



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

January 26, 2021

Joint Committee on Administrative Rules
Boji Tower, Third Floor
124 W. Allegan St.
P.O. Box 30036
Lansing, MI 48909-7536

Re: Ruleset 2020-33 LR (Counseling – General Rules)

Chair Meerman, Alternate Chair Bumstead, and Committee Members:

This letter is to inform you that the Michigan Department of Licensing and Regulatory Affairs has resubmitted the Counseling – General Rules (MOAHR #2020-33 LR) for consideration by the Joint Committee on Administrative Rules. This ruleset was previously withdrawn on November 30, 2020, pursuant to Section 45a(10)(b) of the Administrative Procedures Act (APA), MCL 24.245a(10)(b).

As promised, the Department has reviewed the provisions regarding remote supervision of a limited licensed professional counselor (LLPC) to determine whether additional allowances are warranted. After consulting with the Michigan Board of Counseling and stakeholders, it was determined that if additional allowances are needed during certain emergency conditions, then those allowances would require statutory change. As a result, the rules are being resubmitted without revision as the requested changes were beyond the scope of the department's rulemaking authority.

Please contact me at 517-241-4580 with any questions or concerns regarding this matter. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Marlon I. Brown".

Marlon I. Brown
Director of Policy and Legislative Affairs
Michigan Department of Licensing and Regulatory Affairs

CC: Kim Gaedeke, Chief Deputy Director
Courtney Pendleton, Deputy Director
Katie Wienczenwski, Administrative Rules Manager