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**From:** [BPL-BoardSupport](#)

**Sent:** Wed, 14 Dec 2022 20:20:15

**To:** [MacIntosh, Weston \(LARA\)](#)

**Subject:** FW: Boards and Committees: Attention: Departmental Specialist: Counseling Amendment Comments

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[Thriveworks - MI Counseling rules Comments.pdf](#) 

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**From:** Thriveworks Legal <[legal@thriveworks.com](mailto:legal@thriveworks.com)>

**Sent:** Wednesday, December 14, 2022 2:33 PM

**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>

**Subject:** Boards and Committees: Attention: Departmental Specialist: Counseling Amendment Comments

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Good afternoon,

Please see the attached comments regarding Administrative Rules for Counseling – General Rules. Thank you.

**Stefanie Frank**

Vice President, Associate  
General Counsel | **Thriveworks**



**Phone:** 617-902-0019

**Email:** [legal@thriveworks.com](mailto:legal@thriveworks.com)

**Website:** [thriveworks.com](http://thriveworks.com)



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Thanks for your understanding!

- Your friends at Thriveworks



Thriveworks  
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Stefanie Frank  
Vice President & Associate General Counsel

December 12, 2022

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing  
Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

Re: Administrative Rules for Counseling – General Rules

Dear Board,

Thriveworks appreciates the Board giving us an opportunity to comment on the proposed rules regarding Counseling – General Rules.

Thriveworks is a leading mental health provider offering counseling and psychiatry services online and in-person at 350+ locations nationwide. We work to make therapy and psychiatry better for everyone: providing best-practice care and creating a supportive environment our clinicians can thrive in. We employ over 2000 mental health clinicians nationwide, with over 80 practicing in Michigan, including supervisors and associates. Our goal is to continue to grow our presence in the State.

The Thriveworks Resident Program is a nationwide initiative that provides pre-licensed clinicians, which we call Residents, with the opportunity to provide clinical services under supervision. This enables provisionally licensed clinicians to build professional experience and develop clinical skills in the gap between the completion of their Masters and receiving licensure.

In regard to the proposed rule, and in view of the Thriveworks Resident Program, we agree with the new definition of "Supervisor". We also thank the Board for including Telehealth within the rules and agree with the description and requirements.

Under R. 338.1772, we request clarification on providing a professional disclosure statement with the application for a limited license as it is ambiguous. Thriveworks recommends that notices be sufficient if it is within the informed consent document, and no separate notice be required.

Further, under the same section, we found the language on Supervisors providing information to the Board to be ambiguous as well. Thriveworks asks that the Board create a form that includes all the required information for a Supervisor to easily complete and submit, without the need of Board approval. As Thriveworks employs thirteen Supervisors in the State of Michigan, we want to show our quality, while not overburdening our supervisors.



Lastly, we agree and appreciate the Board's inclusion of the ability for supervision to occur via 2-way real-time audiovisual technology that allows direct, contemporaneous interaction by sight and sound between the supervisor and supervisee.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stefanie Frank", with a long horizontal flourish extending to the right.

Stefanie Frank, VP & Associate General Counsel  
Thriveworks

A handwritten signature in black ink, appearing to read "Heidi Faust", with a stylized, cursive script.

Heidi Faust, Chief Clinical Compliance Officer  
Thriveworks