



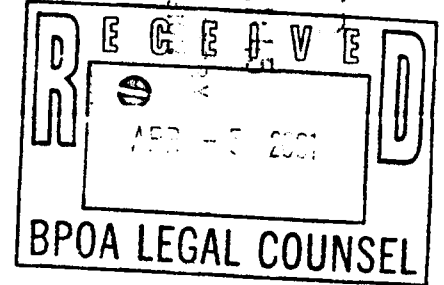
Clear Concepts Counseling

Development in the Individual, Family, and Community

Receiving partial funding from Juniata Valley Tri-County Drug & Alcohol Abuse Commission

April 4, 2001

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



Dear Ms. Cheney:

I am writing this letter to you as a Director and co-owner of a successful outpatient counseling organization that serves both mental health and substance abusing patients.

I am also a M.Ed. in Counselor Education from The Pennsylvania State University, as well as a Certified Addiction Counselor Diplomate. I have eighteen years experience in the counseling field. I have worked with and hired Ph.Ds, LSWs, licensed psychologists, Master's level therapists and Bachelor's level therapists. Some are Certified Addiction Counselors, some are not.

I have concerns in regard to the regulations outlined in Act 136, the Professional Counselor Licensing Bill. I believe the way in which the bill is written raises concerns about the health and welfare of substance abusers seeking counseling. The basic, problematic concerns with the regulations involve grandparenting issues and are non-statutory in nature. The major concern is that the Bill fails to recognize Master's level addiction specialists, who are Certified Addiction Counselors (C.A.C.). This is the largest group of therapists providing addictions treatment in the Commonwealth. The C.A.C. credential is competency based and clinically supervised. There are strict guidelines, including a Case Study, Written Exam, and Oral Exam. The C.A.C. process is very rigorous.


Another concern is how it may effect some Certified Addiction Counselors with Master's Degrees from Lincoln University. This institution is a part of the university system of the Commonwealth. The appearance is exclusionary.

I am advocating three points. First, that Certified Addiction Counselors with Master's Degrees be included in the grandparenting process. Second, that the C.A.C. exam, monitored under the strict guidelines of the International Certification and Reciprocity Consortium, be included under the grandparenting regulations as an acceptable exam.

Finally, I am urging that Certified Addiction Counselors with Master's Degrees from Lincoln University be considered under the grandparenting regulations of the Bill.

Please consider these matters. I am quite familiar, as a facility director and co-owner, of the importance in having qualified clinicians providing excellent services to substance abusers. This is a clinically specialized area of therapy. Master's level Certified Addiction Counselors need to be included in Act 136.

Sincerely,



Mike Grabill, M.Ed., C.A.C. Diplomate
Director
Clear Concepts Counseling
218 Electric Avenue
Lewistown, PA 17044
717-242-3070

cc: Pennsylvania Certification Board
Representative Kerry Benninghoff

April 17, 2001

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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

RE: #16A-694

Dear Ms. Cheney:

As a practicing addictions counselor and resident of this Commonwealth, I am writing to express my most serious concern as well as my opposition to the current regulations as recently published with respect to Act 136, the Professional Counselor Licensing Bill.

The current regulations are clearly exclusionary in nature, and will cause undo risk and hardship for consumers and counselors of addiction services within the Commonwealth of Pennsylvania. The current regulations clearly fail to recognize the potential impact this Bill will have on individuals who are in need of specialized addiction counseling services.

The professionals who fall into this category are, indeed, both qualified and extremely necessary if we are to insure the safety and well-being of those residents who seek counseling services for their addictive disorders. By excluding the CAC national examination (ICRC exam) from your list of acceptable examinations you are create a totally unnecessary obstacle for these professionals to become licensed. Interestingly, and in direct contradiction to the purpose and intent of the Bill, other professionals such as art, music and movement therapists are mentioned, and their respective examinations deemed acceptable. Yet, there is absolutely no reference whatsoever to the largest group of specialized counseling professionals – Certified Addiction Counselors (CACs).

This scenario will, without doubt unnecessarily force residents of this Commonwealth who are in need of addiction services by indirectly forcing them to seek services from professionals who are not mandated to prove their competency in this specialized area of counseling. The purpose of the Bill, as stated, is to enhance the quality of counseling services to our residents. Excluding these professionals clearly undermines the nature and intent of this Bill.


Furthermore, the Bill seems to also exclude the Master's of Human Services degree from Lincoln University. These fine professionals who are working in the trenches on a daily basis have, without doubt, proven their professional stature. Excluding these professionals from becoming licensed would cause serious accessibility issues for minority similar counseling services, since the vast majority of these professionals are either African American or Latino.

Due to the potential harm these regulations would cause in their current form, I am strongly encouraging you to reconsider your perspective. In the best interest of all of the residents of this Commonwealth, I suggest you seriously consider making the following changes to the current regulations:

- ▶ Include the Master's level Certified Addiction Counselor (CAC Diplomate) in the list along with the current list of other specialized professionals (e.g., art, movement, music, etc.)
- ▶ Include the ICRC National Examination for Certified Addiction Counselors (CACs) as an acceptable examination to qualify for licensure
- ▶ Include the Master's of Human Service degree (MHS) from Lincoln University as an acceptable degree for the grandparenting process for licensure.

I sincerely urge you to consider these changes, due to the significant harm residents of this Commonwealth would be exposed to should you choose to adopt the regulations in their current form.

Sincerely,


1358 W. Runnoco ST
York, Pa 17404
1-717-396-0650

IRRC: #2178

Agency: Workers, Marriage & Family Therapist &
Professional Counselors

Title: Licensure

(Form C)		
NAME	ADDRESS	DATE of CORRESPONDENCE
John R VanUff	1258 W. Princess Street York, PA 17404	April 17, 2001
AJ		April 17, 2001
Asinia Abdul-Wakeel	5610 N. 12 th Street Philadelphia, PA 19141	April 18, 2001
Antoinette Sacco, CAC	1158 Irving Avenue York, PA 17403	April 18, 2001
Jeffrey J. Spann	2907 Kensington Avenue Philadelphia, PA 19134	April 8, 2001
Rodney Handy	6351 Fariston Drive Philadelphia, PA 19128	April 17, 2001
Katherine Addison	1426 Catherine Street, Apt. B Philadelphia, PA 19146	April 14, 2001
M. Brunich-Ryan	265 Thepehocken Avenue Elkins Park, PA 19027 (215) 885-3487	April 10, 2001
Carol Magaro	2140 Green Valley Road Hughesville, PA 17737	April 9, 2001
Bonnie Tucker- Hounyovi	215 Hayes Street Chester, PA 19013	April 18, 2001
Florence Paige	686 Steelville Mill Atglen, PA 19310	April 10, 2001
Barbara Reda	607 S. 14 th Avenue Lebanon, PA 17042	April 17, 2001
Pat Lutz	199 N. Main Street Washington, PA 15301	April 17, 2001
Margie Weber	HC65 Box 54 Honesdale, PA 18431	April 17, 2001
Steven Saul	201 N. Wayne Avenue Wayne, PA 19087	April 17, 2001
Hugh Cosgrove	6333 Glen Loch Philadelphia, PA 19135	April 17, 2001



Stephen R. Treat, DMin
Director and CEO

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

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

Concordville
Spring House
Doylestown
Oxford Valley
Voorhees, NJ

2001 APR 26 11:13:31

April 17, 2001

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

RECEIVED

APR 23 2001

BPOA LEGAL COUNSEL

Re: Proposed Licensure Regulations (16A-694)

Dear Ms. Cheney:

I have read the proposed regulations for licensure of marriage and family therapists as published in the PA Bulletin on March 24, 2001 and have serious concerns about several provisions as outlined below. In general, I concur with the comments submitted by the Pennsylvania Alliance of Counseling Professionals and urge the Board to adopt those changes.

Regarding the section entitled "Field closely related to the practice of Marriage and Family Therapy", I urge the Board to expand the list of acceptable degrees to include the multi-disciplinary backgrounds many well-qualified marriage and family therapists now reflect, such as pastoral care/ministry, psychology, education and nursing. Penn Council for Relationships trains and hires many excellent marriage and family therapists with these qualifying degrees and to exclude these qualified professions from licensure would not serve clients well.

In regard to the section dealing with "Acceptable services for clinical experience", the act accurately defines the current practice of marriage and family therapy as "the delivery of psychotherapeutic services to individuals, couples, families and groups". I strongly support PACP's request that you allow all of these services as allowable supervised experience in meeting the 1800 hours requirement.

In the section entitled "Supervision in a group setting", I also concur with the PACP's comment, and urge the Board to allow rather than require supervision in a group setting. Since the current population of post-graduate MFT interns includes many professionals already employed in full-time clinical positions, the difficulty in arranging group supervision will exclude many experienced and otherwise qualified therapists from licensure.

Additional concerns include the following:

- Many senior therapists at Penn Council for Relationships may be unfairly excluded from licensure by exemption if practice is required to consist of 15 hours per week with 10 hours of direct client contact. These therapists teach and supervise as well as maintain clinical practices.
- A provision requiring that the first 1800 hours of supervised clinical experience be done by a professional in one's own field excludes quality systemic supervision by individuals from the fields of pastoral care/ministry, psychology, psychiatry and social work. Requiring that professionals supervised by these people begin to count toward 3600 hours again does not reflect the best interests of consumers or the profession.

I urge your attention to the PACP comments, and your prompt adoption of these specific changes. Thank you for your efforts on behalf of my profession and its consumers.

Sincerely,

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

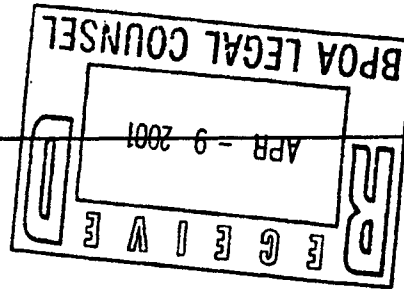
IRRC #2178

Agency: Workers, Marriage & Family Therapist & Professional Counselors Title: Licensure

(Form A)		
NAME	ADDRESS	DATE of CORRESPONDENCE
Michele Gutliwartz	C/O Penn Council for Relationships 4025 Chestnut Street, 1 st Floor Philadelphia, PA 19104	April 17, 2001
Lucy Huff	"Same"	April 17, 2001
W.F. Luffy	"Same"	April 17, 2001
Joellyn L. Ross	"Same"	April 17, 2001
Kenneth W. Corden	"Same"	April 17, 2001
Margaret S. Roth	"Same"	April 17, 2001
Michele M. Marsh	"Same"	April 17, 2001
Thomas H. Hallam	"Same"	April 17, 2001
Nancy DePaul	"Same"	April 17, 2001
C.F. Dill	"Same"	April 17, 2001
Muhail D Antonio	"Same"	April 17, 2001
Martin Zolahoy	"Same"	April 17, 2001
Quicen Floles	"Same"	April 17, 2001
Gwen Ruren	"Same"	April 17, 2001
Rabbi Julie Greenlong	"Same"	April 17, 2001
Charlotte J. Parker	"Same"	April 17, 2001
Paula R. Gable	"Same"	April 17, 2001
Dorothy Carnagie	"Same"	April 17, 2001
Noel S. Diorio	"Same"	April 17, 2001
Douglas Q. Schott	"Same"	April 17, 2001
Yong J. Jin	"Same"	April 17, 2001
Susann Fox	"Same"	April 17, 2001
Fleade S. Hainez	"Same"	April 17, 2001
Sondra SL	"Same"	April 17, 2001
Stephen R. Treat	"Same"	April 17, 2001
Margaret Shapiro	"Same"	April 17, 2001
Lucy S. Rajjian	"Same"	April 17, 2001
William A. Middleton	"Same"	April 17, 2001
Nancy Iberman	"Same"	April 17, 2001
Lee Ann Etscontz	"Same"	April 17, 2001

Asha George-Guiser	"Same"	April 17, 2001
Michele Gutliwartz	"Same"	April 17, 2001
Gruel Wiska	"Same"	April 17, 2001
Nancy DePaul	"Same"	April 17, 2001
Sherry Tucker	"Same"	April 17, 2001
Lois S. Halsel	"Same"	April 18, 2001

BASE SERVICE UNIT FOR MENTAL HEALTH



Eva Cheney, Counsel
State Board of Social Workers, Marriage and Family Therapists and Professional Counselors
116 Pine Street P.O. Box 2549
Harrisburg, Pennsylvania 17105-2649

April 4, 2001

**Re: Public Comment/Regulatory package as published in the Pennsylvania Bulletin
3/24/2001**

Dear Ms. Cheney,

I received a copy of the excerpt of the afore-mentioned Pennsylvania Bulletin which pertains to the proposed regulations for licensure of Professional Counselors. I offer the following comments.

I support, entirely, the Board's intent to use Nationally recognized examinations (e.g., the National Counselor Certification) as the examinations required for licensure, instead of instituting a new, proprietary, State-administered examination. This measure reduces expense for professionals, the State, and taxpayers.

My only recommendation for change involves the definition of those who would be, under the new regulation, "exempt from examination". Of course, since 49.15 (6) continues to require that licensure applicants have already taken and passed one of the many approved examinations, there is, actually, no "exemption" from examination. Why not change the language to eliminate the need to have taken any of these examinations, if the applicant meets all of the other requirements in section 49.15? If not, eliminate the passage: there is no exemption from examination provided for in this regulation.

Further, if there is to be a true exemption from examination within these regulations, the "proof of practice" requirement is problematic. Specifically, I feel that the requirement of "proof of practice" in 49.15 (4) does not acknowledge the fact that many excellent counselors go on to hold supervisory positions. Seven years is certainly a great deal of time in one's career, during which to expect that an outstanding counselor would not be offered a promotion. According to this proposed regulation, those who accepted such a promotion would have lost their opportunity to be "exempt from examination".

RECEIVED
2001 APR 11 AM 9:38
REVIEW COMMENT

In my own case, I can count only two out of the seven past years in which I had full-time direct contact with clients and families....in fact, this time dwindles the longer the regulations take to be made official! Since 1996, I have had the opportunity to serve as the clinical supervisor for other clinical supervisors, thereby making my client-direct contact minimal and well outside of the requirements for proof of practice, per 49.15(4). I feel that this proof of practice requirement leaves out an entire class of clinician within the counseling professions.

I would recommend that 49.15(4) be amended as follows (new language is underlined):

(4) Demonstrated proof of practice of professional counseling in one of the following ways:

- (i) *The applicant can demonstrate proof of practice of professional counseling for at least 5 of the 7 years immediately prior to the date of application for license. To satisfy the practice of professional counseling requirement, the applicant's practice shall have consisted of at least 15 hours per week with 10 of those hours consisting of direct client contact, or*
- (ii) *The applicant meets the definition of a "supervisor", as set forth in section 49.1.*

Please pass my comments on to the Board. I appreciate their work on this very important and exciting initiative, and also appreciate the opportunity for comment.

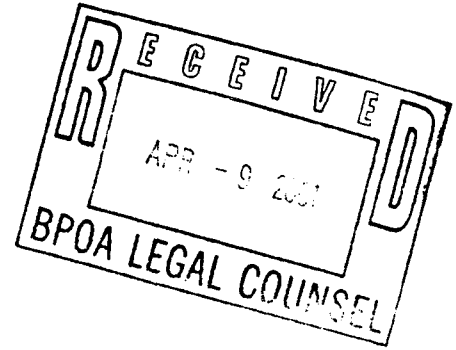
Sincerely



Shari Gross, M.A.
Director of Administrative Case Management

Original: 2178

State Board of Social Workers, Marriage and Family Therapist,
and Professional Counselors
c/o Eva Cheney, Counsel
116 Pine Street
P.O. Box 2649
Harrisburg, Pa. 17105
Re: # 16 A-694
April 3, 2001



Dear Sirs:

Please except this letter as a letter of concern regarding the recent publications related to Act 136, The Professional Counselor Licensing Bill. As an African American PA PCB certified Master's Prepared Addictions Counselor (CAC); I am especially disturbed by not being added to the list of specialty counseling groups who will be grandparented and eligible for licensure. I feel that the recognition of the Pa. Certification Board should be adequate, and I support their position.

Furthermore, not to acknowledge the Master's Degree in Human Services as offered by Lincoln University, the Nation's oldest African American University is discriminatory. The majority of individuals holding this Master's degree are minorities who work with minority populations in urban settings. This exclusion will directly impact services provided to minorities by minorities.

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

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

I strongly encourage your consideration in this matter as a means of assuring that diverse communities of the Commonwealth receive counseling services that are ethnic, racial and culturally adequate.

Sincerely,
Sheila D. Church, M.S. Ed. (CAC)
326 Rural Avenue
Chester, Pa. 19013
(610) 876-1600

2001 APR 16 11 09 56
BPOA LEGAL COUNSEL

ORIGINAL: 2178

State Board of Social Workers, Marriage,
and Family Therapists, & Professional Counselors
116 Pine Street, PO Box 2649
Harrisburg, PA 17105
April 3, 2001

RECEIVED

2001 APR -9 11:45

REVIEW COMMISSION



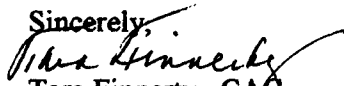
Dear Eva Cheney, Counsel
State Board of Social Workers, Marriage & Family Therapists & Professional Counselors

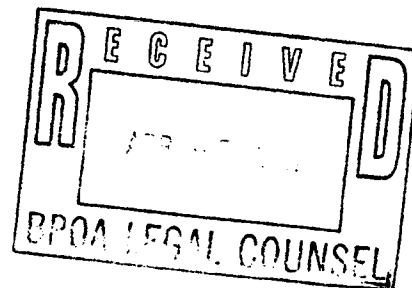
I am writing to you to strongly advocate for the inclusion within the regulations of Act 136, The Professional Counselor Licensing Bill #16A-694, of the following:

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

As a Certified Addictions Counselor scheduled to obtain a Master's degree in the near future, I am disheartened to find that Act 136 fails to recognize Master's level addiction specialists. I have been working in the drug and alcohol field for fifteen years with a population of chronic drug addicts and alcoholics, dually diagnosed, and homeless individuals. Understanding the symptoms, physical, psychological, spiritual and economical properties of drug and alcohol addiction is, in my opinion, a specialized therapeutic modality requiring concentrated education and training and deserves to be credited as such by Act 136. Please revise Act 136 according to the needs of the diverse clients being served as well as to the integrity of the professionals serving them. Thank you for your attention to this very important issue.

Sincerely,


Tara Finnerty, CAC
213 West Grove Street
Clarks Summit PA 18411
(570) 585-8587



408 Bellevue Avenue
Trenton, NJ 08618
(609) 396-5874

Fax (609) 396-3451
mcada@sprynet.com
www.pacpub.com/mcada
TTY (609) 396-2170

EXECUTIVE DIRECTOR
Scott B. Sechrist, MSM, CAC, CPS

April 3, 2001

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

Dear Eva Cheney:

I am writing to you as a Certified Addictions Counselor as well as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

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

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

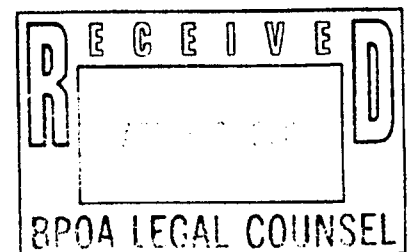
I sincerely urge your consideration in this matter as a means of assuring that the citizens of our Commonwealth are provided counseling services that serve our diverse communities.

Sincerely,



Scott B. Sechrist
44 Roundwood Lane
Levittown, PA 19055
(215) 943-3883

cc: PCB Board



Mr & Mrs Scott Gilfor
404 Santa Anita Drive
North Wales, PA 19454

RECEIVED
2001 APR 18 PM 12:00
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND
FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS
CL

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

April 3, 2001

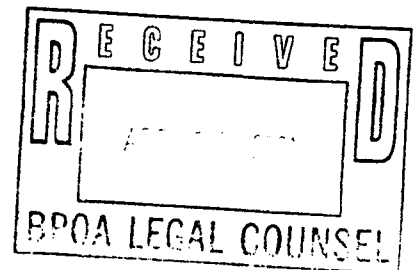
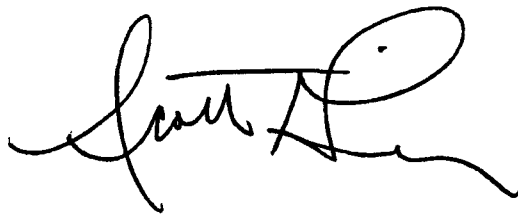
Dear State Licensure Board Members,

Ref: Act 136, The Professional Counselor Licensing Bill
(ref. # 16A-694).

The PCACB Board wishes to work with you to insure quality and enhance opportunities for those Certified Addictions Counselors who pass the ICRC National Exam . They should be considered as candidates for LPCs under the grandfathering, non-statutory, section of ACT 136. The highest standards and continuing education specifications are required along with a strict code of ethics for CACs. I am asking you to address the following issues and make sure that they are included as acceptable criteria grandparenting:

- *Acceptance of Certified Addictions Counselors with appropriate Masters Degrees in the list of various professions to be recognized under the grandfathering provision.*
- *Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite.*

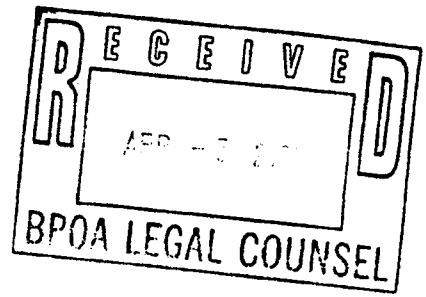
Sincerely,



ORIGINAL: 2178

RECEIVED
2001 APR -9 12:11:48
REVIEW COMMISSION

Julio Ann Cook, M.A.P.C.
Pastoral Counselor
621 East 4th Street
Bethlehem, PA 18018
(610) 865-6121, ex. 2
Clinical Supervisor AAMFT



April 3, 2001

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

RE: reference number 16A-964

Dear Ms. Cheney:

It has been brought to our attention that the proposed regulations for Licensure of Professional Counselors published by your Board in the March 24, 2001 issue of the Pennsylvania Bulletin may create a serious professional problem for the current students and graduates of our Master of Arts in Pastoral Counseling (MAPC) degree program at Moravian College and Theological Seminary in Bethlehem, PA.

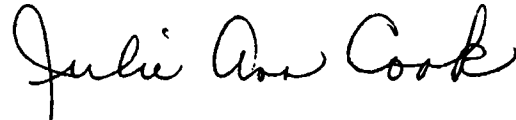
Since 1980, our school has been offering this degree, which is accredited by the Association of Theological Schools in the United States and Canada and by the Commission on Higher Education of the Middle States Association of Colleges and Schools. Our degree is thus recognized by the Council for Higher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

Since our MAPC degree is going to meet these two major criteria for recognition of a professional counseling degree program as stated in the Board's regulations, we respectfully request that the definition of "field closely related to the practice of professional counseling" given in section 49.1 of the proposed regulations be amended to include the phrase "but not limited to" following the word "includes" in the definition. It is our understanding that this phrase was in an earlier version of the regulations but was omitted in this current proposal. This amendment would allow our students and graduates, as well as many others who have graduated from a variety of duly accredited counseling related

degree programs to function within the standards and guidelines intended by your board.

We share the Board's concern for consumer protection and a guaranteed standard for professional counselors, and we sincerely desire that our graduates will be able to receive the recognition they deserve as professional counselors. If you have further questions, do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Julie Ann Cook". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Julie Ann Cook, M.A.P.C.

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

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

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

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

Rep. Julie Harhart, House Professional Licensure Committee

Rep. Richard Grucela, District 137

Rep. T. J. Rooney, District 133

ORIGINAL: 2178
April 3, 2001

RECEIVED
2001 APR 11 AM 9:37

State Board Social Workers, Marriage/Family Therapists, Professional Counselors
116 Pine ST.
Harrisburg, PA 17105

REVIEW COMMISSION



Dear Sir and Madam,

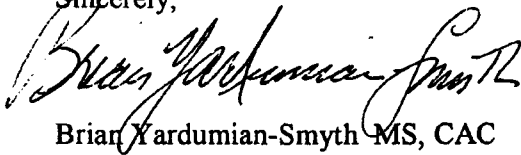
I am writing regarding my interest in the ACT 136, Professional Counselor Licensing Bill. I am a professional counselor in private practice and have served in the capacity of Drug and Alcohol Therapist for ten years. In one of those stints at Eagleville, I witnessed the implementation of many and varied 'therapies' including dance and music so I am not unfamiliar with their practice because we operated in the team approach to treatment and each team had a dance and music therapist. Also have I worked at length with Social Workers in that same environment and in doing therapy in the foster care system. Social Workers and Marriage and Family Therapists are not trained in treating Drug and Alcohol diseases; Professional Counselors may be, but only if they specifically took a degreed curriculum for that purpose.

How in the name of sanity can you legislate for the licensure of therapists and not include D@A counselors? Unless, of course, you recognize that they possess, and the other counseling disciplines **do not possess** the ability to treat Drug and Alcohol disease and therefore would take away that immensely sizeable piece of business from Social Workers et al. Never mind they are incapable of meaningfully treating the diseases; this is not ethics we're legislating here!

The use of Alcohol alone results in economic costs of \$112 billion annually, is the leading cause of death and injury among those 15-24 years. One-fourth of emergency room admittances involves alcohol, and if you add in cocaine and heroin bring your calculator. And by the way Social Worker-types, why is that doctor prescribing a Serotonin-enhancing medication when that guy on cocaine is suffering from dopamine depletion?

Not for one second do I think any of this will influence those who lobbied this bill to its present position. My hope is that legislators will, for once, actually **study** the merits of this bill, understand its misguided implications, and correct this colossally nonsensical omission. Thank you for your consideration.

Sincerely,



Brian Y. Ardumian-Smyth MS, CAC

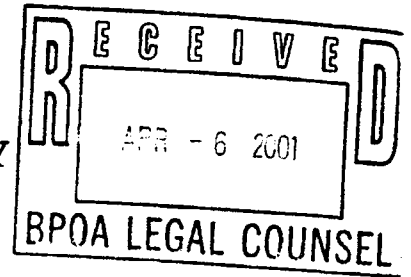
RECEIVED
APR 11 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178



MORAVIAN THEOLOGICAL SEMINARY

April 3, 2001



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

RE: reference number 16A-964

Dear Ms. Cheney:

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

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

Since our MAPC degree will meet these two major criteria for recognition of a professional counseling degree program as stated in the Board's regulations, we respectfully request that the definition of "Field closely related to the practice of professional counseling," given in section 49.1 of the proposed regulations, be amended to include the phrase "but not limited to." As amended, this definition would then read as follows: "Includes, but not limited to, the fields of social work, clinical psychology, educational psychology, counseling psychology and child development and family studies."

RECEIVED
APR 11 10 51 AM '01
BPOA LEGAL COUNSEL

Our understanding is that this phrase we seek to add was included in an earlier version of the regulations, but was omitted in this current proposal. I am sure that you will understand the importance of this amendment to Moravian Theological Seminary. It would allow our students and graduates, as well as many others who have graduated from duly accredited counseling related degree programs, to function within the standards and guidelines intended by your board. At the same time, it would promote the State Board's proper concern for consumer protection and a guaranteed standard for professional counselors.

Thank you in advance for your consideration and help. If you have any further questions, please feel free to call me at (610) 861-1364 or contact me by e-mail at meejr01@moravian.edu.

Sincerely,



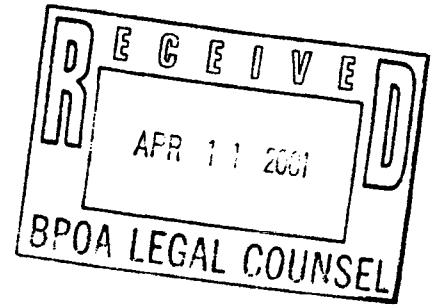
Ervin J. Rokke
President

cc: Independent Regulatory Review Commission
Sen. Clarence Bell
Sen. Charles Dent
Sen. Lisa Boscola
Rep. Julie Harhart
Rep. Richard Grucela
Rep. T.J. Rooney

ORIGINAL: 2178

Tuesday, April 03, 2001

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



Dear Ms. Cheney:

I am writing to you as a Master's level Drug and Alcohol Counselor with the following Certifications: Master Addiction Counselor, from NADDAC, and a Certified Addiction Counselor, from the PCACB, and Alcohol and Drug Counselor, from the IC&RC, as well as a concerned resident of the Commonwealth of Pennsylvania. Act 136; The Professional Counselor Licensing Bill raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialist who represents, by far, the largest specialty treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC), and other National Organizations like the National Association of Alcoholism and Drug Abuse Counselors (NAADAC).

The Federal government has recognized both of these agencies certifications, as a level of competency needed to administer substance abuse treatment to meet the requirements of the Department of Transportation. This in itself indicates the quality of treatment provided by these individuals who hold these certifications. They have mastered the educational and supervised clinical experiences to be Certified Addiction Treatment Counselors. Yet, Act 136 does not recognize their accomplishments, certifications, or degrees.

The current regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American University. It should also be noted that currently the Counseling Education Master's with a Chemical Dependency emphasis from The Pennsylvania State University is also not being recognized. Yet, Penn State is one of the States premier educational institutions. How can this be? The exclusions of degrees from these institutions of higher learning need to be redressed under the grandparenting regulations.

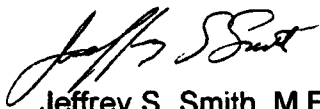
Also, under the grandparenting section you are required to sit for the NBCC exam. In order to sit for the exam you **must** apply for membership in the NBCC. I do not want to be a member of the NBCC. Why should I have to join an organization just to take an exam, so that I can be granted a LPC? I have already taken **two** national exams that are recognized by the Federal government, State certification and licensing agencies, and International Reciprocity Consortiums.

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

- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as a Master Addiction Counselor from NAADAC (MAC).
- Inclusion under grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- Inclusion under grandparenting regulations of the NAADAC national exam for Master Addiction Counselors as an acceptable exam.
- Inclusion under grandparenting regulations of individuals in possession of the Master's Degree in Human Services provided by Lincoln University.
- Inclusion under grandparenting regulations of individuals in possession of the Master's Degree in Counseling Education with an emphasis in Chemical Dependency from The Pennsylvania State University.

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

Sincerely:



Jeffrey S. Smith, M.Ed., MAC, CAC
109 Seymore Avenue
State College, PA 16803-1630

Cc: PCB Board
Representative Benninghoff
Representative Hanna
Representative Herman
Representative George
Senator Corman

PROCESSED
RECEIVED
STATE COLLEGE, PA
16803-1630

ORIGINAL: 2178
April 02, 2001

Dear: State Board of Social Workers, Marriage & Family Therapists & Professional Counselors/// Ref. #16A-694, State Rep. Mario Civera, and State Senator Clarence D. Bell

I am writing to you as a **Mental Health Treatment Coordinator and Behavioral Specialist Consultant** as well as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers and mental health consumers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level specialists who represent, by far, the largest specialty treatment population in the Commonwealth.

The regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest predominantly African American University. The reason Lincoln University originally was created (in 1854) were to formally educate those groups in society then, who were ostracized [Caucasians with limited financial resources] and judicially prevented/denied [African Americans/others] from attaining comprehensive systematic instructional academic training. So today, omitting or not including Lincoln University's MHS Degree as acceptable for educational requirements in receiving licensure for "Clinical Counseling" is an egregious abomination for the members of Pennsylvania's Licensure Board. It causes one to question their educational competence, professionalism, and integrity in forming Act 136's regulations. The MHS Degree conferred by Lincoln University not only has parity and is equal to: La Salle Univ.'s **Clinical Counseling Master's Degree**; St. Joseph Univ.'s **B.S./M.S. Degree**; Bloomsburg Univ.'s **M. ED. Degree**; Villanova Univ.'s **MHS Degree**; and Penn State Univ.'s **Doctoral Program in Counseling Psy.** but, requires one additionally to orally summarize and accept all challenges to the research conducted in completion of all seven chapters of the thesis in the same manner as Doctoral Dissertations.

The vast majority of individuals holding this Master's degree are working with minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will directly impact the provision of services to minorities.

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

Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).

Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.

Inclusion under the grandparenting regulations of individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

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

Sincerely,

Tony Beamon
924 Garrett Rd. Apt. 104
Upper Darby, Pa. 19082
(610)734-0859

cc: PCB Board cc: Pa. Black Caucus
cc: Governor's Office cc: LUGAC cc: File

RECEIVED
2001 APR 11 AM 9:13
STATE BOARD OF PROFESSIONAL REVIEW COMMISSION

ORIGINAL: 2178

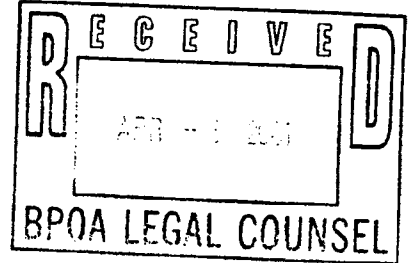
NELSON

Behavioral Center

102 Center Street Ridgway, Pa 15853

Phone: (814) 772-5546

Fax: (814) 772-0511



2001 APR 11 11:09:06
REVIEW SUBMITTED

April 3, 2001

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

To The State Board:

I am writing to you as a Master's Degree Certified Addiction Counselor Diplomat for Nelson Behavioral Center. I am the clinical supervisor.

The recent publication of the regulation related to Act 136, The Professional Counselor Licensing Bill, raises concern for the health and welfare of substance abusers seeking counseling services. I noticed the fundamental problem with the regulation involves the grandparenting issues and is non-statutory in nature.

NELSON

I take strong exception to the state board not accepting addiction specialist who represent the largest specialty treatment population in Pennsylvania. We are just as important as music therapists, dance therapists, or art therapists in dealing with specialty treatment population.

I would like to see you propose in the Act 136:

“Holding a Certified Addiction Counselors credential from the PA Certification Board (PCB), holding a Masters degree, and passing the Addiction Counselor Examination given by the International Certification and Reciprocity Consortium (IC & RC).

I would like to propose that you also take a look at clauses 4 & 5 of the grandparenting section and change the Master’s program credits for the NBCC exam to take the addiction counselors exam and just hold a masters degree with whatever the person graduated in credits. I would also like to propose:

“Include language that would specifically reference “Human Services” in grandparenting regulations”.

I strongly and sincerely urge you to consider the above remedies in this matter as a means of assuring that the citizens of our Commonwealth are provided counseling services that serve all our diverse communities.

Sincerely,



Mary S. Nelson, PhD, NCAC I, AMHCA, APA, CAC DIPLOMATE
National Certified Addiction Counselor
American Mental Health Counselors Association
American Psychotherapy Association
Certified Addiction Counselor

Nelson Behavioral Center
102 Center Street
Ridgway, PA 15853
(814) 772-5546

cc: PCB Board

ORIGINAL: 2178

RECEIVED
2001 APR -5 AM 9:33
REVIEW COMMISSION

John Rose
29 Orchard Lane
Fredericksburg, PA 17026
(717) 865-6105, FAX-4406
4/2/01

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

Dear Ms. Chaney,

This letter is in reference to 16A-964, the recently published regulations for licensure of Social Workers, Marriage and Family Therapists and Professional Counselors. More than fifteen years ago I decided I wished to work in a way that would be more beneficial to others than in my then current work as a building contractor and so I decided to become a counselor. Since there was no clear career path to such a goal at that time I went in the direction that was of greatest interest to me, Family Therapy. I already had a Masters degree from my earlier history in the clergy, so I enrolled in what was the most famous Family Therapy program at the time, the Philadelphia Child Guidance Clinic, where Salvadore Minuchin and associates had pioneered working with the family as a whole rather than acting as if problems somehow resided only inside the children.

My training extended over a long period of time because it was combined with continuing my business as a home builder, making the pursuit of this dream possible. At the same time the training program was itself in the process of revision and development in response to direction from the American Association of Marriage and Family Therapists. My involvement in this process culminated in my earning Clinical Membership in the year 2000.

During that time I experienced the usual process of anxiety and uncertainty as I met with my early clients and feared that I was inadequate to the task before me, proceeding through the intense learning this inspired and gradually, over the years, to greater and greater confidence in my ability to effect beneficial change in families and individuals. My skills and perception have now developed to the point that, most recently, working with the most difficult population of clients that are currently identified by service professionals, I have had a consistent record of success.

All of this will end with the enforcement of the regulations as they are now stated. I will be prohibited from practice at the very time I have achieved mastery of my craft. And this will happen even though, as I understand, it was the intention of the legislation that legitimate practitioners be eligible to continue under the grandfathering clauses..

Two items in those clauses exclude me. The first is the requirement of an advanced degree in a very small number of fields to be eligible for grandfathering. In my own case, I already had ten years of college, six years post-graduate, when I decided to not seek another degree but to enter a more focused program. I'm sure many others who didn't choose the precise degree program that would subsequently be required for grandfathering had equally legitimate reasons for their choices. To require us to start over (not an option for me, financially) or to exclude us from practice is surely not what was intended in the passage of this legislation.

The other clause that would exclude me is the requirement of a defined level of practice in five of the seven years before March, 2002 (two years after the effective date of the regulations.) Some years past, not being a position to predict what requirements the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors would be defining in this year 2001, I chose to engage in one of my periods of financial restoration during one of the years required by this clause. Because of that lack of prescience on my part, the proposed regulations would exclude me from being grandfathered into licensure and therefore exclude me from practice.


And that was not an empty period for me in my development as a therapist. When I returned to practice I was amazed by my own advance in perspective and judgment in comparison with my peers who were just then coming out of their training. I mention this to remind the board that the profession being regulated is one less dominated by narrow technical knowledge than any other profession that might be subject to regulatory oversight. Every experienced practitioner and well-respected text in the field will attest to the preeminent value of maturity and broad experience, even outside the field, in the effective practice of psychotherapy. This regulation seems to exclude this consideration.

Interestingly, I understand that the regulations do not require this specified level of practice for Social Workers. Does the board suggest that Social Workers who took years off for financial reasons as I did, or to raise a family or happened to be in administration recently or were maintaining a low intensity private practice are so different from Family Therapists and Counselors that different rules should be applied? There must have been a rationale for the decision to not require this specified level of practice of Social Workers so could it not be applied to the other

modalities equitably?

Thank you for your consideration to my comments on the proposed regulations. I advocated vigorously for the passage of this legislation that now threatens my career as a Family Therapist. I still believe it is beneficial for regulation and licensure to become operative but, without changes in the clauses I have alluded to, experienced and mature practitioners will be excluded from practice in the profession that, more than any other, profits from those very qualities.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Rose". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Rose MA

Cc. **Independent Regulatory Review Commission**
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator David J. Brightbill
Hon. Peter J. Zug

ORIGINAL: 2178

Susan H. Packard, Ph.D.
2100 North Line Street, Apt. Q1012001 APR -6 AM 9:19
Lansdale, PA 19446-1007
(215) 855-3537

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

April 2, 2001

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

Re: Proposed Licensure Regulations for Professional Counselors et al., Act 136

Dear Ms. Cheney:

Greetings! After the long-awaited passage of counselor licensure legislation on December 21, 1998, like many other counselors in Pennsylvania, I was eager to read the proposed regulations. As I'm sure you are aware, the Pennsylvania Alliance of Counseling Professionals (PACP) has identified six major issues in the section of the proposed legislations related to professional counselors. One of the major issues falls under the "grandparenting" heading (specifically, the requirement that, for at least 5 of the 7 years immediately prior to the date of application for license, *an applicant shall have worked at least 15 hours per week with 10 of those hours consisting of direct client contact*). As PACP articulated in its analysis of the proposed licensure regulations for professional counselors, this requirement has the potential to exclude a large number of counselors (i.e., addictions counselors, mental health counselors, school counselors, counselors in supervisory positions and college counselors) as well as counselor educators otherwise qualified for licensure under the grandparenting clause. In my estimation, this requirement is *very* discriminatory and translates into a regulation of exclusion.

To reiterate PACP's analysis, if an applicant is otherwise qualified for grandparenting, the applicant would be denied a license if he/she is:

- an experienced counselor who is now an educator (i.e., excluding counselor educators is inexplicable - especially in view of the fact that many counselor educators provide supervision for counseling student interns; it makes absolutely no sense to deny a counselor educator who teaches counseling courses and supervises counseling students' field experiences a professional counselor license);
- an experienced counselor who has been promoted to a supervisory or administrative position (i.e., penalizing a counselor who has been promoted and continues to work in the counseling field);

- someone, such as a school counselor/college counselor, who works 9 months per year (i.e., during the 9 months that this counselor works, he/she likely far exceeds 10 hours per week of direct client contact; how about considering an *average* of 10 hours of direct client contact weekly over the required 5-7 year period?);
- an experienced retired counselor who maintains a part-time practice;
- an experienced counselor who has voluntarily cut back on practice;
- an experienced counselor who has been reassigned to less direct client contact because of being unable to get a license; or
- an experienced counselor with far more than 5-7 years of full-time counseling experience, when the experience does **not** fall within the *5 of the 7 years immediately prior to the date of application for license*. The implication is that an otherwise qualified counselor who has 5 or more years of counseling experience any time prior to 1994 doesn't get any credit for that experience - talk about discriminatory! Let's not forget about the counselor who may have been "let go" (or, as previously noted, "reassigned to less direct client contact because of being unable to get a license") in the past 5 years because, as a result of the changes imposed by managed care and the lengthy amount of time it is taking to enact counselor licensure legislation, he/she was not "licensable" and, therefore, not eligible for third-party reimbursement. A counselor, with counseling-specific training and experience, may have been "replaced" by a less qualified, but "licensable" professional (which, I find unconscionable and a disservice to those seeking counseling services). I propose recognizing an applicant's counseling experience (i.e., direct client contact) regardless of whether that experience falls within the 5-7 years immediately prior to the date of application for license.

As PACP pointed out, it is noteworthy that there is no direct client contact requirement for persons seeking to be grandparented as Licensed Clinical Social Workers. If social workers are not required to have direct client contact to obtain a license, why should counselors who seek a professional license have this additional requirement - or, better yet, why shouldn't social workers also be required to have this "direct client contact" experience? Taking into account the many qualified counselors who deserve to be "grandparented" for licensure, thank you for considering the ideas I have presented.

Sincerely,

Susan H. Packard, Ph.D.

cc: Pennsylvania Certification Board; IRRC

ORIGINAL: 2178

Monday, April 02, 2001

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

RECEIVED

2001 APR 18 AM 9:49

INTERNATIONAL COUNSELORS
REVIEW COMMISSION



Dear Counsel Cheney,

I am a Drug and Alcohol Treatment Specialist working for the Pennsylvania Department of Corrections. I have worked for the department for thirty years.

The following concerns are in regard to comment period of the regulations proposed by the licensing board for professional counselors:

1. Under "Field closely related to professional counseling from an accredited educational institution," programs in Counselor Education are omitted. These programs represent a large proportion of Masters level graduates in the counseling profession, and this title should be added to that list.

2. When a co-worker of mine applied to take the test for National Certified Counselor the National Board of Certified Counselors did not recognize his Master of Education Degree in Counselor Education from The Pennsylvania State University as adequate to take the National Counselors Exam.

Has the board had any contact with the National Board of Certified Counselors concerning their requirements to take their exam?

The licensing law does not require me to join any other organization to qualify. Why do professional counselors have to pay to join the organization promoted by the National Board of Certified Counselors?

3. As a specialist in addictions counseling I support the Pennsylvania State examination for Certified Addictions Counselor (CAC) as a qualifying exam for licensing.

The CAC examination is a nationally recognized counselor qualification by the Federal Department of Transportation, the U.S. Armed Forces, and international treatment organizations. In Pennsylvania that *state examination includes an oral board and a written test, making the CAC requirement more stringent than the National Counselor Exam*. I have included a copy of the exam content to illustrate the relevance of the exam to the counseling profession in general, based upon the content areas of the questions.

5. In regard to a 600 hour internship, I inquired about possible internships at The Pennsylvania State University, where I graduated with my Masters degree in May of 1999. I was told that no mechanism exists to accomplish this because I am no longer a degree student and do not have an advisor to supervise such a program. I was advised that Penn State could not

possibly schedule internships for every counselor who would request this just to qualify for licensing.

I was also advised that University policy would not allow me to intern at the same place where I currently hold a full time job as a counselor. Therefor I would be required to quit my job or take an unpaid leave of absence to do an internship elsewhere.

6. In regard to supervision: The proposed regulations call for the first 1800 hours of supervision to be under a Licensed Professional Counselor. There are no licensed professional counselors in Pennsylvania. I currently work under the supervision of a licensed psychologist and already have over 3600 hours of supervised counseling experience post maxters. The regulations appear to prohibit him from attesting to my supervised hours.

If the current proposal stands I would have to quit my job with the State of Pennsylvania, do a student internship somewhere, but not in my hometown (because Penn State would not accept me) and apply for another job where I will have to work at least two years full time to obtain a license.

I cannot believe that the apparent consequences of the licensing regulations as published are what the legislature intended or that they are necessary to ensure the qualifications of licensees.

Thank you for considering my concerns and presenting them to the Board.

Sincerely;



Douglas Brooks, M.Ed.
Drug and Alcohol Treatment Specialist II

SCI Rockview
Box A
Bellefonte, PA 16823
W/ 814 355 4874
H/ 814 234 2946

cc: Representative Herman
Representative Hanna
Representative George
Senator Corman

CANDIDATE GUIDE

International Certification Examination for Alcohol and Other Drug Abuse Counselors

Based on the 1996 Role Delineation Study



Prepared by:
Columbia Assessment Services, Inc.

In Cooperation with:
ICRC/AODA, Inc.
120 First Flight Lane
Morrisville, NC 27560

Revised June 1999

©1997 International Certification and Reciprocity Consortium/Alcohol and Other Drug Abuse, Inc. (ICRC). All rights reserved. No part of this document may be reproduced in any form without written authorization from ICRC.

Examination Content

The 1996 ICRC/AODA Role Delineation Study identified five performance domains for the alcohol and drug counselor. Within each performance domain are several identified tasks which provide the basis for questions in the examination. Following is a brief outline of those domains and the tasks which fall under each domain.

Domain: Assessment

Number of Questions: 31

- Interviewing Techniques
- Recognizing Individual Differences
- Recognizing and Observing Signs & Symptoms of Intoxication/Withdrawal
- Recognizing Co-Existing Disorders
- Evaluating Data from Significant Others
- Determining Eligibility for Treatment
- Recognizing the Need for Referral
- Providing an Accurate Assessment
- Assessing Degree of Risk
- Explaining Purpose of Assessments
- Making Accurate Evaluations
- Developing Written Summaries
- Explaining Results of Assessments
- Formulating Mutually-Agreed-Upon Goals
- Modifying Treatment Plan as Needed

Domain: Counseling

Number of Questions: 56

- Establishing Therapeutic Relationships
- Individualizing the Counseling Process
- Providing Ongoing Communication About the Counseling Process
- Using Appropriate Counseling Modalities
- Developing Recovery Plans to Avoid Relapse
- Assessing Crisis Situations
- Matching Interventions with Client Needs
- Evaluating Treatment Effectiveness
- Applying Pharmacological Knowledge

Domain: Case Management

Number of Questions: 22

- Maintaining Community Resources
- Matching Resources to Client Needs
- Explaining the Rationale for Referral and Consultation

Domain: Maintaining Client Records

- Consulting with Other Service Providers
- Collaborating with Treatment Teams
- Involving Client in Coordinating Services
- Obtaining Client Consent for Referral
- Advocating for Client Interests
- Providing Information to Other Agencies
- Evaluating Effectiveness of Case Management Activities

Domain: Client, Family, & Community Education

Number of Questions: 17

- Educating Others About Substance Abuse
- Delivering Culturally-Relevant Educational Programs
- Explaining How Substance Abuse Affects Families and Other Relationships
- Using Other Professionals to Educate Clients About Effects/Risks of Substance Abuse
- Explaining Relationship Between Lifestyle Choices and Substance Abuse
- Networking with Other Professionals to Examine Their Roles in Substance Abuse
- Relaying Information on Improving Basic Life Skills
- Providing Information on Self-Help Groups
- Explaining Pharmacological Information

Domain: Professional Responsibility

Number of Questions: 24

- Adhering to Ethical Guidelines
- Adhering to Federal/State Regulations
- Recognizing Client Diversity
- Conducting Self Evaluations
- Engaging in Continuing Education
- Participating in Supervision/Consultation
- Practicing Personal Wellness
- Advocating for Outside Resources
- Recognizing/Preventing Personal Biases

About ICRC/AODA, Inc.

The International Certification and Reciprocity Consortium/Alcohol and Other Drug Abuse, Inc. (ICRC/AODA) is a not-for-profit, voluntary membership organization whose members are alcohol and drug abuse certification boards. Incorporated in 1981, ICRC currently consists of over 35,000 alcohol and drug abuse counselors certified by the 62 ICRC member certification boards. ICRC's mission is to establish, monitor, and advance reciprocal competency standards for AODA professionals and to support the member boards, which serve the public. Boards are located in 39 states, the District of Columbia, and include the U.S. Air Force, U.S. Army, U.S. Navy & Marines, Indian Health Services, and credentialing boards abroad.

The purposes of ICRC are:

- to promote uniform professional standards and quality for the alcoholism and drug abuse counseling profession and to give the profession greater visibility throughout the United States, as well as internationally.
- to negotiate reciprocity agreements for alcoholism and drug abuse counselors with certification boards throughout the United States, as well as internationally.
- to provide support services, including consultation and training to all states in the area of certification, *i.e.*, establishment of standards, evaluation of competence, and establishment and training of boards and committees.
- to provide information on certification and certification activities in the United States and internationally.
- to provide international certification for counselors meeting specified qualifications certified by individual member boards. ICADC applications are available from the ICRC office or any ICRC member certification board.

Purpose of the Candidate Guide

The International Examination for Alcohol and Drug Counselors is the first examination to test knowledge and skills about alcohol and drug counseling on an international level. It has been developed by ICRC/AODA through the cooperation of the 62 member boards and their strong desire to have an international exam that is based on current practice in the field.

The purpose of this Candidate Guide is to provide you with guidance for the ICRC/AODA written examination process. By providing you with background information on examination development and sample questions, your preparation for the International Examination for Alcohol and Drug Counselors can be enhanced.

Examination Development

The ICRC/AODA has contracted with Columbia Assessment Services, Inc. (CAS) to develop, score, and administer the International Certification Examination for Alcohol and Drug Counselors. CAS is a full-service testing company providing licensure, certification, and specialty examinations, including practical and written simulation tests, for associations, state boards, government agencies, and corporations.

The development of a valid examination for the ICRC/AODA certification process begins with a clear and concise definition of the knowledge, skills, and abilities needed for competent job performance. Using interviews, surveys, observation, and group discussions, CAS works with experts in the field of alcohol and drug abuse to delineate critical job components. The knowledge and skill bases for the questions in the examination are derived from the actual practice of the counselor in the alcohol and drug field as outlined in the 1996 ICRC/AODA Role Delineation Study.

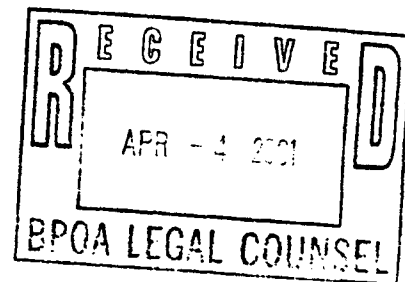


Belmont Center for Comprehensive Treatment

EINSTEIN

Jefferson Health System

April 2, 2001



Members

- Albert Einstein Healthcare Network
 - Albert Einstein Medical Center
 - Belmont Behavioral Health
 - Germantown Community Health Services
 - MossRehab
 - Willowcrest
 - Willow Terrace
- Frankford Hospitals
 - Bucks County
 - Frankford
 - Torresdale
- Main Line Health
 - Bryn Mawr Hospital
 - Bryn Mawr Rehab
 - Lankenau Hospital
 - Mid County Senior Services
 - Paoli Memorial Hospital
 - Wayne Center
- Magee Rehabilitation
- Thomas Jefferson University Hospital
 - Methodist Hospital
 - Methodist Hospital Nursing Center

Jefferson HealthCARE physicians

Jefferson HomeCARE

Jefferson SeniorCARE

Alliance Partners

- AtlantiCare
- Christiana Care Health System
- Pottstown Memorial Medical Center
- Riddle Memorial Hospital
- Underwood-Memorial Hospital

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

Dear Sir or Madam:

I am writing to you as a Master's level, board certified, registered Art Therapist *and* Certified Addictions Counselor working in the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addictions specialists who represent, by far, the largest specialty treatment populations in the Commonwealth. Most notably, Certified Addictions Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines a provided by the International Certification & Reciprocity Consortium (IC&RC).

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

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

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

Strongly concerned,

Terry Fox - Moore
 Belmont Behavioral Health
 8001 Roosevelt Boulevard
 Philadelphia PA 19152
 215 332 3363

APR 11 2001
 BPOA LEGAL COUNSEL

ORIGINAL: 2178

Self Help Movement, Inc.

2600 Southampton Road
Philadelphia, PA 19116
TEL: 215-677-7778 - FAX: 215-677-6794
Dr. Joseph F. Ruggiero, Executive Director

RECEIVED
2001 APR 11 AM 9:37
REVIEW COMMISSION

Board of Directors: *President* - Honorable Jerome A. Zaleski, *Vice President* - Melvin J. Greenberg,
Treasurer - Charles E. Murray, Jr., *Attorney* - Samuel Stretton, *Secretary* - Anne Robinson, *Congressman* Robert Borski,
Representative George T. Kenney, Jr., *Representative* Dennis O' Brien, *Honorable* Jonathan Saidel

April 2, 2001

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

To Whom It May Concern:

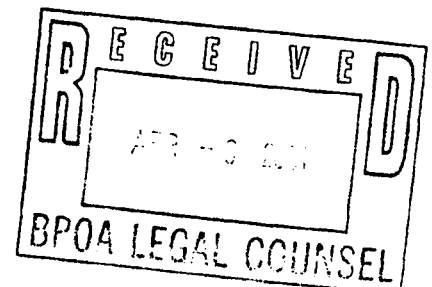
I am writing to you as a professional certified CAC Diplomate, CCS. I am the executive director and founder of Self Help Movement, a 9-month, inpatient, therapeutic community, serving people with drug and alcohol dependencies. The recent publication of regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The regulation fails to recognize master level addiction specialists who represent the largest specialty population in the Commonwealth of Pennsylvania.

The regulation also seems to discriminate against minorities who obtained the Master's degree in Human Services as offered by Lincoln University, the nation's oldest African American University. I am strongly advocating for the inclusion within the regulations the following:

- Inclusion under the grandparenting regulations of individuals in possession of Master's Degree and Certifications as an Addiction Counselor (CAC) and especially CAC Diplomate, CCS.
- Inclusion under the grandparenting regulations of the IC & RC national exam for addiction counselor as an acceptable exam.
- Inclusion under the grandparenting regulations of individuals in possession of the Master's degree in Human services as provided by Lincoln University.

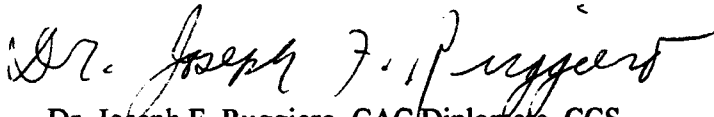
Our society is plagued with drug abusers that lead to criminal behavior, the spread of AIDS, the increase of the homeless population and the lack of productivity in the work

Equal Opportunity Employer



place. I think that by excluding our professional specialty the bill is doing society an injustice, therefore I urge you not only as a professional, but also as a concerned resident of the Commonwealth of Pennsylvania to consider the inclusion, which I advocate.

Sincerely yours,

A handwritten signature in cursive script that reads "Dr. Joseph F. Ruggiero". The signature is written in black ink and is positioned above the typed name and address.

Dr. Joseph F. Ruggiero, CAC/Diplomate, CCS
2600 Southampton Road
Philadelphia, PA 19116
215-677-7778

DJFR/cl

Cc: PCB Board



RECEIVED
2011 APR 14 11 09-07

ST. FRANCIS MEDICAL CENTER

THE CENTER FOR ADDICTION SERVICES
400-45th Street
Pittsburgh, PA 15201-1198
412/622-4511 • FAX: 412/622-6756

4-2-01

Dear Eva Cheney,

I am writing to you in regards to ACT 136, The Professional Counselor Licensing Bill. I am a D: A therapist at St Francis Medical Center with a Certified Addiction Counseling credential. We worked in the addiction field for the last fifteen years. The regulations in the bill leaved out those CACs with a Master's degree.

The regulations also discriminate against minority populations because of the exclusion of the Master's degree in Human Services as offered by Lincoln University.

Therefore, I advocate that Master's degree and CAC are included in the bill along with ICIRC national exam for addiction counselors as an acceptable exam and finally Master's degree in Human Services provided by Lincoln University be included in the bill.

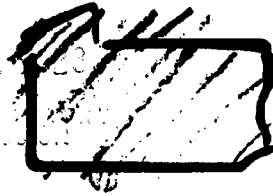
RECEIVED
BPOA LEGAL COUNSEL

RECEIVED
APR -
BPOA LEGAL COUNSEL

Sincerely,
Bob Watters, MEd
1299 Overdale Rd.
W Homestead, Pa. 15120
(412) 462-5431 H
(412) 622-4410 W
cc: PCB Board

April 2, 2001

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



Dear Ms. Cheney,

reference #16A-694

I am writing as Executive Director of the PA Certification Board (PCB). The PCB has been credentialing drug and alcohol counselors, prevention specialists, clinical supervisors, and ancillary workers for over 22 years in the Commonwealth. Our 3,000+ drug and alcohol professionals work in various treatment settings throughout the entire Commonwealth.

PCB has concerns regarding the regulations recently published in the *PA Bulletin* around Act 136 (the Professional Counselor Licensing Bill).

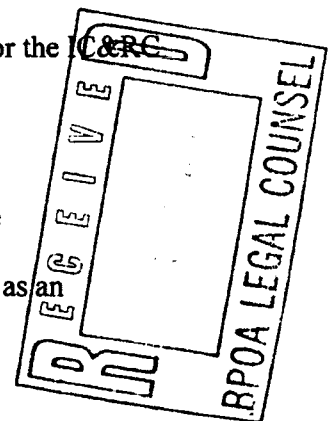
Our primary concern is around the absence of recognition of Master's level Certified Addiction Counselors (CAC) from the regulations. After numerous attempts prior to the publishing of the regulations to dialogue with the State Board around the possible inclusion of Master's level Certified Addiction Counselors, we were not responded to in any form. We continue to be concerned that Addiction Counselors are not recognized yet they make up a very large segment of professionals providing an extremely vital treatment service. The absence of Certified Addiction Counselors in the regulations is glaring and of great concern given the other specialty counselors included (i.e. dance, music, art).

The Certified Addiction Counselor must meet rigorous international standards including 3 years of paid, supervised employment, 300 hours of education relevant to the field of addiction, 300 hours of on-the-job supervision, take and pass an international written examination and an international oral examination. To maintain their certification, the CAC must obtain 50 hours of continuing education every two years.

I would be happy to provide information regarding the CAC credential and/or the IC&RC international written examination.

I am strongly suggesting the following recommendations:

1. Inclusion of individuals with a Master's degree and a CAC under the grandparenting regulations;
2. Inclusion of the IC&RC international written examination for CACs as an acceptable examination under the grandparenting regulations.



Page 2

Please do not overlook this important and very large group of addiction specialists in the proposed regulations. This would not only be a huge disservice to these qualified professionals but also to the hundreds of thousands of needy individuals who seek out their specialized drug and alcohol services.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Jo Mather". The signature is written in a cursive, flowing style.

Mary Jo Mather
Executive Director

cc: PCB Board of Directors
IRRC
House and Senate Professional Licensure Committee Members

ORIGINAL: 2178

New Leaf Psychotherapy Services

Robin M. Kevles-Necowitz, M.Ed., C.A.C.

340 East Maple Avenue
Suite #107
Langhorne, PA 19047
(215) 750-9991

4475 Route 27
Kingston, NJ 08528
(609) 688-1359

April 2, 2001

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

Dear Ms. Cheney:

I am writing to you as a Master's level psychotherapist and Certified Addiction Counselor. I am concerned about the regulations related to ACT 136, The Professional Counselor Licensing Bill. The problems relate to the grandparenting regulations. The regulations fail to recognize Master's level addiction counselors who represent the largest specialty population in Pennsylvania. Master's level Certified Addiction Counselors such as myself, have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

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

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

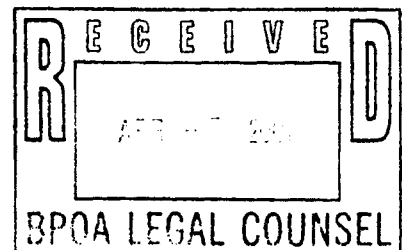
I sincerely urge your consideration in this matter as a means of assuring that the citizens of Pennsylvania have access to quality counseling services that serve our diverse communities.

Sincerely,

Robin M. Kevles-Necowitz, M.Ed., CAC
Robin M. Kevles-Necowitz, M.ED., CAC

Cc: PCB Board

10
RECEIVED
APR 11 2001
6-11-01
RECEIVED



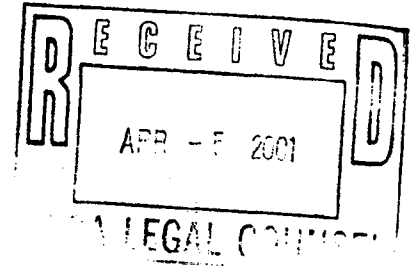
ORIGINAL: 2178

2001 APR - 9 AM 11:45

REVIEW COMMISSION

April 2, 2001

Susan H. Packard, Ph.D.
2100 North Line Street, Apt. Q101
Lansdale, PA 19446-1007
(215) 855-3537



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

Re: Proposed Licensure Regulations for Professional Counselors et al., Act 136

Dear Ms. Cheney:

Greetings! After the long-awaited passage of counselor licensure legislation on December 21, 1998, like many other counselors in Pennsylvania, I was eager to read the proposed regulations. As I'm sure you are aware, the Pennsylvania Alliance of Counseling Professionals (PACP) has identified six major issues in the section of the proposed legislations related to professional counselors. One of the major issues falls under the "grandparenting" heading (specifically, the requirement that, for at least 5 of the 7 years immediately prior to the date of application for license, *an applicant shall have worked at least 15 hours per week with 10 of those hours consisting of direct client contact*). As PACP articulated in its analysis of the proposed licensure regulations for professional counselors, this requirement has the potential to exclude a large number of counselors (i.e., addictions counselors, mental health counselors, school counselors, counselors in supervisory positions and college counselors) as well as counselor educators otherwise qualified for licensure under the grandparenting clause. In my estimation, this requirement is *very* discriminatory and translates into a regulation of exclusion.


To reiterate PACP's analysis, if an applicant is otherwise qualified for grandparenting, the applicant would be denied a license if he/she is:

- an experienced counselor who is now an educator (i.e., excluding counselor educators is inexplicable - especially in view of the fact that many counselor educators provide supervision for counseling student interns; it makes absolutely no sense to deny a counselor educator who teaches counseling courses and supervises counseling students' field experiences a professional counselor license);
- an experienced counselor who has been promoted to a supervisory or administrative position (i.e., penalizing a counselor who has been promoted and continues to work in the counseling field);

- someone, such as a school counselor/college counselor, who works 9 months per year (i.e., during the 9 months that this counselor works, he/she likely far exceeds 10 hours per week of direct client contact; how about considering an *average* of 10 hours of direct client contact weekly over the required 5-7 year period?);
- an experienced retired counselor who maintains a part-time practice;
- an experienced counselor who has voluntarily cut back on practice;
- an experienced counselor who has been reassigned to less direct client contact because of being unable to get a license; or
- an experienced counselor with far more than 5-7 years of full-time counseling experience, when the experience does **not** fall within the *5 of the 7 years immediately prior to the date of application for license*. The implication is that an otherwise qualified counselor who has 5 or more years of counseling experience any time prior to 1994 doesn't get any credit for that experience - talk about discriminatory! Let's not forget about the counselor who may have been "let go" (or, as previously noted, "reassigned to less direct client contact because of being unable to get a license") in the past 5 years because, as a result of the changes imposed by managed care and the lengthy amount of time it is taking to enact counselor licensure legislation, he/she was not "licensable" and, therefore, not eligible for third-party reimbursement. A counselor, with counseling-specific training and experience, may have been "replaced" by a less qualified, but "licensable" professional (which, I find unconscionable and a disservice to those seeking counseling services). I propose recognizing an applicant's counseling experience (i.e., direct client contact) regardless of whether that experience falls within the 5-7 years immediately prior to the date of application for license.

As PACP pointed out, it is noteworthy that there is no direct client contact requirement for persons seeking to be grandparented as Licensed Clinical Social Workers. If social workers are not required to have direct client contact to obtain a license, why should counselors who seek a professional license have this additional requirement - or, better yet, why shouldn't social workers also be required to have this "direct client contact" experience? Taking into account the many qualified counselors who deserve to be "grandparented" for licensure, thank you for considering the ideas I have presented.

Sincerely,



Susan H. Packard, Ph.D.

cc: Pennsylvania Certification Board

April 2, 2001

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

RECEIVED
2001 APR -6 AM 9:23
REVIEW COMMISSION

Re: Professional Licensure Bill - Act 136 - Reference 16A-694

Dear Counsel:

I am writing to you as a mental health provider and certified addictions counselor in Pennsylvania who is very interested in the licensing of counselors as soon as possible in Pennsylvania.

A recent publication of Act 136 raises questions for substance abusers seeking counseling services in this state, particularly when they want to use their insurance coverage. The regulations do not recognize Master's level Certified Addictions Counselors in the grandparenting process. Addictions counselors are a large percentage of counselors and the Act does not recognize Master's Level Certified Addictions Counselors. There is a competency based, clinically supervised credential required by the International Certification & Reciprocity Consortium (IC&RC) to obtain the CAC. Also, there are several people who provide valuable services to many minorities who have graduated from Lincoln University with a major in Human Services. It is felt that the exclusion of this degree from the grandparenting regulations is a disservice to minorities, especially those from Lincoln University.

In summary, I am asking the following to be included in the grandparenting regulations of Act 136, the Professional Counselor Licensing Bill:

- * Those who have earned a Master's Degree and passed the Certified Addictions Counselor requirements.
- * The national examination IC&RC for addiction counselors be included as an acceptable exam.
- * Those who have earned a Master's Degree or Doctorate in Human Services.

Sincerely,

Mary Lou Kunkle, Ph.D., C.A.C.

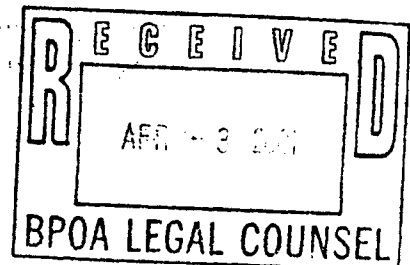
Mary Lou Kunkle, Ph.D., C.A.C.

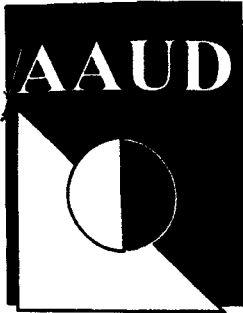
2487 Carriage Drive

Lancaster, PA 17601

Phone: 717-581-1693

cc: PCB Board





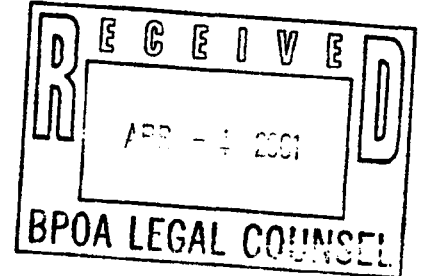
Aliquippa
Alliance for
Unity &
Development

THE FRANKLIN CENTER
 A Social Service, Health and
 Workforce Development Facility
 524 Franklin Avenue
 Aliquippa, Pennsylvania 15001
 (724) 378-2882 (724) 375-4811 fax

THE RENAISSANCE PLACE
 A Business Development, Technical
 Assistance and Education Center
 392 Franklin Avenue
 Aliquippa, Pennsylvania 15001
 (724) 378-2884 (724) 378-9976 fax

April 2, 2001

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



Dear Ms. Chaney,

As a concerned resident of Pennsylvania and a Credited Addiction Counselor, I write this letter to express my concern over the recent publication of the regulations related to Act 136. The Professional Counselor Licensing Bill raises many concerns for the health and welfare of substance abusers that seek counseling services. As I and many of my colleagues see it, there are rudimentary problems with the regulations that involve grandparenting issues. The regulations fail to recognize Master's level addiction specialists. A big concern is that Certified Addiction Counselors with Master's degree are not identified in the regulations. In achieving a competency-based, clinically supervised credentials under strict guidelines as provided by the International Certification and Reciprocity Consortium, (IC&RC), these professionals should be included under the umbrella of Act 136.

In addition, the regulations are discriminatory to minority populations through its exclusion of Master's Degree in Human Services as offered by Lincoln University, the oldest African-American university. The vast majority of these graduates serve the minority population in urban centers. The exclusion of this degree from the grandparenting regulations creates a disservice to the cause of providing culturally sensitive as well as ethnic services within the state. This could have a direct impact on the provision of services to minorities in Pennsylvania.

In closing, I strongly promote the inclusion within the Act 136 regulations the following points:

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

Please give your consideration to this matter as a means of assuring that PA residents are provided counseling services that reach our diverse communities.

Yours truly,

Maureen Morelli, CAC, CDF
 817 Sixteenth Street
 Aliquippa, PA 15001

ORIGINAL: 2178

**Eva Cheney, Counsel
State Bd of Social Workers, Marriage & Family
Therapists & Prof. Counselors
PO Box 2649, 116 Pine St
Harrisburg, PA 17105-2649**

RECEIVED

2001 APR -9 AM 11:45 April 2, 2001

THE REVIEW COMMISSION



Dear Ms. Cheney,

I am a certified addictions counselor in the Commonwealth of Pennsylvania holding a 45 credit Master's Degree in Counseling Psychology from Chestnut Hill College in Philadelphia. Due to the recently published regulations related to act 136. The professional Counselor Licensing bill causes me to be concerned for the citizens of Pennsylvania who are Chemically dependent and looking for counseling. The main problem, as I see it, involves the grandparenting issues and is non statutory in nature. The regulations don't recognize the masters level addiction specialist, which is the largest specialty treatment population in Pennsylvania. Certified addiction Counselor holding a master's degree are not recognized even though they received a competency based and supervised credential under the guidelines of the International Certification and reciprocity (IC&RC).

I do not feel counselors holding a degree from Lincoln University, the oldest African American university, the MHS, Masters of Human Services, should be discriminated against. They serve mainly a minority population. Not including them says a great deal regarding racial equality. These counselors provide cultrically sensitive treatment. I am appalled that credentials for which I personally worked so hard for are not to be included in this licensing procedure. Your discrimination against a larger number of minority counselors who also worked hard is reprehensible and counter productive to all I stand for as a professional. I personally will stay they course until this matter is resolved in the best interest of all certified addiction counselors. Your inclusion of only an "elite" group of professionals leaves me to wonder as to the professionalism of any of the group.

I urgently request the inclusion of the following in the regulations.

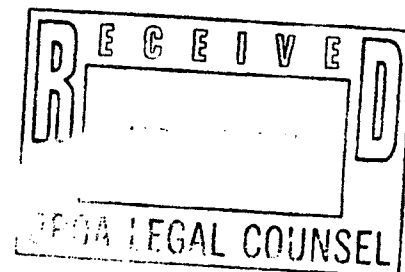
1. Include under the grandparenting regulations, individuals with a Master's degree and a CAC.
2. include the IC&RC national exam for addiction counselors as an acceptable exam under grandparenting regulations.
3. Include people who have a Master's degree in Human Services from Lincoln University under the grandparenting regulations.

Pennsylvanians need to be provided with counseling services that meet their special needs and I urge you to consider my requests in this matter.

Sincerely,

Mary K Deverant

**Mary K. Deverant, M.S., C.A.C. Diplomate, C.C.S.
770 Locust Drive
North Wales, PA 19454
(215) 362-5930**



ORIGINAL: 2178

167 Cherry Hill Rd.
Nazareth, PA 18064
April 2, 2001

RECEIVED
2001 APR -9 11:48

State Board of Social Workers, Marriage & Family Therapists, & Professional Counselors
C/o Eva Cheney, Counsel
116 Pine St.
P.O. Box 2649
Harrisburg, PA 17105

Dear Ms. Cheney;

I am writing to you as a Certified Addictions Counselor, Diplomate level, as well as a concerned resident of the Commonwealth of Pennsylvania. I have grave concerns about the regulations related to Act 136, the Professional Counselor Licensing Bill. There are serious problems with the regulations involving the grandparenting issues. The regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in Pennsylvania. Most notably, Certified Addiction Counselors with a Masters degree such as myself are not recognized by the regulations. I have worked hard to achieve this credential and I provide quality service based on my training and education.

The regulations also will provide a hardship to minority populations because of the exclusion of the Master's Degree in Human Services offered by Lincoln University, the country's oldest African American university. The vast majority of people with this degree are working with minority populations. The exclusion of this degree from the grandparenting regulations will affect the provision of racial, ethnic and culturally sensitive treatment.

I am strongly advocating for the following changes to the regulations:

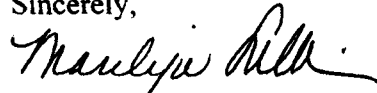
Inclusion under of individuals with a Master's degree and Certification as an Addictions Counselor under the grandparenting regulations.

Inclusion of the IC & RC national exam for addictions counselors as an acceptable exam under the grandfathering regulations.

Inclusion of individuals with the Master's Degree in Human Services from Lincoln University under the grandfathering regulations.

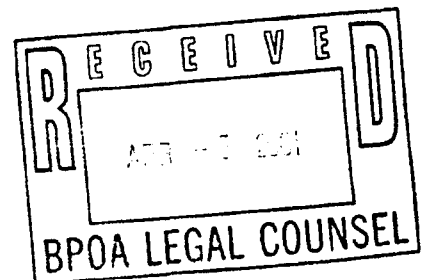
Please consider these concerns.

Sincerely,



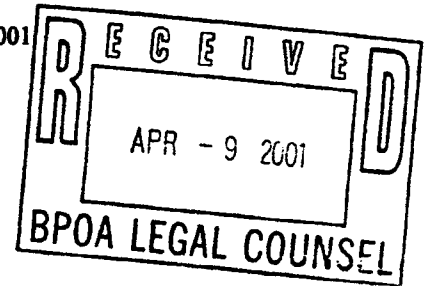
Marilyn Sullivan MA, CAC Diplomate

Cc: PCB Board



Original: 2178

April, 2, 2001



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

Dear Ms. Cheney:

I am a CACD, with over 6 years of experience in the field, all of them working in different capacities at the Caron Foundation, a well known worldwide leader in the treatment of the disease of addiction, located in Wernersville, Pa. I have read with great concern the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. These concerns mainly involve the grandparenting issues and are non-statutory in nature. It is my understanding that the regulations fail to recognize Master's level Addiction specialists, who represent the largest specialty treatment population in the state of Pennsylvania. By not recognizing Certified Addiction Counselors with a Master's degree, the regulations exclude and discriminate a group of professionals who have achieved a competency-based, clinically supervised credential as provided by the International Certification & Reciprocity Consortium (IC&RC).

Furthermore, the regulations are specifically discriminatory of minority populations, by excluding the Master's Degree in Human Services, as established by Lincoln University, the nation's oldest African-American University. Lincoln graduates with a Master's degree in Human Services fundamentally provide services to minority populations in the Commonwealth urban centers, therefore, the exclusion of this degree from the grandparenting regulations have the potential to negatively impact the provision of services to the culturally diverse population.

Summarizing: I am advocating for the inclusion within the grandparenting regulations of the following:

1. Individuals with a Master's Degree and Certification as an Addiction Counselor (CAC).
2. IC&RC national exam for addiction counselors as an acceptable exam.
3. Individuals with a Master's Degree in Human Services as established by Lincoln University.

The inclusion of these issues within the grandparenting regulations would be conducive to assure that the citizens of our Commonwealth are provided counseling services according to their diverse cultural needs.

Sincerely,

A handwritten signature in cursive script that reads "Maria A. Hendrickson".

Maria A. Hendrickson, MA, CACD
2 Host Church Rd,
Womelsdorf, Pa, 19567
(610) 589 1329

cc: PCB Board

RECEIVED
2001 APR 16 AM 9:56
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, & PROFESSIONAL COUNSELORS
EVA CHENEY



Memorial Hospital
Susquehanna Counseling

2300 East Market Street
York, Pennsylvania
17402

TEL: 717-849-5744
FAX: 717-757-9456

April 2, 2001

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

RE: #16A-694

Dear Ms. Cheney,

As a Certified Addiction Counselor Diplomate and resident of Pennsylvania, I am Writing to you concerning the regulations related to Act 136. Specifically the regulations that involve the grandparenting issues that are non-statutory in nature. The Master's level CAC's are not recognized by the regulations. I and others like me have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC).

The regulations are also notably discriminatory of minority populations through the exclusion of Master's Degree in Human Services as offered by Lincoln University. The majority of individuals holding this Master's degree are working with minority populations in urban areas. This exclusion is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services of Pennsylvania and could easily impact these services to minorities.

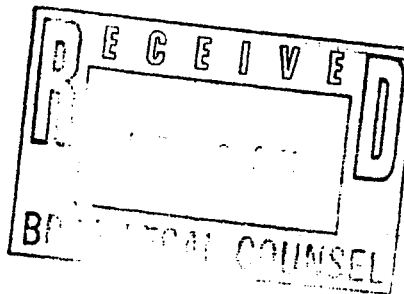
I am strongly advocating for the inclusions of the following:

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

I sincerely urge your consideration in this matter to assure the citizens of Pennsylvania that counseling diverse communities will continue.

Sincerely,

John S. Thornton
920 Richwill Drive
York, Pennsylvania 17404
717-843-1794 Home 171-849-5744 Work
cc:pcb Board



- Memorial Family of Health Services
- Memorial Hospital
- HomeCare of York
- Industrial Resource Center
- MRI of York
- Memorial Primary Care
- Shiloh Family Diagnostic Center
- Surgical Center of York
- Susquehanna Counseling
- White Rose Home Health
- White Rose Hospice

CLINICAL & COUNSELING ASSOCIATES

HAROLD CARTER, Ph.D., C.A.C., C.S.W., C.C.J.S.

ORIGINAL: 2178

April 2, 2001

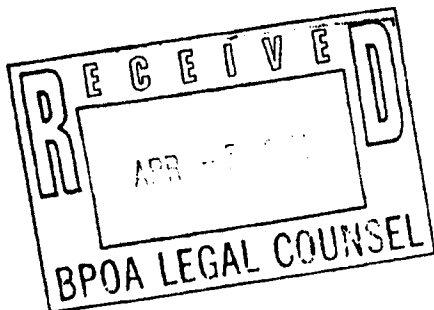
Eva Cheney, Counsel
State Board of Social Workers,
Marriage & Family Therapists &
Professional Counselors
P.O. Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649

Dear Ms. Cheney:

I am writing to you as a Ph.D., CAC who has a Master's Degree from Lincoln University and also as a concerned resident of the Commonwealth of Pennsylvania; who also is an African American and provides services to this population. Many of my referrals travel 45 minutes to one and a half hours to receive counseling services, due to the fact there is a shortage of providers for this minority group.

The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in the Commonwealth. Most notably, Certified Addiction Counselors with a Master's degree are not recognized by the regulations. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC).

The regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American University. The vast majority of individuals holding this Master's degree are working with minority populations in our urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impact the provision of services to minorities.



1503 MCDANIEL DRIVE
WEST CHESTER, PA 19380
(610) 692-6797

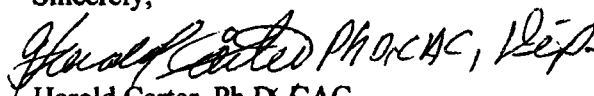
RECEIVED
2001 APR -9 11:44
STATE BOARD OF SOCIAL WORKERS
HARRISBURG, PA

I have been in addiction counseling for twenty five years and participated in and have witnessed many, many changes. Act 136 if passed would have negative impact on chemical dependency treatment services here in Pennsylvania. I am professionally hopeful that this is not the INTENT of Act 136. To ensure that we do not allow Act 136 to pass, as proposed, please include the following language:

1. The Bill currently lists several specialty-counseling groups (e.g., music therapists, dance therapists, art therapists, drama therapists, etc.), but fails to make reference to Addictions Specialists, who represent by far the largest specialty treatment population in the state.
PROPOSED REMEDY: Include: “Holding a Certified Addiction Counselor credential from the Pennsylvania Certification Board (PCB), passing the Addiction Counselor Examination given by the International Certification & Reciprocity Consortium (IC&RC) and holding a Master’s degree.
2. The Bill presently has an irreconcilable issue with respect to Clauses “4” and “5” of the grandparenting section. Clause “4” states that you are license-eligible if you have completed a Master’s program of at least 36 credits. However, Clause “5” makes reference to the NBCC exam which requires you to have completed a minimum of a 48 credit program in order to even take the exam.
PROPOSED REMEDY: Inclusion of Remedy #1 previously stated above would correct this problem.
3. The Bill currently fails to make specific reference to a Master’s Degree In “Human Services” as an acceptable qualifying degree for licensure. This would mean that Lincoln University graduates, who are predominately African American and Latino, and who already represent a large number of Counselors currently providing treatment (CACs) in the field, would be Excluded from being eligible for becoming licensed Professional Counselors. Consequently, the number of available culturally consistent counselors Will be significantly restricted. In addition, this would also unnecessarily And unfairly limit minority counselors from benefiting from the financial Gails that would obviously come with becoming “licensed”.
REMEDY: Include language that would specifically reference “Human Services” in grandparenting regulations.

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

Sincerely,

A handwritten signature in black ink that reads "Harold Carter, Ph.D. CAC, Dip." The signature is written in a cursive style.

Harold Carter, Ph.D. CAC

Diplomate

ORIGINAL: 2178

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

RECEIVED

2001 APR 11 AM 9:36

REVIEW COMMISSION

April 2, 2001

Dear Ms. Cheney,

The purpose of my correspondence to you is in regard to the proposed ACT 136 Professional Counselor Licensing Bill. I write to you as a professional (CAC) of 10 years, consumer and as a concerned resident of the State of Pennsylvania. My primary concern is for the health and welfare of those residents in PA seeking counseling services for chemical dependency. The foundational problem with ACT 136 regards the grandparenting issues which are non-statutory in nature and do require scrutinizing flexibility on your part to address the paramount issues at hand. The regulations set forth in the bill fail to acknowledge the Master's level addiction specialists who by far represent the largest contingency of specialty treatment clinicians in the state. Most importantly and unfairly, Certified Addictions Counselors with a Master's degree are not recognized by the regulations in the Bill set forth. These individuals have successfully completed a competency-based, clinically supervised credential under strict guidelines as set forth by the International Certification & Reciprocity Consortium (IC&RC).

These regulations in ACT 136 Bill appear to be discriminatory in nature toward the minority population in that they fail to acknowledge the Master's Degree in Human Services offered by Lincoln University, this nation's oldest African American University. The majority of individuals holding a Masters Degree from Lincoln University are working in the urban sector, which is by far the neediest segment of the population requiring substance services in the state. The lack of acknowledgment of the Masters Degree is deplorable and demonstrates a disservice to the cause of providing racial, ethnic, and cultural sensitivity to the dire need for chemical dependency services in the urban sector in the State of Pennsylvania.

I implore you to reconsider for the inclusion within the regulations of the following:

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

I respectfully urge your consideration of the above-mentioned issues to insure the highest caliber of chemical dependency treatment for the residents encompassing many diverse communities within our fine Commonwealth.

Sincerely,

Jeffrey Tress
Jeffrey Tress
100 Kleyona Ave.
(610) 935-7714
cc: PCB Board

RECEIVED
APR - 6 2001
BPOA LEGAL COUNSEL

John Rose
29 Orchard Lane
Fredericksburg, PA 17026
(717) 865-6105, FAX-4406
4/2/01

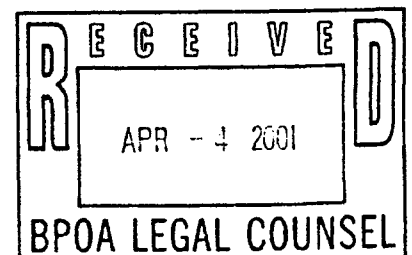
Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapists, and Professional
Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Chaney,

This letter is in reference to 16A-964, the recently published regulations for licensure of Social Workers, Marriage and Family Therapists and Professional Counselors. More than fifteen years ago I decided I wished to work in a way that would be more beneficial to others than in my then current work as a building contractor and so I decided to become a counselor. Since there was no clear career path to such a goal at that time I went in the direction that was of greatest interest to me, Family Therapy. I already had a Masters degree from my earlier history in the clergy, so I enrolled in what was the most famous Family Therapy program at the time, the Philadelphia Child Guidance Clinic, where Salvadore Minuchin and associates had pioneered working with the family as a whole rather than acting as if problems somehow resided only inside the children.

My training extended over a long period of time because it was combined with continuing my business as a home builder, making the pursuit of this dream possible. At the same time the training program was itself in the process of revision and development in response to direction from the American Association of Marriage and Family Therapists. My involvement in this process culminated in my earning Clinical Membership in the year 2000.

During that time I experienced the usual process of anxiety and uncertainty as I met with my early clients and feared that I was inadequate to the task before me, proceeding through the intense learning this inspired and gradually, over the years, to greater and greater confidence in my ability to effect beneficial change in families and individuals. My skills and perception have now developed to the point that, most recently, working with the most difficult population of clients that are currently identified by service professionals, I have had a consistent record of success.



All of this will end with the enforcement of the regulations as they are now stated. I will be prohibited from practice at the very time I have achieved mastery of my craft. And this will happen even though, as I understand, it was the intention of the legislation that legitimate practitioners be eligible to continue under the grandfathering clauses..

Two items in those clauses exclude me. The first is the requirement of an advanced degree in a very small number of fields to be eligible for grandfathering. In my own case, I already had ten years of college, six years post-graduate, when I decided to not seek another degree but to enter a more focused program. I'm sure many others who didn't choose the precise degree program that would subsequently be required for grandfathering had equally legitimate reasons for their choices. To require us to start over (not an option for me, financially) or to exclude us from practice is surely not what was intended in the passage of this legislation.

The other clause that would exclude me is the requirement of a defined level of practice in five of the seven years before March, 2002 (two years after the effective date of the regulations.) Some years past, not being a position to predict what requirements the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors would be defining in this year 2001, I chose to engage in one of my periods of financial restoration during one of the years required by this clause. Because of that lack of prescience on my part, the proposed regulations would exclude me from being grandfathered into licensure and therefore exclude me from practice.

And that was not an empty period for me in my development as a therapist. When I returned to practice I was amazed by my own advance in perspective and judgment in comparison with my peers who were just then coming out of their training. I mention this to remind the board that the profession being regulated is one less dominated by narrow technical knowledge than any other profession that might be subject to regulatory oversight. Every experienced practitioner and well-respected text in the field will attest to the preeminent value of maturity and broad experience, even outside the field, in the effective practice of psychotherapy. This regulation seems to exclude this consideration.

Interestingly, I understand that the regulations do not require this specified level of practice for Social Workers. Does the board suggest that Social Workers who took years off for financial reasons as I did, or to raise a family or happened to be in administration recently or were maintaining a low intensity private practice are so different from Family Therapists and Counselors that different rules should be applied? There must have been a rationale for the decision to not require this specified level of practice of Social Workers so could it not be applied to the other

modalities equitably?

Thank you for your consideration to my comments on the proposed regulations. I advocated vigorously for the passage of this legislation that now threatens my career as a Family Therapist. I still believe it is beneficial for regulation and licensure to become operative but, without changes in the clauses I have alluded to, experienced and mature practitioners will be excluded from practice in the profession that, more than any other, profits from those very qualities.

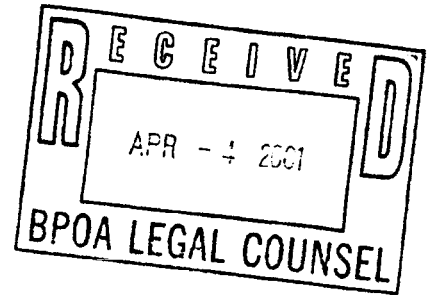
Sincerely yours,

A handwritten signature in black ink, appearing to read "John Rose". The signature is fluid and cursive, with a large initial "J" and "R".

John Rose MA

Cc. **Independent Regulatory Review Commission**
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
Senator David J. Brightbill
Hon. Peter J. Zug

Lynn Benjamin, M.Ed., CAC, Diplomate
12 Mayo Place
Dresher, PA 19025-1228
(215) 646-7932



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

April 2, 2001

Dear Ms. Cheney:

I am writing to you with concerns about the publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. I am a Certified Addictions Counselor with a Master's degree in Psychoeducational and Life Span Processes from Temple University. I earned my CAC under the strict guidelines as provided by the International Certification and Reciprocity Consortium, which included supervision and a national exam. The new regulations fail to recognize Master's level certified addictions counselors, a group that represents the largest specialty treatment population in the state. As a result, the health and welfare of substance abusers are at risk.

Additionally, the regulations discriminate against minority populations by excluding the Master's degree in human services, which is offered by Lincoln University, the nation's oldest African American University.

I would strongly recommend that the new regulations include:

- 1) grandparenting of individuals in possession of a Master's degree and with a Certification as an Addiction Counselor (CAC)
- 2) the IC&RC national exam for addiction counselors as an acceptable exam
- 3) Lincoln University's Master's degree in Human Services as an acceptable degree

I hope that you will consider this matter. Master's degreed Certified Addictions Counselors follow a rigorous certification procedure with a national qualifying exam. They deserved to be included in Act 136.

Sincerely,

Lynn Benjamin, M.Ed., CAC
Cc: PCB Board

620 Howard Avenue
Altoona, PA 16801-4889

814/946-2141
Fax 814/946-7999

Behavioral Health Services

Marian Fifer, M.S.
Executive Director

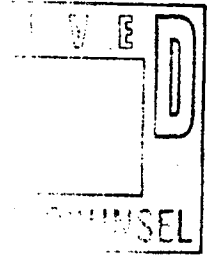
Richard A. Bennett, M.D., Ph.D.
Medical Director



altoona hospital
CENTER FOR MEDICINE

2001 APR -6 11:09:28

RECEIVED



April 2, 2001

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

Dear Ms. Eva Cheney:

I am writing to you as a Certified Addiction Counselor Diplomate as well as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. A fundamental problem with the regulations involves the failure to recognize Master's level certified addiction counselors. These individuals, like myself, have achieved a competency-based, clinically supervised credential under strict guidelines by the International Certification & Reciprocity Consortium (IC&RC).

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

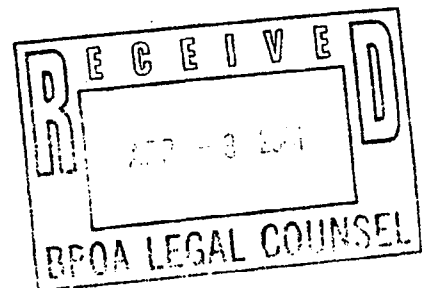
- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- Inclusion under the grandparenting regulations of the IC&CR national exam for addiction counselors as an acceptable exam.

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

Sincerely,

David Knepp MA CAC

cc: PCB Board



April 2, 2001

Dear Eva Cherry,

My name is Charles Gusty MEd CAC. I retired recently but plan to and am in the process of renewing certification. This letter is in response to Act 136.

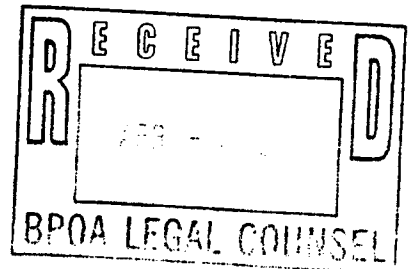
Please consider the following three points that will be a means of assuring the citizens of Pennsylvania will be provided counseling services to our diverse communities:

a) Include under the grandparenting regulations of individuals, like myself, who possess a Master's Degree (MEd) and are Certified Addiction Counselors (CAC),

b) Also please include under the grandparenting regulations of the IC + RC national exam for addiction counselors as an acceptable exam,

c) and please include under the grandparenting regulations of individuals having a Master's Degree in Human Services provided by Lincoln University.

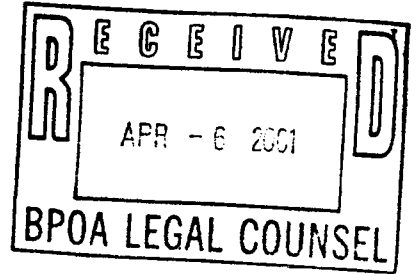
Sincerely,
Charles Gusty
2913 Hemlock Dr
Allison Park PA 15101
(412) 486 1977



ORIGINAL: 2178

RECEIVED
2001 APR 11 11:59:37

REVIEW COMMISSION: **Steven W. Ginsburg, M.Ed., CAC Diplomate**
771 N. 23rd St.
Philadelphia, PA. 19130



April 1, 2001

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

Dear Ms. Cheney:

I am writing to you as a Certified Addiction Counselor, Diplomate status as well as a concerned resident of the Commonwealth of Pennsylvania. Please note that I am strongly advocating that the Professional Counselor Licensing Bill, Act 136 (reference #16A-694), include within the regulations the following:

*Those individuals who have a Master's degree as well as a CAC (Certified Addiction Counselor) who also pass the Addiction Counselor Examination given by the International Certification and Reciprocity Consortium, be grandparented in with respect to those professionals who qualify for the Professional Counselor designation. This is because Certified Addiction Counselors have achieved a competency-based, clinically supervised credential, and passing this exam would make a rigorous requirement.

*Those individuals who have Master's Degree in Human Services as provided by Lincoln University be grandparented in with respect those professionals who qualify for the Professional Counselor designation. This is so as to create ethnic diversity amongst professional counselors who can service clients since a number of individuals from African-American and Latino minority groups graduate from Lincoln.

I sincerely urge your consideration of the above inclusions in the Professional Licensing Bill. If you have any questions, please call me at (215) 236-4294 or (215) 236-5403.

Thank you.

Steven W. Ginsburg
Steven W. Ginsburg

Cc: PCB

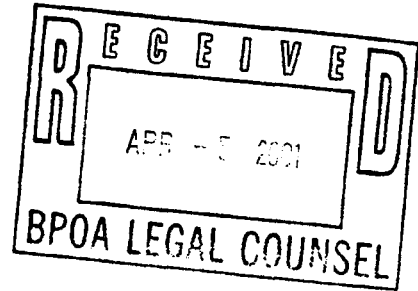


ORIGINAL: 2178

RECEIVED

2001 APR -9 AM 11:48

REVIEW CONTINUED



PATRICK J. PALMER

610 KING ROAD, ROYERSFORD, PA 19468

PHONE: (610) 948-8583

FAX: (610) 948-5806

EMAIL: ONEDAYER@AOL.COM

April 1, 2001

Ms. Eva Cheney, Counsel

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

P.O. Box 2649

116 Pine Street

Harrisburg, PA 17105-2649

Dear Ms. Cheney:

Please accept this letter as documentation of my total disagreement with the current language of Act 136 (Professional Counselor Bill). As a certified addictions professional with over fifteen years experience treating those who suffer from chemical dependency and other addictive disorders, I can state that, without a doubt, implementation of this Bill in its current regulatory state would cause serious and undo harm to citizens of this Commonwealth who are seeking treatment for addictive disorders. Furthermore, if implemented in its current form, this Bill will cause serious and undo harm to minority counselors and consumers alike.

The fundamental problem with the Bill is the absence of the inclusion of Master's level Certified Addiction Counselors (CACs) as being specifically named as being eligible for licensure, even though they have a Master's degree and have passed a nationally certified examination. With other speciality counseling groups clearly named in the Bill (e.g., Art, Movement, Music, etc.), it makes no sense, nor is it in the best interest of the public to exclude the largest specialized group of counseling professionals, that is, Certified Addiction Counselors (CACs).

Additionally, the absence of specific reference to Lincoln University Master's of Human Services graduates clearly excludes these fine and much needed professionals from becoming licensed as a professional counselor. This is a serious flaw, and will, in my estimation, cause serious and undo harm to minority counselors and minority consumers by limited access to culturally similar counseling services.

I strongly suggest the Board include the following three changes in the current regulations:

- **Include the National Exam (ICRC) for addiction counselors as an acceptable exam.**
- **Specifically mention Master Level CACs within the regulations just as you have listed other speciality counseling services (e.g., Art, Music, Movement, Rehab, etc.).**
- **Specifically reference the Master's of Human Services Degree from Lincoln University as an acceptable degree, at least for the grandparenting period.**

Concern Letter
Social Work, Professional Counselor Board
Page 2 of 2

In closing I sincerely urge you and those with the power to make these corrective measures. Since it is the intent and purpose of this Bill to enhance the quality of counseling services, and therefore, to increase the level of consumer protection, I see no reasonable or feasible argument for not addressing these specific issues.

Sincerely,



PATRICK J. PALMER, MS, CAC, CCS
610 King Road
Royersford, PA 19468
610-948-8583

cc: Pennsylvania Certification Board

ORIGINAL: 2178

36 South Lane
Levittown, Pa., 19055

RECEIVED

2001 APR -9 11:48

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



April 1, 2001

In reply to: #16A-694

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

Dear Eva Cheney:

I am writing to you as a Human Service worker in the field of addictions. I am a Program Supervisor and I have been in the field for 14 years. I am a resident of the Commonwealth of Pennsylvania and lived here my entire life. The purpose of this letter is the publication of the regulations related to Act 136, the Professional Counselor Licensing Bill. The elementary problems with the regulations involve the grandparenting issues. The issues fail to recognize Master's level specialists in the field of addiction. Certified Addiction Counselors with a Master's degree are not recognized by the regulations. I have achieved a competency-based clinically supervised credential under the stringent guidelines as provided by the International Certification and Reciprocity Consortium.

The regulations also discriminate against those of us who achieved a Master's degree from Lincoln University. Lincoln University's Master program has been approved by the Mid-Atlantic States which is the body that recognizes the major universities in this area. The great majority of those holding the Master's degree are minorities who currently work in the urban areas. Failure to recognize this degree is a disservice to the people of this Commonwealth. This failure to acknowledge Master's level clinicians from Lincoln University could directly affect services to minorities in this state.

I am strongly advocating and backing the inclusion within the regulations of the following:

Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor

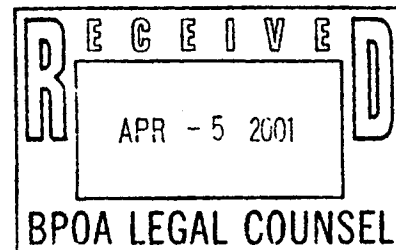
Inclusion under the grandparenting regulations of the IC&RC national exam for addiction counselors as an acceptable exam.

Inclusion under the grandparenting regulations of individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

I sincerely urge that you consider this matter as a means of assuring that the citizens of our Commonwealth are provided with the counseling services that will serve best serve them.

Sincerely,

Richard J. Beckett MHS CAC Diplomate
36 South Lane
Levittown Pa., 19055
215-943-8966
cc: PCB Board

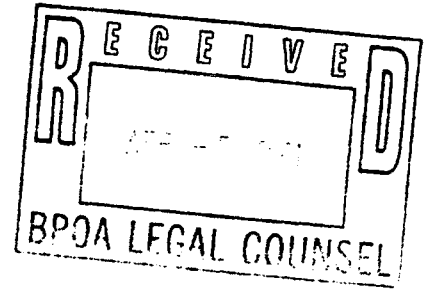


JOANNE PALMER, MS, CAC
610 King Road, Royersford, PA 19468

ORIGINAL: 2178

April 1, 2001

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



Dear Ms. Cheney:

Please accept this letter as documentation of my total disagreement with the current language of Act 136 (Professional Counselor Bill). As a certified addictions professional with over fifteen years experience treating those who suffer from chemical dependency and other addictive disorders, I can state that, without a doubt, implementation of this Bill in its current regulatory state would cause serious and undo harm to citizens of this Commonwealth who are seeking treatment for addictive disorders. Furthermore, if implemented in its current form, this Bill will cause serious and undo harm to minority counselors and consumers alike.

The fundamental problem with the Bill is the absence of the inclusion of Master's level Certified Addiction Counselors (CACs) as being specifically named as being eligible for licensure, even though they have a Master's degree and have passed a nationally certified examination. With other speciality counseling groups clearly named in the Bill (e.g., Art, Movement, Music, etc.), it makes no sense, nor is it in the best interest of the public to exclude the largest specialized group of counseling professionals, that is, Certified Addiction Counselors (CACs).

Additionally, the absence of specific reference to Lincoln University Master's of Human Services graduates clearly excludes these fine and much needed professionals from becoming licensed as a professional counselor. This is a serious flaw, and will, in my estimation, cause serious and undo harm to minority counselors and minority consumers by limited access to culturally similar counseling services.

I strongly suggest the Board include the following three changes in the current regulations:

- **Include the National Exam (ICRC) for addiction counselors as an acceptable exam.**
- **Specifically mention Master Level CACs within the regulations just as you have listed other speciality counseling services (e.g., Art, Music, Movement, Rehab, etc.).**
- **Specifically reference the Master's of Human Services Degree from Lincoln University as an acceptable degree, at least for the grandparenting period.**

In closing I sincerely urge you and those with the power to make these corrective measures. Since it is the intent and purpose of this Bill to enhance the quality of counseling services, and therefore, to increase the level of consumer protection, I see no reasonable or feasible argument for not addressing these specific issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Joanne M. Palmer".

JOANNE M. PALMER, MS, CAC,
610 King Road
Royersford, PA 19468
610-948-8583

cc: Pennsylvania Certification Board

RECEIVED
2001 APR -9 10:11:45
REVIEW COMMUNICATIONS
PENNSYLVANIA
STATE BOARD OF PROFESSIONAL COUNSELORS

ORIGINAL: 2178
March 31, 2001

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



Allegheny Children's
Initiative Inc.
A Subsidiary of
Citizen Care, Inc.

William Williams, M.Ed., C.A.C.
Family Based Mental Health Program
Program Director

24 South 18th Street • Pittsburgh, PA 15203
(412) 431-8006 Ext. 349 • (412) 431-8457 FAX
wwilliams@citizencare.org



Attention: c/o Eva Cheney:

I am addressing this letter to your attention and to ask your consideration on the matter of Act 136. I am a resident of Pennsylvania and a Masters Level Certified Addictions Counselor. I am also a Director of a Family Based Program for Children and Adolescents with Mental Disorders. I sincerely take exception to the publication of the regulations related to Act 136, The Professional Counselors Licensing Bill. It is my understanding that the Bill do not give substance abusers an opportunity to for service by highly qualified individuals. The Bill not written to grandfather in individuals like me into the bill as Licensed Counselors in the state of Pennsylvania fail to take into account substance addictions. Thus, it does not consider highly qualified individuals. The bill excludes Individuals with degrees from some of the highly credentialed higher institutions throughout this country. In addition, these individuals, like me, are under the strict supervision and guidelines of the International Certification & Reciprocity Consortium.

In summary, I sincerely want you to understand that individuals with a Master's Degree and Certification as an Addiction Counselor should be included within Act 136, The Professional Counselor Licensing Bill. Give this matter your attention as a means of assuring that proper Counseling services given for the citizens of Pennsylvania with addiction issues. If you need any additional information, feel free to call me at the information below.

Sincerely,

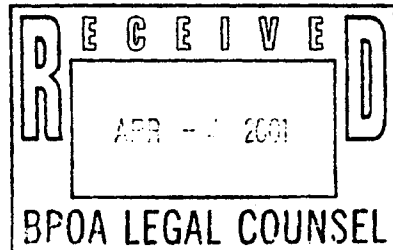
William A Williams MEd. CAC.

418 Jonathan Court
Pittsburgh Pa. 15208

(412) 731-7488

Waw

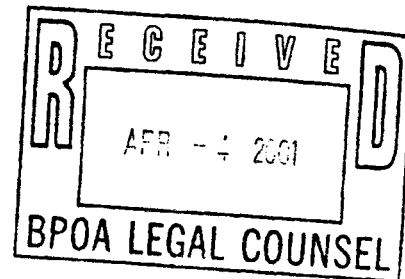
cc: PCB Board



ORIGINAL: 2178

3-31-01

Ms. Eva Cheney
State Board of Social workers, Marriage and Family Therapists
& Professional Counselors
PO Box 2649, 116 Pine St.
Harrisburg, Pa. 17105-2649



Dear Ms. Cheney,
I am a concerned resident of the Commonwealth of Pa. and a Master's level Certified Addiction Counselor working in the field as a Clinical Supervisor. I have concerns about the grandparenting clause in the regulations of Act 136. The provision does not include a CAC with a Master's Degree. I have worked in the addictions field for 14 years. My current position as well as previous positions required me to obtain and maintain my CAC as part of my employment. The Pa Dept. of Health and Welfare, which licenses facilities to provide treatment, requires persons providing treatment to obtain a CAC. I think this is a great disservice to the clients who request Substance Abuse services as well as to the Master's level CAC who up until Act 136, was appropriately recognized by the Commonwealth, employers and insurance providers. This would cause problems to individuals like myself who have many years of experience, a Master's Degree and ongoing training from becoming a Licensed Professional Counselor. Employers may have to review hiring policies, as many now require individuals to have a CAC.

The national exam I was required to take by International Certification & Reciprocity Consortium should be included as an acceptable exam. This competency-based exam is a national exam with strict guidelines and is not recognized as part of Act 136.

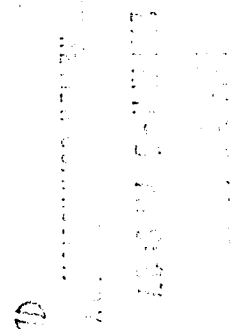
I am also concerned to learn that some individuals with a Master's Degree in Human services from Lincoln University are not provided for in the Act. I think this is a disservice to those individuals and to many minorities to whom they may provide services.

The main problem appears to be all grandparenting issues are non-statutory in nature. The Act(136) lists several specialty counseling groups, dance, music, art, and drama therapist but does not recognize addictions therapists. I would suggest you include Master's Level CAC in the grandparenting.

Sincerely,

Joseph Bindas MA,CAC
556 Carnival Dr.
Pittsburgh, Pa. 15239

A handwritten signature in cursive script that reads "Joseph Bindas".



March 31, 2001

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



A Subsidiary of
Citizen Care, Inc.

William Williams, M.Ed., C.A.C.
Family Based Mental Health Program
Program Director

24 South 18th Street • Pittsburgh, PA 15203
(412) 431-8006 Ext. 349 • (412) 431-8457 FAX
williams@citizencare.org

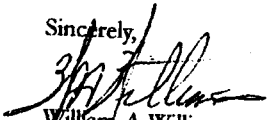


Attention: c/o Eva Cheney:

I am addressing this letter to your attention and to ask your consideration on the matter of Act 136. I am a resident of Pennsylvania and a Masters Level Certified Addictions Counselor. I am also a Director of a Family Based Program for Children and Adolescents with Mental Disorders. I sincerely take exception to the publication of the regulations related to Act 136, The Professional Counselors Licensing Bill. It is my understanding that the Bill do not give substance abusers an opportunity to for service by highly qualified individuals. The Bill not written to grandfather in individuals like me into the bill as Licensed Counsels in the state of Pennsylvania fail to take into account substance addictions. Thus, it does not consider highly qualified individuals. The bill excludes Individuals with degrees from some of the highly credentialed higher institutions throughout this country. In addition, these individuals, like me, are under the strict supervision and guidelines of the International Certification & Reciprocity Consortium.

In summary, I sincerely want you to understand that individuals with a Master's Degree and Certification as an Addiction Counselor should be included within Act 136, The Professional Counselor Licensing Bill. Give this matter your attention as a means of assuring that proper Counseling services given for the citizens of Pennsylvania with addiction issues. If you need any additional information, feel free to call me at the information below.

Sincerely,

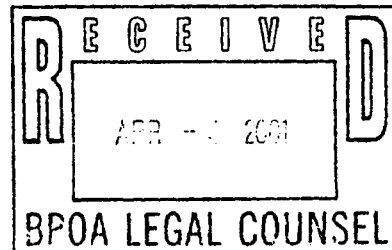

William A Williams m.ed. C.A.C.

418 Jonathan Court
Pittsburgh Pa. 15208

(412) 731-7488

Waw

cc: PCB Board



ORIGINAL: 2178

2001 APR -5 10:06:36
INDEPENDENT REGULATORY
REVIEW COMMISSION

Jerry Waxler, M.S.
P.O. Box 99
Quakertown, PA 18951
610-390-0325
March 31, 2001

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

Re: Comment on the Proposed Licensure Regulations, 16A-964

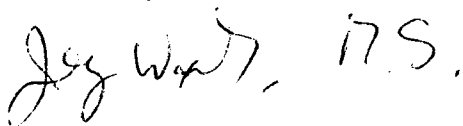
Having recently received my Master's degree in Counseling from Villanova University, and having passed the NBCC's NCE, I thought I was well prepared and on track to qualify for licensure. Now I find a regulation that has me seriously concerned.

The 700 hour practicum/internship requirement will present a hardship for me. I already have a 300 hour practicum/internship, as required by Villanova's Master's degree program. Because I was in a school program, I worked those practicum/internship hours without pay. Now, to meet the PA Licensure requirement of a 700 hour internship/practicum, I would have to perform more low- or no-pay counseling within a school program. Since I need to work for a living, these additional hours of school will create an added financial burden.

By increasing the number of hours of practicum/internship, the licensure regulations create a financial barrier around the profession that will favor young people supported by wealthy parents. Those of us who must work to pay our way during the education process, and notably older adults with family responsibilities who want to transition into the profession, are going to be kept out. In my opinion this is not a benefit to either the public or the profession.

I urge you to reconsider this regulation and bring it into line with the existing practices of graduate programs such as those at Villanova that require 300 hours of practicum/internship.

Sincerely,



Jerry Waxler, M.S.

ORIGINAL: 2178

March 31, 2001

Dear Ms Cheney:

I am writing to you as a Certified Addictions Counselor with BSW degree as well as a concerned resident of the State of Pennsylvania. I am concerned about the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. I believe the Bill will hurt substance abusers that seek counseling as it stands. The fundamental problems with the relations involve the grand parenting issues and are non-statutory in nature. The regulations fail to recognize Master's level addiction specialist who represent the largest specialty treatment population in Pennsylvania. Certified Addiction Counselors with a Master's degree are not recognized by the regulations. I see this as a great injustice to the many highly qualified professionals I have worked with in the past seventeen years. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity Consortium (IC&RC).

I see the regulations as discriminatory towards minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University. A number of highly qualified professionals have received their degree from this African American University. I see the exclusion of this degree from the grand parenting regulations as a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the urban minority populations. This would be unfair to jeopardize opportunities for minority populations. Perhaps, you should examine the Certification Process for Addiction Counselors. I find it thorough and quite comprehensive.

I strongly advocate for the inclusion with the regulations of the following:

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

Please take time to consider this matter as a means of assuring the substance abusers residing in Pennsylvania are and will be provided with counseling services that serve the entire community consisting of such diverse populations.

Sincerely,

Mary Dzielski BSW/CAC

Mary Dzielski BSW, CAC
228 Pine Drive
Coraopolis, PA 15108
412 264-3091
CC: PCB Board

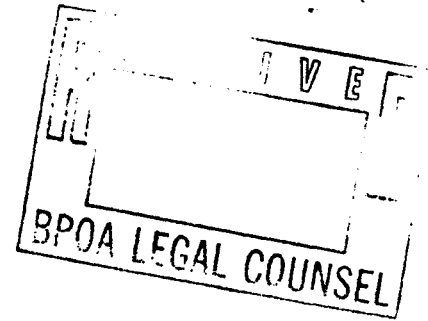
RECEIVED
2001 APR -9 AM 11:14
REVIEW COMMISSION

RECEIVED
APR - 5 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178

March 31, 2001

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



Dear Ms. Cheney:

I am a resident of Pennsylvania and a Certified Addictions Counselor (CAC) with a Master's degree in Clinical Psychology. I am very concerned about the Professional Counselor Licensing Bill. Under the current grandparenting regulations, I would not be considered as a licensed counselor even though I have years of clinical supervision and have passed a nationally recognized exam under the auspices of the International Certification & Reciprocity Consortium (IC&RC).

I strongly advocate that Master's level Certified Addiction Counselors be included under the grandparenting regulations and that the IC&RC national exam be considered an acceptable exam. I also believe that you need to take into account the number of African-American counselors that have a Master's degree in Human Services from Lincoln University. Excluding these counselors from the grandparenting regulations does a great disservice to our profession's attempt to provide multicultural counseling within our communities.

I sincerely hope that you will take into account the work of addictions counselors in providing much needed services to one of the largest specialty treatment populations within the Commonwealth of Pennsylvania.

Sincerely,

Carol Chaffin-Page

Carol Chaffin-Page
6013 McDaniel Road
Cochranon, PA 16314
814-425-7878
cc: PCB Board

SECRET
1256 PM 3-31-01

March 31, 2001

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

RECEIVED
MARCH 30 11 29 AM '01
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND FAMILY THERAPISTS, AND PROFESSIONAL COUNSELORS
HARRISBURG, PA 17105

Dear Ms. Cheney,

I am writing you as one whom has a Masters Degree in Counselor Education from the Pennsylvania State University and Certified Addictions Counselor and resident of the Commonwealth Of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill, raises concerns for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve the grandparenting issues are non-statutory in nature. The regulations fail to recognize Master's level addiction specialists why like myself, represent the largest specialty treatment population in the Commonwealth. Most notably, Certified Addictions Counselors with a Master's degree are not recognized by regulations. I and others in my profession have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification and Reciprocity consortium (IC&RC).

The regulations are also notably discriminatory of minority populations through the exclusion of the Master's Degree in Human Services as offered by Lincoln University, the nation's oldest African American University. The vast majority of individuals holding this Master's Degree are working with minority populations in out urban centers. The exclusion of this degree from the grandparenting regulations is a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impacts the provision of services to minorities.

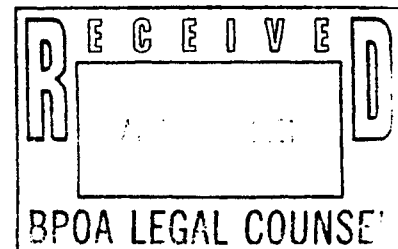
I am strongly advocating for the inclusion within the regulations of the following:

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

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

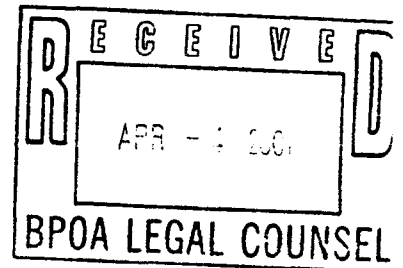
Respectfully,
Sally R. Crompton MEd. CAC
Sally R. Crompton, M.Ed., CAC

355 Elmbrook Lane
Pittsburgh, PA 15243
#412.279.2362



LINDA ALPERT-DIANI, PH.D.

**2909 Atkinson Place
Holland, PA 18966-5511
(215) 860-1124**



March 31, 2001

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

Dear Ms. Cheney,

This is in reference to Act 136, the Professional Licensure Bill. As a Ph.D. clinical psychologist and Pennsylvania certified addiction counselor (CAC) as well as a concerned resident of the Commonwealth of Pennsylvania, the recent publication of the regulations related to Act 136 raises concern for the future health and welfare of substance abusers in need of counseling services. As I see it, the fundamental problems with the regulations as written are: a) the grandfathering issues, and b) the non-statutory nature. The regulations fail to recognize Master's level certified addiction specialists who are representative of the largest specialty treatment population in the Commonwealth. These individuals have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC).

The regulations also appear to be notably discriminatory of minority populations. Those holding a Master's Degree in Human Services, as offered by my alma mater Lincoln University (the nation's oldest African-American University), are excluded. The vast majority of individuals holding this Master's degree are working with minority populations in our urban centers. Exclusion of the Master's Degree in Human Services from the grandparenting regulations may directly and indirectly impact the provision of services to minority populations. It may very well create a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania.

I am strongly advocating for the recognition and inclusion under the grandparenting regulations of

1. individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC),
2. the IC&RC national exam for addiction counselors as an acceptable exam, and
3. individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

I sincerely urge the Board's consideration in this matter not only as a means of affirming professional equality, but to also ensure that citizens of Pennsylvania throughout our diverse communities are provided equitable counseling services.

Sincerely,

A handwritten signature in black ink that reads "Linda Alpert-Diani, Ph.D." with a stylized flourish at the end.

Linda Alpert-Diani, Ph.D., CAC
cc: PCB Board