

legally, as binding on the act
page 9

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ARKANSAS
BOARD OF EXAMINERS IN COUNSELING



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REVIEW COMMISSION

RULES AND REGULATIONS
ACT 593 AMENDED BY ACT 244 OF 1997

Preface

The Arkansas Board of Examiners in Counseling interprets the intent of the Legislature, which passed as A.C.A. 17-27-101 through 104. (An Act to amend Arkansas Act 593 to provide for the licensure and regulation of Marriage and Family Therapists, now numbered Act 244 of 1997) and the Governor who signed it into law to be for the protection of the public welfare and in the public interest.

Therefore, the Board of Examiners in Counseling shall in all its deliberations and all its adopted rules and regulations diligently pursue goals most consistent with the public interest, and shall, at all times, apply the provisions of A.C.A 17-27-101, et seq. and the rules and regulations adopted from time to time in a fair and impartial manner.

1. GENERAL INFORMATION

1.1 Description of Organization

The Arkansas Board of Examiners in Counseling is composed of nine (9) members appointed by the Governor to staggered terms of three years. The composition of the Board shall include six (6) licensed or licensable counselors, (three practicing counselors, three counselor educators or supervisors, (one of which shall also be a licensed marriage and family therapist, if available), and one (1) non-licensed individual who represents the general public. The seven are recommended to the governor by November 1 each year by the Executive Committee of the Arkansas Counseling Association (ArCA). One (1) licensed marriage and family therapist shall be recommended to the governor by the Board of Directors of the Arkansas Association for Marriage and Family Therapists (ArAMFT). One (1) non-licensed member shall represent the over sixty populations and is selected by the governor from the general population.

Practicing counselors are defined, by the American Counseling Association, as individuals who apply mental health, psychological, or human development principles, through cognitive, affective, behavioral or systemic intervention strategies, that address wellness, personal growth, or career development, as well as pathology.

Counselor educators are defined, in accordance with the American Counseling Association's (ACA) 1995 Code of Ethics and Standards of Practice, as counselors who are responsible for developing, implementing, and supervising educational programs and are skilled as teachers and practitioners. They are knowledgeable regarding the ethical, legal, and regulatory aspects of the profession, are skilled in applying that knowledge, and make students and supervisees aware of their responsibilities. Counselors conduct counselor education and training programs in an ethical manner and serve as role models for professional behavior. Individuals

Clergy - Clarification of 17-27-103 Exemptions (b)(3)

3.1 Definition

Clergy appointed and/or endorsed to practice pastoral counseling as long as they are operating in a role within the congregation or synagogue or ministry assignment (such as Pastor, Associate Minister, Staff member, Institutional Chaplain, etc.) and are serving members of that assignment be exempt from licensure requirements. The same status should be granted to an institutional chaplain (military, hospital, industrial). Any minister, clergy or pastoral counselor who has a private practice, offers services to persons outside membership of their assignment or accepts fees, (from any source, such as third party payments, clients, donations, etc.), or from people outside their congregations, church, synagogue, or immediate work (such as chaplaincy) or offers counseling services to the public, will be licensed. This includes part-time, private practice provided in addition to or beyond the documented assigned, ministry work as pastor, chaplain, etc.

3.2 Qualifications

Clergy who are credentialed as member, fellow, or diplomate by the American Association of Pastoral Counselors (AAPC) or other Board-approved credentialing organizations will be accepted as meeting the Board definition of equivalent training for Licensed Associate or Professional Counselor/Therapist.

Upon completion of the application process, providing a passing score on one of the written examinations (National Counseling Examination, Marriage and Family Therapy Examination, Pastoral Counselor Examination or equivalent), passing the situational and oral exams, clergy applicants with appropriate documented experience will be granted the Licensed Counselor/Therapist license with the specialty license as pastoral counselor/therapist.

4A. QUALIFICATIONS FOR COUNSELING LICENSE

4A.1 Licensed Associate Counselor

- (a) Must be a major.
- (b) Must have received a graduate degree that is primarily professional counseling in content from a regionally accredited institution. The graduate semester hours must meet the national academic and training content standards adopted by the Board and the Council for the Accreditation of Counseling and Related Educational Programs (CACREP) or equivalent.
- (c) Must demonstrate professional competencies by passing written, oral, and situational examinations as prescribed by the Board.
- (d) Must arrange supervision with a Board-approved LAC supervisor and have same approved in writing by the Board.
- (e) Must have clear criminal background check (Act 1317 of 1997)
- (f) Must be a citizen of the U.S. or have an immigration (green card) document verifying legal alien work permit in the U.S.

4A.2 Licensed Professional Counselor

- (a) All of the above, plus:

PCEB

Pastoral Counselors Examination Board
1701 S. Prospect, Suite 19, Champaign, IL 61820
217-356-4357 or decondan@msn.com

September 20, 2000

To Whom It May Concern:

This is to certify that Mary (Dyer) Hubbard successfully passed the Pastoral Counselors Examination in 1995. The Pastoral Counselors Examination has been standardized to the norms of pastoral counselors throughout the United States.

Sincerely,



Daniel C. Henderson
President
Pastoral Counselors Examination Board

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PASTORAL COUNSELORS EXAMINATION BOARD

SAMPLE ITEMS

1. According to Erikson's psychosocial view of development, the struggle between industry and inferiority occurs during
 - A. school age.
 - B. middle age.
 - C. infancy.
 - D. adolescence.
2. Which of the following is not an axis dimension of the DSM-IV?
 - A. age of syndrome appearance
 - B. physical disorder
 - C. psychiatric syndrome displayed
 - D. psychological stressors
3. In *The Living Human Document*, Charles Gerkin proposes a(n) _____ approach to pastoral counseling.
 - A. hermeneutic
 - B. client centered
 - C. analytical
 - D. structural
4. The core idea at the root of the meaning of ministry is
 - A. status.
 - B. worship.
 - C. proclamation.
 - D. service.
5. In the context of sexual or domestic violence in the family, Marie Fortune argues that
 - A. justice is the precondition for forgiveness.
 - B. mediation is a valuable pastoral resource.
 - C. forgiveness allows victims to forget their abuse.
 - D. the perpetrator's religious conversion is a primary goal.
6. Statistically, the means of three or more samples may be compared simultaneously by using
 - A. the chi-square test.
 - B. the t test.
 - C. the analysis of variance.
 - D. the correlation coefficient.
7. Which of the following tests is primarily intended to measure psychopathology?
 - A. Minnesota Multiphasic Personality Inventory
 - B. Edwards Personal Preference Inventory
 - C. The Personality Orientation Inventory
 - D. Sixteen Personality Factors Test
8. African-American family structures differ from many middle-class European American family structures in that
 - A. there are seldom two parents.
 - B. the extended family is the prevalent model.
 - C. they are usually matriarchal.
 - D. generational differences are relatively unimportant.
9. Edwin H. Friedman studied the emotional life of synagogues and churches under the rubrics of
 - A. Jungian psychology.
 - B. Freudian psychology.
 - C. Alderian psychology.
 - D. Systemic family therapy.
10. Ron Taffel and Rosemary Masters identify certain variables that limit the ability a woman has to change her life (e.g. in therapy). Which of the following is not one of those variables?
 - A. Number of children
 - B. Economic viability
 - C. Perceived empathic support
 - D. Level of education
11. According to the *AAPC Code of Ethics*, it is permissible to use testimonials from clients when advertising one's services
 - A. if the client provides written release for the testimonial.
 - B. if no individual client names are used in the advertisement.
 - C. if the ad copy has been reviewed before publication by the AAPC.
 - D. none of the above.

CASE SCENARIO

John is a 50 year old white married male. He is referred to you by a managed care company where he has had an initial assessment interview by a psychologist prior to assignment. The client says to you that he is seeking therapy because he is anxious about decisions he has to make in life. He is considering a career change. In fact, he has made several career changes in his life, seeming to do well in each field until he decides to try something different. His speech is rapid and he frequently changes subjects. The report from the managed care company psychologist who did the assessment says, "John is clearly manic-depressive, as evidenced by his pressured speech." You are suspicious of the correctness of the diagnosis.

1. Given the above information, what additional information can be sought immediately in order to confirm the correctness of the diagnosis.

- A. The reputation of the person doing the initial assessment.
- B. The effectiveness of medication in treating the disorder.
- C. Indications of the cycle involved in the bi-polar illness.
- D. Test results from either an MMPI or MMPI-2.

2. It is determined by further questioning that the bi-polar diagnosis is probably not valid. Given the above information, which of the following is most likely to be an alternative diagnosis.

- A. Schizophrenia
- B. Attention Deficit Disorder
- C. Schizotypal Personality Disorder
- D. Dependent Personality Disorder

3. Which of the following spiritual issues would most likely be involved with this person.

- A. Issues related to how he fits in the world.
- B. Issues related to how we relates to other people.
- C. Issues related to how well he avoids doing inappropriate things.
- D. Issues related to his extending grace to himself.

4. In the above scenario, the client had been asked by the psychologist doing the initial assessment to make an appointment with a psychiatrist for evaluation regarding the appropriateness of lithium. He indicates to you that he has not made the appointment and asks if you think he needs to follow through. If you were to answer his question, the best answer would be

- A. To advise him to delay the appointment until you have done more testing and evaluation.
- B. To advise him to follow what the managed care representative had asked him to do.
- C. To advise him that the diagnosis given at his initial assessment was probably wrong and that he should go back to the managed care company for further assessment.
- D. To advise him not to go for medical evaluation since the diagnosis is clearly wrong.

5. Given only the above information, the most appropriate treatment plan for you would focus on would involve

- A. Further assessment
- B. Medication and further assessment
- C. Career counseling
- D. Relaxation training



**Samaritan
Counseling
Center**

765 Skippack Pike, Suite 300
Blue Bell, PA 19422
(215) 643-5826
Fax (215) 643-6750

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STATE BOARD OF PROFESSIONAL COUNSELORS
REVIEW COMMITTEE

April 10, 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**

Dear Eva Cheney,

I am responding to you regarding the Proposed Licensure Regulations for Professional Counselors and Marriage and Family Therapists. (reference number 16A-964) As a certified Pastoral Counselor with the American Association of Pastoral Counselors (AAPC), I strongly urge these recommendations to the proposed regulations:

- 1) In naming fields "closely related to the practice of professional counseling" §49.1 expand the list to include: pastoral counseling.
- 2) In approving "continuing education requirements for grandparenting" §49.15(5)(iv) include: courses approved by AAPC (American Association of Pastoral Counselors).
- 3) In recognizing certification through national counseling organizations; include certification as a Fellow or a Diplomate through the American Association of Pastoral Counselors.
- 4) In recognizing national licensing examinations for counselors, include the Pastoral Counselors Examination administered through the Pastoral Counselors Examination Board (PCEB).

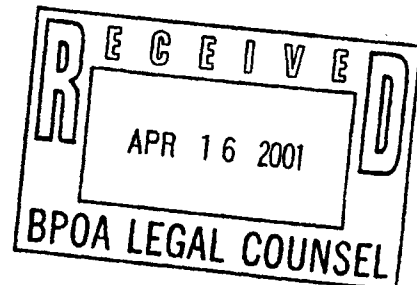
Thank you for your attention to these recommendations, Ms. Cheney. I have also included for your information:

- a copy of another state's (Arkansas) law recognizing AAPC as a qualified credentialing body for their licensed professional counselors
- sample questions from the Pastoral Counselor Examination to demonstrate its clinical rigor

As a full-time therapist with the Samaritan Counseling Center since 1995, I provide competent professional counseling to many individuals. It is appropriate that I - and others in my profession - have the opportunity to be licensed as professional counselors in the state of Pennsylvania.

Sincerely,

Mary Dyer Hubbard, M.S.
Pastoral Counselor



Clergy - Clarification of 17-27-103 Exemptions (b)(3)

3.1 Definition

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3.2 Qualifications

Clergy who are credentialed as member, fellow, or diplomate by the American Association of Pastoral Counselors (AAPC) or other Board-approved credentialing organizations will be accepted as meeting the Board definition of equivalent training for Licensed Associate or Professional Counselor/Therapist.

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4A.2 Licensed Professional Counselor

(a) All of the above, plus:

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**Rue Suhrke-Flowers
1732 Hood Lane
Maple Glen, PA 19002**

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

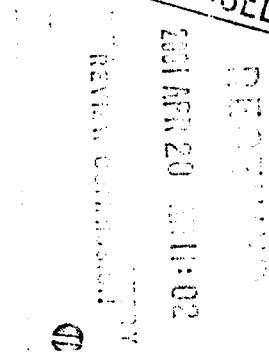
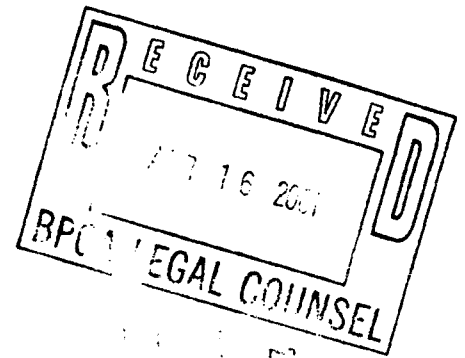
April 10, 2001

Dear State Board Members,

I am writing as a Human Resources Director with a large PA employer and as a concerned PA citizen who has seen first hand the devastating consequences of mental health and Substance abuse problems being treated by inadequately trained professionals impacted by managed care. As such, I am writing in reference to: Pennsylvania bulletin, 31 (12), 1547-1668, March 24, 2001. (ref. # 16A-694).

Pennsylvania's business are seriously hurt by addiction issues. We must act together to be certain That our Commonwealth's Certified Addiction Counselors, who are qualified to provide counseling and meet the other standards, should be able to obtain licensure as Professional Counselors under the non-statutory grandparenting provisions of Act 136.

Members of the State Licensure Board need to include, under grandfathering, Certified Addictions Counselors with Masters Degrees, in the Proposed Rulemaking (ref.#16A-694). CACDs meet specific standards including passing a national examination and are required to complete on-going training to re-certify. The expectations for this credential, which has a long history, are common with the other counseling professions included in this ACT i.e. Art Therapists, Social Workers, Rehabilitation Counselors, Music Therapists, Dance Therapists, Drama Therapists, Clinical Mental Health Counselors, & NCCs.



Please respond in the best interests of consumers by enacting:

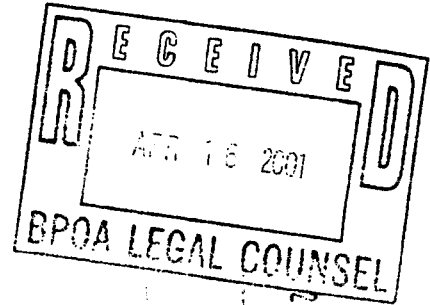
- **Acceptance of the credential of Certified Addictions Counselors with appropriate Counseling Masters Degrees (CAC Diplomat status) in the list of professions to be recognized.**
- **Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite.**

Sincerely,

Rue Suhrke-Flowers

PENN·Friends
Behavioral Health Services

April 10, 2001



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

Dear State Board Members:

As the Executive Vice-President of PENN-Friends Behavioral Health System, a joint venture between Friends Hospital and the University of Pennsylvania, I oversee the delivery of behavioral health services to over 600,000 residents of the Delaware Valley and more specifically Southeastern Pennsylvania. I writing to you in great concern about the following:

Act 136, The Professional Counselor Licensing Bill, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors, Proposed Rulemaking (Licensure) to Act 136. Pennsylvania Bulletin, 31(12), 1547-1668, March 24, 2001. (ref. # 16A-694).

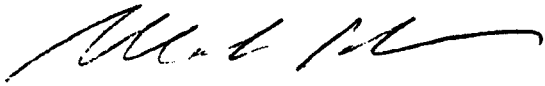
Under the non-statutory grandparenting provision of this ACT, I am writing about the necessity to include **Certified Addictions Counselors with Masters Degrees** in the Proposed Rulemaking (ref. #16A-694). This exclusion of a clearly identifiable and competent group of counseling professionals delivering specialized services to the State's population of individuals with drug and alcohol problems must be corrected. CACs at the Masters Level, have met nationally-based standards (established by the International Certification & Reciprocity Consortium) of education and continuing education, demonstrated competencies through work performance, a written exam, and clinical supervision, and adhere to a code of professional ethics equal to the behavioral health care professions included in the proposal including Art & Music Therapists, Drama Therapists, and Marriage and Family Therapists. CACs are dedicated, competent professionals with a rich history in this state. As such, they must be recognized to insure that those in need of addictions treatment are seen by the appropriate professional.

For Act 136 to be taken seriously and serve all of the Commonwealth's behavioral healthcare needs the following must be included in the Proposed Rulemaking. Including CACs who meet the grandfathering requirements as LPCs will help diversify the network of providers eligible to help troubled individuals and families. The Pennsylvania Certification Board (Mary Jo Mather at 717-540-4455 is eager to work with you to see that this situation is rectified.

- 1. The grandparenting regulations to accept individuals with appropriate Masters Degrees and hold the Certification as Addictions Counselors in the State of Pennsylvania.**
- 2. Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite. (passed by Masters level CAC Diplomats)**

I ask that you give your most positive consideration to including this group of professionals, who specialize in treating a very significant cohort of people that present for behavioral health services in Pennsylvania. Please also know that you can contact me directly to discuss the above referenced concern.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Schor', with a long horizontal flourish extending to the right.

Mark Schor
Executive Vice-President and Chief Operating Officer
PENN-Friends Behavioral Health System

April 10, 2001

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

RECEIVED
STATE BOARD OF SOCIAL WORKERS, MARRIAGE & FAMILY THERAPISTS, & PROFESSIONAL COUNSELORS
APR 10 2001

RE: Act 136

Dear Ms. 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 serve the largest specialty treatment population in Pennsylvania. 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 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 nations oldest African American university. Exclusion of this degree discriminates against African American CAC's and would serve to severely limit culturally sensitive counseling to minority populations.

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

- Inclusion under the grandparenting regulations of those in possession of a Masters Degree and a CAC credential.
- 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 Masters Degree in Human Services as provided by Lincoln University

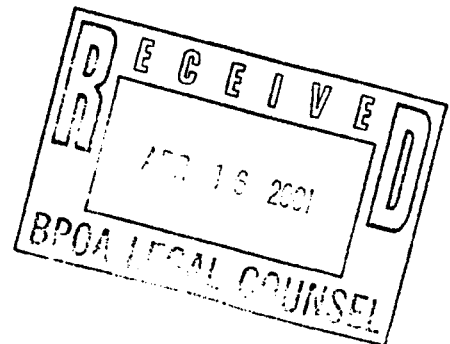
I sincerely urge your consideration in the matter.

Sincerely,

GARY Andrews BACAC



cc: PCB Board



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INDEPENDENT REGULATORY
REVIEW COMMISSION



Stephanie Stover
324 East Washington Avenue
Bethlehem, PA 18018-2543
April 9, 2001

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

To Whom It May Concern:

Enclosed is a copy of a letter I am sending to Eva Cheney, Board Counsel to the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors, regarding the proposed regulations for Licensure of Professional Counselors in the state of Pennsylvania. I would appreciate your prompt attention to this matter.

Sincerely,

Stephanie Stover

Stephanie Stover

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
April 9, 2001

RE: reference number 16A-964

Dear Ms. Cheney:

As a current student in the Master of Arts in Pastoral Counseling (MAPC) program at Moravian Theological Seminary in Bethlehem, PA, I was very concerned to learn that the proposed regulations for Licensure of Professional Counselors would exclude pastoral counselors from licensure in the state of Pennsylvania.

Moravian Seminary's MAPC degree is accredited by the Association of Theological Schools in the United States and Canada, as well as by the Commission on Higher Education of the Middle States Association of Colleges and Schools. The seminary is also actively working towards accreditation of the MAPC degree by the Council for the Accreditation of Counseling and Related Programs (CACREP) by the year 2005.

Since the 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.

The students, faculty, and administration of Moravian Theological Seminary 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. We hope that our request might be given careful consideration as the final form of the proposed regulations is determined.

Sincerely,

Stephanie Stover
324 E. Washington Avenue
Bethlehem, PA 18018-2543

cc: Independent Regulatory Review Commission

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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The Counseling Centre
13226 Leslie Road
Meadville, PA 16433

Dear Ms. Cheney-State Board of Social Workers-

I am writing to give my thoughts about the recent publication of ACT 136-The Professional Counseling Bill. I am a Certified Addiction Counselor and as a concerned resident of PA, I am wondering about the bill is going to affect substance abusers who seek counseling. I am concerned about the regulations of the grand parenting issues that are non-statutory in nature. I am concerned that the regulations don't recognize Master level addiction specialist. To my understanding, we represent the largest specialty group in our state and I feel that the regulations fail to recognize Certified addiction Counselors with a Master's Degree. I worked hard for this certification and was tested with strict guidelines as provided by the International Certification and Reciprocity Consortium.

Also people who graduated from Lincoln University with a Masters degree in human services seem to be excluded as well. This would hurt the minority population who work in urban centers. This exclusion could very well negatively affect the services to our Afro American brothers and sisters.

I strongly advocate to include the following within the regulations: Individuals who have a Masters degree and Certification in Addiction Counseling, be included under the grandparenting regulations. As well as grandparenting the IC&RC national exam for addiction counselors as acceptable and that those with Masters in Human services from Lincoln University be included as well.

I sincerely ask you to consider these requests as a means of assuring my clients as well as others are going to be able to be continued to have counseling services and that the minority populations be able to be adequately served as well

Sincerely,

Cindy Kightlinger
17796 Pond Drive
Saegertown, Pa 16433
814-763-6787
cc:PCB Board

Cindy Kightlinger

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2001 APR -9 10:11:45
STATE BOARD OF SOCIAL WORKERS
KENTON, OHIO

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APR 11 2001
BPOA LEGAL COUNSEL

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Louise H. Young, R.N.C.S., M.A.

Clinical Nurse Specialist
National Certified Counselor
Pastoral Counselor

206 West Broad Street
Bethlehem, PA 18018
610-866-9060

Eva Cheney, Board Counsel
State Board of Social Workers, Marriage and Family Therapist, and Professional
Counselors
PO Box 2649
Harrisburg, PA 17105 - 2649
April 9, 2001

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PENNSYLVANIA
COMMISSION

RE: reference number 16A - 964

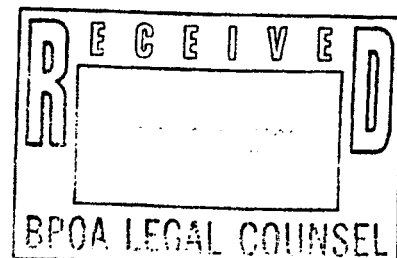
Dear Ms. Cheney:

I appreciate the Board's work and commitment to the licensing bill but am concerned about a portion of Section 49.1. The proposed regulations for licensure of Professional Counselors published by your Board in the March 24, 2001 issue of the Pennsylvania Bulletin eliminates a clause that was in an earlier version of the Regulations. In Section 49.1 the definition of, "field closely related to the practice of professional counseling" specifies five fields of study; thus omitting and thereby **discriminating against other closely related degree programs in professional counseling.**

I am a graduate of a degree program which is accredited by the Commission of Higher Education of the Middle States Association of Colleges and Schools and by the Association of Theological Schools in the United States and Canada. The degree is thus recognized by the Council for Higher Education as called for in the regulations. Further, I have met criteria of the National Board of Certified Counselors and have been practicing as a National Certified Counselor since 1992. **However, my degree is not one of the "five fields of study".**

I 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 ammended to include the phrase, "but not limited to" following the word "includes" in the definition. This amendment would allow myself as well as many others who have graduated from a variety of duly accredited counseling related degree programs to function within the standards and guidliens intended by your Board.

I sincerely hope we will be able to receive the recognition we deserve as professional counselors.

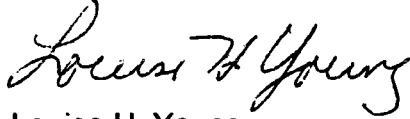


Clinical Nurse Specialist
National Certified Counselor
Pastoral Counselor

Louise H. Young, R.N.C.S., M.A.

206 West Broad Street
Bethlehem, PA 18018
610-866-9060

Sincerely,



Louise H. Young

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

Kathy Wilson, MA, CAC, CEAP
548 Tyler Street
Pittsburgh, PA 15237
724-225-9700

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

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2001 APR 20 AM 0:59
STATE BOARD OF SOCIAL WORKERS, MARRIAGE & FAMILY THERAPISTS & PROFESSIONAL COUNSELORS
HARRISBURG, PA

April 9, 2001

Dear Ms. Cheney,

This letter is in reference to the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. I am a Master level Certified Addiction Counselor currently employed at a very reputable Drug & Alcohol Treatment Center. I am outraged that you would fail to recognize master's level addiction specialist like myself who have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the International Certification & Reciprocity Consortium (IC&RC). Because of this exclusion, I am also frightened for the health and welfare of substance abusers seeking counseling services.

I am strongly advocating for the inclusion of individuals in possession of a Master's Degree and Certification as an Addiction Counselor and of the IC&RC national exam for addiction counselors as an acceptable exam under the regulations. I urge your consideration in this matter as a means of assuring that this population can be served by the professional most educated and experienced in addiction treatment.

Sincerely,

Kathy Wilson, MA, CAC, CEAP

cc: PCB Board

RECEIVED
APR 10 2001
BPOA LEGAL COUNSEL

ORIGINAL: 2178
2001 APR 18 10:11 AM
MAIL ROOM



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

*Father John S. Krafchak
Gary Lennon
Maureen Reimiller
Joseph J. Stochla
Susan Thier*

Clem-Mar House, Inc.

PO Box 2028
Kingston, PA 18704-7038
(570) 288-0403 FAX (570) 288-4403

April 9, 2001

To the State Board of Social Workers:

I am writing to you as a drug and alcohol counselor with two years experience who plans to pursue a Certificate in Addictions Counseling and as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counseling Licensing Bill, causes me great concern for the well being of those who seek counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature.

First, 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 & Reciprocity Consortium (IC&RC).

Also, 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 who hold this Master's Degree work with minority populations in urban centers. Clients in such areas are often economically and socially unable to receive services elsewhere. The exclusion of this degree from the grandparenting regulations shows no regard for the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will impact the availability of services to minorities.

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

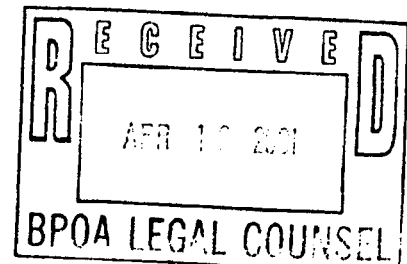
- * Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- * Inclusion under the grandparenting the regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- * Inclusion under 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 all citizens of our Commonwealth are provided counseling services to serve our widely diverse communities.

Sincerely,

Sonya Mowry, BSW
Primary Counselor

cc: PCB Board



ORIGINAL: 2178

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2001 APR 18 PM 12:00

REVIEW DIVISION



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

Father John S. Krafchak

Gary Lennon

Maureen Reimiller

Joseph J. Stochla

Susan Thier

Clem-Mar House, Inc.

PO Box 2028
Kingston, PA 18704-7038
(570) 288-0403 FAX (570) 288-4403

April 9, 2001

To the State Board of Social Workers:

I am writing to you as Clinical Director with 16 years experience in the field as a drug and alcohol counselor and as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counseling Licensing Bill, causes me great concern for the well being of those who seek counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature.

First, 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 & Reciprocity Consortium (IC&RC).

Also, 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 who hold this Master's Degree work with minority populations in urban centers. Clients in such areas are often economically and socially unable to receive services elsewhere. The exclusion of this degree from the grandparenting regulations shows no regard for the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will impact the availability 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 the 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.

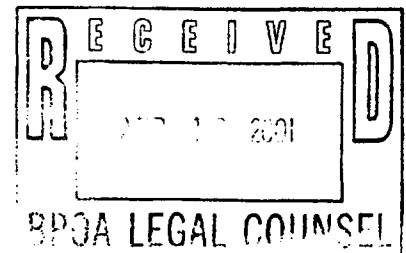
I sincerely urge your consideration in this matter as a means of assuring that all citizens of our Commonwealth are provided counseling services to serve our widely diverse communities.

Sincerely,

Paulette Capwell

Paulette Capwell, CAC
Clinical Director

cc: PCB Board



ORIGINAL: 2178

RECEIVED
COMMUNITY SERVICES
REVENUE COMMISSION



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

*Father John S. Krafchak
Gary Lennon
Maureen Reimiller
Joseph J. Stochla
Susan Thier*

Clem-Mar House, Inc.

PO Box 2028
Kingston, PA 18704-7038
(570) 288-0403 FAX (570) 288-4403

April 9, 2001

To the State Board of Social Workers:

I am writing to you as an Admissions Coordinator in the drug and alcohol field and as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counseling Licensing Bill, causes me great concern for the well being of those who seek counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature.

First, 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 & Reciprocity Consortium (IC&RC).

Also, 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 who hold this Master's Degree work with minority populations in urban centers. Clients in such areas are often economically and socially unable to receive services elsewhere. The exclusion of this degree from the grandparenting regulations shows total disregard for providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will negatively impact the availability of services to minorities.

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

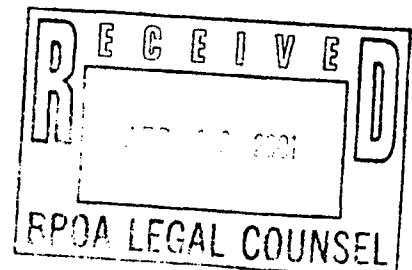
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- * Inclusion under the grandparenting the regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- * Inclusion under the grandparenting regulations of individuals in possession of the Master's Degree in Human Services as provided by Lincoln University.

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

Sincerely,

Lynn Ann P. Cholko
BS, Human Resources Management

cc: PCB Board



ORIGINAL: 2178

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REVIEW DIVISION



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

Father John S. Krafchak

Gary Lennon

Maureen Reimiller

Joseph J. Stochla

Susan Thier

Clem-Mar House, Inc.

PO Box 2028

Kingston, PA 18704-7038

(570) 288-0403 FAX (570) 288-4403

April 9, 2001

To the State Board of Social Workers:

I am writing to you as a Licensed Social Worker with 10 years experience counseling in the drug and alcohol field and as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counseling Licensing Bill, causes me great concern for the well being of those who seek counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature.

First, 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 & Reciprocity Consortium (IC&RC).

Also, 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 who hold this Master's Degree work with minority populations in urban centers. Clients in such areas are often economically and socially unable to receive services elsewhere. The exclusion of this degree from the grandparenting regulations shows no regard for the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will impact the availability of services to minorities.

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

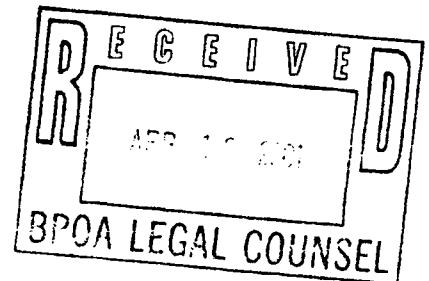
- * Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- * Inclusion under the grandparenting the regulations of the IC&RC national exam for addiction counselors as an acceptable exam.
- * Inclusion under 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 all citizens of our Commonwealth are provided counseling services to serve our widely diverse communities.

Sincerely,

John Duffy, LSW, AACII
Primary Counselor

cc: PCB Board



ORIGINAL: 2178

DEPARTMENT OF REVENUE
COMMUNICATIONS DIVISION
HARRISBURG, PENNSYLVANIA
REVENUE COMMISSION



*"Establishing the roots for
a Renewal of Life through
Recovery"*

Board of Directors

- Father John S. Krafchak*
- Gary Lennon*
- Maureen Reimiller*
- Joseph J. Stochla*
- Susan Thier*

Clem-Mar House, Inc.

PO Box 2028
Kingston, PA 18704-7038
(570) 288-0403 FAX (570) 288-4403

April 9, 2001

To the State Board of Social Workers:

I am writing to you as Certified Addictions Counselor Diplomate with 10 years experience as a counselor and as a concerned resident of the Commonwealth of Pennsylvania. The recent publication of the regulations related to Act 136, The Professional Counseling Licensing Bill, causes me great concern for the well being of those who seek counseling services. The fundamental problems with the regulations involve the grandparenting issues and are non-statutory in nature.

First, 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 & Reciprocity Consortium (IC&RC).

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

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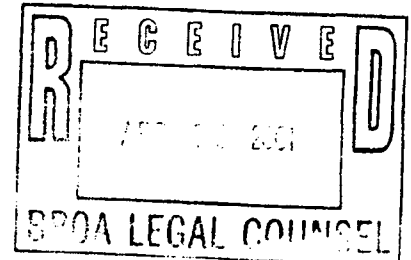
I sincerely urge your consideration in this matter as a means of assuring that all citizens of our Commonwealth are provided counseling services to serve our widely diverse communities.

Sincerely,

James Hassel, MS, CAC Diplomate

James Hassel, MS, CAC Dilplomate
Primary Counselor

cc: PCB Board



ORIGINAL: 2178

Eva Cheny, Counsel
POBox 2649
116 Pine St.
Harrisburg,PA.17105-2649

RECEIVED

2001 APR -9 AM 11:47

STATE OF PENNSYLVANIA
REVIEW COMMISSION



Dear Ms. Cheny:

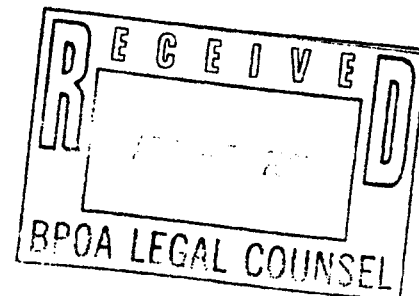
I am to you writing to you concerning the recent publication of the regulations related to Act 136 of The Professional Counselor Licensing Bill (#16A-694). I am a Gestalt therapist in private practice in Pittsburgh, Pennsylvania. I have worked in social services for the last 18 years. I am certified as an addiction counselor (CAC) from the Pennsylvania Certification Board (PCB). The problem with the licensing bill is that CAC is not recognized for the grand parenting regulations. I do understand that for this regulation a Master degree and a national certification. I am suggesting the NAADAC Master Addiction Counselor Certification (MAC) for which a Master's degree is required. The requirements for this certification are no less rigorous than those of the other organizations, which the board proposes to recognize. In addition to the requirement of a Master's Degree, a candidate for MAC certification must have 5000 contact hours of specific alcoholism and drug abuse counseling, three full years or 6,000 hours of supervised experience, two years or 4,000 hours of which must be post-master's degree award, and a passing score on the national examination for the MAC.

I believe that state licensure for drug and alcohol counselors as important for any of the other professional counseling fields. Individuals in need of addiction counseling should have the same right as any other mental health patients to be assured that their professional counselors are competent and have met minimum education and experience standards. Additionally, state licensure of addiction counselors will provide eligibility for insurance reimbursements for their services, making such services more obtainable by the citizens of this Commonwealth.

I would also call you attention to additional letters that have been sent concerning this very issue. One was sent by Representative Rod Wilt on October 4,2000 to Commissioner Dorothy Childress. I am enclosing a copy for you to view if MS. Childress has not forwarded to you. Another letter was sent at this same time by Bill Malone president of NAADAC. He also sent this correspondence to Commissioner Childress. I do not have a copy of this letter. If Ms. Childress cannot give you a copy please let me know and I will ask Mr. Malone to re-issue a letter to you.

Thank you for your cooperation and attention. I look forward to this time of public review as an opportunity to correct the licensure Act 136 of 1998. I may be reached by phone 412-421-8020 and my email is cfitz@icubed.com. And my address is 5562 Wilkins Ave. Pittsburgh, Pennsylvania 15217.

Sincerely,
Gina M. Fitzmartin
Gina M. Fitzmartin M. ED. CAC



ORIGINAL: 2178

DUANE P. CONRAD, M.A., CSP, CAC
104 South Lynwood Lane
Exton, PA 19341
610.942.5900

April 9, 2001

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

RE: Act 136; 16A-694

Dear Board:

As a Pennsylvania resident who holds a certification in addiction counseling I was outraged to learn that Act 136, in its present state, excludes addiction counselors. I hold a master's degree in clinical psychology and I am also a certified school psychologist. In my work in human services over the past 15 years I can attest to the need to recognize properly certified addiction counselors as license eligible. Of all the other specialty certifications I can think of no other that performs a service more needed than the addiction counselor.

I strongly advocate the grandparenting inclusion of master's level addiction counselors within the regulations. To omit such is a great disservice not only to addiction counselors and to those they treat, but also to all residents of the commonwealth whose lives are impacted by the disease of chemical dependency.

Thank you for your anticipated support of this position.

Sincerely,



Duane P. Conrad, M.A., CSP, CAC

RECEIVED
2001 APR 18 11:13:58
PENNSYLVANIA
MERCANTILE COMMISSION

cc: PCB Board

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APR 17 2001
BPOA LEGAL COUNSEL



ORIGINAL: 2178

EDINBORO UNIVERSITY

OF PENNSYLVANIA

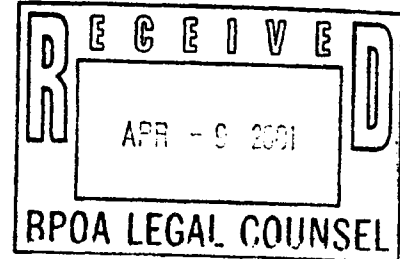
2001 APR 11 AM 9:42

REVIEW COMMISSION

Department of Psychology
Edinboro, PA 16444
(814) 732-2774

April 4, 2001

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



Dear Ms. Cheney:

I would like to express my appreciation to the members of the state board for their hard work in thoughtfully crafting the new credentialing regulations, and for their willingness to solicit feedback from other professionals and the public regarding these changes. I realize that the proposed rules that appeared in the *Pennsylvania Bulletin* on March 24, 2001, represent a draft, and not the final version of the statute. Nevertheless, I am seeking clarification regarding two of the items, and I have one request which I would ask the board members to consider.

In terms of clarification, I have one question which pertains to the Educational requirements listed under section 49.2. Would it be possible to meet course requirements if the required material is integrated across courses as opposed to being self-contained within one specific course? For example, two semester hours are required in the area of "Social and cultural foundations," which is listed under section 49.2, item (2). While some graduate programs offer a "stand alone" course in multicultural counseling, other programs believe that the material is better learned when integrated throughout the curriculum. The same could be true, for example, for the teaching of ethical principles. Will there be a format for requesting credit for material covered across multiple courses?

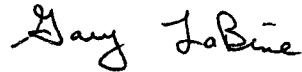
Second, while our graduate faculty are in support of the 100 hour supervised practicum experience prior to the internship at the end of the program, we find ourselves wondering what kinds of experiences will be required in order to meet the practicum requirement. In addition, are there certain types of settings which will or will not meet this requirement? Under section 49.13, item (b), the board specifically identifies the kinds of clinical activities which will satisfy the experience requirement for the licensed professional counselor credential. Is there a need for greater specificity or guidance regarding the kinds of experiences which will satisfy the practicum and internship requirements (section 49.2, item 9), or will that be left to the discretion of the various graduate programs?

Finally, in terms of my request, I would ask that board members consider (or perhaps reconsider) the inclusion of the Practice Exam of Psychological Knowledge offered by NAMP under section 49.11, Licensure Examination. I am aware that results from this exam are deemed acceptable for exemption from licensure examination (section 49.15, item 6, viii), yet the exam is not included as an option for newer professionals seeking to meet the standard requirements. While our graduate faculty strongly agree that disciplines such as clinical and

counseling psychology are indeed "closely related fields," there are some differences in the emphasis of each curriculum, as well as in the terminology which is typically used. Given that the board has determined that clinical and counseling psychology are closely related to the discipline of counseling, it would seem most fair to allow students graduating from an applied psychology program to demonstrate their knowledge and competence on an exam which most closely relates to their education, training, and experience.

Thank you for your time and your consideration of these matters. Should you need further clarification regarding my concerns, I can be reached at the above number, or through email at glabine@edinboro.edu.

Sincerely,

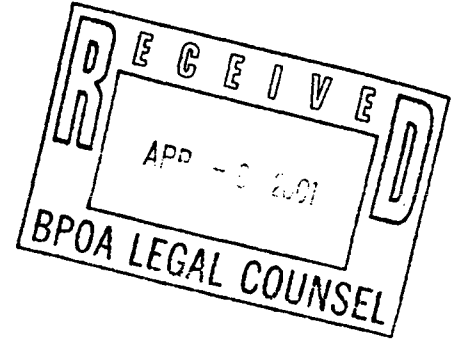
A handwritten signature in black ink that reads "Gary LaBine". The signature is written in a cursive style with a horizontal line under the name.

Gary LaBine, Ph.D.
Associate Professor



HOSPITAL
FOUNDATION
RIVERSIDE CARE, INC.

ORIGINAL: 2178



State Board of Social Workers, Marriage & Family
Therapist & 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 the Director of Clinical Services at Eagleville Hospital who holds a Masters Degree in Human Services and a CAC. I believe that Act 136, The Professional Counselors Licensing Bill raises concerns regarding quality care for those seeking treatment for substance abuse. The regulations do not recognize Master's level addiction specialist who I understand represent the largest specialty treatment population in the State. Persons, who are certified addictions counselors and hold a Masters' Degree, have achieved a competency-based clinically supervised credential under the strict guidelines of the International Certification and Reciprocity Consortium (IC & RC). These persons are not recognized by the regulations.

Also of concern is the exclusion of the Masters Degree in Human Services as offered by Lincoln University. This program which is almost 25 years old, was created in part by Professionals in the Addictions Treatment field who recognized the specialty of addictions treatment and sought to improve quality care through the credentialing of their employees. Lincoln University is also the nations oldest African American University and the majority of individuals who earned this Masters Degree are working with minority populations. Even in the private corporate wold standards are being set to train employees to improve their awareness of cultural issues. Persons who hold an MHS and a CAC are experts in the treatment of addictive diseases and providing racial, ethnic and cultural sensitive counseling to this population. The exclusion of this degree from grand parenting will directly and indirectly impact on services to minorities in the state.

I am strongly recommending for the inclusion of the following within the regulation;

- Inclusions under the grand parenting regulations of individuals in possession of a Masters 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 exam.
- Inclusion under the grand parenting regulations of individuals in possession of a Masters Degree in Human Services as provided by Lincoln University.
- I urge you to consider this matter as a means of assuring our citizens continued quality care for the treatment of addictive diseases and counseling services which serve our diverse community.

Sincerely,

Dennis Anthony Deal, MHS, CAC
239 North Whitehall Rd.
Norristown, PA, 19403
Home No: 610-631-1014
Work No: 610-539-6000 Ext. 206

cc: PCB Board

DAD/lmt

Vertical stamp: COMMUNICATIONS SECTION APR 16 11 29 AM '01

HOSPITAL • 100 Eagleville Road • P O Box 45 • Eagleville, PA 19408-0045 • (610) 539-6000
FOUNDATION • P O Box 265 • Eagleville, PA 19408-0265 • (610) 539-6009
RIVERSIDE CARE, INC. • 131 Harmony Street • Coatesville, PA 19320 • (610) 393-9600
1509 Woodbourne Road • Levittown, PA 19057 • (215) 945-7100
1007 W. Lehigh Avenue • Philadelphia, PA 19133 • (215) 226-5890
5828 Market Street • Philadelphia, PA 19139 • (215) 747-6490

Visit us on the web at www.eaglevillehospital.org

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2001 APR 18 11:59
REVIEW COMMISSION

April 9, 2001

Dear Members of the State Board for Social Workers,

I am writing to you as a Master's Level Certified Addiction Counselor as well as a resident of the Commonwealth of Pennsylvania. I have specific concerns regarding the recent publication of the regulations for Act 136, The Professional Counselor Licensing Bill. These concerns involve the grandparenting issues. The regulations do not recognize Master's Level Certified Addiction Counselors. I feel that counselors with these credentials should be included under the specialty counseling groups since they make up the largest specialty treatment population in our state. Individuals with these credentials have met all the requirements mandated by the International Certification Reciprocity Consortium that ensures the counselors are highly competent and qualified.

I am therefore strongly requesting that you include the following in the grandparenting regulations for licensing:

- 1) Include individuals possessing a Masters Degree and Certification as an Addiction Counselor (CAC)
- 2) Include the IC&RC national exam for Addiction Counselors as an acceptable exam

I request that these issues be taken into consideration in order to provide citizens of Pennsylvania with the most qualified counseling services available.

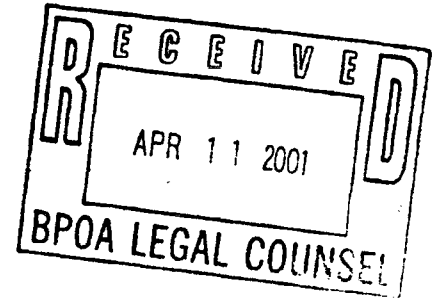
Sincerely,

Denise Seagren-Peterson
20 Fiske Avenue
Bradford, PA 16701
(814) 368-6498
cc: PCB Board

RECEIVED
APR 18 2001
PROA LEGAL COUNSEL

ORIGINAL: 2178

Patricia L. Epps, M.Ed., NCC, CAC, CEAP
133 Laurel Avenue
Pittsburgh, PA 15202-2119



April 8, 2001

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

Re: #16A-694

Dear Sir or Madam,

As a Certified Addictions Counselor (CAC) and a resident of Pennsylvania, I am concerned about the recent publication of the regulations related to Act 136, The Professional Counselor Licensing Bill. The regulations do not recognize the Master's level addiction specialists. CACs with a Master's degree have achieved a competency-based credential under the guidelines of the International Certification & Reciprocity Consortium (IC&RC).

The regulations also discriminate by excluding the Master's Degree in Human Services. Many people with such a degree are working with minority populations. This exclusion will impact the provision of services to minorities.

I am advocating the inclusion of the following:

- ◆ Inclusion under the grandparenting regulations of those individuals with 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 those with a Master's Degree in Human Services.

2001 APR 18 AM 11:57
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STATE BOARD OF SOCIAL WORKERS, MARRIAGE & FAMILY THERAPISTS, & PROFESSIONAL COUNSELORS

Please consider these issues that greatly impact the delivery of counseling services to the diverse communities of Pennsylvania.

Sincerely,

Patricia L. Epps

Patricia L. Epps, M.Ed., NCC, CAC, CEAP
133 Laurel Avenue
Pittsburgh, PA 15202-2119
412-761-1488

cc: PCB Board

Original: 2178

RECEIVED

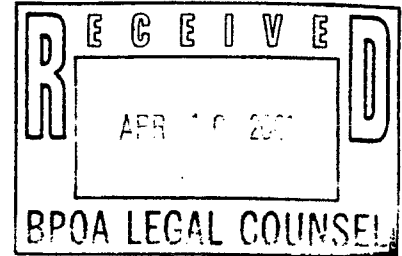
April 8, 2001

2001 APR 16 11:09:56

REVIEW COMMISSION



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



Ms. Eva Cheney;

I am writing you in concern of 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. As a licensed Certified Addiction Counselor and a licensed supervisor, for the past ten years, I am deeply concerned by the fundamental problems with regulations which involve the grandparenting issues. These regulations fail to recognize Master's level addiction specialists who represent, by far, the largest specialty treatment population in the Commonwealth.

Currently, Master's level Certified Addiction Counselors are not recognized by these regulations, even though they have achieved a competency-based, clinically supervised credential under stringent guidelines as provided by the International Certification & Reciprocity Consortium.

These regulations also limit services to 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. Many of these graduates are working with minority populations in our urban centers. When you exclude this degree from the grandparenting regulations, you provide an avenue of disservice to a whole population of individuals that need these services.

Please consider the implications of this exclusion and consider the following requests;

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

In consideration of our diverse communities, as well its professionals who have demonstrated not only competency but also commitment to our communities and their wellness, please consider this request for inclusion in current regulations. In these changing times, we need all the empathy and passion available to treat and care for those afflicted by the disease of addiction.

Respectfully,

Kathy J. Dreisbach

Kathy J. Dreisbach, CAC, CCS
Supervisor of the Women's Extended Care
Caron Foundation

Original: 2178

Mrs. Ann Reynolds
16 Terminal Avenue
Erdenheim, PA 19038

RECEIVED

2001 APR 16 AM 9:22

STATE BOARD OF PROFESSIONAL COUNSELORS
REVIEW COMMISSION

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 8, 2001

Dear State Board Members,

As a teacher who has seen the individual and family problems of those suffering from Alcohol and Drug problems, I urge the licensing Board to review these comments regarding the non-statutory provisions of Act 136, The Professional Counselor Licensing Bill-ref. # 16A-694.

As you know, allowing for Masters Level and above Certified Addictions Counselors who pass the ICRC National Exam and meet all other grandparenting requirements to apply for state licensure as professional counselors under the grandfathering clause will be in the best interests of consumers of counseling services in Pennsylvania. CACs offer valuable services to a population who has needs that far exceed some of the counseling provided by other professionals covered by the ACT. The CAC continuing education requirements and code of ethics are equal to the other counseling groups covered under this Act. Please see that these suggestions are included under the **non-statutory** grandparenting section.

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

Thank you for your willingness to put aside any petty turf issues and respond to the needs of consumers of counseling services who need professionals with a variety of specialties such as music and art therapy but also Addictions knowledge.

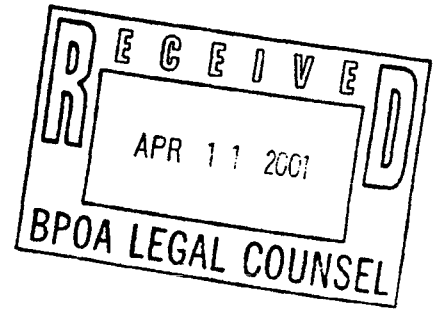
Sincerely,


Ann Reynolds

CC: Senators Holl and Reps. Curry and Civera

ORIGINAL: 2178

Albert J. Leonard
348 E. 11th Ave.
Homestead, PA 15120



April 8, 2001

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

RE: Act 136: Professional Licensure Bill - Public Comment 16A-694

Dear Eva Cheney:

G. K. Chesterton wrote, "Most mistaken people mean well, and all mistaken people mean something. There is something to be said for every error, but, whatever may be said for it, the most important thing to be said about it is that it is erroneous."

I believe it is an error to grandfather Dance, Music, Drama and other specialized counselors while leaving Addiction counselors excluded. Over the past twenty years I have dedicated myself to being a professional counselor in Pennsylvania. I cannot believe that I will not be included, which now appears to be a union keeping people out, rather than a sincere effort to acknowledge who have been the professional counselors in Pennsylvania.

As a former priest, I earned two Master's degrees. My Master of Arts in 1979 and Master of Divinity in 1986 equipped me to found and direct the first comprehensive ministry in the Diocese of Pittsburgh to address the needs of those impacted by a homicide, suicide or other tragic death. My efforts to provide counseling received national attention in both the religious and secular community. Eventually, I published, "After Tragic Death, Hope and Help." My work with delinquent youth and victims prompted Senator Arlen Specter to call me a national expert as a way to introduce me to foreign countries in order to learn more about delinquency outside the United States.

From 1994-2000, I served as an additional specialist at Holy Family Institute and earned the Certified Addiction Counselor, Diplomate from the Pennsylvania Certification Board. For the past two years I have served as a trauma specialist therapist at the Center for Victims of Violent Crime. I have received the NOVA training and this summer will receive certification as a Trauma & Loss Consultant from the National Institute for Trauma and Loss in Children.

I have been selected by a national adoption organization to speak at their national convention in August on the subject of counseling those affected by trauma and loss. But it seems that none of this will get me a place at the licensure table as defined by the working document. This is an error and I welcome any constructive way to correct it.

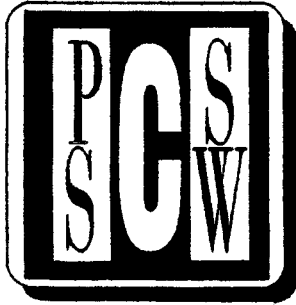
Looking forward to the inclusion of all the real professional counselors serving in Pennsylvania, I am

Sincerely,

A handwritten signature in black ink, appearing to read "Albert J. Leonard".

Albert J. Leonard

ORIGINAL: 2178



**Pennsylvania Society
for
Clinical Social Work**

112 Carol Lane, Richboro, PA 18954
215/942-0775 or

800/429-7579 (outside the 215 and 610 area codes)



April 7, 2000

Eva L. Cheney, Esq., Counsel
State Board of Social Workers,
Marriage and Family Therapists and Professional Counselors
Commonwealth of Pennsylvania
Department of State
Bureau of Professional Affairs

Ms Eva Cheney:

We appreciate the Board's opportunity to respond to the proposed regulations for the LCSW law in your March 23rd letter. We have several points which we would like to make, and the Board should know that we feel very strongly against using the psychology regulations for prospective clinical social workers.

The Pennsylvania Society for Clinical Social Work [PSCSW], as part of the PA Social Work Coalition, has already expressed the need for the Marriage and Family Therapists [MFTs] and the Professional Counselors to have comparable accrediting organizations to CSWE. Such organizations provide at least the minimum of baseline standardization for ethics and normative behavior over time and across educational institutions. Since it is relatively new for educational institutions to provide higher standards for these two groups, we think it would be helpful. There are studies which show that students learn for certain tests, so we do not feel that demand of one universal test means that such oversight bodies aren't needed.

In terms of the Social Work Regulations, we were grossly disappointed that these regulations were apparently lifted from the psychologists' regulations. Act 136 already requires three (3) years of post-graduate supervised clinical experience, not two (2) years as in many other states. To add to this, the burden of such close supervision and one (1) hour for every (10) does not seem either desirable in terms of training to become a professional nor workable. As the social workers on the State Licensing Board know, graduate social work students are supervised on a one hour of supervision for every ten hours of direct practice in their two years of their practicum. To continue such close supervision does not create a professional.

We recommend that 156 hours of supervision over the 3600 hours of clinical experience is much more the norm and more workable. Upon checking with several surrounding state statutes, we have not

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PROFESSIONAL BOARD
REVIEW COMMISSION

- (e) Individual Supervision means one supervisor with a maximum of two supervisees.
- (f) Group Supervision means one supervisor meeting with the maximum of six supervisees.

These definitions of individual and group supervision are typical of many in the state statutes. Wyoming requires only one hour of supervision for every 30 hours of experience over only one year.

Currently, many social workers have gone to purchasing supervision outside of their work settings due to instability in the public social service agencies and mental health services since the advent of managed care. Funding sources are fluid and many beginning as well as experienced social workers have had to change jobs frequently or piece jobs together. New professionals are having a very hard time finding salaried jobs, so they have resorted to hiring outside supervision or enrolling in post graduate training programs, from psychoanalytic to family and marriage programs and getting their supervision outside their workplace(s). Therefore, to demand that the supervisor be in a position of authority over their workload(s) is often, unfortunately, not possible. Therefore, we don't know how most new graduates preparing to become a LCSW could fulfill the 47.1 or 47.12B standards.

We also suggest that under 47.1a (at the bottom of page 5) you change the last word from "psycho-therapeutic" to "psycho-social-therapeutic," as it is more representative of our perspective.

As stated in the PA Social Work Coalition letter, we have strong objection to notifying any third party payor about any professional covered by this Board as their commitment is to make a profit not to protect the public. The LSW already is duty bound to protect the public as would be any licensed professional providing supervision. We do recommend that a LSW seeking clinical experience toward his or her LCSW be required to be supervised at least half the time by a clinical social worker, with proper exceptions for geographic areas which cannot provide this.

Let me finish by saying that many states have standards for their tripartite Boards which seem more appropriate and feasible. I would be glad to provide more information, if requested.

For the PA. Society for Clinical Social Work Board,
Sincerely yours,

Virginia C. McIntosh, LSW, BCD, President
(215-844-1995 or gmacapple@aol.com)
fax 215-843-5318

Original: 2178

Mr. And Mrs. Harry Horn
1654 Jenkintown Road
North Hills, PA 19038

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

RECEIVED
2001 APR 10 PM 12:00
STATE BOARD OF SOCIAL WORKERS, MARRIAGE
& FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS
HARRISBURG, PA 17105-2649

April 7, 2001

Dear State Board Members,

It is imperative that you consider the following related to Act 136, The Professional Counselor Licensing Bill, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (ref. # 16A-694). My concerns pertain to the grandparenting provisions and are non-stutory.

We need the Board to do whatever you can to include Certified Addictions Counselors who pass the ICRC National Exam as candidates for state licensure as professional counselors under the ACT 136 grandparenting clause.

Please act upon these changes so that CACs can offer treatment and counseling to the millions who are effected by Addictions and other problems.

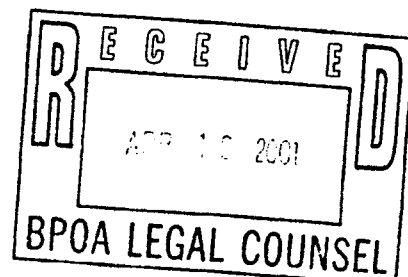
1. Acceptance of Certified Addictions Counselors with appropriate Masters Degrees in the list of professions to be recognized under the grandparenting provision.
2. Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite.

Thank you for your consideration to this most urgent matter.

Respectfully,

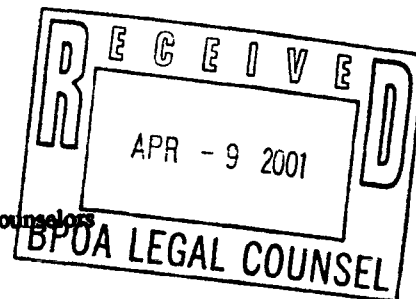
Mr. And Mrs. Harry Horn

Harry Horn



Original: 2178

Francis M. McAndrew
528 Ruben Kehrler Road
Lot 28
Muncy, Pa. 17756
570 433 2613



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

4/7/01

Dear Ms. Cheney,

I am writing to you as a Certified Addiction Counselor Diplomat, currently holding a supervisory position in the dual diagnosis unit at White Deer Run, Inc., a respected provider of services to numerous residents of Pennsylvania as well as several other states. I am also a concerned resident of the Commonwealth of Pennsylvania. Act 136, The Professional Counselor Licensing Bill, raises my concerns for the health and welfare of substance abusers seeking counseling services. As a Master's level addiction specialist, I am a provider to the largest specialty treatment population in the Commonwealth. I am very concerned that a Certified Addiction Counselor with a Master's degree in Human Services would not be recognized by the new regulations. There are fundamental problems with the regulations. They fail to recognize that I have achieved a competency-based, clinically supervised credential under strict guidelines as provided by the PCACB and/or the International Certification & Reciprocity Consortium (IC&RC).

I believe the regulations are discriminatory as they exclude my Master's Degree in Human Services which I completed at Lincoln University, the nation's oldest African American university. I and other individuals holding this Master's degree are working with minority populations in drug and alcohol centers throughout the commonwealth. I will campaign vigorously to make exclusion of this degree from the grandparenting regulations known to all who come in social and professional contact with me, to grasp what a disservice to the cause of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania would be caused by the passage of this bill in its current formulation. I further promise to spread the word as to how it will directly and indirectly impact the provision of services to minorities to all within my range.

If the following issues are not included, you can rest assured that I will unite and act with those who may be injured by their exclusion:

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

Lincoln graduates are a force in the provision of human services to the citizens of our Commonwealth. I strongly urge you to consider the above as a means of assuring that I and others like me may continue to provide general and specialty counseling services that serve our diverse communities.

Sincerely,

Francis M. McAndrew, MHS, CAC Diplomat

cc: PCB Board

Vertical stamp: APR 16 11 58 AM '01
BPOA LEGAL COUNSEL

ORIGINAL: 2178

*John Bennis, Jr.
1507 Sycamore Avenue
Willow Grove, PA 19090*

RECEIVED
2001 APR 10 PM 12:00
REVENUE DEPARTMENT
CL

*State Board of Social Workers, Marriage and
Family Therapists and Professional Counselors
Eva Cheney, Counsel (ref.# 16A-694)
P. O. Box 2649, 116 Pine Street
Harrisburg, PA 17105-2649*

April 7, 2001

Dear State Board Members,

Please consider the following related to Act 136, The Professional Counselor Licensing Bill, State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (ref. # 16A-694). Please add the following under the ACT 136 non-statutory grandparenting clause.

The citizens of Pennsylvania demand treatment services by professionals who have qualification that match their needs.

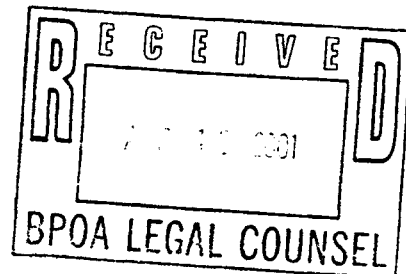
- 1. Acceptance of Certified Addictions Counselors with appropriate Masters Degrees in the list of professions to be recognized under the grandparenting provision.*
- 2. Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite.*

Thank you for your efforts to successfully resolve this most important matter effective accessibility of counseling services for a large number of citizens of PA.

Respectfully,

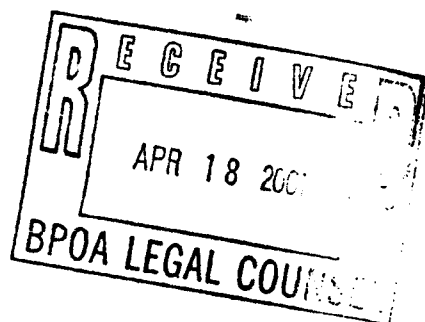
John Bennis, JR.

John Bennis



ORIGINAL: 2178

RECEIVED
2001 APR 20 AM 11:07
REVIEW DIVISION



April 7, 2001

State Board of Social Workers, Marriage and Family Therapists and Professional Counselors
c/o Eva Cheney, Counsel
116 Pine St., PO Box 2649
Harrisburg, PA 17105
Reference #16A-694

I am writing to you both as an individual resident of Pennsylvania and as a Certified Addiction Counselor with a Masters Degree in Education. The recent publication of the regulations of ACT 136, The Professional Counselor Licensing Bill, do not recognize the Master's level addiction specialist as a professional entitled to licensing. The problem with the regulations involves issues of grandparenting and are non-regulatory. I have been a CAC in the state of Pennsylvania for the last fourteen years. This is a competency based, clinically supervised credential that is monitored under strict guidelines as provided by the International Certification & Reciprocity Consortium.

I strongly recommend that the following be a part of the licensing agreement:

- 1) The 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 addictions counselors as an acceptable exam.
- 3) Recognition of the Master's Degree in Human Services as provided by Lincoln University.

I appreciate your consideration of this matter as it will provide a more diverse choice of counseling services that will be particularly relevant for the population that suffer from any type of addiction.

Carolyn J. Olivett, M.Ed., CAC
17 Shybrook Court, Elizabethtown, PA 17022
Phone: 717 361-0842

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2001 APR 18 AM 11:50

REVENUE DEPARTMENT



April 7, 2001

Dear Ms. Cheney;

I am writing you as a Certified Addiction Counselor as well as a concerned resident 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 not statutory in nature. The regulations fail to recognize many qualified and experienced addiction specialists who represent by far, the largest specialty treatment population in the Commonwealth. Most notably Certified Addiction Counselors 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.

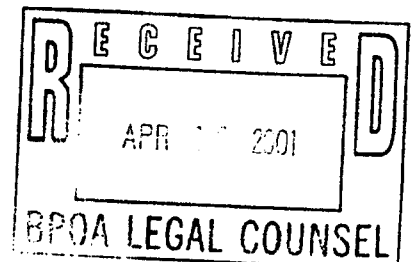
I am strongly advocating for the inclusion within the regulations of the following:

Inclusion under the grandparenting regulations of individuals who are Certified as Addiction Counselors.

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

I strongly urge your consideration in this matter as a means of assuring that the citizens of our Commonwealth are provided services that serve a very diverse population.

Sincerely,
Everette Slusher, Jr.
2648 Buckius St.
Phila. Pa. 19137
(215) 831- 1203
cc: PCB Board





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2001 APR 12 AM 8:49
INDEPENDENT REGULATORY
REVIEW COMMISSION

April 6, 2001

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

Dear Sir or Madam:

Enclosed with this letter is a copy of my comments on the Proposed Rulemaking by the State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors (49 Pa. Code, Chapters 47-49). This letter was originally addressed to the Counsel for this Board. I appreciate your attention to my concern about these regulations.

Sincerely,

Barry K. Wyrick, MS, MBA
Executive Director



ORIGINAL: 2178

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2001 APR 12 AM 9:49

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

March 28, 2001

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

Reference Number 16A-694

Dear Ms. Cheney:

Enclosed please find my comments regarding the Proposed Rulemaking by the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (49 Pa. Code, Chapters 47-49). I have only one significant comment regarding the regulations as published, and that comment relates to the Exemption from Licensure Examination section on professional counselors (P49.15). As currently written, the regulations will not allow for "grandfathering" of individuals who have direct counseling experience in their professional experience, but for the past several years have been engaged in supervisory, administrative, or education positions. It is critical that these individuals be grandfathered for licensure. Let me provide some examples of individuals who would not be eligible for licensure as the regulations are currently written:

- A. A Professor of Counseling at an accredited educational institution who holds an Ed.D. in Counselor Education, has 12 years of experience providing direct, clinical services, is certified as an NCC and a CCMHC, but has been a full-time professor for 8 years.
- B. A Director of Outpatient Services at a community mental health center who holds a 48-hour master's degree in counseling from an accredited university, has over 20 years of experience in the field, holds certification as an NCC, but has been a full-time clinical supervisor (providing supervision but no direct client service) for the past 4 years.
- C. An Agency Administrator who holds a 48-hour master's degree in counseling from an accredited university, has 13 years of experience in the field, holds certification as an

NCC and a CCMHC, but has been a full-time administrator and clinical supervisor for the past 3 years.

These individuals all fail to be eligible for the grandfathering clause because they do not meet the requirement in 49.15.4 of practicing for at least 5 of the past 7 years at least 15 hours per week *with 10 of those hours consisting of direct client contact*. These individuals are not currently engaged in direct client contact, which is not defined in the regulations, but I assume means one of the activities described in 49.13(b)(1) including assessment, counseling, therapy, psychotherapy, other therapeutic interventions, and consultation. However, these are key individuals to be eligible for grandfathering, *as they will be the ones who will be providing the education and supervision of new licensees*. I believe that it would be inappropriate to exclude from license eligibility these individuals because they have progressed in their professional roles to positions of educators, administrators, and supervisors.

Therefore, I would recommend that 49.15.4 (Relating to the Exemption from the licensure examination) be revised to read as follows:

Demonstrated 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~~ activities defined in Chapter 49.13.4(b)(1), direct supervision of individuals engaged in those activities, and/or instruction in a counseling program or in a program closely related to the practice of professional counseling at an accredited educational institution.

It is only through adopting this change that we can assure that our most highly qualified and experienced counselors will be eligible for licensure so that they can act as clinical supervisors as defined in the regulations and serve as role models for other counselors in pursuing licensure.

I thank you for consideration of this requested change. If you have questions regarding the comment, you may contact me by telephone at 717-264-5410, by email at bwyrick@innernet.net, or in writing at 533 S. Main St., Chambersburg, PA 17201.

Sincerely,



Barry K. Wyrick, MS, MBA; NCC, CCMHC
Executive Director

CC: Independent Regulatory Review Commission
Senator Clarence Bell, Chairman, Senate Consumer Protection and Professional
Licensure Committee
Representative Patricia Vance, Vice-Chairman, House Professional Licensure Committee

ORIGINAL: 2178

RECEIVED

Marcia Gelman, M.Ed. AAMFT 2001 APR 11 AM 9:17

Marriage and Family Therapy

10 East Main Street

Shiremanstown, Pa. 17011

INDEPENDENT REGULATORY
REVIEW COMMISSION

April 6, 2001

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pa. 17101
Reference Number: 16A-964

To Whom It May Concern:

I am a Marriage and Family Therapist who has been in private practice for approximately seven years. I have worked for the Capital Area Intermediate Unit as a Family Resource Specialist for over 20 years, helping families who have children with special needs. I have a master's degree in education from Shippensburg University and supervisory degree in education from Millersville University. In addition I have certification in Marriage and Family Therapy from Temple University. I have studied at Philadelphia Child Guidance and I have met the requirements for and am a clinical member of the American Association of Marriage and Family Therapy. Under the current regulations for Marriage and Family Therapists I would not be licensable under the grandparent clause due to my degree in education. My extensive experience in education has provided me with the experience to work with children and families and I am sought after due to my expertise with children. This current clause in the regulations does not recognize the contributions that the field of education has made to families and to children.

I also believe that the regulations should be revised to reflect cumulative hours of post graduate education. Many professionals received a master's degree in education from Universities in this state at a time when the degree offered was a 30 hours master's program. My master's program is a two fold program - one of 30 hours (from Shippensburg) and an additional 15 hours from Millersville as a supervisor in the field of education. To discount master's level work from state universities sends a message in regard to the quality to those programs. I believe the education I have received from Shippensburg, Millersville, and Temple has been excellent.

It is imperative that professionals who have dedicated their careers to helping families and have the national credentials to do so should be included. A degree in education is an excellent foundation for helping children and families. The amount of course work and study to become a clinical member of AAMFT is extensive and should be held in high regard by the legislators in this state.

I sincerely hope that the career that I have chosen will not be challenged by the regulations that are currently before you. Please take in to consideration the professionals in education who have dedicated many years to helping children and families.

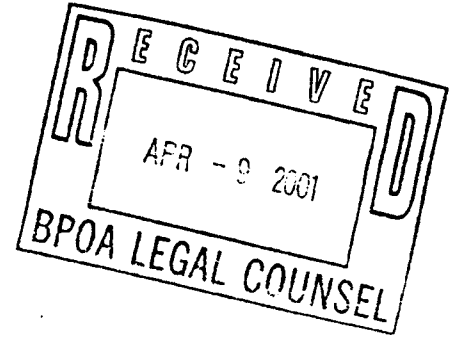
Marcia Gelman
Marcia Gelman M.Ed, AAMFT

ORIGINAL: 2178

WILLIAM R. DORN, M.DIV. CAC DIPLOMATE
3832 MAYFAIR STREET
PITTSBURGH, PA 15204-1012
412-331-3704
E-MAIL: BILYD@AOL.COM

April 6, 2001

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



Dear Ms. Cheney:


As a certified drug and alcohol professional in the state of PA., I am concerned about the recent publication of the regulations related to Act 136, the Professional Counselor Licensing Bill. My concern centers on the lack of recognition in the Bill of Master's level addiction specialists in the Commonwealth. This Bill does not recognize my credentials and professional position as a Master's level therapist holding a CAC Diplomate certification.

In addition my concern extends to my colleagues who serve minority populations and who are not recognized by the Bill as they seek to provide racial, ethnic and culturally sensitive counseling services to the citizens of the Commonwealth.

Please hear my advocacy for the inclusion within the regulation of the following:

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

Provision of counseling services that serve our diverse communities is critical. I urge you to consider this matter with the upmost seriousness.

Sincerely,

William R. Dorn, M.Div., CAC Diplomate
3832 Mayfair St.
Pittsburgh, PA 15204-1012
(412) 331-3704

cc: PCB Board

RECEIVED
2001 APR 16 AM 9:55
BPOA LEGAL COUNSEL

ORIGINAL: 2178

6 April 2001

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

RECEIVED
2001 APR 25 11:09:15
REVIEW COMMISSION

Dear Sirs,

I am writing to you as a Psychotherapist, 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 concern for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve 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 & 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, culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impact provision of services to minorities.

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

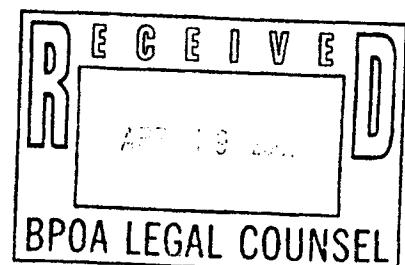
- Inclusion under the grandparenting regulations of individuals in possession of a Master's Degree and Certification as an Addiction Counselor (CAC).
- Inclusion under the grandparenting regulations of the IC & RC national exam for addiction counselors as an acceptable exam.
- Inclusion under the grandparenting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

Virginia Simmons

Virginia Simmons
2417 N. 29th Street, Phila., PA 19132
215-228-8233

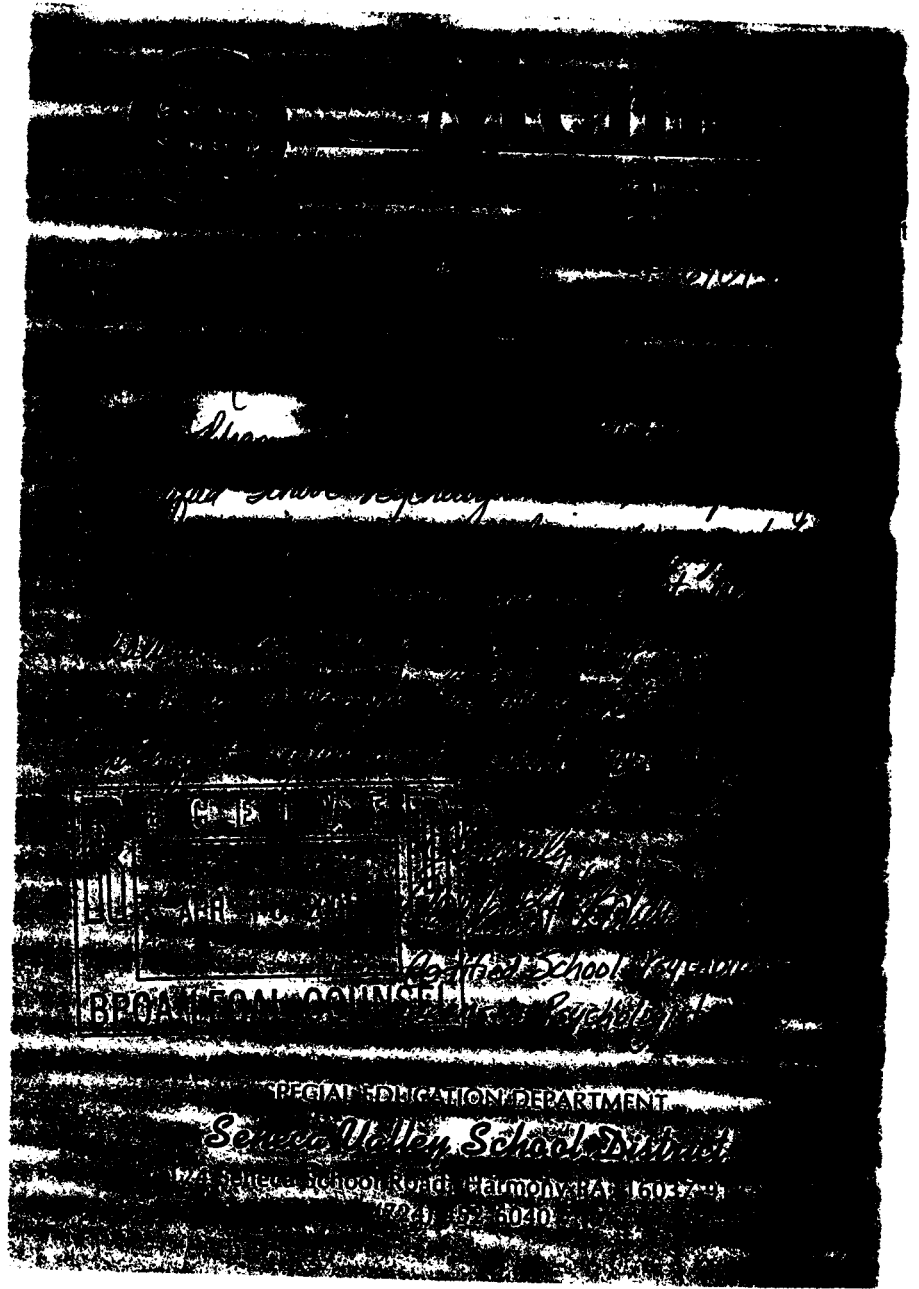


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REVIEW COMMISSION

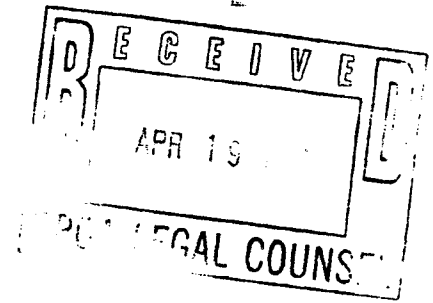


APR 18 2001
SPECIAL EDUCATION DEPARTMENT
Senior Valley School District
174 Bened School Road, Harmony PA 16037
724-532-6040

ORIGINAL: 2178

April 6, 2001

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



Dear Ms. Cheney:

I am writing to you to express my concerns regarding Act 136, the Professional Counselor Licensing Bill. I have been a professional in the mental health and drug & alcohol field for the past 13 years. I currently work in Philadelphia at a drug & alcohol treatment center. I have an accredited master's degree in clinical psychology and am pursuing completion of certification as an addictions counselor. Under Act 136, I would not be recognized by the regulations, yet groups such as music and art therapists would be. How can this be?

To exclude master's level addictions specialists would be doing a disservice to the many people in our state who suffer from drug and alcohol problems, and who rely on persons such as myself and my colleagues for treatment and counseling.

The regulations are also discriminatory of minority populations by excluding those who hold a master's degree in Human Services as offered by Lincoln University. I work with a number of fine professionals who have graduated from Lincoln University with a master's degree in Human Services, and they, along with myself, are on the "front lines" of helping individuals suffering from addiction, and in many cases, mental illness as well. Our work is very important and much needed. Exclusion of such professionals is not the answer.

I strongly advocate for the following to be included within the regulations:

1. Inclusion under the grandparenting regulations of professionals with a Master's degree and Certification as an Addictions Counselor.
2. Inclusion in the regulations of the International Certification and Reciprocity Consortium exam for addiction counselors as an acceptable exam.
3. Inclusion of the Lincoln University Master's degree in Human Services .

Thank you for your time and consideration of this very important matter.

Sincerely,

Scott Marshall, M.S.
1600 Church Rd., Apt D-202
Wyncote, PA 19095
(215) 576-1811

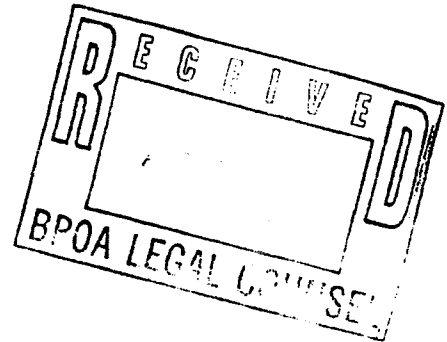
CC: PCB Board

Vertical text on the right side of the page, possibly a stamp or a list of names, is mostly illegible due to blurring and orientation.

ORIGINAL: 2178

6 April 2001

STATE BOARD OF SOCIAL WORKERS
MARRIAGE & FAMILY THERAPISTS & PROFESSIONAL
COUNSELORS
c/o Eva Cheney, Counsel
116 Pine Street
PO Box 2649
Harrisburg, PA 17105



Dear Sirs,

I am writing to you as a Psychotherapist, 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 concern for the health and welfare of substance abusers seeking counseling services. The fundamental problems with the regulations involve 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 & 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, culturally sensitive counseling services within the Commonwealth of Pennsylvania and may directly and indirectly impact 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,

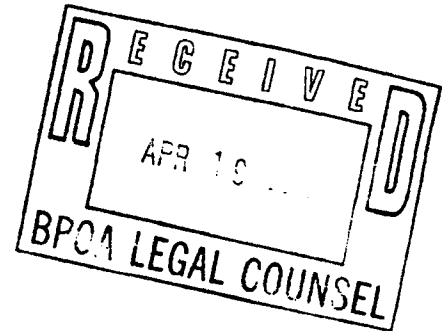
Robert N. Sadowski

Robert Sadowski, B.S.
324 W. Lloyd Street, Shenandoah, PA 17976
570-462-9327

ORIGINAL: 2178

6 April 2001

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



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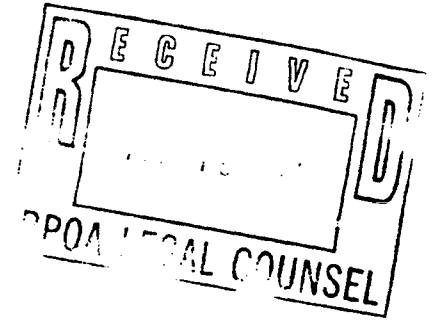
A handwritten signature in cursive script that reads "Paula Sam".

Paula S. Sam, B.S.
4416 Chestnut Street, Phila., Pa. 19104
215.386.3512

ORIGINAL: 2178

April 6, 2001

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



RE: #16A-694

Dear Ms. Cheney:

I am writing to you as a Mental Health Therapist employed in the state of Pennsylvania, as well as a resident 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 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).

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Page 2

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, appearing to read "Nicholas Cucchiaro". The signature is fluid and cursive, with a long horizontal stroke at the end.

**Nicholas Cucchiaro M.Div.
444 North Main Street
Telford, PA 18969
215-721-0313**

cc: PCB Board

Original: 2178

36 Mayfield Street
Dover, PA 17315-1112
(717) 308-2898 (evening number)
(717) 763-2276 (daytime number)

April 6, 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 as National Certified Counselor and Certified Addiction Counselor regarding the regulations related to Act 136, The Professional Counselor Licensing Bill. I work full-time at Holy Spirit Hospital as a Dual Diagnosis Therapist in outpatient Addiction Services and also maintain a small private practice.

As a graduate of a 60-hour master's degree program from a CACREP-accredited community counseling program administered by the Department of Pastoral Counseling at Loyola College in Maryland, I am disturbed not to find the terms "community counseling" and "pastoral counseling" specifically listed among the disciplines mentioned in the regulations. Although the term "counseling psychology" covers the scientific basis common to all counseling disciplines, I would feel more comfortable seeing the additional disciplines noted above specifically included in the regulations. I would hate to be denied licensure based on an overly narrow reading of the regulations. Please note that various other states do include these terms under licensure regulations.

Secondly, I would like to see licensure extended to masters-educated Certified Addiction Counselors and to have the IC&RC national examination for addiction counselors included in the list of acceptable qualifying examinations. Increasingly, masters-educated addiction counselors are called upon to work with MISA (Mentally Ill Substance Abusing) patients, also known as dually diagnosed patients. Treatment of these challenging patients requires in-depth knowledge of mental health and addictions counseling theories and techniques. Therapists who possess this knowledge base should be recognized as peers of other masters-level counselors.

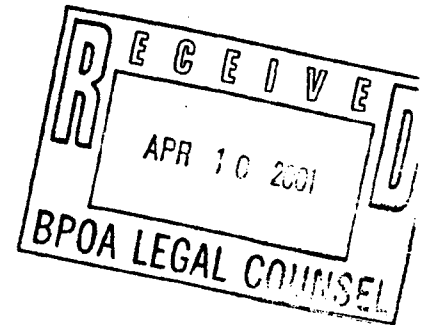
I strongly urge your consideration of these views as a means of assuring that the mental health and addictions counseling consumers in Pennsylvania have the full protection of provider accountability under the law.

Sincerely,

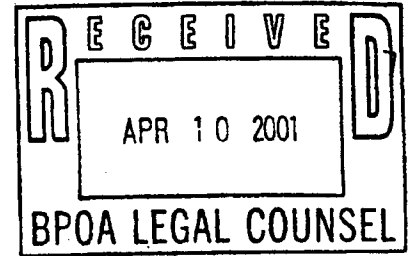


Patricia O. Rice, Ph.D., NCC, CAC
Dual Diagnosis Therapist
Holy Spirit Hospital

Cc: PCB



Original: 2178



Marcia Gelman, M.Ed. AAMFT
Marriage and Family Therapy
10 East Main Street
Shiremanstown, Pa. 17011

April 6, 2001

Eva Cheney
State Board of Social Workers, Marriage and Family Therapists, and Professional Counselors
116 Pine Street
P.O. Box 2649
Harrisburg, Pa. 17105-2649
Reference Number: 16A-964

Dear Ms. Cheney,

I am a Marriage and Family Therapist who has been in private practice for approximately seven years. I have worked for the Capital Area Intermediate Unit as a Family Resource Specialist for over 20 years, helping families who have children with special needs. I have a master's degree in education from Shippensburg University and supervisory degree in education from Millersville University. In addition I have certification in Marriage and Family Therapy from Temple University. I have studied at Philadelphia Child Guidance and I have met the requirements for and am a clinical member of the American Association of Marriage and Family Therapy. Under the current regulations for Marriage and Family Therapists I would not be licensable under the grandparent clause due to my degree in education. My extensive experience in education has provided me with the experience to work with children and families and I am sought after due to my expertise with children. This current clause in the regulations does not recognize the contributions that the field of education has made to families and to children.

I also believe that the regulations should be revised to reflect cumulative hours of post graduate education. Many professionals received a master's degree in education from Universities in this state at a time when the degree offered was a 30-hour master's program. My master's program is a two fold program - one of 30 hours (from Shippensburg) and an additional 15 hours from Millersville as a supervisor in the field of education. To discount master's level work from state universities sends a message in regard to the quality to those programs. I believe the education I have received from Shippensburg, Millersville, and Temple has been excellent.

It is imperative that professionals who have dedicated their careers to helping families and have the national credentials to do so should be included. A degree in education is an excellent foundation for helping children and families. The amount of course work and study to become a clinical member of AAMFT is extensive and should be held in high regard by the legislators in this state.

I sincerely hope that the career that I have chosen will not be challenged by the regulations that are currently before you. Please take in to consideration the professionals in education who have dedicated many years to helping children and families.

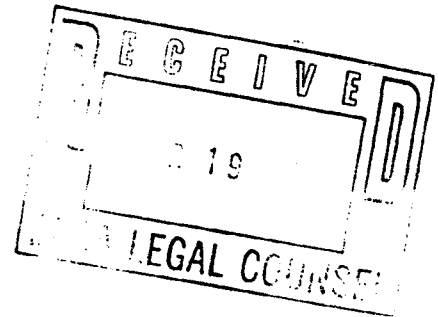
Marcia Gelman

ORIGINAL: 2178

Minda Magundayao, M.D.
1010 Shepard Drive, Blue Bell, PA 19422
610-277-5615

April 6, 2001

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



Dear Ms. Cheney:

As a practicing psychiatrist and resident of this Commonwealth, I am writing to express my deepest concern regarding the current regulations as denoted in Act 136, the Professional Counselor Licensing Bill.

This Bill, without question, raises serious concerns for the health and welfare of Pennsylvania residents with addictive disorders who will be seeking professional counseling services subsequent to this Bill being fully enacted. In its present form, the Bill's regulations present fundamental issues with respect to the grandparenting process, and furthermore, are exclusionary with respect to Master's level Certified Addiction Counselors (CACs). The current regulations fail to recognize Master's level CACs who represent, by far, the largest speciality group of treatment professionals in the State. These professionals, who have successfully passed a national examination, are not deemed qualified, yet professionals who counsel other, significantly smaller populations (e.g., art, movement, music, etc.) are deemed acceptable. This makes no common or clinical sense, and will undoubtedly seriously and negatively impact the delivery of addiction services.

In addition, the regulations in their current form are clearly discriminatory. At present the regulations clearly exclude Lincoln University Master of Human Service graduates from eligibility. The vast majority of these graduates are African American and Latino. Exclusion of these professionals would cause undo harm to minority consumers of counseling services. Additionally, exclusion of MHS graduates would seriously impact the accessibility of culturally similar counseling services for a group of consumers who are already experiencing this problem.

I would strongly suggest you consider amending the regulations to include:

1. Inclusion of the Addictions ICRC examination as an acceptable examination for licensing

Cheney Letter

Page 2 of 2

2. Inclusion of the Master's level Certified Addiction Counselor (CAC) as an acceptable degree and certification for licensure eligibility.
3. Inclusion of the Lincoln University Master's in Human Services (MHS) degree as an acceptable degree for license eligibility.

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,



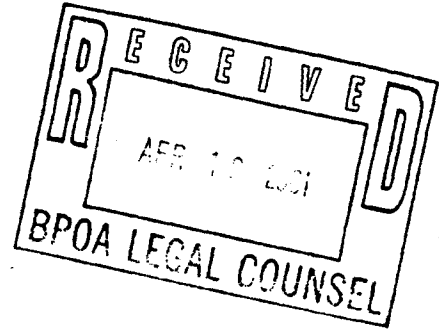
Minda Magundayao, M.D.
1010 Shepard Drive, Blue Bell, PA 19422
610-277-5615

ORIGINAL: 2178

RECEIVED
2001 APR 20 AM 11:06

REVIEW COMMISSION

April 6, 2001



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

RE: #16A-694

Dear Ms. Cheney:

As a resident of this Commonwealth, I am writing to express my deepest concern regarding the current regulations as denoted in Act 136, the Professional Counselor Licensing Bill.

This Bill, without question, raises serious concerns for the health and welfare of Pennsylvania residents with addictive disorders who will be seeking professional counseling services subsequent to this Bill being fully enacted. In its present form, the Bill's regulations present fundamental issues with respect to the grandparenting process, and furthermore, are exclusionary with respect to Master's level Certified Addiction Counselors (CACs). The current regulations fail to recognize Master's level CACs who represent, by far, the largest speciality group of treatment professionals in the State. These professionals, who have successfully passed a national examination, are not deemed qualified, yet professionals who counsel other, significantly smaller populations (e.g., art, movement, music, etc.) are deemed acceptable. This makes no common or clinical sense, and will undoubtedly seriously and negatively impact the delivery of addiction services.

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1. Inclusion of the Addictions ICRC examination as an acceptable examination for licensing

2. Inclusion of the Master's level Certified Addiction Counselor (CAC) as an acceptable degree and certification for licensure eligibility.
3. Inclusion of the Lincoln University Master's in Human Services (MHS) degree as an acceptable degree for license eligibility.

My personal experience with other, non-certified professionals, has clearly shown that CACs are, by far, the most competent professionals to treat those who suffer from chemical dependency. Allowing other, less, or in some cases, even non-qualified professionals treat such a complex disorder is, without doubt, clinically inappropriate and places these individuals at unnecessary risk of harm.

In the best interest of the recovering citizens of this state, I sincerely urge you to consider the changes I have outlined in my letter.

Sincerely,

Madeleine Dacco

168 S. Pine St.

Hazleton, PA 18201

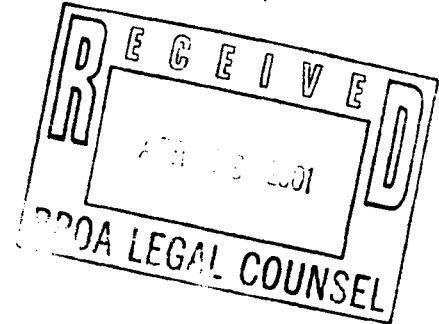
Peter Dacco

168 S. Pine
Hazleton Pa. 18201

ORIGINAL: 2178

April 6, 2001

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



RE: #16A-694

Dear Ms. Cheney:

I am writing to you as a Licensed Social Worker employed in the state 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 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).

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.

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

Page 2

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, appearing to read "Lori L. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

**Lori L. Watson, LSW, MSW
208 Hinton Way
Somerdale, NJ 08083
856-309-9141**

cc: PCB Board

Original: 2178

800 Longfield Road
Glenside, PA 19038

RECEIVED

2001 APR 16 AM 9:28

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



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

6 April 2001

Dear State Board Members,

Ref: Act 136, The Professional Counselor Licensing Bill
State Board of Social Workers, Marriage and Family Therapists and
Professional Counselors, Proposed Rulemaking (Licensure) to Act
136.

Pennsylvania Bulletin, 31(12), 1547-1668, March 24, 2001. (ref. #
16A-694).

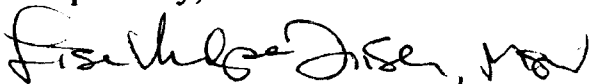
As Licensed Social Workers in Managerial positions in the Behavioral Health field we are asking that the licensure board consider how vital it is to find appropriate Licensed Masters Level Counselors with expertise in Addictions Counseling to provide counseling for such a needy population. We are asking you to fully support the inclusion of **Certified Addictions Counselors with Masters Degrees** in the Proposed Rulemaking (ref. #16A-694) under the **grandparenting process which is non-statutory**. CAC Diplomats with counseling related Masters Degrees, would pass the ICRC examination as a specification for their credential and grandparenting under this new Licensure Act. Masters Level Certified Addictions Counselors who hold the Diplomat Status as CACD fulfill credentialing requirements including on-going clinical supervision comparable to those professions included in this proposal, e.g., Social Workers, Rehabilitation Counselors, Art Therapists, Music Therapists, Dance Therapists, Drama Therapists, and Clinical Mental Health Counselors, Masters Degreed Psychologists, and National Certified Counselors.

We need to act together to help this state to support improvement of effective treatment and prevention services and keep skilled individuals in this field. CACDs have met nationally-based standards (established by the International Certification & Reciprocity Consortium) of education and continuing education, demonstrated competencies through work performance, a written exam, and clinical supervision, and adhere to a professional code of ethics. CACs represent a diverse pool of counselors much needed for inclusion in Managed Care Organization's panels of providers.

Since last year, The Pennsylvania Certification Board has repeatedly asked to provide you with the information you need to assess this credential as eligible to meet grandparenting requirements. Please work with them. Our near neighbor, New Jersey, already licenses addictions counselors and we would hate to see our eligible counselors have to go there to work and provide services so needed right here in PA. Please allow Act 136 to truly serve the Commonwealth's healthcare needs by including the following in the Proposed Rulemaking, non-statutory grandparenting section:

- I. The grandparenting regulations to accept individuals with appropriate Masters Degrees and who hold the credential of Certified Addictions Counselors, Diplomat, in the State of Pennsylvania.
- II. Acceptance of the International Certification & Reciprocity Consortium's national exam as fulfilling the examination prerequisite.

Respectfully,



Lisa Vulpe-Fisher, M.S.W.

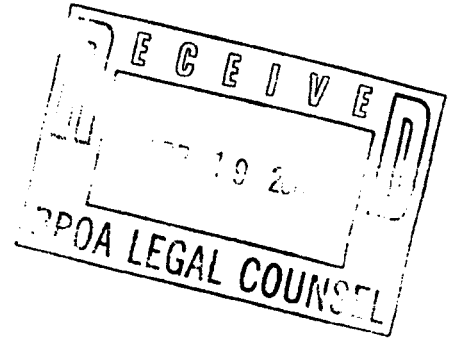
Paul Fisher, M.S.W.

cc: Rep. Civera
Senator Holl
IRRC

ORIGINAL: 2178

6 April 2001

STATE BOARD OF SOCIAL WORKERS
MARRIAGE & FAMILY THERAPISTS & PROFESSIONAL
COUNSELORS
c/o Eva Cheney, Counsel
116 Pine Street
PO Box 2649
Harrisburg, PA 17105



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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,

Joyce L. West, M.S.
1402 Cardeza Street, Phila. PA 19150
215.424.2487

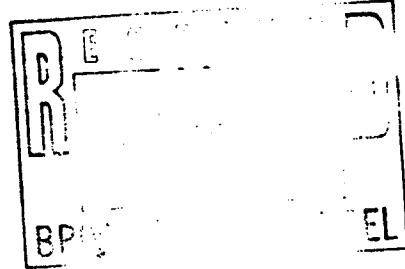
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2001 APR 18 AM 11:58

REVIEW COMMISSION

April 6, 2001

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



RE: #16A-694

Dear Ms. Cheney:

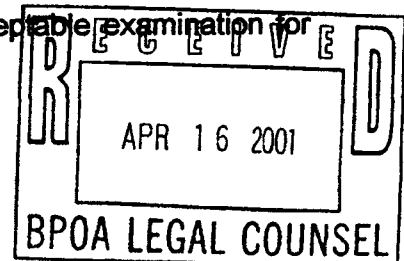
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In the best interest of the recovering citizens of this state, I sincerely urge you to consider the changes I have outlined in my letter.

Sincerely,



Ernie Manuel

10F STONEY LN

Dover PA

17315

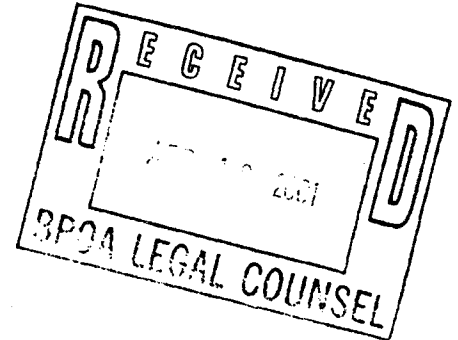
ORIGINAL: 2178

RECEIVED

2001 APR 20 10:06

REVIEW COMMISSION

April 6, 2001



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

RE: #16A-694

Dear Ms. Cheney:

As a resident of this Commonwealth, I am writing to express my deepest concern regarding the current regulations as denoted in Act 136, the Professional Counselor Licensing Bill.

This Bill, without question, raises serious concerns for the health and welfare of Pennsylvania residents with addictive disorders who will be seeking professional counseling services subsequent to this Bill being fully enacted. In its present form, the Bill's regulations present fundamental issues with respect to the grandparenting process, and furthermore, are exclusionary with respect to Master's level Certified Addiction Counselors (CACs). The current regulations fail to recognize Master's level CACs who represent, by far, the largest speciality group of treatment professionals in the State. These professionals, who have successfully passed a national examination, are not deemed qualified, yet professionals who counsel other, significantly smaller populations (e.g., art, movement, music, etc.) are deemed acceptable. This makes no common or clinical sense, and will undoubtedly seriously and negatively impact the delivery of addiction services.

In addition, the regulations in their current form are clearly discriminatory. At present the regulations clearly exclude Lincoln University Master of Human Service graduates from eligibility. The vast majority of these graduates are African American and Latino. Exclusion of these professionals would cause undo harm to minority consumers of counseling services. Additionally, exclusion of MHS graduates would seriously impact the accessibility of culturally similar counseling services for a group of consumers who are already experiencing this problem.

I would strongly suggest you consider amending the regulations to include:


1. Inclusion of the Addictions ICRC examination as an acceptable examination for licensing

2. Inclusion of the Master's level Certified Addiction Counselor (CAC) as an acceptable degree and certification for licensure eligibility.
3. Inclusion of the Lincoln University Master's in Human Services (MHS) degree as an acceptable degree for license eligibility.

My personal experience with other, non-certified professionals, has clearly shown that CACs are, by far, the most competent professionals to treat those who suffer from chemical dependency. Allowing other, less, or in some cases, even non-qualified professionals treat such a complex disorder is, without doubt, clinically inappropriate and places these individuals at unnecessary risk of harm.

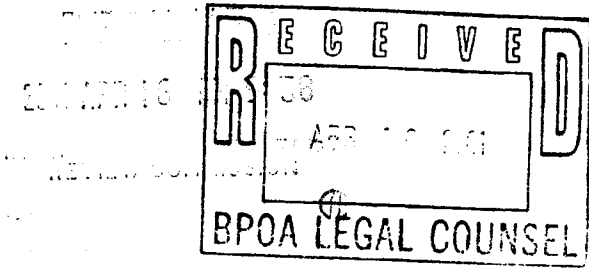
In the best interest of the recovering citizens of this state, I sincerely urge you to consider the changes I have outlined in my letter.

Sincerely,



George Prusak
52 Station Lane
Weatherly PA. 18255

Original: 2178



COMMONWEALTH OF PENNSYLVANIA
Department of Corrections
State Correctional Institution at Frackville
Telephone: (570) 874-4516
April 6, 2001

Dear Sir or Madam:

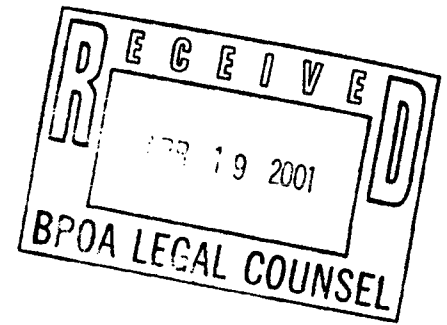
I am a Certified Addiction Counselor (CAC) Diplomat who has been certified as an addictions counselor since August 13, 1988 and I have also achieved a Master's of Human Services Degree from Lincoln University. I am writing to you at this time to express myself as a CAC Diplomat, a graduate with a Master's Degree in Human Services from Lincoln University and as a very concerned citizen of the commonwealth of Pennsylvania. It has come to my attention that ACT 136, The Professional Counselor Licensing Bill, could have some devastating consequences for the welfare of those seeking and acquiring needed counseling services to address specific needs which impact on substance abusers self destructive lifestyles from their continued use/abuse of drugs and/or alcohol.

There are three (3) very distinct issues with the recent publication of the regulations related to ACT 136. First, the regulations do not recognize Master's level addiction specialists who have been treating chemically dependent consumers for many years, when "Mental Health Professionals" did not want to treat the chemically dependent consumer, but wanted to institutionalize them in insane asylums. This was a result of ignorance and not fully understanding the disease of addiction. **It's time that CAC's are recognized for their significant contributions that they have made in the treatment of chemical dependence and be inclusive in the licensure bill rather than being excluded.** Secondly, the regulations outlined in ACT 136 are very bias towards grandparenting Master's level CAC's and are non-statutory in nature. **This bill should be re-written for the inclusion under the grandparenting clause of individuals in possession of a Master's Degree from any accredited University especially Lincoln University MHS Degree which is geared specifically towards human service work and those who have obtained Certification as an Addictions Counselor (CAC).** CAC's with a Master's Degree have successfully achieved a competency-based credential under the clinical supervision of the International Certification & Reciprocity Consortium (IC & RC) which is carefully monitored for the highest ethical conduct as an addictions professional. Lastly, ACT 136 is also very discriminating through the exclusion of the Master's Degree in Human Services that is being offered through Lincoln University. **This degree in human services being offered at Lincoln University is very culturally diversified and if not included in the grandparenting regulations will ultimately negatively impact on the provisions of services to minority populations. Therefore, once again we would be taking a step backwards in our efforts to obtain social equality through degree programs such as the MHS Degree Program at Lincoln University.**

April 6, 2001

ORIGINAL: 2178

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



Dear Ms. Cheney:

As both a Certified Addictions Counselor and having a Master's in Human Services Degree, I am expressing my concerns with Act 136, The Professional Counselor Licensing Bill. The recently published regulations for Act 136, The Professional Counselor Licensing Bill, have caused me concern for the health and welfare of residents of Pennsylvania who abuse substances and who seek professional counseling services. My concern is not statutory in nature. My concerns are in regard to the regulations for grand parenting. The regulations fail to recognize Master's level Certified Addictions Counselors who treat, by far, the largest special needs treatment population in Pennsylvania. Again, Master's level Certified Addictions Counselors are not included by the regulations. Master's level Certified Addictions Counselors have already achieved a tested competency-based, clinically supervised credential under the strict guidelines of the International Certification & Reciprocity Consortium (IC&RC).

The exclusion of the Master's Degree in Human Services from Lincoln University, is exceedingly discriminatory of minorities. Could this be because Lincoln University is our countries oldest African American university? Or is it because the vast majority of us who hold this Master's degree are working with minority populations in Philadelphia? The exclusion of this degree from the grand parenting regulations does harm to the goal of providing racial, ethnic, and culturally sensitive counseling services within the Commonwealth of Pennsylvania and will directly and indirectly cause worse services to minorities.

I believe it to be fair and just that the following be included in the regulations:

1. Inclusion under the grand parenting regulations of individuals with Master's Degrees and that is also Certified as an Addiction Counselor (CAC),
2. Inclusion under the grand parenting regulations of the IC&RC national exam for addiction counselors,
3. Inclusion under the grand parenting regulations of individuals who have a Master's Degree in Human Services from Lincoln University.

I encourage you to consider the above three items to assure that the citizens of our Commonwealth will be provided with counseling services that represent our diverse communities.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Sweeney".

Christopher Sweeney
712 Mine Hill Road
Schwenksville, PA 19473
(610)-287-6527
cc: PCB Board

RECEIVED
APR 19 2001
BPOA LEGAL COUNSEL