 23, 2024, the board discussed Act 4 of 2024 and began the work of drafting the regulations. The board continued to evaluate Act 4 of 2024 and draft the proposed regulations at the June 11, July 16, and October 25, 2024 public meetings. On November 26, 2024, the board reviewed a draft of the proposal and directed that an exposure draft of the proposal be sent out to interested parties and stakeholders inviting them to comment. The board did not receive any comments. Thereafter, at a regularly scheduled public meeting, the board voted to proceed with the proposal as drafted.

Description of the Proposed Amendments

The board proposes to amend § 47.4 (relating to licensure fees) to establish the application fee (\$75), which is the amount set by Act 4 of 2024, and biennial renewal fee (\$95), which is the same fee charged for other licensees of the board.

The board proposes to amend § 48.1 (relating to definitions) to define and add the acronym for “associate marriage and family therapist” (AMFT). The board proposes to include this acronym in Chapter 48 to be consistent with the use of MFT for marriage and family therapists. For consistency throughout this proposed rulemaking, the board proposes to make amendments by including the acronyms MFT and AMFT. The board further proposes amendments in §§ 48.1 and 49.1 (relating to definitions) to the following definitions to include references to AMFTs and associate professional counselors, including the definitions of “client/patient,” “professional relationship” and “sexual intimacies.” The board further proposes to include a definition for “supervision plan” in §§ 48.1 and 49.1 to clarify that a supervision plan includes the criteria in § 48.13a(a)(3) (relating to licensed associate marriage and family therapist) or § 49.13a (relating to licensed associate professional counselor), respectively.

The board proposes to make clarity edits pertaining to qualifications for supervisors in §§ 47.1a, 48.3 and 49.3 to clarify that the supervisor shall hold an active license in the state where the supervisee’s experience is occurring. In addition, the board clarifies that the 5 years of experience must be post-master’s experience. Also, when the supervisor’s license is in a related field, the supervisor’s master’s or doctoral degree and experience shall also be in that field. The board proposes to amend § 48.3(1) (identified in this proposed rulemaking as § 48.3(a)(1)) by removing the requirement that the supervisor shall have received certification as an approved supervisor or supervisor in training by the American Association for Marriage and Family Therapy. The board

considers this requirement to be overly burdensome and discourages licensees from becoming supervisors. In its place, similar to the other professions regulated by the board, licensed MFTs would be required to have at least 5 years of relevant experience within the last 10 years. Additionally, the board proposes the same educational requirements for all licensure categories under the board by adding the requirement in proposed §§ 47.1a(b), 48.3(b) and 49.3(b) that a supervisor shall complete at least 6 continuing education clock hours on supervision prior to beginning as a supervisor. If licensees are already supervising, they shall complete those 6 continuing education units by the next biennial renewal cycle. Supervisors who have already taken a graduate level course on supervision or a clinical supervisor certification program are considered to have met this requirement. This proposed amendment will put safeguards in place for supervisees, without being overly burdensome, to ensure proper supervision by supervisors.

The board is proposing to add §§ 48.13a and 49.13a (relating to licensed associate marriage and family therapist; and licensed associate professional counselor) to set forth the requirements to be issued a license as an AMFT and associate professional counselor, respectively. The board proposes to include qualifications for licensure as provided under the act and the general requirements for licensure of §§ 48.12 and 49.12 (relating to general qualifications for licensure) and one of the educational requirements under §§ 48.13(a)(3) and 49.13(a)(3) (relating to licensed MFT; and licensed professional counselor), respectively. Act 4 of 2024 (63 P.S. § 1907(e.1)(1)(iv) and (f.1)(1)(iv)) requires applicants for the associate licenses to submit a supervision plan, including a detailed job description and each location where client contact and supervision will occur. As such, in this section, the board proposes to require submission of the supervision plan with a description of the work setting; a detailed job description for the supervisee, including the nature of supervisee duties and responsibilities; a detailed description of the supervisor's

responsibilities and qualifications; identification of each location where client contact will occur; identification of each location where supervision will occur; and frequency of supervision planned. The board would also require submission of the supervisor's resumé or curriculum vitae, and updated curriculum vitae when supervision changes. The board is also proposing the completion of at least 3 hours of training in child abuse recognition and reporting as a condition of licensure as an AMFT or associate professional counselor. In proposed subsection (c) the board is setting forth biennial renewal requirements; in subsection (b) requiring supervisors of associate licensees to meet the supervisory requirements and standards under existing sections in the relevant chapter.

The board proposes amendments to §§ 48.21-48.25, 48.32, 48.35, 48.36, 48.38, 48.42, 48.51-48.55, 48.57, 48.58, 48.71, 49.21-49.25, 49.32, 49.35, 49.36, 49.38, 49.42, 49.51-49.55, 49.57, 49.58, and 49.71 to simply add AMFTs and associate professional counselors to the regulatory provisions having to do with sexual misconduct, continuing education, child abuse reporting requirements, and the code of ethical practice and professional conduct. These amendments serve to hold AMFTs and associate professional counselors to the same standards as all other licensees of the board.

Fiscal Impact

The proposed rulemaking will have a fiscal impact to individuals applying for the AMFT license and the associate professional counselor license in that they would be required to pay a \$75 application fee, and a \$95 biennial renewal fee. However, individuals are not required to obtain or maintain the associate license and may continue to pursue licensure without obtaining the associate license. Those who obtain and seek to maintain the associate license would be required to renew their license, which would require completion of 30 clock hours of continuing education. This is the same clock hours of continuing education required of all licenses to renew under the board.

Additionally, supervisors would be required to obtain 6 hours of continuing education related to supervision. These hours, however, may be attributed towards the required 30 clock hours; therefore, the board does not anticipate additional costs for licensees.

Paperwork Requirements

Individuals applying for the AMFT license and the associate professional counselor license would need to file an application for licensure and keep documentation on file to demonstrate completion of continuing education credit hours. The board has developed an application for licensure. Applicants will also be required to submit a supervisor plan along with the supervisor's resumé or curriculum vitae. There should be no other paperwork requirements for the Commonwealth or the regulated community.

Sunset Date

The board continuously monitors the cost effectiveness of the board's regulations. Therefore, no sunset date has been assigned.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on December 11, 2025, the board submitted a copy of this proposed rulemaking and a copy of a Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the Consumer Protection and Professional Licensure Committee of the Senate and to the Chairpersons of the Professional Licensure Committee of the House of Representatives. A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act, IRRC may convey comments, recommendations or objections to the proposed rulemaking within 30 days of the close of the public comment period. The comments, recommendations or objections shall specify the

regulatory review criteria in section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The Regulatory Review Act specifies detailed procedures for review prior to final publication of the rulemaking by the board, the General Assembly and the Governor.

Public Comment

Interested persons are invited to submit written comments, recommendations or objections regarding this proposed rulemaking to Regulatory Counsel to the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, at P.O. Box 69523, Harrisburg, PA 17106-9523 or by e-mail at RA-STRegulatoryCounsel@pa.gov within 30 days of publication of this proposed rulemaking in the *Pennsylvania Bulletin*. Please reference No. 16A-6927 (Associate MFT and PC and Supervision), when submitting comments.

Michelle Santiago, Psy.D., NCC, CCMHC, LPC
Chairperson

ANNEX A

PENNSYLVANIA ADMINISTRATIVE CODE

TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS

PART I. DEPARTMENT OF STATE

Subpart A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS

CHAPTER 47. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS

GENERAL PROVISIONS

§ 47.1a. Qualifications for supervisors of individuals pursuing a clinical social work license.

(a) *Education and experience.* To qualify as a supervisor, an individual shall meet one of the following criteria:

(1) Hold [a] an active license as a clinical social worker in the state where the supervisee's experience is occurring and have 5 years of post-master's experience within the last 10 years as a clinical social worker.

(2) Hold [a] an active license in a related field in the state where the supervisee's experience is occurring and a master's or doctoral degree in [a] that related field [,] and have 5 years of post-master's experience within the last 10 years in that field.

(3) Until January 1, 2006, the following criteria:

(i) Practices as a clinical social worker.

(ii) Have 5 years of experience within the last 10 years as a clinical social worker.

(iii) Hold a license to practice as a social worker in this Commonwealth.

(b) *Required education.* A supervisor shall complete at least 6 continuing education clock hours on clinical supervision before beginning as a supervisor. For individuals who are providing supervision on _____, the 6 continuing education clock hours shall be completed

within 2 years of _____ . The 6 continuing education clock hours may be counted as part of the total number of clock hours required in § 47.32 (relating to requirement for biennial renewal). The Board considers supervisors who have completed a graduate level course on supervision or a clinical supervisor certification program to have met this requirement.

(Editor's note: In the blank in subsection (b), insert the date of final publication in the Pennsylvania Bulletin.)

§ 47.4. Licensure fees.

The fee schedule for licensure as a licensed bachelor social worker, licensed social worker, licensed clinical social worker, licensed marriage and family therapist, **[or]** licensed professional counselor, **licensed associate marriage and family therapist or licensed associate professional counselor** shall be as follows:

- (1) Application fee for licensure and original license issuance as a licensed bachelor social worker, **[or]** licensed social worker, **licensed associate marriage and family therapist or licensed associate professional counselor**..... \$75
- (2) Biennial renewal for a licensed bachelor social worker, licensed social worker, licensed clinical social worker, licensed marriage and family therapist, **[or]** licensed professional counselor, **licensed associate marriage and family therapist or licensed associate professional counselor**..... \$95
- (3) Verification of licensure \$15
- (4) Certification of license, scores or hours \$25
- (5) Application fee for licensure and original license issuance as a licensed clinical social worker \$90

- (6) Application fee for licensure and original license issuance as a licensed marriage and family therapist or licensed professional counselor \$100
- (7) Late renewal fee (per month or part of month) \$5

* * * * *

**CHAPTER 48. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS – LICENSURE OF MARRIAGE
AND FAMILY THERAPISTS**

GENERAL PROVISIONS

§ 48.1. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

AAMFT--The American Association for Marriage and Family Therapy.

AMFTRB--The Association of Marital and Family Therapy Regulatory Boards.

AMFT—Associate marriage and family therapist.

Accredited educational institution--A graduate school which is recognized as an institution of higher education or which is accredited by a regional accrediting association recognized by the Council for Higher Education Accreditation.

* * * * *

COAMFTE--The Commission on Accreditation for Marriage and Family Therapy Education.

Client/patient--An individual, group or family for whom a licensed [marriage and family therapist] **MFT or AMFT** provides marriage and family therapy services. In the case of an

individual with a legal guardian, such as a minor or legally incapacitated adult, the individual is the client/patient.

Doctoral degree in marriage and family therapy--A doctoral degree which is awarded upon successful completion of a program in marriage and family therapy which is either accredited by COAMFTE, or, which includes coursework that meets the criteria in § 48.2 (relating to educational requirements).

* * * * *

Planned program of 60 semester hours or 90 quarter hours which is closely related to marriage and family therapy--A program which includes coursework that meets the criteria in § 48.2.

Professional relationship--A therapeutic relationship which is deemed to exist for the period of time beginning with the first professional contact or consultation between a licensed **[marriage and family therapist] MFT or AMFT** and a client/patient and continuing thereafter until the last date of a professional service. If a licensed **[marriage and family therapist] MFT or AMFT** sees a client/patient on an intermittent basis, the professional relationship is deemed to start anew on each date that the licensed **[marriage and family therapist] MFT or AMFT** provides a professional service to the client/patient.

Program recognized by a National accrediting agency--A master, doctor or postgraduate degree training program accredited by COAMFTE.

Related field—Includes the fields of psychiatry, psychology, social work, counseling, art therapy, dance/movement therapy, drama therapy, music therapy, human services and counseling education.

Sexual intimacies--Romantic, sexually suggestive, sexually demeaning or erotic behavior.

Examples of this behavior include the following:

- (i) Sexual intercourse, or any touching of the sexual or intimate parts of the person for the purpose of arousing or gratifying sexual desire in either person.
- (ii) Nontherapeutic verbal communication or inappropriate nonverbal communication of a sexual or romantic nature.
- (iii) Sexual invitations.
- (iv) Soliciting or accepting a date from a client/patient.
- (v) Masturbating in the presence of a client/patient or encouraging a client/patient to masturbate in the presence of the licensed [marriage and family therapist] **MFT or AMFT.**
- (vi) Indecent exposure, kissing, hugging, touching, physical contact or self-disclosure of a sexual or erotic nature.

Supervisee--An individual who is fulfilling the supervised experience requirement for licensure.

Supervision--The act of overseeing, directing or instructing the activity or course of action of another.

Supervision plan--A plan of supervision that includes the criteria in § 48.13a(a)(3) (relating to licensed associate marriage and family therapist) and § 49.13a(a)(3) (relating to licensed associate professional counselor).

Supervisor--An individual providing supervision to a supervisee who meets the criteria in § 48.3 (relating to qualifications for supervisors).

§ 48.3. Qualifications for supervisors of individuals pursuing a marriage and family therapist license.

(a) Education and experience. To qualify as a supervisor, an individual shall meet one of the following criteria:

- (1) Hold a current and active license as an MFT in the state where the supervisee's experience is occurring and have 5 years of post-master's experience within the last 10 years as an MFT [and have received certification as an approved supervisor or supervisor-in-training by the AAMFT.]
- (2) Hold a current and active license in a related field in the state where the supervisee's experience is occurring and [have at least] a master's or doctoral degree in [a] that related field and have 5 years of post-master's experience within the last 10 years in that field.
- (3) Until January 1, 2010, meet the following criteria:
 - (i) Practices as an MFT.
 - (ii) Have completed a 1-semester graduate course in MFT supervision (at least 30 contact hours) or the equivalent.
 - (iii) Have 5 years of experience within the last 10 years as an MFT.

(b) Required education. A supervisor shall complete at least 6 continuing education clock hours on supervision before beginning as a supervisor. For individuals who are providing supervision on _____, the 6 continuing education clock hours shall be completed within 2 years of _____. The 6 continuing education clock hours may be counted as part of the total number of clock hours required in § 48.32 (relating to requirements for biennial renewal). The Board considers supervisors who have taken and passed a graduate level

course on supervision or a clinical supervisor certification program to have met this requirement.

(Editor's note: In the blank in subsection (b), insert the date of final publication in the Pennsylvania Bulletin.)

LICENSURE

§ 48.13a. Licensed associate marriage and family therapist.

(a) Qualifications. To be issued a license to hold oneself out as a licensed AMFT, an applicant shall provide proof satisfactory to the Board that the applicant has met the following conditions:

(1) Has satisfied the general requirements for licensure of § 48.12 (relating to general qualifications for licensure).

(2) Has satisfied one of the educational requirements under § 48.13(a)(3) (relating to licensed MFT).

(3) Has submitted a written supervision plan for supervised clinical experience, which includes all of the following:

(i) A description of the work setting.

(ii) A detailed job description for the supervisee, including the nature of the supervisee's duties and responsibilities.

(iii) A detailed description of the supervisor's responsibilities and qualifications.

(iv) Identification of each location where client contact will occur.

(v) Identification of each location where supervision will occur.

(vi) Frequency of supervision planned.

(4) Has submitted the resumé or curriculum vitae for each licensee who provides supervision.

(5) Has completed at least 3 hours of training in child abuse recognition and reporting in accordance with § 48.58(a) (relating to child abuse recognition and reporting--mandatory training requirement).

(b) Supervisors. Supervisors shall meet the requirements under § 48.3 (relating to qualifications for supervisors) and supervisory standards in this chapter, including §§ 48.13(b) and 48.14 (relating to license MFT; and standards for supervisors).

(c) Renewal. Renewal of an AMFT license shall be on a biennial basis, and the license shall be eligible for no more than three renewals. As a condition for biennial renewal, a licensed AMFT shall meet the continuing education requirements in §§ 48.31 – 48.42.

(d) Notification to the Board. When an AMFT obtains a new supervisor, the AMFT shall notify the Board and provide the resumé or curriculum vitae for the licensee or licensees who provide supervision.

SEXUAL MISCONDUCT

§ 48.21. Prohibited conduct.

Sexual intimacies between a licensed **[marriage and family therapist] MFT or AMFT** and a current client/patient, or an immediate family member of a current client/patient, are prohibited.

§ 48.22. Former sexual partners as clients/patients.

[Licensed marriage and family therapists] Licensed MFTs and AMFTs may not accept as client/patients individuals with whom they have engaged in sexual intimacies.

§ 48.23. Sexual intimacies with a former client/patient or an immediate family member of a former client/patient.

- (a) Sexual intimacies between a licensed **[marriage and family therapist] MFT or AMFT** and a former client/patient, or an immediate family member of a former client/patient are prohibited for 7 years following the termination of the professional relationship.
- (b) Following the passage of the 7-year period, licensed **[marriage and family therapists] MFTs and AMFTs** may engage in sexual conduct with a former client/patient, or an immediate family member of a former client/patient which is not exploitive. In determining whether the conduct is exploitive, the licensed **[marriage and family therapist] MFT or AMFT** shall consider all of the following:

* * * * *

- (6) Statements or actions made by the licensed **[marriage and family therapist] MFT or AMFT** during the course of therapy suggesting or inviting the possibility of a posttermination sexual or romantic relationship with the client/patient.

* * * * *

§ 48.24. Disciplinary proceedings.

(a) A violation of [§ §] §§ 48.21—48.23 (relating to prohibited conduct; former sexual partners as clients/patients; and sexual intimacies with a former client/patient or an immediate family member of a former client/patient) will be deemed unprofessional conduct and will subject the licensed **[marriage and family therapist] MFT or AMFT** to discipline under section 11(a)(2) of the act (63 P.S. § 1911(a)(2)).

(b) The consent of a former client/patient or immediate family member of a former client/patient to engage in sexual intimacies with the licensed **[marriage and family therapist] MFT or AMFT** is not a defense in any disciplinary action brought under § § 48.21—48.23.

* * * * *

§ 48.25. Impaired professional program.

When the Board takes disciplinary or corrective action against a licensed **[marriage and family therapist] MFT or AMFT** under section 11(a) of the act (63 P. S. § 1911(a)), for conduct prohibited by [§ §] §§ 48.21—48.23 (relating to prohibited conduct; former sexual partners as clients/patients; and sexual intimacies with a former client/patient, or an immediate family member of a former client/ patient), the licensed **[marriage and family therapist] MFT or AMFT** will not be eligible for placement into an impaired professional program in lieu of disciplinary or corrective action.

CONTINUING EDUCATION

§ 48.32. Requirement for biennial renewal.

The Board requires, as a condition of biennial renewal of **[a marriage and family therapist's] an MFT's or AMFT's** license, the completion during the preceding biennium of 30 clock hours of continuing education in acceptable courses and programs offered by approved providers. Up to 20 clock hours may be obtained by home study. Excess clock hours may not be carried over to the next biennium. At least 3 of the required 30 clock hours must be related to ethical issues and at least 2 of the required 30 clock hours must be completed in child abuse recognition and reporting in accordance with § 48.58(b) (relating to child abuse recognition and reporting—mandatory training requirement).

§ 48.35. Standards for courses and programs.

(a) A provider or licensee seeking Board approval of a course or program shall present evidence that the course or program is appropriate for the master's level practitioner and has the following:

(1) Subject matter pertaining to the enhancement of the **[marriage and family therapist's] MFT's or AMFT's** knowledge and practice skills related to helping people achieve adequate and productive personal, interpersonal and social adjustments in their individual lives, in their families and in their community.

* * * * *

§ 48.36. Preapproved providers of continuing education courses and programs for marriage and family therapists and associate marriage and family therapists.

* * * * *

(b) The Board will consider for approval, as preapproved providers, other organizations who offer multiple courses and programs for **[marriage and family therapists] MFTs or AMFTs.** The

request for approval shall be submitted to the Board in writing along with a rationale as to why the organization should be included as a preapproved provider.

* * * * *

§ 48.38. Reporting by licensee of hours spent in continuing education; continuing education audit and enforcement.

* * * * *

(b) The Board will randomly audit licensees to ensure compliance with the continuing education requirements. A licensee selected for audit shall provide information to document the licensee's completion of required continuing education. The information must include the following:

* * * * *

(7) The Board approval number assigned to the course or program unless the provider is preapproved under § 48.36(a) (relating to preapproved providers of continuing education courses and programs for marriage and family therapists and associate marriage and family therapists).

(c) A licensee who, as a result of an audit, is determined to be deficient in continuing education hours is subject to formal disciplinary action under section 11(a)—(c) of the act (63 P. S. § 1911(a)—(c)) or the issuance of a citation under section 5(a) of the act of July 2, 1993 (P. L. 345, No. 48) (63 P. S. § 2205(a)) as provided in § 43b.24 (relating to schedule of civil penalties—social workers, marriage and family therapists and professional counselors).

* * * * *

§ 48.42. Disciplinary action authorized.

(a) A licensed **[marriage and family therapist] MFT or AMFT** who submits fraudulent clock hour reports will be subject to disciplinary action under section 11(a)(5) of the act (63 P. S. § 1911(a)(5)).

* * * * *

CHILD ABUSE REPORTING REQUIREMENTS

§ 48.51. Definitions relating to child abuse reporting requirements.

The following words and terms, when used in this section and § § 48.52—48.59 (relating to child abuse reporting requirements), have the following meanings, unless the context clearly indicates otherwise:

* * * * *

Mandated reporter—A person who is required under 23 Pa.C.S. § 6311 (relating to persons required to report suspected child abuse) to make a report of suspected child abuse. For purposes of this chapter, the term includes all licensed **[marriage and family therapists] MFTs and AMFTs**.

Parent—A biological parent, adoptive parent or legal guardian.

* * * * *

§ 48.52. Suspected child abuse—mandated reporting requirements.

(a) *General rule.*

(1) Under 23 Pa.C.S. § 6311 (relating to persons required to report suspected child abuse), licensed **[marriage and family therapists] MFTs and AMFTs** are considered mandated reporters. A mandated reporter shall make a report of suspected child abuse in

accordance with this section if the mandated reporter has reasonable cause to suspect that a child is a victim of child abuse under any of the following circumstances:

(i) The mandated reporter comes into contact with the child in the course of employment, occupation and practice of the profession or through a regularly scheduled program, activity or service.

(ii) The mandated reporter is directly responsible for the care, supervision, guidance or training of the child, or is affiliated with an agency, institution, organization, school, regularly established church or religious organization or other entity that is directly responsible for the care, supervision, guidance or training of the child.

(iii) A person makes a specific disclosure to the mandated reporter that an identifiable child is the victim of child abuse.

(iv) An individual 14 years of age or older makes a specific disclosure to the mandated reporter that the individual has committed child abuse.

(2) Nothing in this subsection shall require a child to come before the mandated reporter to make a report of suspected child abuse.

(3) Nothing in this subsection shall require the mandated reporter to identify the person responsible for the child abuse to make a report of suspected child abuse.

(b) *Staff members of public or private agencies, institutions and facilities.* Whenever a licensed **[marriage and family therapist] MFT or AMFT** is required to make a report under subsection

(a) in the capacity as a member of the staff of a medical or other public or private institution,

school, facility or agency, that licensed **[marriage and family therapist] MFT or AMFT** shall report immediately in accordance with subsection (c) and shall immediately thereafter notify the person in charge of the institution, school, facility or agency or the designated agent of the person in charge.

* * * * *

§ 48.53. Photographs of child subject to report.

A licensed **[marriage and family therapist] MFT or AMFT** may take or cause to be taken photographs of the child who is subject to a report. Summaries or reports of the photographs taken shall be sent to the county children and youth social service agency at the time the written report is sent, or within 48 hours after an electronic report is made under § 48.52(c)(1)(ii) (relating to suspected child abuse—mandated reporting requirements), or as soon thereafter as possible. The county children and youth social service agency shall have access to actual photographs or duplicates and may obtain them or duplicates of them upon request. Summaries or reports of the photographs shall be made available to law enforcement officials in the course of investigating cases under 23 Pa.C.S. § 6490(a)(9) or (10) (relating to release of information in confidential reports).

§ 48.54. Suspected death as a result of child abuse—mandated reporting requirement.

A licensed **[marriage and family therapist] MFT or AMFT** who has reasonable cause to suspect that a child died as a result of child abuse shall report that suspicion to the coroner or medical examiner of the county where death occurred or, in the case where the child is transported to

another county for medical treatment, to the coroner or medical examiner of the county where the injuries were sustained.

§ 48.55. Immunity from liability.

Under 23 Pa.C.S. § 6318 (relating to immunity from liability) a licensed **[marriage and family therapist] MFT or AMFT** who participates in good faith in the making of a report of suspected child abuse, making a referral for general protective services, cooperating or consulting with an investigation including providing information to a child fatality or near fatality review team, testifying in a proceeding arising out of an instance of suspected child abuse or general protective services or engaging in any action authorized under 23 Pa.C.S. §§ 6314—6317, shall have immunity from civil and criminal liability that might otherwise result by reason of the licensed **[marriage and family therapist's] MFT's or AMFT's** actions. For the purpose of any civil or criminal proceeding, the good faith of the licensed **[marriage and family therapist] MFT or AMFT** shall be presumed. The Board will uphold the same good faith presumption in any disciplinary proceeding that might result by reason of a licensed **[marriage and family therapist's] MFT's or AMFT's** actions under §§ 48.52—48.54 (relating to suspected child abuse—mandated reporting requirements; photographs of child subject to report; and suspected death as a result of child abuse—mandated reporting requirement).

§ 48.57. Noncompliance.

(a) *Disciplinary action.* A licensed **[marriage and family therapist] MFT or AMFT** who willfully fails to comply with the reporting requirements in §§ 48.52—48.54 (relating to suspected child abuse—mandated reporting requirements; photographs of child subject to report;

and suspected death as a result of child abuse—mandated reporting requirement) will be subject to disciplinary action under section 11 of the act (63 P.S. § 1911).

(b) *Criminal penalties.* Under 23 Pa.C.S. § 6319 (relating to penalties), a licensed **[marriage and family therapist] MFT or AMFT** who is required to report a case of suspected child abuse or to make a referral to the appropriate authorities and who willfully fails to do so commits a criminal offense, as follows:

(1) An offense not otherwise specified in paragraphs (2), (3) or (4) is a misdemeanor of the second degree.

(2) An offense is a felony of the third degree if all of the following apply:

(i) The mandated reporter willfully fails to report.

(ii) The child abuse constitutes a felony of the first degree or higher.

(iii) The mandated reporter has direct knowledge of the nature of the abuse.

* * * * *

§ 48.58. Child abuse recognition and reporting—mandatory training requirement.

(a) Except as provided in subsection (c), individuals applying to the Board for a license as **[a marriage and family therapist] an MFT or AMFT** shall complete, as a condition of licensure, at least 3 hours of training in child abuse recognition and reporting requirements which has been approved by the Department of Human Services and the Bureau, as set forth in § 48.59 (relating to child abuse recognition and reporting course approval process). The applicant shall certify on the application that the applicant has either completed the required training or has been granted an exemption under subsection (c). The Board will not issue a license unless the Bureau has received

an electronic report from an approved course provider documenting the attendance/participation by the applicant or the applicant has obtained an exemption under subsection (c).

(b) Except as provided in subsection (c), licensed **[marriage and family therapists] MFTs or AMFTs** seeking renewal of a license issued by the Board shall complete, as a condition of biennial renewal of the license, at least 2 hours of approved continuing education in child abuse recognition and reporting as a portion of the total continuing education required for biennial renewal. For credit to be granted, the continuing education course or program must be approved by the Bureau, in consultation with the Department of Human Services, as set forth in § 48.59. The Board will not renew a license unless the Bureau has received an electronic report from an approved course provider documenting the attendance/participation by the licensee in an approved course within the applicable biennial renewal period or the licensee has obtained an exemption under subsection (c). If a licensee holds more than one license issued by the Board, or holds a license issued by another licensing Board within the Bureau that requires mandatory training in child abuse recognition and reporting, credit for completion of an approved course will be applied to both licenses.

* * * * *

CODE OF ETHICAL PRACTICE AND STANDARDS OF PROFESSIONAL CONDUCT

§ 48.71. Code of ethical practice and professional conduct.

The Board subscribes to the code of ethics and practice standards for licensed **[marriage and family therapists] MFTs or AMFTs** (licensees) promulgated by the American Association for Marriage and Family Therapy (AAMFT) and the Board will use the AAMFT Code of Ethics in

resolving ambiguities which may arise in the interpretation of this chapter, except that whenever any conflict exists between this chapter and the AAMFT Code of Ethics, this chapter shall prevail.

**CHAPTER 49. STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS—LICENSURE OF
PROFESSIONAL COUNSELORS**

GENERAL PROVISIONS

§ 49.1. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

* * * * *

Client/patient—An individual, group or family for whom a licensed professional counselor **or** **associate professional counselor** provides professional counseling services. In the case of an individual with a legal guardian such as a minor or legally incapacitated adult, the individual is the client/patient.

* * * * *

Professional relationship—A therapeutic relationship which is deemed to exist for the period of time beginning with the first professional contact or consultation between a licensed professional counselor **or associate professional counselor** and a client/patient and continuing thereafter until the last date of a professional service. If a licensed professional counselor **or** **associate professional counselor** sees a client/patient on an intermittent basis, the professional

relationship is deemed to start anew on each date that the licensed professional counselor **or** **associate professional counselor** provides a professional service to the client/patient.

Related field—Includes the fields of psychiatry, psychology, social work, marriage and family therapy, art therapy, dance/movement therapy, drama therapy, music therapy, human services and counseling education.

Sexual intimacies—Romantic, sexually suggestive, sexually demeaning or erotic behavior. Examples of this behavior include the following:

- (i) Sexual intercourse, or any touching of the sexual or intimate parts of the person for the purpose of arousing or gratifying sexual desire in either person.
- (ii) Nontherapeutic verbal communication or inappropriate nonverbal communication of a sexual or romantic nature.
- (iii) Sexual invitations.
- (iv) Soliciting or accepting a date from a client/patient.
- (v) Masturbating in the presence of a client/patient or encouraging a client/patient to masturbate in the presence of the licensed professional counselor or **associate professional counselor.**
- (vi) Indecent exposure, kissing, hugging, touching, physical contact or self-disclosure of a sexual or erotic nature.

Supervisee—An individual who is fulfilling the supervised experience requirement for licensure.

Supervision—The act of overseeing, directing or instructing the activity or course of action of another.

Supervision plan--A plan of supervision that includes the criteria in § 49.13a (relating to licensed associate professional counselor).

Supervisor—An individual providing supervision to a supervisee who meets the criteria in § 49.3 (relating to qualifications for supervisors).

§ 49.3. Qualifications for supervisors of individuals pursuing a professional counselor license.

(a) Education and experience. To qualify as a supervisor, an individual shall meet one of the following criteria:

(1) [Holds a] **Hold an active** license as a professional counselor **in the state where the supervisee's experience is occurring** and [has] **have** 5 years **of post-master's degree** experience within the last 10 years as a professional counselor

(2) [Holds a] **Hold an active** license **in a related field in the state where the supervisee's experience is occurring** and [has at least] a master's **or doctoral** degree in [a] **that** related field and [has] **have** 5 years **of post-master's** experience within the last 10 years in that field.

(3) Until January 1, 2006, meet the following criteria:

(i) Practices as a professional counselor.

(ii) Has 5 years experience within the last 10 years as a professional counselor.

(b) Required continuing education. A supervisor shall complete at least 6 continuing education clock hours on supervision before beginning as a supervisor. For individuals who

are providing supervision on _____, the 6 continuing education clock hours shall be completed within 2 years of _____. The 6 continuing education clock hours may be counted as part of the total number of clock hours required in § 49.32 (relating to requirement for biennial renewal). The Board considers supervisors who have taken a graduate level course on supervision or clinical supervisor certification program to have met this requirement.

(Editor's note: In the blank in subsection (b), insert the date of final publication in the Pennsylvania Bulletin.)

LICENSE

§ 49.13a. Licensed associate professional counselor.

(a) *Qualifications.* To be issued a license to hold oneself out as a licensed associate professional counselor, an applicant shall provide proof satisfactory to the Board that the applicant has met the following conditions:

(1) Has satisfied the general requirements for licensure of § 49.12 (relating to general qualifications for licensure).

(2) Has satisfied one of the educational requirements under § 49.13(a)(3) (relating to licensed professional counselor).

(3) Has submitted a written supervision plan for supervised clinical experience, which includes all of the following:

(i) A description of the work setting.

(ii) A detailed job description for the supervisee, including the nature of the supervisee's duties and responsibilities.

(iii) A detailed description of the supervisor's responsibilities and qualifications.

(iv) Identification of each location where client contact will occur.

(v) Identification of each location where supervision will occur.

(vi) Frequency of supervision planned.

(4) Has submitted the resumé or curriculum vitae for each licensee who provides supervision.

(5) Has completed at least 3 hours of training in child abuse recognition and reporting in accordance with § 49.58(a) (relating to child abuse recognition and reporting--mandatory training requirement).

(b) Supervisors. Supervisors shall meet the requirements under § 49.3 (relating to qualifications for supervisors) and supervisory standards in this chapter, including §§ 49.13(b) and 49.14 (relating to licensed professional counselors; and standards for supervisors).

(c) Renewal. Renewal of an associate professional counselor license shall be on a biennial basis, and the license shall be eligible for no more than three renewals. As a condition for biennial renewal, a licensed associate professional counselor shall meet the continuing education requirements in §§ 49.31 – 49.42.

(d) Notification to the Board. When an associate professional counselor obtains a new supervisor, the associate professional counselor shall notify the Board and provide the resumé or curriculum vitae for the licensee or licensees who provide supervision.

SEXUAL MISCONDUCT

§ 49.21. Prohibited conduct.

Sexual intimacies between a licensed professional counselor **or associate professional counselor** and a current client/patient, or an immediate family member of a current client/patient, are prohibited.

§ 49.22. Former sexual partners as clients/patients.

Licensed professional counselors **and associate professional counselors** may not accept as client/patients individuals with whom they have engaged in sexual intimacies.

§ 49.23. Sexual intimacies with a former client/patient or an immediate family member of a former client/patient.

(a) Sexual intimacies between a licensed professional counselor **or associate professional counselor** and a former client/patient, or an immediate family member of a former client/patient are prohibited for 7 years following the termination of the professional relationship.

(b) Following the passage of the 7-year period, licensed professional counselors **and associate professional counselors** may engage in sexual conduct with a former client/patient, or an immediate family member of a former client/patient which is not exploitive. In determining

whether the conduct is exploitive, the licensed professional counselor **or associate professional counselor** shall consider all of the following:

- (1) The amount of time that has passed since the professional relationship terminated.
- (2) The nature and duration of the therapy.
- (3) The circumstances of termination.
- (4) The client/patient's personal history, for example, unique vulnerabilities.
- (5) The client/patient's current mental status.
- (6) Statements or actions made by the licensed professional counselor **or associate professional counselor** during the course of therapy suggesting or inviting the possibility of a posttermination sexual or romantic relationship with the client/patient.
- (7) The likelihood of adverse impact on the client/patient and immediate family members of the client/patient.

§ 49.24. Disciplinary proceedings.

(a) A violation of § § 49.21—49.23 (relating to prohibited conduct; former sexual partners as clients/patients; and sexual intimacies with a former client/patient or an immediate family member of a former client/patient) will be deemed unprofessional conduct and will subject the licensed professional counselor **or associate professional counselor** to discipline under section 1911(a)(2) of the act (63 P. S. § § 1911(a)(2)).

(b) The consent of a former client/patient or immediate family member of a former client/patient to engage in sexual intimacies with the licensed professional counselor **or associate professional counselor** is not a defense in any disciplinary action brought under § § 49.21—49.23.

* * * * *

§ 49.25. Impaired professional program.

When the Board takes disciplinary or corrective action against a licensed professional counselor **or associate professional counselor** under section 11(a) of the act (63 P. S. § 1911(a)), for conduct prohibited by § § 49.21—49.23 (relating to prohibited conduct; former sexual partners as clients/patients; and sexual intimacies with a former client/patient, or an immediate family member of a former client/patient), the licensed professional counselor **or associate professional counselor** will not be eligible for placement into an impaired professional program in lieu of disciplinary or corrective action.

CONTINUING EDUCATION

§ 49.32. Requirement for biennial renewal.

The Board requires, as a condition of biennial renewal of a professional **[counselor's] counselor or associate professional counselor** license, the completion during the preceding biennium of 30 clock hours of continuing education in acceptable courses and programs offered by approved providers. Up to 20 clock hours may be obtained by home study. Excess clock hours may not be carried over to the next biennium. At least 3 of the required 30 clock hours must be related to ethical issues and at least 2 of the required 30 clock hours must be completed in child abuse recognition and reporting in accordance with § 49.58(b) (relating to child abuse recognition and reporting—mandatory training requirement).

§ 49.35. Standards for courses and programs.

(a) A provider or licensee seeking Board approval of a course or program shall present evidence that the course or program is geared toward the master's level practitioner and has the following:

(1) Subject matter pertaining to the enhancement of the professional **counselor's or associate professional counselor's** knowledge and practice skills related to helping people achieve adequate and productive personal, interpersonal and social adjustments in their individual lives, in their families and in their community.

* * * * *

§ 49.36. Preapproved providers of continuing education courses and programs for professional counselors and associate professional counselors.

* * * * *

(b) The Board will consider for approval, as preapproved providers, other organizations who offer multiple courses and programs for professional counselors **and associate professional counselors.** The request for approval shall be submitted to the Board in writing along with a rationale as to why the organization should be included as a preapproved provider.

* * * * *

§ 49.38. Reporting by licensee of hours spent in continuing education; continuing education audit and enforcement.

* * * * *

(b) The Board will randomly audit licensees to ensure compliance with the continuing education requirements. A licensee selected for audit shall provide information to document the licensee's completion of required continuing education. The information must include the following:

- (1) The date attended.
- (2) The clock hours claimed.
- (3) The title of course or program and description of content.
- (4) The school, hospital, medical center or organization which sponsored the course or program.
- (5) The instructor.
- (6) The location of course or program.
- (7) The Board approval number assigned to the course or program unless the provider is preapproved under § 49.36(a) (relating to preapproved providers of continuing education courses and programs for professional counselors **and associate professional counselors**).

(c) A licensee who, as a result of an audit, is determined to be deficient in continuing education hours is subject to formal disciplinary action under section 11(a)—(c) of the act (63 P. S. § 1911(a)—(c)) or the issuance of a citation under section 5(a) of the act of July 2, 1993 (P. L. 345, No. 48) (63 P. S. § 2205(a)) as provided in § 43b.24 (relating to schedule of civil penalties—social workers, marriage and family therapists and professional counselors).

* * * * *

§ 49.42. Disciplinary action authorized.

(a) A licensed professional counselor **or associate professional counselor** who submits fraudulent clock hour reports will be subject to disciplinary action under section 11(a)(5) of the act (63 P. S. § 1911(a)(5)).

(b) The falsification of a clock hour report by a program provider will result in revocation of approval by the Board for further program offerings of that provider.

CHILD ABUSE REPORTING REQUIREMENTS

§ 49.51. Definitions relating to child abuse reporting requirements.

The following words and terms, when used in this section and § § 49.52—49.59 (relating to child abuse reporting requirements), have the following meanings, unless the context clearly indicates otherwise:

* * * * *

Mandated reporter—A person who is required under 23 Pa.C.S. § 6311 (relating to persons required to report suspected child abuse) to make a report of suspected child abuse. For purposes of this chapter, the term includes all licensed professional counselors **and associate professional counselors.**

* * * * *

§ 49.52. Suspected child abuse—mandated reporting requirements.

(a) *General rule.*

(1) Under 23 Pa.C.S. § 6311 (relating to persons required to report suspected child abuse), licensed professional counselors **and associate professional counselors** are

considered mandated reporters. A mandated reporter shall make a report of suspected child abuse in accordance with this section if the mandated reporter has reasonable cause to suspect that a child is a victim of child abuse under any of the following circumstances:

(i) The mandated reporter comes into contact with the child in the course of employment, occupation and practice of the profession or through a regularly scheduled program, activity or service.

(ii) The mandated reporter is directly responsible for the care, supervision, guidance or training of the child, or is affiliated with an agency, institution, organization, school, regularly established church or religious organization or other entity that is directly responsible for the care, supervision, guidance or training of the child.

(iii) A person makes a specific disclosure to the mandated reporter that an identifiable child is the victim of child abuse.

(iv) An individual 14 years of age or older makes a specific disclosure to the mandated reporter that the individual has committed child abuse.

(2) Nothing in this subsection shall require a child to come before the mandated reporter to make a report of suspected child abuse.

(3) Nothing in this subsection shall require the mandated reporter to identify the person responsible for the child abuse to make a report of suspected child abuse.

(b) *Staff members of public or private agencies, institutions and facilities.* Whenever a licensed professional counselor **or associate professional counselor** is required to make a report under

subsection (a) in the capacity as a member of the staff of a medical or other public or private institution, school, facility or agency, that licensed professional counselor **or associate professional counselor** shall report immediately in accordance with subsection (c) and shall immediately thereafter notify the person in charge of the institution, school, facility or agency or the designated agent of the person in charge.

* * * * *

§ 49.53. Photographs of child subject to report.

A licensed professional counselor **or associate professional counselor** may take or cause to be taken photographs of the child who is subject to a report. Summaries or reports of the photographs taken shall be sent to the county children and youth social service agency at the time the written report is sent, or within 48 hours after an electronic report is made under § 49.52(c)(1)(ii) (relating to suspected child abuse—mandated reporting requirements), or as soon thereafter as possible. The county children and youth social service agency shall have access to actual photographs or duplicates and may obtain them or duplicates of them upon request. Summaries or reports of the photographs shall be made available to law enforcement officials in the course of investigating cases under 23 Pa.C.S. § 6490(a)(9) or (10) (relating to release of information in confidential reports).

§ 49.54. Suspected death as a result of child abuse—mandated reporting requirement.

A licensed professional counselor **or associate professional counselor** who has reasonable cause to suspect that a child died as a result of child abuse shall report that suspicion to the coroner or medical examiner of the county where death occurred or, in the case where the child is transported

to another county for medical treatment, to the coroner or medical examiner of the county where the injuries were sustained.

§ 49.55. Immunity from liability.

Under 23 Pa.C.S. § 6318 (relating to immunity from liability) a licensed professional counselor **or associate professional counselor** who participates in good faith in the making of a report of suspected child abuse, making a referral for general protective services, cooperating or consulting with an investigation including providing information to a child fatality or near fatality review team, testifying in a proceeding arising out of an instance of suspected child abuse or general protective services or engaging in any action authorized under 23 Pa.C.S. § § 6314—6317, shall have immunity from civil and criminal liability that might otherwise result by reason of the licensed professional counselor's **or associate professional counselor's** actions. For the purpose of any civil or criminal proceeding, the good faith of the licensed professional counselor **or associate professional counselor** shall be presumed. The Board will uphold the same good faith presumption in any disciplinary proceeding that might result by reason of a licensed professional counselor's **or associate professional counselor's** actions under § § 49.52—49.54 (relating to suspected child abuse—mandated reporting requirements; photographs of child subject to report; and suspected death as a result of child abuse—mandated reporting requirement).

§ 49.57. Noncompliance.

(a) *Disciplinary action.* A licensed professional counselor **or associate professional counselor** who willfully fails to comply with the reporting requirements in § § 49.52—49.54 (relating to suspected child abuse—mandated reporting requirements; photographs of child subject to report;

and suspected death as a result of child abuse—mandated reporting requirement) will be subject to disciplinary action under section 11 of the act (63 P.S. § 1911).

(b) *Criminal penalties.* Under 23 Pa.C.S. § 6319 (relating to penalties), a licensed professional counselor **or associate professional counselor** who is required to report a case of suspected child abuse or to make a referral to the appropriate authorities and who willfully fails to do so commits a criminal offense, as follows:

(1) An offense not otherwise specified in paragraphs (2), (3) or (4) is a misdemeanor of the second degree.

(2) An offense is a felony of the third degree if all of the following apply:

(i) The mandated reporter willfully fails to report.

(ii) The child abuse constitutes a felony of the first degree or higher.

(iii) The mandated reporter has direct knowledge of the nature of the abuse.

* * * * *

§ 49.58. Child abuse recognition and reporting—mandatory training requirement.

(a) Except as provided in subsection (c), individuals applying to the Board for a license as a professional counselor **or associate professional counselor** shall complete, as a condition of licensure, at least 3 hours of training in child abuse recognition and reporting requirements which has been approved by the Department of Human Services and the Bureau, as set forth in § 49.59 (relating to child abuse recognition and reporting course approval process). The applicant shall certify on the application that the applicant has either completed the required training or has been granted an exemption under subsection (c). The Board will not issue a license unless the Bureau

has received an electronic report from an approved course provider documenting the attendance/participation by the applicant or the applicant has obtained an exemption under subsection (c).

(b) Except as provided in subsection (c), licensed professional counselors **or associate professional counselors** seeking renewal of a license issued by the Board shall complete, as a condition of biennial renewal of the license, at least 2 hours of approved continuing education in child abuse recognition and reporting as a portion of the total continuing education required for biennial renewal. For credit to be granted, the continuing education course or program must be approved by the Bureau, in consultation with the Department of Human Services, as set forth in § 49.59 (relating to child abuse recognition and reporting course approval process). The Board will not renew a license unless the Bureau has received an electronic report from an approved course provider documenting the attendance/participation by the licensee in an approved course within the applicable biennial renewal period or the licensee has obtained an exemption under subsection (c). If a licensee holds more than one license issued by the Board, or holds a license issued by another licensing Board within the Bureau that requires mandatory training in child abuse recognition and reporting, credit for completion of an approved course will be applied to both licenses.

* * * * *

CODE OF ETHICAL PRACTICE AND STANDARDS OF PROFESSIONAL CONDUCT

§ 49.71. Code of ethical practice and professional conduct.

(a) The Board subscribes to the code of ethics and practice standards for licensees promulgated by the American Counseling Association (ACA). Licensed professional counselors **and associate professional counselors** (licensees) shall adhere to the ACA Code of Ethics, except when the ACA Code of Ethics conflict with this chapter. The Board will use the ACA Code of Ethics in resolving ambiguities that may arise in the interpretation of this chapter, except that whenever any conflict exists between this chapter and the ACA Code of Ethics, this chapter shall prevail.

* * * * *



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
**STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY
THERAPISTS AND PROFESSIONAL COUNSELORS**
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
1-833-367-2762

December 11, 2025

The Honorable George D. Bedwick, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
Forum Place
555 Walnut Street, Suite 804
Harrisburg, PA 17101

Re: Proposed Rulemaking
State Board of Social Workers, Marriage and Family Therapists and Professional
Counselors
16A-6927: Associate MFT and PC and Supervision

Dear Chairman Bedwick:

Enclosed is a copy of a proposed rulemaking package of the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors pertaining to Associate MFT and PC and Supervision.

The Board will be pleased to provide whatever information the Commission may require during the course of its review of the rulemaking.

Sincerely,
Michelle L. Santiago
Michelle L. Santiago, Psy.D., NCC, CCMHC, LPC,
Chairperson
State Board of Social Workers, Marriage and Family
Therapists and Professional Counselors

MLS/jaw/wc
Enclosure

cc: Arion Claggett, Acting Commissioner of Professional and Occupational Affairs
K. Kalonji Johnson, Deputy Secretary for Regulatory Programs
Robert Beecher, Policy Director, Department of State
Andrew LaFratte, Deputy Policy Director, Department of State
Jason C. Giurintano, Deputy Chief Counsel, Department of State
Jacqueline A. Wolfgang, Senior Regulatory Counsel, Department of State
Cathy A. Tully, Board Counsel, State Board of Social Workers, Marriage and Family
Therapists and Professional Counselors
State Board of Social Workers, Marriage and Family Therapists and Professional Counselors

From: Monoski, Jesse <Jesse.Monoski@pasenate.com>
Sent: Thursday, December 11, 2025 9:07 AM
To: Christman, William; Dimm, Ian; Kelly, Joseph; Vazquez, Enid
Cc: Roland, Joel; Worthington, Amber
Subject: Re: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Boscola

Received.

-Jesse Monoski

RECEIVED

Independent Regulatory
Review Commission

December 11, 2025

Get [Outlook for Android](#)

From: Christman, William <wchristman@pa.gov>
Sent: Thursday, December 11, 2025 8:41:52 AM
To: Monoski, Jesse <jesse.monoski@pasenate.com>; Dimm, Ian <ian.dimm@pasenate.com>; Kelly, Joseph <joseph.kelly@pasenate.com>; Vazquez, Enid <enid.vazquez@pasenate.com>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Boscola

■ EXTERNAL EMAIL ■

Please be advised that the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is electronically delivering the below-identified proposed rulemaking today **Thursday, December 11, 2025**.

- **16A-6927 Associate MFT and PC and Supervision**

This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic delivery.

Thank you for your attention to this matter.

Sincerely,



William Christman | Legal Assistant II
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing address: P.O. Box 69523 | Harrisburg, PA 17106-9523
Office Phone 717.783.7200 | Fax: 717.787.0251
wchristman@pa.gov | www.dos.pa.gov

RECEIVED

Independent Regulatory
Review Commission

December 11, 2025

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

This message and any attachment may contain privileged or confidential information intended solely for the use of the person to whom it is addressed. If the reader is not the intended recipient then be advised that forwarding, communicating, disseminating, copying or using this message or its attachments is strictly prohibited. If you receive this message in error, please notify the sender immediately and delete the information without saving any copies.

From: Orchard, Kari L. <KOrchard@pahouse.net>
Sent: Thursday, December 11, 2025 9:44 AM
To: Christman, William; Barton, Jamie; Brett, Joseph D.
Cc: Roland, Joel; Worthington, Amber
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Burns

December 11, 2025

Received. Thank you!

Kari Orchard

Executive Director (D) | House Professional Licensure Committee
Chairman Frank Burns, 72nd Legislative District

From: Christman, William <wchristman@pa.gov>
Sent: Thursday, December 11, 2025 8:44 AM
To: Orchard, Kari L. <KOrchard@pahouse.net>; Barton, Jamie <JBarton@pahouse.net>; Brett, Joseph D. <JBrett@pahouse.net>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Burns
Importance: High

Please be advised that the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is electronically delivering the below-identified proposed rulemaking today **Thursday, December 11, 2025**.

- **16A-6927 Associate MFT and PC and Supervision**

This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic delivery.

Thank you for your attention to this matter.

Sincerely,



William Christman | Legal Assistant II
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing address: P.O. Box 69523 | Harrisburg, PA 17106-9523

From: Emily Hackman <Ehackman@pahousegop.com>
Sent: Thursday, December 11, 2025 9:14 AM
To: Christman, William
Cc: Cindy Sauder
Subject: RE: [EXTERNAL]: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Emrick

December 11, 2025

Received. Thank you!

Emily Epler Hackman | Senior Policy Analyst
Pennsylvania House of Representatives
Health Committee (R)
141 Ryan Office Building
Phone: (717) 260-6351

From: Christman, William <wchristman@pa.gov>
Sent: Thursday, December 11, 2025 8:47 AM
To: Nicole Sidle <Nsidle@pahousegop.com>; Cindy Sauder <Csauder@pahousegop.com>; Emily Hackman <Ehackman@pahousegop.com>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: [EXTERNAL]: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Emrick
Importance: High

Please be advised that the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is electronically delivering the below-identified proposed rulemaking today **Thursday, December 11, 2025**.

- **16A-6927 Associate MFT and PC and Supervision**
This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic delivery.

Thank you for your attention to this matter.

Sincerely,



William Christman | Legal Assistant II
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110
Mailing address: P.O. Box 69523 | Harrisburg, PA 17106-9523
Office Phone 717.783.7200 | Fax: 717.787.0251
wchristman@pa.gov | www.dos.pa.gov

RECEIVED

Independent Regulatory
Review Commission

December 11, 2025

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this information in error, please contact the sender and delete the message and material from all computers.

From: Smeltz, Jennifer <jmsmeltz@pasen.gov>
Sent: Thursday, December 11, 2025 9:48 AM
To: Christman, William
Subject: RE: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Stefano

December 11, 2025

Received.

*Jen Smeltz, Executive Director
Consumer Protection and Professional Licensure Committee
Office of Senator Pat Stefano
Phone: (717) 787-7175*

From: Christman, William <wchristman@pa.gov>
Sent: Thursday, December 11, 2025 8:39 AM
To: Smeltz, Jennifer <jmsmeltz@pasen.gov>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - Stefano
Importance: High

ⓘ CAUTION : External Email ⓘ

Please be advised that the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is electronically delivering the below-identified proposed rulemaking today **Thursday, December 11, 2025**.

- **16A-6927 Associate MFT and PC and Supervision**

This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office for the Majority or Minority Chair of your office effectuating the electronic delivery.

Thank you for your attention to this matter.

Sincerely,



William Christman | Legal Assistant II
Office of Chief Counsel | Department of State
Governor's Office of General Counsel
2400 Thea Drive, Suite 201 | Harrisburg, PA 17110

From: Bulletin <bulletin@palrb.us>
Sent: Thursday, December 11, 2025 9:48 AM
To: Christman, William
Cc: Roland, Joel; Worthington, Amber
Subject: [External] Re: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - LRB

December 11, 2025

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

Good morning William!

Thank you for sending this proposed rulemaking. Someone from our office will be in touch regarding the publication date.

Have a great rest of your day!

Leah

From: Christman, William <wchristman@pa.gov>
Sent: Thursday, December 11, 2025 8:48 AM
To: Bulletin <bulletin@palrb.us>
Cc: Roland, Joel <joeroland@pa.gov>; Worthington, Amber <agontz@pa.gov>
Subject: DELIVERY NOTICE OF: REGULATION # 16A-6927 Associate MFT and PC and Supervision - LRB

Please be advised that the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is electronically delivering the below-identified proposed rulemaking today **Thursday, December 11, 2025**.

- 16A-6927 Associate MFT and PC and Supervision**
 This proposed rulemaking effectuates the act of March 28, 2024, (P.L. 11, No. 4) (Act 4 of 2024) which amended the Social Workers, Marriage and Family Therapists and Professional Counselors Act (act) to include the licensure and practice of associate marriage and family therapists (AMFT), and associate professional counselors. The State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (board) proposes regulations for associate level licensure of marriage and family therapists (MFT) and professional counselors. This proposed rulemaking establishes the application and biennial renewal fees as set forth in Act 4 of 2024, includes definitions concerning associate licenses, further establishes the requirements to be issued a license as an AMFT and an associate professional counselor under Act 4 of 2024, and makes clarifying amendments pertaining to qualifications and continuing education for supervisors.

The Board is requesting a written (email) confirmation of receipt of this delivery from the designated contact person(s) from your office effectuating the electronic delivery.

Thank you for your attention to this matter.

Sincerely,



William Christman | Legal Assistant II
 Office of Chief Counsel | Department of State
 Governor's Office of General Counsel
 2400 Thea Drive, Suite 201 | Harrisburg, PA 17110