

Phone: 608-266-2112 Web: http://dsps.wi.gov Email: dsps@wisconsin.gov

Scott Walker, Governor Laura Gutiérrez, Secretary

PROFESSIONAL COUNSELOR SECTION

MARRIAGE AND FAMILY THERAPY, PROFESSIONAL COUNSELING AND SOCIAL WORK EXAMINING BOARD

Room 121B, 1400 East Washington Avenue, Madison Contact: Dan Williams (608) 266-2112 June 26, 2018

The following agenda describes the issues that the Section plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a record of the actions of the Section.

AGENDA

9:00 A.M.

CALL TO ORDER - ROLL CALL - OPEN SESSION

- A. Adoption of the Agenda (1-3)
- B. Approval of the Minutes of January 30, 2018 (4-7)
- C. Administrative Matters Discussion and Consideration
 - 1. Staff Updates
 - 2. Delegation of Authorities (8-11)
 - 3. Section Member Term Expiration Date
 - a. Allison Gordon -7/1/2018
 - b. Tammy Scheidegger 7/1/2020
 - c. Kathleen Miller–7/1/2021 (re-appointed, not yet confirmed)
 - d. Monica Vick 7/1/2019
- D. Society of Counseling Psychology/American Psychological Association (APA) Letter Discussion and Consideration (12-14)
- E. Legislation and Administrative Rule Matters Discussion and Consideration
 - 1. Implementation of MPSW 14.01 Relating to Academic Program Equivalent to Professional Counseling Degree
 - 2. Update on Legislation and Pending and Possible Rulemaking Projects
- F. Deliberation on Items Added After Preparation of Agenda:
 - 1. Introductions, Announcements and Recognition
 - 2. Election of Officers
 - 3. Appointment of Liaison(s)
 - 4. Delegation of Authorities
 - 5. Administrative Matters
 - 6. Education and Examination Matters

- 7. Credentialing Matters
- 8. Practice Matters
- 9. Legislative and Administrative Rule Matters
- 10. Liaison Reports
- 11. Board Liaison Training and Appointment of Mentors
- 12. Informational Items
- 13. Division of Legal Services and Compliance (DLSC) Matters
- 14. Presentations of Petitions for Summary Suspension
- 15. Petitions for Designation of Hearing Examiner
- 16. Presentation of Proposed Stipulations, Final Decisions and Orders
- 17. Presentation of Proposed Final Decision and Orders
- 18. Presentation of Interim Orders
- 19. Petitions for Re-Hearing
- 20. Petitions for Assessments
- 21. Petitions to Vacate Orders
- 22. Requests for Disciplinary Proceeding Presentations
- 23. Motions
- 24. Petitions
- 25. Appearances from Requests Received or Renewed
- 26. Speaking Engagement(s), Travel, or Public Relation Request(s)

G. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85 (1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85 (1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

H. Deliberation on DLSC Matters

1. Deliberation on Monitoring Matters

a. Review of Fitness-to-Practice Evaluation Results – Curt Clausen, L.P.C. (15-43) b. Requesting Removal of the Practice Limitation Relating to the Treatment of Male Clients – Charity Nikolay, L.P.C. (44-62)

2. Proposed Stipulations, Final Decisions, and Orders

- a. 16 CPC 047 Clifford J. Kuster, M.S., L.P.C. (63-69)
- b. 17 CPC 004 Vicki J. Marquardt, L.P.C. (**70-74**)
- 3. Case Closings

I. Deliberation on Order Fixing Costs

- 1. Curt E. Clausen, Respondent, DHA Case Number SPS-17-0016/DLSC Case Number 16 CPC 043 (75-82)
- J. Deliberation of Items Added After Preparation of the Agenda
 - 1. Education and Examination Matters
 - 2. Credentialing Matters
 - 3. DLSC Matters
 - 4. Monitoring Matters
 - 5. Professional Assistance Procedure (PAP) Matters
 - 6. Petitions for Summary Suspensions
 - 7. Petitions for Designation of Hearing Examiner
 - 8. Stipulations, Final Decisions and Order
 - 9. Proposed Interim Orders

- 10. Administrative Warnings
- 11. Review of Administrative Warnings
- 12. Proposed Final Decision and Orders
- 13. Matters Relating to Costs/Orders Fixing Costs
- 14. Case Closings
- 15. Board Liaison Training
- 16. Petitions for Assessments and Evaluations
- 17. Petitions to Vacate Orders
- 18. Remedial Education Cases
- 19. Motions
- 20. Petitions for Re-Hearing
- 21. Appearances from Requests Received or Renewed
- K. Consulting with Legal Counsel

RECONVENE INTO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

L. Voting on Items Considered or Deliberated on in Closed Session, If Voting is Appropriate.

ADJOURNMENT

NEXT MEETING DATE: JULY 24, 2018

MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE.

Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held at 1400 East Washington Avenue, Madison, Wisconsin, unless otherwise noted. In order to confirm a meeting or to request a complete copy of the board's agenda, please call the listed contact person. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of disciplinary hearings may be changed by the examiner for the convenience of the parties. Interpreters for the hearing impaired provided upon request by contacting the Affirmative Action Officer, 608-266-2112.

PROFESSIONAL COUNSELOR SECTION MEETING MINUTES JANUARY 30, 2018

PRESENT: Allison Gordon, Kathleen Miller (via GoToMeeting; arrived at 10:33 a.m.), Tammy

Scheidegger, Monica Vick (via GoToMeeting)

STAFF: Dan Williams, Executive Director; Laura Smith, Bureau Assistant; Sharon Henes,

Rules Coordinator; and other DSPS Staff

CALL TO ORDER

Tammy Scheidegger, Chair, called the meeting to order at 10:30 a.m. A quorum was confirmed.

ADOPTION OF AGENDA

MOTION: Allison Gordon moved, seconded by Monica Vick, to adopt the agenda as

published. Motion carried unanimously.

APPROVAL OF THE MINUTES OF DECEMBER 5, 2017

MOTION: Allison Gordon moved, seconded by Monica Vick, to approve the minutes of

December 5, 2017 as published. Motion carried unanimously.

ADMINISTRATIVE MATTERS

Election of Officers

Slate of Officers

NOMINATION: Tammy Scheidegger nominated the 2017 slate of officers to continue in 2018.

Dan Williams called for nominations three (3) times.

Nomination carried by unanimous consent.

The 2017 Slate of Officers was reelected to continue in 2018.

2018 ELECTION RESULTS				
Chair	Tammy Scheidegger			
Vice Chair	Kathleen Miller			
Secretary	Allison Gordon			

Appointment of Liaisons and Delegates

2018 LIAISON APPOINTMENTS

	Kathleen Miller,		
Credentialing Liaisons	Tammy Scheidegger,		
	Allison Gordon,		
	Monica Vick		
Education and	Tammy Sahaida asan		
Examination Liaison	Tammy Scheidegger		
DLSC Monitoring and			
Professional Assistance	17 d 1 NC11		
Procedure (PAP)	Kathleen Miller		
Liaison(s)			
Screening Panel (beginning	Tammy Scheidegger		
February 2018)	(Alternate: Kathleen Miller)		

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to affirm the Chair's

appointment of liaisons for 2018. Motion carried unanimously.

Delegated Authorities

Delegated Authority for Urgent Matters

MOTION: Allison Gordon moved, seconded by Kathleen Miller, that, in order to

facilitate the completion of assignments between meetings, the Section delegates its authority to the Chair to appoint liaisons to carry out the duties of

the Section in accordance with the law. Motion carried unanimously.

Delegated Authority for Application Denial Reviews

MOTION: Allison Gordon moved, seconded by Kathleen Miller, that the Section counsel

or another department attorney is formally authorized to serve as the Section's designee for purposes of Wis. Admin Code § SPS 1.08(1). Motion carried

unanimously.

Document Signature Delegation

MOTION: Allison Gordon moved, seconded by Kathleen Miller, that the Section

delegates authority to the Chair to sign documents on behalf of the Section. In order to carry out duties of the Section, the Chair has the ability to delegate this signature authority to the Section's Executive Director for purposes of facilitating the completion of assignments during or between meetings.

Motion carried unanimously.

Credentialing Authority Delegations

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to delegate authority to

the Credentialing Liaisons to address all issues related to credentialing

matters. Motion carried unanimously.

Education Delegations

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to delegate authority to

the Office of Education and Examination Liaison(s) to address all issues related to education and examinations. Motion carried unanimously.

CLOSED SESSION

MOTION: Kathleen Miller moved, seconded by Monica Vick, to convene to closed

session to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85 (1)(b), Stats.); to consider closing disciplinary investigation with administrative warning (ss.19.85(1)(b), Stats. and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85 (1)(f), Stats.); and, to confer with legal counsel (s.19.85(1)(g), Stats.). The Chair read the language of the motion. The vote of each member was ascertained by voice vote. Roll Call Vote: Allison Gordon-yes; Kathleen Miller-yes; Tammy Scheidegger-yes; Monica Vick-yes.

Motion carried unanimously.

At this time, all external communication contacts will be terminated for purposes of going into Closed Session.

The Section convened into Closed Session at 10:54 a.m.

RECONVENE TO OPEN SESSION

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to reconvene into open

session. Motion carried unanimously.

The Section reconvened into Open Session at 11:08 a.m.

VOTING ON ITEMS CONSIDERED OR DELIBERATED ON IN CLOSED SESSION

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to affirm all motions

made in closed session. Motion carried unanimously.

(Be advised that any recusals or abstentions reflected in the closed session motions stand for the purposes of the affirmation vote.)

DIVISION OF LEGAL SERVICES AND COMPLIANCE (DLSC) MATTERS

Proposed Stipulation(s), Final Decision(s) and Order(s)

16 CPC 042 - R.M.P.

MOTION: Kathleen Miller moved, seconded by Allison Gordon, to adopt the Findings of

Fact, Conclusions of Law and Order in the matter of disciplinary proceedings against Roger M. Pumphrey, DLSC case numbers 16 CPC 042. Motion

carried unanimously.

16 CPC 039 - M.M.C.

MOTION: Allison Gordon moved, seconded by Kathleen Miller, to adopt the Findings of

Fact, Conclusions of Law and Order in the matter of disciplinary proceedings against Molly M. Christofferson, DLSC case number 16 CPC 039. Motion

carried unanimously.

Case Closings

MOTION: Kathleen Miller moved, seconded by Allison Gordon, to close the DLSC

cases for the reasons outlined below:

1. 16 CPC 007 (St.) – Insufficient Evidence

2. 16 CPC 007 (Sa.) – Prosecutorial Discretion (P2)

Motion carried.

DELIBERATION ON PROPOSED FINAL DECISION AND ORDER IN THE MATTER OF DISCIPLINARY PROCEEDINGS AGAINST CURT E. CLAUSEN, RESPONDENT, DHA CASE NO. SPS-17-0016/DLSC CASE NO. 16 CPC 043 AND OBJECTIONS

MOTION: Monica Vick moved, seconded by Kathleen Miller, to adopt the Findings of

Fact, Conclusions of Law, and Proposed Decision and Order in the matter of disciplinary proceedings against Curt E. Clausen, Respondent – DHA Case No. SPS-17-0016/DLSC Case No. 16 CPC 043. Motion carried unanimously.

ADJOURNMENT

MOTION: Allison Gordon moved, seconded by Monica Vick, to adjourn the meeting.

Motion carried unanimously.

The meeting adjourned at 11:10 a.m.

State of Wisconsin Department of Safety & Professional Services

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request:		2) Date When Request Submitted:				
Ashley Ayres		December 18, 2017				
Monitoring and Intake Supervisor Division of Legal Services and Compliance				Items will be considered late if submitted after 4:30 p.m. and less than: 10 work days before the meeting for Medical Board		
3) Name of Board, Comm	ittee. Cou	ıncil. Secti	ions:	- 14 WOLK UZ	ays before the meeting for all others	
Professional Couns						
			() How should the	ha itam ha titlad on th	ao aganda naga?	
4) Meeting Date:	5) Attac	nments:	6) How Should II	he item be titled on th	ne agenda page?	
April 16, 2018				of Monitoring Lia	aison and Delegated Authority Motion	
7) Place Item in:		8) Is an appearance before the Board being scheduled? 9) Name of Case Advisor(s), if required:			9) Name of Case Advisor(s), if required:	
		_				
☐ Closed Session			(Fill out Board Ap	ppearance Request)		
☐ Both		⊠ No				
40) D 11 11 1						
10) Describe the issue ar	id action t	hat shoul	d be addressed:			
Adopt or reject the Roles and Authorities Delegated to the Monitoring Liaison and Department Monitor document as presented in today's agenda packet.						
			9			
11)		^	Authorizati	on		
- Ashlugt	mes)				
013-001	0,00				December 18, 2017	
Signature of person making this request Date						
Supervisor (if required)					Date	
Supervisor (il requireu)					Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date						
Directions for including supporting documents:						
This form should be attached to any documents submitted to the agenda.						
2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director.						
3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a						
meeting.						

Roles and Authorities Delegated to the Monitoring Liaison and Department Monitor

The Monitoring Liaison ("Liaison") is a Board/Section designee who works with department monitors to enforce Board/Section orders as explained below.

Current Authorities Delegated to the Monitoring Liaison

The Liaison may take the following actions on behalf of the Board/Section:

- 1. Grant a temporary reduction in random drug screen frequency upon Respondent's request if he/she is unemployed and is otherwise compliant with Board/Section order. The temporary reduction will be in effect until Respondent secures employment in the profession. The Department Monitor ("Monitor") will draft an order and sign on behalf of the Liaison.
- 2. Grant a stay of suspension if Respondent is eligible per the Board/Section order. The Monitor will draft an order and sign on behalf of the Liaison.
- 3. Remove the stay of suspension if there are repeated violations or a substantial violation of the Board/Section order. In conjunction with removal of any stay of suspension, the Liaison may prohibit Respondent from seeking reinstatement of the stay for a specified period of time. The Monitor will draft an order and sign on behalf of the Liaison.
- 4. Grant or deny approval when Respondent proposes continuing/remedial education courses, treatment providers, mentors, supervisors, change of employment, etc. unless the order specifically requires full-Board/Section approval.
- 5. Grant a maximum of <u>one 90-day extension</u>, if warranted and requested in writing by Respondent, to complete Board/Section-ordered continuing education.
- 6. Grant a maximum of one extension or payment plan for proceeding costs and/or forfeitures if warranted and requested in writing by Respondent.
- 7. Grant full reinstatement of licensure if Respondent has fully complied with all terms of the order without deviation. The Monitor will draft an order and obtain the signature or written authorization from the Liaison.
- 8. Grant or deny a request to appear before the Board/Section in closed session.
- 9. (Except Pharmacy) Accept Respondent's written request to surrender credential. If accepted by the Liaison, Monitor will consult with Board Counsel to determine if a stipulation is necessary. If a stipulation is not necessary, Monitor will draft an order and sign on behalf of the Liaison. If denied by the Liaison, the request to surrender credential will go to the full Board for review.
- 10. (Except Pharmacy) Grant Respondent's petition for a reduction in drug screens per the standard schedule, below. If approved, Monitor will draft an order and sign on behalf of the Liaison.
 - a. Year 1: 49 screens (including 1 hair test, if required by original order)
 - b. Year 2: 36 screens (plus 1 hair test, if required by original order)
 - c. Year 3: 28 screens plus 1 hair test
 - d. Year 4: 28 screens plus 1 hair test
 - e. Year 5: 14 screens plus 1 hair test
- 11. (Dentistry only) Ability to approve or deny all requests from a respondent.

Current Authorities Delegated to the Department Monitor

The Monitor may take the following actions on behalf of the Board/Section, draft an order and sign:

- 1. Grant full reinstatement of licensure if CE is the <u>sole condition</u> of the limitation and Respondent has submitted the required proof of completion for approved courses.
- 2. Suspend the license if Respondent has not completed Board/Section-ordered CE and/or paid costs and forfeitures within the time specified by the Board/Section order. The Monitor may remove the suspension and issue an order when proof completion and/or payment have been received.
- 3. Suspend the license (or remove stay of suspension) if Respondent fails to enroll and participate in an Approved Program for drug and alcohol testing within 30 days of the order, or if Respondent ceases participation in the Approved Program without Board approval. This delegated authority only pertains to respondents who must comply with drug and/or alcohol testing requirements.

Proposed (New) Delegations to the Monitoring Liaison

The Monitoring Unit is proposing the following additions to the Monitoring Liaison's authority:

- 1. Board Monitoring Liaison may determine whether Respondent's petition is eligible for consideration by the full Board/Section.
- 2. Board Monitoring Liaison may approve or deny Respondent's request to be excused from drug and alcohol testing for work, travel, etc.

Updated 12/15/2017 2017 Roles & Auth **10** ities

State of Wisconsin Department of Safety & Professional Services

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request:			t:	2) Date When Request Submitted:			
, i		1/8/2018					
				Items will be consider	Items will be considered late if submitted after 12:00 p.m. on the deadline		
Carrrie Cusick, LPPA	D 4				ess days before the meeting		
Stephanie Oren LF 3) Name of Board, Comi		umail Castiana					
3) Name of Board, Comi	nillee, Co	ouncii, Sections:					
Professional Couns	selor						
4) Meeting Date:							
04/17/2018	⊠ Y€	es					
	☐ No	0	Revi	ew of Credentiali	ng delegated authority		
		1 .					
7) Place Item in:			ice before	e the Board being	9) Name of Case Advisor(s), if required:		
Open Session		scheduled?					
☐ Closed Session		☐ Voc /Fill out	Doord Ar	opearance Request)			
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10) Describe the issue a	nd aation	No	draccadı				
10) Describe the issue a	nu actioi	i triat Srioulu de au	uresseu.				
Credentialing is request	ing the fo	ollowing delegated	authoritie	es:			
4. A calle a cita a talle		Pallan Palana Ara			death Parameter		
				I issues related to cre			
					aund checks have been approved for a previous has occured since that approval.		
3. Authority for DSPS staff to approved education that meets CACREP requirement.							
11)			Nuthoriza	tion			
'					Date		
Signature or person making this request					Dute		
Carrie Cusick & Stephanie Oren				1/8/18			
Supervisor (if required)				Date			
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date							
Directions for including	supporti	na documents:					
This form should be attached to any documents submitted to the agenda.							
2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director.							
3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a							
meeting.							

AGENDA REQUEST FORM

1) Name and Title of Por	can Subr			2) Data When Begu		
1) Name and Title of Person Submitting the Request: 2) Date When Request Submitted:					est Submitted:	
Dan Williams Executive Director				Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting		
3) Name of Board, Comr		ouncil, Sections:				
Professional Counselor	Section					
4) Meeting Date:	5) Attac	6) Attachments: 6) How should the item be titled on the agenda page?				
6/26/2018	⊠ Ye					
		Society of Counseling Psychology/APA letter- Discussion and Consideration				
7) Place Item in:		8) Is an appearance before the Board being 9) Name of Case Advisor(s), if require				
Open Session		scheduled?				
☐ Closed Session		Yes (Fill out	Board Ar	ppearance Request)		
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10) Describe the issue a	nd action	_	dressed:			
From: Michael Schee	el <msch< th=""><th>eel2@unl.edu></th><td></td><th></th><th></th></msch<>	eel2@unl.edu>				
Sent: Wednesday, M						
To: Williams, Dan - D	SPS < Da	n1.Williams@wi	sconsin.	.gov>		
Subject: letter suppo	rting ind	clusiveness of ma	isters co	ounseling training		
Dear Wisconsin masters counseling licensing board,						
With this email, I am sending you a letter (see attached) which addresses the desire of the organizations represented in it for your state licensing board to continue to take an inclusive and comprehensive orientation toward masters counseling training, accreditation, and licensure. Our letter originates from the Society of Counseling Psychology (SCP) and is signed by myself, the VP for Education and Training of SCP, as well as Dr. Arpana Inman, the president of the Society of Counseling Psychology (SCP), Dr. Barry Chung, the president of the Council of Counseling Psychology Training Programs (CCPTP), Dr. Elaine Johnson, the president of the Alliance of Professional Counselors (APC), and Dr. Anabel Bejarano, the president of the Council of Masters in Counseling Training Programs (CMCTP). We have put a great deal of time and thought into this communication to you. Our hope is the letter conveys our unified stance of inclusiveness and comprehensiveness toward masters counseling training.						
You may like to reply to us with questions or other responses. Please feel free to use my email, mscheel2@unl.edu . I will be sure to pass your sentiments along to all those represented in the letter.						
Michael J. Scheel, PhD, ABPP Professor APA Fellow SCP VP for Education and Training Associate Editor, The Counseling Psychologist University of Nebraska-Lincoln 38 Teachers College Hall Lincoln, NE 68588-0345 402-472-0573 (w) 402-730-7481 (c)						



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Society of Counseling Psychology

Division 17, American Psychological Association http://www.div17.org

May 3, 2018

Dear State Professional Counselor Licensing Board:

We wish to update you on progress being made in the development of a comprehensive and inclusive path to master's level practice and licensure. We represent the leadership of several organizations dedicated to excellence in training professional counselors. We are concerned about the detrimental implications of ongoing efforts to limit pathways to licensure for counseling students. We want to call your attention to the merits of our shared mission to retain broad avenues to training professional counselors.

For the last nine years, the Council for Accreditation of Counseling and Related Educational Programs (CACREP) and allied organizations have attempted to limit the number and type of programs training license-eligible counselors. They promote the exclusive requirement of a degree from a CACREP-approved program. However, more than 400 master's training programs not affiliated with CACREP exist in the United States.

The Masters in Counseling and Psychology Accreditation Council (MPCAC) offers accreditation to **all** programs that meet its high standards. MPCAC fills the need for program accreditation for master's programs that CACREP does not serve including those based in psychology, counseling, and interdisciplinary departments. Both MPCAC and CACREP standards are geared toward meeting curricular licensing requirements in every state. The primary differences are MPCAC's greater emphasis on scientific foundations of counseling practice and in its inclusion of training in academic disciplines such as counseling psychology that have contributed to the development of the counseling profession. At last count, 30% of all masters' training programs are CACREP, 10% are MPCAC. Thus, fully 60% are unaffiliated.

Most states need more mental health practitioners, not less, to address the mental health disparity problem in our country. To limit the number of programs eligible to train license- eligible counselors **flies in the face of this growing problem**. In 2014, the National Alliance for Mental Illness reported 44 million Americans as experiencing some form of mental illness, yet 60% of individuals with diagnosable mental illnesses in our country go untreated in a given year. In many regions there simply are **too few mental health practitioners** to address the growing need for mental health treatment.

The 400+ master's programs not affiliated with CACREP are an overwhelming majority of counseling training programs. These programs would be forced to close if licensure were restricted only to graduates of CACREP programs. The demise of these programs would be **disastrous to humanitarian efforts to increase mental health services to the underserved**. CACREP serves only programs that meet their narrow definitions of "counseling" and "counselor education." It specifically does not accredit programs in psychology, despite the fact that counseling psychology, clinical psychology, and school psychology all have long and successful histories of providing excellent training and producing top-notch master's clinicians. The CACREP-only initiative not only would limit mental health access to treatment, it would also restrict many deserving students from achieving their career goals of becoming professional counselors in states where they desire to work.

Thus, we strongly endorse an inclusive and comprehensive approach to master's level counseling training. We represent programs with long and successful histories (since 1946) of preparing students through counseling and psychology training to practice as professional counselors. Our programs align with individual state licensing requirements and are based on the *Competencies In Professional Counseling and Related Human Services* (Scheel, Lichtenberg, Fouad, & Jackson, 2012). These competencies promote high standards and emphasize science-practice integration, culturally sensitive and competent practice, social justice advocacy, contextualized evidence-based practice, and strengths-oriented prevention efforts. We are proud of the work being done to retain diverse career pathways to master's level licensure and practice. We are confident that our efforts are needed to address the mental health treatment disparity in the United States. We urge you to continue the good work you have been doing to regulate the licensure of professional counselors prepared in diverse ways.

Michael J. Scheel, PhD, ABPP VP for Education and Training

Society of Counseling Psychology

Arpana G. Inman, PhD

President

Society of Counseling Psychology

para 6.2m

1500

Y. Barry Chung, PhD President

Council of Counseling Psychology Training Programs

Elaine Johnson, PhD, President Alliance for Professional Counselors

Anabel Bejarano, PhD President

Council of Masters in Counseling Training Programs