



Michigan Mental Health
Counselors Association

September 22, 2020

Attention: Policy Analyst
Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing - Boards and Committees Section
P.O. Box 30670, Lansing, MI 48909-8170

Dear Bureau of Professional Licensing,

On behalf of the Michigan Mental Health Counselors Association (MMHCA), I would like to thank you for the opportunity to provide comment on the proposed counseling rules set (2020-33 LR).

MMHCA believes the rules as presented appropriately implement the legislative intent of the current licensed professional counseling statute and that, if promulgated, will ensure licensed professional counselors the opportunity to practice to their full scope, education and training as provided for under Public Act 96 of 2019.

In light of actions taken by Governor Whitmer under the COVID-19 State of Emergency Declaration that suspended mandatory in-person supervision during the pandemic, we strongly recommend that this rules opportunity also be utilized to allow for similar accommodations in a future state of emergency. To that end, MMHCA recommends the following provision be added to this proposed rule set:

“Under a Governor declared state of disaster or emergency, the Board may allow for an alternative supervision arrangement to the immediate physical presence requirement between a supervisor and the supervisee such as, but not limited to, use of two way real time audiovisual technology that allows for direct remote interaction by sight, sound, and observation between the supervisor and the supervisee to obtain the required supervision hours.”

Thank you again for this opportunity to provide comment and for all the department’s efforts throughout this inclusive and collaborative rules process. Please allow this letter to serve as MMHCA’s formal communication of our full support for the proposed general counseling rules with the addition of the proposed rule allowing for an alternative supervision arrangement under a future state of emergency.

Sincerely,

JAMES BLUNDO, MA, LPC
Executive Director
Michigan Mental Health Counselors Association
248-930-0644
jamesblundo@att.net

Department Of licensing and Regulatory Affairs
Bureau of Professional Licensing- Boards and Committees Section
P.O. Box 30670
Lansing, Michigan 48909-8170

Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

RE: Purposed rule: 2020-33LR

Rule set title: Counseling General Rules (R338.1751- R 338.1781)

Draft Language update on: 8/17/20

Greetings,

As part of my professional career as Licensed Professional Counselor in the State of Michigan, I've worked for the last four-plus years by providing supervision using the CCE approved credential for supervisors of "ACS" to therapists during their Limited License in Counseling and/or Internship as they work towards their full Professional Counseling License. I also provide supervision to other therapists in the agency I work for.

In behalf of providing supervision in modalities that will be equitable in learning, time, and financial management I am requesting that the language in the Counseling General Rule to be updated to the current and future scope of providing supervision from "in immediate physical presence" to language that encompasses our current and future modalities of supervision administration and oversight of development and monitoring of current and future Professional Counselors.

In the purposed rule 2020-33LR under Part 3. Licensure

Rule: R 338.1774 Application requirements; licensure by examination. It states the following in subsection:

- (i) regularly scheduled supervision accrued in the immediate physical presence of the supervisor. Of the 100 hours, no more than 25 hours may be accrued via 2-way real-time audiovisual technology that allows direct, contemporaneous interaction by sight and sound between the supervisor and the supervisee.

And in subsection:

- (ii) regularly scheduled supervision accrued in the immediate physical presence of the supervisor. Of the 50 hours, no more than 15 hours may be accrued via 2-way real-time audiovisual technology that allows direct, contemporaneous interaction by sight and sound between the supervisor and the supervisee.

Suggested change in Subsection (i) and Subsection (ii) (as stated above) to...

...Regularly scheduled supervision to be accrued between the applicant and the supervisor on an individual or group basis either in person or using a telecommunication method that provides for live and simultaneous contact.

Respectfully submitted,

Christine Gjestland LBSW, LPC, NCC, ACS
Community Services Coordinator & Mental Health Therapist
Cgjestland@highfields.org;
Christine.gjestland@gmail.com

From: [Connor Jewell](#)
To: [BPL-BoardSupport](#)
Subject: Purposed rule: 2020-33LR
Date: Monday, September 21, 2020 2:51:01 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

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Greetings,

I am a Limited Licensed Professional Counselor in the state of Michigan, and I am writing concerning purposed rule 2020-33LR in regards to the guidelines for licensure supervision. The current language limits the ability for professional counselors to receive supervision via virtual options. Due to the COVID-19 pandemic, this rule potentially places both supervisor and supervisee at additional risk of exposure, which consequently increases the exposure risk of our clients. Furthermore, I believe that the need to meet supervisors in person, while definitely preferable, is not strictly necessary. Research suggests that the benefits of teletherapy are comparable to those of in-person therapy; though there is not a significant body of research indicating that tele-supervision is as effective as in-person supervision, it stands to reason that the results are likely similar.

I am requesting that the language in the Counseling General Rule to be updated to the current and future scope of providing supervision from “in immediate physical presence” to language that encompasses our current and future modalities of supervision administration and oversight of development and monitoring of current and future Professional Counselors.

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Respectfully submitted,

Connor Jewell, MA, LLPC

Home-Based Clinician

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From: [Michelle](#)
To: [BPL-BoardSupport](#)
Subject: Purposed rule: 2020-33LR Rule set title: Counseling General Rules (R338.1751- R 338.1781)
Date: Monday, September 21, 2020 9:14:24 PM

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Department Of licensing and Regulatory Affairs

Bureau of Professional Licensing- Boards and Committees Section

P.O. Box 30670 Lansing, Michigan 48909-8170

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Respectfully submitted,

Michelle Lake MA, LLPC

(517)612-3037

From: [Overton, Roberto \(LARA-BoardMember\)](#)
To: [BPL-BoardSupport](#)
Subject: Support for MMHCA
Date: Tuesday, September 22, 2020 2:22:21 PM

Hello,

This is Roberto Overton. I had technical difficulties with my audio during the meeting. I want to support MMHCA on the proposed counseling rules set (2020-33 LR).

Sincerely,

Roberto Overton

From: [Rachel Toiv](#)
To: [BPL-BoardSupport](#)
Subject: Policy Analyst - Public Hearing 9/22
Date: Thursday, September 3, 2020 6:07:40 PM

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Hello,

I have received the notice of the upcoming Michigan Department of Licensing and Regulatory Affairs virtual public hearing on September 22nd. I would like to show my support and agreement with the discussion of "adding the National Clinical Mental Health Counseling Examination (NCMHCE) as an approved examination for licensure".

Last year I moved to Michigan from New York where I was pursuing New York State Mental Health Counseling Licensure. New York requires its aspiring counselors to take the NBCC's National Clinical Mental Health Counselors Examination (NCMHCE). I successfully passed the NCMHCE before moving to Michigan.

The National Board of Certified Counselors (NBCC) creates and administers the two state-recognized counselor examinations, the NCMHCE and the NCE. The content outline for the two exams are published on the NBCC's website and clearly demonstrate that both exams test counselors in the same 6 Domains. As stated in its content outline, this NCMHCE is a newer exam that was designed to frame the exam to reflect "the central clinical requirements of counselors through real world simulated cases." This is an advantage that the NCMHCE has beyond the multiple choice NBCC exam.

I have been in the process of trying to see if my NCMHCE examination can qualify as an equivalent test to the NCE. This addition of the NCMHCE would be incredibly helpful as both examinations are extremely similar.

I look forward to attending the hearing,

Best,

Rachel Toiv

rtoiv82@gmail.com
303-550-4882