



February 22, 2016

RB No 133: An Act Concerning Licensed Professional Counselors

Dear Senator Gerratana, Representative Ritter, and Members of the Public Health Committee:

The Connecticut Psychological Association (CPA) **opposes RB No 133: An Act Concerning Licensed Professional Counselors**, which seeks to both change the designation of licensed professional counselors, as well as add an additional licensure category for professional counselors with significantly lower training requirements and potentially expanded scope of practice. It also dilutes training supervision requirements.

CPA is very concerned about, and also questions the necessity of, the *new* "licensed master professional counselor" designation, which requires significantly less training and supervision than the current "licensed professional counselor"/proposed "licensed clinical professional counselor" designation, yet potentially seeks to expand professional counselors' scope of practice.

This new designation of "licensed master professional counselor", as compared to the current licensed professional counselor and proposed "licensed clinical professional counselor":

1. eliminates the need for a master's degree;
2. decreases training hours of supervised clinical work in "professional counseling" to 100 hours from 3000 hours, and decreases total supervised hours to 340 hours;
3. potentially seeks to expand scope of practice into assessment and treatment; and,
4. the new qualifications of trainee supervisors are vague ("professional supervision").

In addition to the 100 supervised clinical hours in "professional counseling", master professional counselor candidates would also be required to complete 240 supervised hours of direct client contact in the practice of "psychosocial assessment and mental health counseling", for a total of 340 supervised hours. This is far fewer total hours than the current requirement of 3000 hours supervised "professional counseling" for professional counselors.

The additional 240 supervised hours of "psychosocial assessment and mental health counseling" appear to be an effort to expand scope of practice and to place professional counselors in a position to conduct traditional mental health assessments and treatment; however, the adequacy of the proposed training of 240 supervised hours is questionable in this regard and could lead to inappropriate care and failure to recognize issues of risk.

An additional 360 hours of clinical mental health counseling, which *does not necessarily include direct client contact*, and is *without any supervision* (see Sec. 4(b)(3)) is also included in the bill. It is not clear what this practice would entail, and without supervision, this practice is meaningless in terms of increasing competency.

Page 1 of 3



- Overall, the "practice" provisions of Section 4(b)(2) and (3) are unclear as to their intent, and serve to license a new mental health provider, "master professional counselor", with far less training, yet potentially increased scope of practice, as compared to the current licensed professional counselor recognized under Connecticut statute.

CPA opposes the changes to section 4(a)(3), which deletes specific qualifications for supervisors of applicant training hours and replaces these requirements with simply "professional supervision" which is vague and can be interpreted as supervision by any person who engages in any sort of counseling, licensed or not, including those specified in section 2(c) of this bill. Inadequate supervision increases risk of inadequate care and potential harm.

CPA finds the two new licensure categories to be both confusing and misleading. We find the two new licensure categories *confusing* in that it is unclear based on title what the difference is between "licensed clinical professional counselor" and "licensed master professional counselor". We believe these designations will simply create more confusion for the public regarding the different mental health providers, without adding significant value.

We also find the two new licensure categories *misleading* in that "licensed master professional counselor" suggests a master's degree when none is required. In addition, "licensed clinical professional counselor" suggests some sort of equivalence with a clinical psychologist and clinical social worker.

Without a meaningful basis for the creation of these two new licensure categories, the likelihood of public confusion, the decreased training standards, the lack of any appreciable public benefit, and the risk of inadequate care, all weigh against RB 133.

For each of the above reasons, CPA opposes RB 133.

Thank you for your time and consideration.

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Page 2 of 3



Sec. 4. (RB 133, AAC Licensed Professional Counselors)

(a) Except as otherwise provided in [subsections (b) and (c) of] this section, an applicant for a **license as a clinical professional counselor** shall submit evidence satisfactory to the [Commissioner of Public Health] commissioner of having: (1) Completed sixty graduate semester hours in or related to the discipline of counseling at a regionally accredited institution of higher education, [which] that included coursework in each of the following areas: (A) Human growth and development, (B) social and cultural foundations, (C) counseling theories and techniques or helping relationships, (D) group dynamics, (E) processing and counseling, (F) career and lifestyle development, (G) appraisals or tests and measurements for individuals and groups, (H) research and evaluation, and (I) professional orientation to counseling; (2) earned, from a regionally accredited institution of higher education a master's or doctoral degree in social work, marriage and family therapy, counseling, psychology or a related mental health field; (3) acquired **three thousand hours of postgraduate-degree-supervised experience** in the practice of **professional counseling**, performed over a period of not less than one year, that included a minimum of one hundred hours [of direct supervision by (A) a physician licensed pursuant to chapter 370 who has obtained certification in psychiatry from the American Board of Psychiatry and Neurology, (B) a psychologist licensed pursuant to chapter 383, (C) an advanced practice registered nurse licensed pursuant to chapter 378 and certified as a clinical specialist in adult psychiatric and mental health nursing with the American Nurses Credentialing Center, (D) a marital and family therapist licensed pursuant to chapter 383a, (E) a clinical social worker licensed pursuant to chapter 383b, (F) a professional counselor licensed, or prior to October 1, 1998, eligible for licensure, pursuant to section 20-195cc, or (G) a physician certified in psychiatry by the American Board of Psychiatry and Neurology, psychologist, advanced practice registered nurse certified as a clinical specialist in adult psychiatric and mental health nursing with the American Nurses Credentialing Center, marital and family therapist, clinical social worker or professional counselor licensed or certified as such or as a person entitled to perform similar services, under a different designation, in another state or jurisdiction whose requirements for practicing in such capacity are substantially similar to or higher than those of this state] in the practice of professional counseling under professional supervision; and (4) passed an examination prescribed by the commissioner

(b) Except as otherwise provided in this section, an applicant for licensure as a master professional counselor shall submit evidence satisfactory to the commissioner of having: (1) Completed sixty graduate semester hours in counseling at a regionally accredited institution of higher education, that included coursework that meets the accreditation requirements of the Council for Accreditation of Counseling and Related Educational Programs or the National Council on Rehabilitation Education; (2) acquired **one hundred hours of supervised experience** in the practice of **professional counseling** that is performed over a period of not less than one year under professional supervision; (3) acquired **six hundred hours** in the practice of **clinical mental health counseling**, of which not less than **two hundred forty hours** involved **direct client contact offering psychosocial assessment and mental health counseling under professional supervision**; and (4) passed an examination prescribed by the commissioner.