

Eddie Sleeper

From: Valerie H. <hughes.valerie12@gmail.com>
Sent: Wednesday, October 2, 2019 12:22 PM
To: Eddie Sleeper; Rep. Lee Chatfield (District 107)
Subject: written statement; HB4325 and LARAs LPC rule change

To Whom It May Concern,

Thank you for taking the time to read and understand my concerns regarding LARA's rule change and the need to pass bill HB4325.

I am not an LPC nor am I a Mental Health provider, but I am a Human Resource professional in one of the largest Healthcare Systems in the Lower Northern Michigan region and am very concerned. I am not here to discuss LPC's training and abilities as I know that their programs mandate classes in psychotherapy, diagnosis, treatment planning, and treatment extensively. I know after they complete their formal education, which can take 2-4 years, they are required to have supervised hours that take a minimum of 2 years to obtain and then they are eligible to test and be reviewed by an oversight board. I know this oversight board reviews their education and supervision to ensure they will have the ability and means to diagnose, create treatment plans and execute said plans. I understand that LPCs are required to obtain more continuing education for their NCC certification than other Clinical positions with direct patient care, such as Registered Nurses. I also know that LPCs must go through a Credentialing process that Medical Providers such as DO and MDs must also go through for insurances in order to bill, which includes but not limited to education review, license review and certification review. I am left confused and concerned that it is even a question if LPCs should maintain their scope of practice, but what I wanted to draw attention to was the secondary impact that many do not discuss. Maybe it is because I am on the business end of Healthcare, but my brain immediately jumps to work force planning and the impact on the bottom line of the Hospitals I work with.

LARA stated in its impact statement that no one would be affected by the rules change, only licenses. As a person on the business end of healthcare, this caught my attention. What I see is a play on words that is not entirely honest or forthcoming. How could this statement be true if the ability to bill for services is directly tied to the ability for LPCs to diagnose, create treatment plans and provide treatment would be then considered outside of their practice? Over 10,000 LPCs, who are productive, contributing, members of Society would be out of the work force and drawing from unemployment. I know this sentiment has been discussed a lot, so I will digress, but what I did want to bring to your attention is the large spread secondary negative consequences to such changes. It is not the just LPCs and their patients that would be affected by this change.

Any Hospital employee will be directly impacted by the loss of LPCs. LPC's play a vital role in patient care as healthcare moves and has moved to be taking care of the patients as a whole, physically, mentally and sometimes spiritually. LPCs are directly woven into positive patient outcomes as we see their direct impact in reduction of readmissions, end of life advance care planning and are trained as durable power of attorneys for healthcare, and crises interventions in both Emergency rooms and Critical Care Units.

If LARA were to pass their rule change and HB4325 were not to pass, we are allowing our other medical professionals to be put in harm's way in a physical, mental and emotionally sense. LPCs are called on a daily basis to assist and complete crisis screens, safety assessments, and psych placements. Examples of Hospital workers directly impacted in just a single department is, but not limited to, Registered Nurses, CENAs, Doctors- both MD and DO, Advance Practice Providers such as Nurse Practitioner, Physician Assistants, Emergency Room Technicians, Patient Access Representatives, and Phlebotomist.

Entire clinics, and not just the private practice clinics, but Hospital Outpatient Therapy Clinics would have to shut down as well. Again, this directly impacts the livelihoods of other such as, but not limited to, Medical Receptionist, Patient Schedulers, House Keepers, Medical Billers and such. These aftershocks are secondary, but they are just as important to

consider. In Rural Michigan the local Hospitals are the areas largest employer, leaving the impact on a much more profound level than can be calculated.

Police Officers and Judges consider LPC's Subject Matter Experts in Mental Health and will rely on their expertise in the court of law. They are asked to ensure the safety of not only the incarcerated but also themselves. LPCs are called for jail screens and assessments regularly.

Teachers will be directly impacted. I have worked in schools and in classrooms and have watched first hand as a student had an emotional break and the Teachers call the school Counselor to help handle the situation. Schools are recognizing the teen suicide epidemic and are struggling to fill these gaps of need due to lack of Mental Health Professionals to begin with.

I hope you can see the scope of impact outside of just LPC's and their families.

I ask you to support HB4325 without Amendment not just for LPCs, but for the entire communities that will be affected.

Again, thank you for taking the time read and understand my concerns.

Sincerely,

Valerie Hughes, MHA, BSBA

Master's in Healthcare Administration

BSBA Human Resources

Eddie Sleeper

From: S Long <SLong@Wellspringccs.org>
Sent: Wednesday, October 2, 2019 10:21 AM
To: Eddie Sleeper
Subject: for public hearing on HB4325 on 10/02/19

Dear Chairman Iden and Committee members:

I am in support of HB4325 and its move out of committee to revise the licensing and practice rules for Licensed Professional Counselors in Michigan. As a citizen, and as an office manager for Wellspring Counseling in Okemos, Michigan, I am a witness to the many intake calls and the robust waiting lists of the LPCs in our office. I am also a witness to the fact that all of our fulltime psychotherapists are LPCs. For this reason, it is imperative that we maintain the availability of mental health and substance abuse treatment counselors (specifically LPCs) in Michigan to meet the continued needs of the people of Michigan.

Regards,

Wendy Gregg
Office Manager, Wellspring Counseling
Okemos, Michigan
517 336-4335

Eddie Sleeper

From: dorothy archambeau <dorothyalice1977@gmail.com>
Sent: Wednesday, October 2, 2019 11:07 AM
To: Eddie Sleeper
Subject: HB 4325

Hello,

I have been an LPC for the past 25 years, and cannot stress enough the importance of passing HB 4325. Without this bill, tens of thousands of people in Michigan will be without mental health care, and thousands of counselors will be rendered unemployed and unable to practice. It is imperative this passes. May I count on you for your support?

Thank you,

Dorothy Archambeau

MA,LPC

Eddie Sleeper

From: Matt Carnegie
Sent: Wednesday, October 2, 2019 12:07 PM
To: Eddie Sleeper
Subject: FW: HB 4325 Ways and Means Committee Written Testimony

From: House Clerk
Sent: Wednesday, October 2, 2019 12:07 PM
To: Matt Carnegie <mcarnegie@house.mi.gov>
Subject: FW: HB 4325 Ways and Means Committee Written Testimony

From: Abby Norris <abby.s.norris@gmail.com>
Sent: Tuesday, October 1, 2019 10:34 AM
To: House Clerk <HouseClerk@house.mi.gov>
Subject: HB 4325 Ways and Means Committee Written Testimony

Dear Ways and Means Committee,

I am writing to express my concern with LARA's proposed rules changes for Licensed Professional Counselors (LPC) that have significant consequences on the counseling profession and the workforce in Michigan's public mental health system. I urge you to support HB 4325, which would protect the work of over 10,000 licensed professional counselors in the state of Michigan, preserving access to needed mental health care for an estimated 150,000 Michiganders.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751. These are rules that have been recognized as part of the scope since they were first promulgated after the passage of the Licensed Professional Counselor statute in 1988. Instead, the department insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. Included in this repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem". Without these and numerous other definitions, the counseling scope of practice is severely limited.

These changes in scope would also put Michigan's LPCs in violation of the American Counseling Association's Code of Ethics (E.5.a. Proper Diagnosis), which requires the proper diagnosis of a client's mental disorder before treatment, and could subject them to permanent expulsion from the profession. Additionally, insurance companies will likely stop reimbursing for the services of LPCs due to the significant limits on scope these rule changes would impose.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. This training is a national standard for professional counseling. Again, if this rule is rescinded, counselors who provide supervision without training would be practicing in violation of the ACA's Code of Ethics (F.2.a Supervisor Preparation). Furthermore, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving.

If these changes go into effect, access of quality health mental health care to 150,000 Michiganders would be greatly reduced at a time when they are needed more than ever. HB 4325 rectifies this problem by updating the language of the Public Health Code to reflect the current training and practices of LPCs in Michigan, while bringing the code into alignment with the national standards for professional standards. Your support of HB 4325 would not change the scope of practice for LPCs in the state of Michigan, rather it would codify the privileges that LPCs currently perform.

In summary, I strongly encourage the legislature pass HB 4325 (sponsored by Rep. Miller), which would overturn these proposed changes.

Thank you in advance for your consideration.

Sincerely,

Abigail Norris, LLPC

Eddie Sleeper

From: Steven Halsell <halsell.counselor@gmail.com>
Sent: Wednesday, October 2, 2019 10:06 AM
To: Eddie Sleeper
Subject: for public hearing on HB4325 on 10/02/19

Dear Chairman Iden and Committee members:

I am in support of HB4325, and its move out of committee to revise the licensing and practice rules for Licensed Professional Counselors in Michigan. As a citizen and Licensed Professional Counselor myself, I believe we need to maintain the availability of mental health and substance abuse counselors in Michigan to meet the continued needs of the people of Michigan.

Regards,

Steven A. Halsell, MA, LPC
517 336-4335

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*This message is of a confidential nature, and is meant to be read only by the intended recipient.

Steven A. Halsell, MA, LPC, NCC
2111 University Park Drive, Suite 100
Okemos, MI 48864
(517) 336-4335
shalsell@wellspringccs.org

"When he came to his senses...he got up and went to his father. But while he was still a long way off, his father saw him and was filled with compassion for him; he ran to his son, threw his arms around him and kissed him." Luke 15

Eddie Sleeper

From: Sonja Thayer <slthayer@oakland.edu>
Sent: Wednesday, October 2, 2019 10:02 AM
To: Eddie Sleeper
Subject: HM4325 Ways & Means Committee Written Testimony

Dear Representative,

I am contacting the Ways and Means Committee to voice my support for HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS.

If LARA revises the rules and the HB4325 bill does not pass, the impact will render profound economic ramifications in Michigan:

- **You will be cutting out a massive revenue stream.**

The average salary for a Licensed Professional Counselor in Michigan is approximately \$48,000 - \$50,000 per year in Michigan. LARA reports over 10,000 LPC licenses in Michigan. If LARA's proposed rule changes go into effect and if HB 4325 is denied, it will result in income tax REVENUE LOSS OF \$480 MILLION PER YEAR to the State of Michigan.

- **10k Michigan LPCs will be forced out of business, placing themselves, their dependents, and support staff in financial ruin.**

Many of us are in private practice as small business owners here in Michigan and would be forced to shut down our practices. We would not only lose our businesses and our household income, but since our degree and license would be worthless, we would not be qualified to get a financially equivalent job anywhere else. This could ultimately cause over ten thousand families to potentially go bankrupt, foreclose on their homes, be unable to pay back the average amount of \$80,000+ in student loans. In addition, it will significantly affect the lives of our children.

- **Unemployment rates will skyrocket.**

10,000+ LPCs will instantly be unemployed ...for an EXTENDED period of time due to their nullified degree/qualifications to get another professional job. Furthermore, we are also career counselors that support unemployed or underemployed individuals to help them get back out into the workforce. Without counselors to help them, the number of citizens who will remain unemployed is incalculable.

- A ripple effect crisis will occur when more than 200,000 Michiganders will instantly be without their counselors and unable to contribute to our economy

- We are in the middle of an opioid crisis, a suicide epidemic, and record-breaking rates of depression and anxiety issues. We need to be expanding access to mental health services right now, not contracting it, so that we have more high-functioning citizens positively contributing to our society.

Once again, I urge you to support HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS.

Thank you for your time and consideration,

--

Sonja L. Thayer, MA, LPC, NCC

Doctoral Candidate | Clinical Supervisor | Lecturer |
Counselor Education & Supervision
Oakland University, Rochester, MI

Eddie Sleeper

From: nick khoury <nicholask123@gmail.com>
Sent: Tuesday, October 1, 2019 4:31 PM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means Committee letter

Hi this is a revised version of the letter I sent a few hours ago - recognized a few minor errors.

Dear Ways and Means Committee Members,

My name is Nicholas Khoury, I am a Licensed Professional Counselor (LPC) and the owner of a mental health counseling practice – Caritas Counseling Center (Caritas is Latin).

Mine and other practices employ other therapists, administrative staff, accountants, secretaries, receptionists, billing services, internet services, we pay rent, we utilize advertising agencies, and other expenses. Let me be clear- if the LARA proposed rule changes are enacted ALL practices will be forced to close. If we cannot diagnose and use psychotherapy techniques then the service we offer is completely nullified. Our business models are and have been built upon diagnosing a problem, developing a treatment plan for that problem, and then utilizing psychotherapy techniques to treat that problem FOR 30 YEARS.

It is not as if only "some" LPC's diagnose, treat, and use psychotherapy techniques. ALL LPC's and related mental health counseling practices have been doing so for the last 30 years. This has been the statewide standard of training, practice, and our business models for 3 decades.

LPCs have grown from a relatively small number 30-40 years ago to over 10,000 today. Most of the LPC's around the state have full client loads. This has occurred because the consumer has repeatedly chosen to make a free market choice to obtain mental health services from LPCs. This voice has shown they are benefiting from and as a result are increasingly demanding services from LPCs.

The premise for the thousands of LPCs having embarked upon such hefty student loans is and has been based upon an assessment of the industry wide current standard of practice – which are diagnosing, using psychotherapy techniques, being reimbursed by insurance for services, or cash fees of 70-170\$. Each LPC's cost/benefit analysis of education expenditure took this statewide standard scope of practice and the organically occurring free market supply/demand factors into account. The proposed LARA rules changes are completely out of touch with this current landscape and would decimate it. Bill HB 4325 is very much in line with it and would allow LPC's to continue to pay off student loans and continue on their current path.

Unlike the misinformation perpetuated by some, the University training LPCs receive, are more than adequate as related to current scope of practice. It is 4 years from start of master degree to receiving full license. The first two years involve 60 credits which are all geared toward diagnosing, testing and assessment of disorders/psychopathology, developing treatment plans based upon the diagnoses, the use of psychotherapy techniques, and understanding human development as related to psychopathology. The 4 years also involves 3700 hours of supervision (psychologists receive 4000 hours). I personally chose the clinical mental health counseling program at Oakland University over the Masters in Social Work MSW program at Wayne State (accepted to both) because at WSU only the second year 28 credits were

focused directly on mental health therapy (first 32 credits focused on broad social work curriculum). Therefore, the proposed LARA changes are completely out of line with the current structure of University LPC training programs. Bill HB 4325 is very much in line with said training programs and existing infrastructure.

We are in the middle of an opioid crisis, a suicide epidemic, mass shootings, and record-breaking rates of depression and anxiety issues. Many clients will suddenly be cut off from their mental health therapy in the middle of treatment. This is against ALL ethical standards of practice for any helping industry. We need to be expanding access to mental health services right now, not contracting it, so that we have more high-functioning citizens positively contributing to our society.

I urge you to pass through Bill HB 4325 WITHOUT AMENDMENT.

Sincerely,

Nicholas Khoury LPC

10/01/2019

ATTN: Ways and Means Committee

Edward Sleeper, Committee Clerk

esleeper@house.mi.gov

Dear Representatives:

I am writing this letter to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on their counselors for treatment. Every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPC's. This will be so limiting that the scope of LPC's will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPC's unable to legally practice in our state. This means most LPC's will immediately be out of work including those that work in: emergency rooms, counseling agencies, private practices, substance abuse treatment services, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detox, mental health facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities, and prisons. This will leave hundreds of thousands of Michigan residents without mental health treatment they need. This will result in a statewide mental health emergency.

On a personal note, I work for North Country Community Mental Health in Northern Michigan. Our agency covers six counties in Northern Lower Michigan. We currently have 21 of our staff that are LPC's. This represents 33% of the clinical staff at NCCMH. NCCMH also manages emergency services and response in those six counties. This equates to 75% of the staff that covers our emergency services in our emergency departments and jails. I, again, ask that you pass HB 4325 without amendment to ensure that our clients will continue to be served.

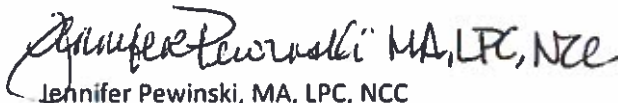
As you are already aware, our nation is facing a mental health crisis. There are simply not enough counselors and other mental health professionals to meet the increased demand for services, according to a recent analysis by the U.S. Health Resources and Services Administration (HRSA). HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan, there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care that they need. We already have a shortage of mental health clinicians in our state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPC's scope of practice. This is not true. Rather, HB 4325 will clearly put into law LPC's current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Respectfully Submitted,

 MA, LPC, NCC
Jennifer Pewinski, MA, LPC, NCC

12028 Fairgrieve Road

Johannesburg, MI 49751

jpewinski@norcoco.org

Dear Ways and Means Committee Members,

My name is Jennifer Prestenbach, I am a Licensed Professional Counselor (LPC) providing mental health therapy for Oakland Psychiatric Associates, PC for the past eight years. I am writing to implore you to pass HB 4325 out of committee without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of up to 300,000 mental health therapy clients that depend on these counselors for treatment. Moreover, there will be a financially devastating impact on the state level if 10,000+ Michigan LPCs were suddenly without work and the state no longer had that tax revenue.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

The changes LARA is going to be requesting October 4th are not reasonable, and will cost the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) in Michigan, have devastating consequences for up to 300,000 mental health therapy clients we are serving, and lead to home foreclosures, business closures, defaulting on student loans, and other catastrophic consequences, not to mention the devastating fiscal impact on the state level from losing state tax revenue of 10,000+ LPCs.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA). HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand. In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

I ask that you please allow HB 4325 to move through the Ways and Means Committee without amendment as quickly as possible, and that you support it unanimously. The bill itself, the 10,000 LPCs in Michigan carrying sky high rates of student debt for our education, up to 300,000 clients who will lose mental health coverage, and the current anxiety, depression, opioid, and mental health shortage crises all make that the right thing to do.

Respectfully Submitted,

Jennifer M. Prestenbach MA, LPC
Oakland Psychiatric Associates, PC
43700 Woodward Ave., Suite 301
Bloomfield Hills, MI 48302
Office: 248-335-4010
Fax: 248-977-3860

Eddie Sleeper

From: Beth Bolthouse, MA, LPC <BBolthouse@harborhospicemi.org>
Sent: Tuesday, October 1, 2019 4:09 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

House Bill 4325 will save lives – literally. In Muskegon County losing LPCs will adversely impact people who rely on LPCs in the following agencies:

- Harbor Hospice
- Child Abuse Council
- Every Woman's Place (domestic violence shelter)
- HealthWest (CMH)
- Numerous private practice LPCs
- Other agencies

Thousands of clients will be without support, safety, and counseling!! **PLEASE MOVE THIS THROUGH THE WAYS & MEANS COMMITTEE ASAP WITHOUT AMENDMENTS!**

Thank you!
Beth Bolthouse, MA, LPC

Beth Bolthouse, MA, LPC
Bereavement Counselor
Direct Line: 231.728.3442
Toll Free: 800.497.9559
Fax: 231.722.0708

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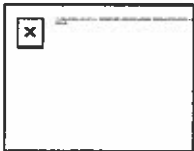
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Eddie Sleeper

From: Melanie Szucs <melanie@mindfulcounselinggr.com>
Sent: Tuesday, October 1, 2019 4:23 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

I am concerned about the potential rule changes that would seriously and negatively impact mental health providers with the LPC license. This would drastically impact the livelihood of nearly 10,000 counselors in the state of Michigan, but the impact on clients who see them would be tenfold. If this change were to be made, it would cause a mental health crisis wherein many existing clients of LPC-licensed counselors would face abandonment at no longer being able to maintain long-established relationships with their counselors. This decrease in insurance-paneled counselors would dramatically and negatively affect your constituency.

Please pass HB 4325, introduced by Rep. Aaron Miller (R-Sturgis), without amendments, BEFORE OCT 4TH, which would negate the need for LARA's rule changes altogether.



MELANIE SZUCS, MA, LPC, LLMFT

PSYCHOTHERAPIST

A: 741 Kenmoor Ave. S.E., Suite B

P: 616 710.1466

mindfulcounselinggr.com

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Eddie Sleeper

From: David Szaraz <david@szaraz.net>
Sent: Tuesday, October 1, 2019 4:23 PM
To: Eddie Sleeper
Subject: HB4325 -Ways and Means Committee Written Testimony

Dear Representatives,

I urge you to pass HB 4325, without amendments, out of the Ways and Means Committee, so the bill can move quickly to Governor Whitmer for her signature.

As a family physician, I hear daily from my patients how hard it is to access mental health therapy. In my own practice I see that patients who receive counseling experience improvements in their overall functioning. When my patients are able to reduce anxiety, depression, and stress levels it has a significant positive impact on other areas of self-care.

HB 4325 puts into law what the practice of Licensed Professional Counselors (LPCs) has been for over three decades. It allows counselors to maintain their ability to appropriately and properly diagnose mental disorders and provide psychotherapy services to individuals with mental and emotional issues.

I oppose the rule changes for LPCs suggested by the Michigan Department of Licensing and Regulatory Affairs (LARA). If 10,000 LPCs in Michigan are suddenly unable to diagnose and offer psychotherapy services, our already over-stretched mental health system will crash. Counselors and Social Workers adapted decades ago to a managed care environment which requires diagnosis for reimbursement. We need less barriers to health care, not road blocks. Let the graduate-level, trained, and licensed professionals who spend their careers specializing in mental health treatment continue to do what they do best.

I greatly appreciate your support in this serious matter to codify the important work of LPCs. Michiganders deserve access for mental health therapy. Please pass HB4325 quickly and without amendments.

Respectfully ,

David Szaraz, MD
Canton, Michigan

Eddie Sleeper

From: Mitch Rice <MRice@WellspringCCS.Org>
Sent: Tuesday, October 1, 2019 4:26 PM
To: Eddie Sleeper
Subject: for public hearing on HB4325 on 10-2-19

Dear Chairman Iden and Committee members:

I am in support of HB4325 and its move out of committee to revise the licensing and practice rules for Licensed Professional Counselors in Michigan. As a citizen and a License Professional Counselor myself, we need to maintain the availability of mental health and substance use treatment counselors in Michigan to meet the continued needs of the people of Michigan.

Regards,

Mitch Rice MA LPC CAADC
517-336-4335

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Eddie Sleeper

From: Lauren Young <laurenyoung223@gmail.com>
Sent: Tuesday, October 1, 2019 4:31 PM
To: Eddie Sleeper
Subject: HB4325 Ways and Means Committee Written Testimony

Hello,

My name is Lauren Young. I have been working as an LPC in the state of Michigan for 1 year, but have been practicing for 3 years. I underwent a rigorous masters level program to be prepared to practice therapy within my scope of practice as an LPC. I received my Master of Marriage and Family Therapy Counseling/Therapy degree from The University of Akron in Akron, Ohio. I was born and raised in Michigan and went to The University of Akron with the intention of moving back to Michigan to practice therapy. My degree program involved 3 years of education: 2 years of classwork and 1 year of fieldwork. I worked with professors and supervisors learning to diagnose and treat mental illnesses. In addition to my education, I have taken additional trainings to practice Trauma-Focused Cognitive Behavioral Therapy and Intensive Home-Based Therapy, both of which are both evidenced-based therapy models.

I am disheartened to hear that there is belief that LPCs are not equipped to diagnose and treat mental illness. I have seen progress from all of my clients, but one in particular stands out. I have been working with Kim *(name changed for confidentiality) since February of 2019. Kim came to me after attempting suicide and being discharged from an inpatient unit. Kim's partner chose me from the practice website to work with Kim. Kim is a veteran who actively served for 2 years, including one year in Afghanistan. Several of Kim's military friends and acquaintances have completed suicide and she always assumed that was how her life would end. By some miracle, Kim survived a very lethal attempt in early 2019. Kim consistently reported no hope and was continually reporting she would complete suicide and always had a plan during the beginning of our treatment. Kim has worked very hard in sessions, but has always insisted that she would still complete suicide and was still actively planning. We shifted the focus of our sessions to building connections with loved ones and Kim was working very hard in and outside of our sessions. I am happy to report that as of September 2019, after 10 months of treatment, Kim has stopped planning her suicide for the first time in nearly 8 years. Kim has actively started creating connections with her children, the oldest of which is almost 3 years old. Kim is actively involving herself in her marriage as well - all things that she swore she would not do, to make it easier to end her life.

Seeing the success of Kim's treatment makes it hard for me to understand how LPCs are "not trained well enough to diagnose or treat mental illness." With the passing of HB4325, clients like Kim would be protected. I have a caseload of 50 clients who would be left without mental health care. Outside of my caseload, the nearly 10,000 other LPCs in Michigan and their 150,000+ clients would also be left without treatment. LPCs all over the state are doing valuable work with clients just like Kim. It would be detrimental to residents of Michigan to eliminate an entire profession of mental health workers, especially in the midst of an opioid, suicide, and general mental health crisis.

I truly hope you consider stories like Kim's when making the decision to pass HB4325 for LPCs. We have worked hard to provide thoughtful and effective care for our clients and I hope you bear in mind the fall back that would occur if 10,000 LPCs were to lose their jobs, not to mention the economic impact of this decision as well.

**This email content has been read and approved by the client. The name was changed and details were modified to protect the client's identity. **

Best,
Lauren
39871 Coalport

Clinton Twp., MI 48038

Lauren Young, LPC, LLMFT
Individual, Family, and Couples Therapist
Perspectives Therapy Services
Brighton, MI
734-589-0207

Eddie Sleeper

From: Kristen Houston <khouston@theseattleschool.edu>
Sent: Tuesday, October 1, 2019 4:32 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Dear Committee Members:

I am writing to you today to express support for Michigan's House Bill HB4325 regarding Licensed Professional Counselors. We are a graduate school of Counseling Psychology located in Washington State and many of our graduates have gone on to serve the constituents of Michigan. I know first hand the quality of care their clients have and will hopefully continue to receive if this bill can pass through your committee as is and without tacking on unnecessary amendments. Our program, and many others across the country, prepares Master's level practitioners to serve their clients with care, compassion, and informed diagnosis based on years of training and supervision. Please help LARA by passing this bill promptly so that they can continue to license and support the practitioners who provide this quality care to the residents of Michigan.

Thank you,

Kristen Houston

Registrar & Director of Academic Services at [The Seattle School of Theology & Psychology](http://TheSeattleSchoolofTheology.com)
khouston@theseattleschool.edu

tel. 206.876.6132 | fax. 206.876.6195
2501 Elliott Avenue, Seattle, WA 98121
theseattleschool.edu

Eddie Sleeper

From: Rebecca Fitton <rfittoncounseling@gmail.com>
Sent: Tuesday, October 1, 2019 4:38 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Dear Mr Sleeper,

I am an LPC working in Dewitt, MI. I see approximately 20-27 clients per week in individual, couples and family therapy. I have a caseload of over 40 client, couples and families. I have been in the field for 16 years. I have continued to invest heavily in my own training and growth as a therapist. In the last 16 years, I have pursued multiple "best practice" therapies including EMDR (eye movement desensitization reprocessing) and I have been going out of state to get training in Emotional Focused Therapy, one of only 2 well researched and proven therapies for couples. I have also received additional training in sex therapy, a specialty that is difficult to find. I have to turn people away in my practice because I do not have enough space to meet the need in my area. I strongly support the well being and healthy functioning of my clients. If HB 4325 does not pass, these clients will be without a therapist, and these families will be affected.

I also have supported my family by working full time and will be left without the ability to do so in this capacity. I urge you to pass HB 4325.

Sincerely,
Rebecca Fitton, LPC

Eddie Sleeper

From: Emily Rose <emilyroselpc@gmail.com>
Sent: Tuesday, October 1, 2019 4:38 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Dear Ways and Means Clerk,

My name is Emily Cole-Rose and I am one of Michigan's Licensed Professional Counselors.

I received my Master's degree in Counseling in 2015 and currently have an outstanding student loan balance of over \$100,000. I am lucky to have recently obtained a job working as an independent contractor in a private practice and I am so grateful for the opportunity to begin paying back my student loans while still being able to support my family.

I am terrified of the prospective changes to LPC's scope of practice that are under consideration by LARA at this time, as my ability to practice will be diminished. These changes could leave my family, unable to make sufficient income to support ourselves. The financial effects to my family alone would be devastating for us. And I am but one voice amongst 10,000 LPCs.

My Counseling license required me to receive a graduate level education. I completed a practicum, a 600 hour internship, years of post-graduation supervised experience, over 3,000 hours of employment, and the successful completion of the National Counselor Exam. Not being able to practice would be a huge loss for me and my family after the time, passion, and energy invested into this goal. In addition, it would be a catastrophic loss to the hundreds of thousands of Michigan residents who utilize LPCs for their mental health care needs, especially when the mental health field is already struggling to maintain enough practitioners.

Please consider the financial effects of the loss of income of 10,000 licensed practitioners when you review the information regarding HB 4325. HB 4325 will safeguard my profession from the changes being put forth by LARA at this time.

I urge you to please pass HB 4325 QUICKLY and WITHOUT AMENDMENT.

Thank you for your time and consideration.

Sincerely,

Emily Cole-Rose, MA, LPC, NCC

Eddie Sleeper

From: Karen Massoll, LPC, RPT-S <MassollK@WellspringCCS.org>
Sent: Tuesday, October 1, 2019 4:40 PM
To: Eddie Sleeper
Subject: support HB4325 hearing on 10-2-19

Dear Chairman Iden and Committee members:

As a practicing LPC in the state of Michigan for over 25 years, I am in full support of HB4325, and its move out of committee to revise the licensing and practice rules for Licensed Professional Counselors in this state.

I have found it unconscionable that LARA has a bill in movement that was put forward without notifying everyone with an LPC. That act in and of itself needs accountability.

Thank-you for your work to preserve and cultivate the mental health care of Michigan children and adults through the work of LPCs.

Sincerely,

Karen Massoll, Licensed Professional Counselor
517-336-4335

Please Note I Have a New Updated E-mail Address it is MassollK@WellspringCCS.org

Please Up Date your Records

.....
Karen Massoll, LPC, RPT-S

Licensed Professional Counselor, Registered Play Therapist – Supervisor

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Eddie Sleeper

From: Jim Bolthouse <jimbolthouse@gmail.com>
Sent: Tuesday, October 1, 2019 4:46 PM
To: Eddie Sleeper
Subject: HB 4235

Please move this bill out of committee to not disrupt important mental health counseling.

Eddie Sleeper

From: Richard Lieske MA MDiv LPC MITS <richardlieske@alightcounseling.net>
Sent: Tuesday, October 1, 2019 4:45 PM
To: Eddie Sleeper
Cc: Andrea Cascarilla; Blundo, James; Napoleon Harrington
Subject: HB 34325 -- Ways and Means Committee Written Testimony

Mr. Sleeper and Hon. Members of the Ways and Means Committee -- In the midst of all the very important work you are doing for the state of Michigan, a preventable crisis is unfolding that could powerfully affect the lives of thousands of Michigan families. It is urgent that you pass HB 4325, introduced in March of this year, to be heard by the full house in order to facilitate movement of this important bill to the senate and on to the governor's desk.

It is vital to understand that this bill does not in any way expand the scope of practice for licensed professional counselors in the state of Michigan. It brings statute in line with the rules promulgated by the Board of Counseling over the past three decades. The scope of practice is essential to keep counselors in compliance with the Code of Ethics of the American Counseling Association. All health professions are legally bound to operate within the code of ethics of the relevant governing professional organization. Without HB 4325, once the proposed LARA rules re-write is certified, and if JCAR adopts them without objection, by early to mid November it will be illegal for more than 9,000 frontline mental health professionals to serve an estimated 150,000 clients and their families.

After working as a behavioral medicine specialist for Sparrow Health System from 1996-2017, I am now in private practice as a Licensed Professional Counselor in Okemos MI. In my practice, I have 53 active clients currently, some of whom I see monthly, others bi-weekly, most weekly, and some are on brief hiatus for various reasons. By that math, the number is far more than the modest estimate of 150,000. The words "catastrophe" and "historic negligence" come to mind if that many Michigan citizens with mental health needs suddenly need to start again with a new therapist. The odds are very slim that enough providers can be found with openings to accommodate even a fraction of this uncared-for tsunami of need. It does not take much imagination to picture suicidal gestures, addictive relapse, collapsing families, and violence in relationships, all increasing precipitously and suddenly, with the proximal cause a bill that languished for six months while administrative rules changes that seem benign to some (apparently) cause untold distress and disruption.

LARA, it should be noted, is going forward with this rules re-write against the unanimous objection of the Board of Counseling. Your prompt action, here in committee, and on the house floor, as well as urging your colleagues in the other chamber to swiftly pass this measure without amendment, is vital, much appreciated,

and will be remembered gratefully. Thank you for your attention to these matters. If I can be of service to any of you in any way, please get in touch.

Richard P. Lieske MA MDiv LPC MITS

--



Richard P. Lieske MA MDiv LPC MITS *Licensed Professional Counselor, Alight Counseling* | [\(517\) 292-2801 \(private practice cell\)](tel:5172922801) | [\(855\) 440-1552 \(digital HIPAA compliant fax\)](tel:8554401552) | Psychological Diagnostic and Treatment Center, 3800 Heritage Ave., Suite A2, Okemos MI 48864 | richardlieske@alightcounseling.net | <https://www.alightcounseling.net> | Google maps link: <https://goo.gl/maps/iCmOn> | Bing maps link: <https://binged.it/2pwgQuk>



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Eddie Sleeper

From: Nicholas Burner <nicholasburner@gmail.com>
Sent: Tuesday, October 1, 2019 4:48 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Hello clerk Sleeper,

I would like to have my testimony (below) included in the record for tomorrow's (Weds, Oct 2) Ways and Means Committee Meeting. Thank you.

I am writing to urge the Ways and Means Committee members to pass HB 4325 as soon as possible without amendments. As it stands, the bill puts into law the work, service and professional identity of LPC/LLPCs that has been established in Michigan over the last 30 years.

Your decisive support of the bill deeply impacts me. I and those I care about are personally impacted by the mental health services provided by Michigan LPC-licensed counselors. I also currently in a masters program that will prepare me to apply for and receive my LLPC license after graduation, ultimately allowing me to work towards my full LPC license. It is vitally important to me personally and professionally that the House Bill 4325 is passed without amendments, securing my career path and defending countless helping professionals and their clients in the state of Michigan.

Thank you for your consideration and support.

Nicholas Burner

Eddie Sleeper

From: Caroline M Ray <caroline.ray@wmich.edu>
Sent: Tuesday, October 1, 2019 4:56 PM
To: Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Bronna Kahle (District 57); Rep. Jason Wentworth (District 97); Rep. Rebekah Warren (District 55); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Kevin Hertel (District 18)
Cc: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony
Importance: High

Dear Ways and Means Committee,

Please, pass HB 4325 without amendments. I implore you to do this quickly in light of LARA's recently proposed rule changes affecting Licensed Professional Counselors (LPCs). These rule changes will have a significant negative impact on the professional work of over 10,000 Licensed Professional Counselors in the state. It is estimated that over 150,000 individuals that receive treatment from LLPCs/LPCs will be harmed by these rule changes.

Please, support HB 4325. If this bill is adopted, then the scope for LPCs' will be clearly defined by law. The proposed rule changes by LARA will harm our state by ending the work of a profession that has been practiced for over 30 years. It will cause mental and emotional harm to clients, LLPCs, LPCs, clinical training institutions and counseling students at both the Master's and Ph.D. levels. In addition, there will be economical challenges related to an immediate decrease revenue going into the state due to Counselor's no longer being able to bill and be paid by insurance companies (no diagnosis, no ability to bill) to counselors leaving Michigan to pursue work in other states and untreated clients may become unable to work. I also foresee many class-action lawsuits being initiated by clients, LLPCs, LPCS, counseling students and counselor educators, etc. if this rule change were to be implemented.

I personally have dedicated over 11 years of my life seeking education and training as a clinical mental health counselor starting with my Master's degree and now in completing my Ph.D. in Counselor Education and do not want everything I have done to be for naught. I have incurred school loan debt to pursue this education and my livelihood depends on my ability to work. My clients depend on me to provide treatment so that they can lead meaningful and productive lives. Michigan currently has a shortage of trained mental health service providers. These changes will exacerbate this problem in the worst way. Please, quickly pass HB 4325 without amendment.

Sincerely,

Caroline M. Ray

Caroline M. Ray, MA, LLPC
Associate Director, Center for Research on Instructional Change in Postsecondary Education (CRICPE)

Western Michigan University
1903 W Michigan Avenue
Kalamazoo, MI 49008-5288 USA
caroline.ray@wmich.edu
(269) 387-1719 (office)
wmich.edu/changeresearch

Eddie Sleeper

From: Kallie Howell <Kallie.Howell@NHBP.ORG>
Sent: Tuesday, October 1, 2019 4:55 PM
To: Eddie Sleeper
Subject: Public comment on Counseling- General Rule (ORR 2019-063 LR)

Kallie Howell, MA, LPC, CAADC
Diplomat of the Academy of Cognitive Therapy
505 Cherry St. SE
Unit #512
Grand Rapids, MI 49503
989-295-1973
Kallie.howell@nhbp.org

10/01/2019

The proposed Licensed Professional Counselor (LPC) rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer has significant negative consequences and threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan. As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR). These are rules that have been recognized as part of the LPC scope of practice after the passage of our LPC statute in 1988. LARA insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. This change would artificially limit LPC's current scope of practice.

Included in LARA's repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem." Without these and numerous other definitions, the LPC scope of practice is severely limited. Restricting LPC's scope of practice in this way will most certainly reduce the availability of mental health counseling services in Michigan and at a time when there is a growing demand for these services.

The Institute of Medicine states that there is a "conspicuous lack" of national attention to ensuring sufficient numbers of mental health service providers to Americans. Matters are further complicated by 54% of Michigan counties being designated as a mental health service coverage shortage area by the Health Resources and Services Administration. With the citizens of Michigan currently struggling to get access to counseling services, LARA's proposed LPC Scope of Practice Rules changes will put all LPCs immediately out of practice and will ensure that the citizens of Michigan will have less access to mental health care.

Further, LARA's proposed changes in the LPC scope of practice would put LPCs in violation of ACA's Code of Ethics standard E.5.a. Proper Diagnosis, which requires the proper diagnosis of a client's mental disorder before treatment. Furthermore, third-party payers will immediately stop paying for the counseling services provided by LPCs because the billing process REQUIRES a diagnosis for a counseling services third party claim to be paid.

This means that when LARA's proposed Scope of Practice Rules change goes into effect, thousands of people across the state of Michigan will immediately be stripped of current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association's (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that "Counselors do not abandon or

neglect clients in counseling." If LPCs cannot bill third party payers because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA's LPC Scope of Practice Rules change.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. If LARA makes the proposed changes, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving. This would occur because supervision training is a national standard for LPCs. Additionally, if LARA makes the proposed changes, counselors who provide supervision without appropriate training (as would now be allowed under LARA's new proposed changes) would be practicing in violation of the ACA's Code of Ethics standard F.2.a Supervisor Preparation.

It is the job of state licensing boards to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, I would ask that LARA allow the legislative process to provide the necessary changes.

LARA's proposed LPC Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) must not be adopted. The legislature should instead pass HB 4325, introduced by Rep. Aaron Miller (R Sturgis), which would address legitimate concerns and needed updates and negate the need for LARA's LPC Scope of Practice Rules changes altogether.

I hope that my letter will help inform the Board of Professional Licensing about the negative consequences of LARA's proposed LPC Scope of Practice Rules change. If you desire additional information from me, please contact me via phone at XXX-XXX-XXX or e-mail XXXX.

Sincerely,
Kallie Howell, MA, LPC, CAADC
Diplomat of Cognitive Therapy

Here is additional information from the Lansing State Journal that will help you understand this issue:
<https://www.lansingstatejournal.com/story/news/local/2019/09/25/mental-health-counseling-michigan-licensing-rule-change-2019/2417749001/>

Sent from my iPhone

Eddie Sleeper

From: Christina Shoemaker <tina@clscounseling.com>
Sent: Tuesday, October 1, 2019 4:58 PM
To: Eddie Sleeper
Subject: "HB4325 - Ways and Means Committee Written Testimony."

Dear Mr. Edward Sleeper,

October 1, 2019

I am writing this testimony to go on record regarding HB 4325 and the changes proposed by LARA.

I am a Licensed Professional Counselor (LPC) as well as a National Certified Counselor (NCC). I graduated with a Master of Education, Counseling, from a CACREP Accredited University. During my tenure at WSU, I took numerous classes on diagnosing and treating those with mental disorders. In addition to these courses and other classes related to counseling techniques, assessments, theories, ethics etc. I was directly supervised while diagnosing and treating individuals. Once all of this was done, I was required to complete **600 hours of internship**, also diagnosing and treating individuals. Upon completion of this 60-credit master's program, I began my work as a Limited Licensed Professional Counselor (LLPC) **requiring 3000 hours in no less than two years**, under the supervision of a trained LPC. I took and successfully passed, the National Counselor Exam (NCE) which entitled me to become fully licensed in the state of Michigan. Contrary to the opinion of some mental health practitioners, **I am highly qualified to practice, independently, as a LPC.**

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPC's – so severely limiting the scope, that LPC's will no longer be able to diagnose or provide psychotherapy services which we are educated and trained to do. These proposed rule changes could be in effect as early as November of this year, immediately rendering Michigan's 10,000+ LPC's unable to legally practice in Michigan.

This means most LPC's will immediately be out of work including those who work in:

- Emergency rooms
- Counseling agencies
- Private practices
- Substance abuse rehabilitation facilities
- Community Mental Health (over 25% of their therapists are LPCs)
- Inpatient/outpatient detoxification
- Mental health facilities and agencies
- Residential care facilities
- Half-way houses
- Nursing homes and geriatric related facilities
- VA medical hospitals and outpatient clinics
- Rehabilitation centers
- Correctional facilities and prisons

This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

If the changes proposed by LARA go into effect as many as 300,000 people in the State of Michigan will be seriously, negatively impacted and 10,000 + LPC's:

- Cannot diagnose and treat

- Cannot use counseling techniques
- Cannot supervise LLPC's
- Cannot bill insurance
- Cannot receive reimbursement from insurance
- Cannot make a living
- We will have to abandon our clients, violating our ethical code
- **As many as 300,000 people in Michigan lose access to their mental health providers. This, at a time when the state is already facing a severe shortage of qualified providers, an opioid crisis, a suicide epidemic, and record rates of depression and anxiety.**

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years!

Please pass HB 4325, without amendment, as quickly as possible.

Respectfully,

Christina L Shoemaker M.Ed., LPC, NCC

Eddie Sleeper

From: Smith, Scott <Scott.Smith@PineRest.org>
Sent: Tuesday, October 1, 2019 4:59 PM
To: Eddie Sleeper
Subject: HB 4325

Good day, I am writing to urge the passage of HB 4325 as is with no amendments. As I am sure you are aware, MI is well below the national average for mental health and substance use providers available to our citizens and in Northern MI where I practice it is even worse, with individuals regularly driving 90 minutes one way, or more, to reach a clinician. With the proposed LARA changes which appear to threaten the ability of licensed professional counselors (LPC) to practice independently as we have been able to for the past 30 years, the shortages in MI will be even worse. I work for an agency that has an office in Iowa as well as many in MI. Due to the lack of any LPC or substance use provider within an hour drive of that clinic I became licensed in IA in order to conduct tele therapy sessions with those in need. My agency was also awarded a 800K dollar grant to develop telehealth services in MI due to the extreme lack of providers currently in our state. The proposed changes to the scope of practice and supervision by LARA have the potential to cut the number of qualified mental health providers significantly. HB 4325 would protect the providers which do so much to help those in need in our state. I fear that if this bill does not pass and become law to protect providers and citizens against LARA's proposed changes then MI will soon be inviting clinicians from other states to work with our citizens via telehealth due to the shortages created, as in Iowa. I am not sure what the end goal is for LARA or why they have not listened to the experts in the field regarding these detrimental changes but I urge you to work to protect the mentally ill and hurting people of this state from a loss of service providers by protecting the precious resources we have from the ill-advised regulation changes that LARA is seeking to push through.

Thank you,

Scott Smith, LPC, CAADC

Sent via the Samsung Galaxy S7, an AT&T 4G LTE smartphone

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Eddie Sleeper

From: David Beach <drbeach@vetgr.org>
Sent: Tuesday, October 1, 2019 5:22 PM
To: Eddie Sleeper
Subject: Written testimony re: HB 4325

Dear Representatives serving the people of the great State of Michigan through the Ways and Means Committee, I write to you on behalf of our veterans and first responders, their families, and on behalf of counselors affected by HB 4325.

VetGR and a growing body of service providers serve veterans and first responders as private sector professionals. As you know, our veteran and first responder population is currently seeing numbers of suicides at an unacceptable level. Passage of HB 4325 would allow many of these professionals to continue providing services, unhindered by proposed changes in LARA administrative rules for licensing.

Therefore, I urge you, as our representatives, on behalf of our veterans and first responders, and on behalf of the many service providers affected, to support HB4325 in committee and its passage in the House.

Thank you for your time.

Best regards,
Dave Beach

Dr. David Beach
Mental Health Director - VetGR
77 Monroe Center NW, Suite 504
Grand Rapids, MI 49503
drbeach@vetgr.org

Eddie Sleeper

From: Heather Notter MA LPC <mindfulmatterschild@outlook.com>
Sent: Tuesday, October 1, 2019 5:30 PM
To: Eddie Sleeper
Subject: HB4325 Ways & Means Committee Written Testimony

LARA needs to be stopped immediately from making changes to the LPC scope of practice that would pillage an entire profession and cause unprecedented devastation to tens of thousands in our state.

I have been an LPC in the state of Michigan since May 2002 with a plethora of experience providing mental health treatment that includes diagnosing mental health conditions, formulating plans of treatment, and providing counseling services. I was trained in my graduate program to do this and I have attended numerous continuing education programs over the past 19 years to reinforce my ability to do this accurately and to always act in the best interest of my clients.

Proposed changes to the LPC scope of practice, which takes away our ability to provide mental health treatment, would be devastating to my clients, my community, my family, myself, and to Michigan itself. I own and operate a private practice in a small town that focuses on treating children and adolescents with emotional and behavior difficulties. If my ability to provide these much needed services is taken away, especially, and I emphasize, **WITHOUT JUST CAUSE**, the children in my community will be intentionally denied the sound mental health treatment that they have been depending on for several years, and it will cause undue emotional harm on all of my clients and on myself. The unjust changes will harm tens of thousands of people receiving mental health services in our state during a time when mental health treatment is needed more than ever, with suicides, including those of children and adolescents, skyrocketing.

The work of LPCs is also **imperative** to the **economic health and well-being** of Michigan. Taking away an entire profession's ability to do the work they completed graduate degrees and years of training for, and in many cases such as mine, work they've been doing for decades, is not only absurd and unjust, it will stymie our ability to support our families.

Many of us have devoted our entire professional lives to our clients in this career. A mental health therapist for children is all I ever wanted to be, it's all I've ever been, and I've worked diligently to establish a reputation for providing excellent mental health care and building my small business to do so. Many LPCs are in private practice like me and this entire sector of small business will be eradicated instantly, clients will be left stranded, and thousands of therapists will be left unemployed without even a prospect of doing the work we trained for and have dedicated our lives to. Please understand how devastating this would be. You have the power to stop such a devastation. Please keep this unjust, unwarranted, and completely devastating change from happening.

Please pass the legislation being brought before you to both protect the rights of those needing mental health treatment in Michigan, and to protect LPCs and their ability to provide this treatment as well.

Heather Notter, MA, LPC
Clinical Therapist/Owner
Mindful Matters Child & Adolescent Counseling Services
111 E. Midland Rd. Auburn, MI
48611
(989) 266-3421

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Eddie Sleeper

From: Christine Gjestland <christine.gjestland@gmail.com>
Sent: Tuesday, October 1, 2019 6:32 PM
To: Eddie Sleeper
Subject: Hb 4325

Ways and Means Committee:

Greetings, leaders. Thank you for the work you do on behalf of the citizens of Michigan. I am writing regarding HB 4325, which you will soon be addressing – perhaps even this week.

It is critical that HB 4325 move through the Ways and Means Committee unamended.

The changes LARA is going to be requesting October 4th are not reasonable and will have devastating consequences for up to 300,000 clients we are serving, cost the livelihoods of 10,000 counselors in Michigan, and lead to home foreclosures, business closures, defaulting on student loans, and other catastrophic consequences.

What LARA is seeking to do directly contravenes their relationship with us for the past 30 years. In that time, they have been receiving our disclosure statements (which state forthrightly the nature of the work we do), our transcripts, and our supervision experience forms, and granting us licenses to do the work they are now saying they never allowed us to do. That we are highly trained to diagnose and treat mental illness/disturbance is simply beyond question, though it appears that a couple other professional organizations such as the American Psychological Association certainly wants you to think otherwise. Keep in mind, the APA has never accredited master's level programs – even though their PHD students sat side by side with us in most of the exact same classes.

HB 4325 seeks to do what LARA has been asking the Board of Counseling to do for years, which is get our profession and its proper scope of practice enshrined permanently into law, like it is for the Limited Licensed Psychologists and the Licensed Master Social Workers, two other professions beside whom we work shoulder to shoulder and are verifiably trained to an equivalent level (there's no reason this is even up for discussion -- the classes we take and the requirements we meet are a matter of public record).

I ask that you please allow HB 4325 to move through the Ways and Means Committee unamended, and that you support it unanimously. Without your action, hundreds of thousands of struggling clients will be left without treatment providers and many could end up in costly crises if the LARA decision takes place before the bill is passed.

Thank you for your time.

Christine Gjestland LPC, LBSW, ACS
Jackson, Michigan
Licensed Professional Counselor

Sent from my Verizon, Samsung Galaxy smartphone

Eddie Sleeper

From: Nicole Throop <nicolethroop@gmail.com>
Sent: Tuesday, October 1, 2019 8:08 PM
To: Eddie Sleeper
Subject: testimony for HB4325

I am writing to ask for your help regarding the proposed Scope of Practice Rules change to the LPC license currently being put forth by the Department of Licensing and Regulatory Affairs (LARA). If adopted, it would severely limit LPCs scope of practice and render their services unbillable. As such, 10,000 LPCs would be unable to provide treatment. More than 100,000 Michigan citizens would be without mental health care. This could be catastrophic.

My request today is that you support HB 4325 without amendments. This bill clarifies the LPC law, and it includes an explanation and definitions for scope of practice. It does not expand scope of practice as its opponents may suggest. This Bill simply puts into law what LPCs have been doing, with competence, for more than 30 years. If HB 4325 is passed there will be no need for the proposed changes.

It is important to note, that LPC's are well qualified to provide mental health treatment. In order to practice, they must obtain a master's or doctoral degree, complete two years of postgraduate supervised experience and pass a national exam to obtain a license to practice independently. In addition to the requirements, many in the profession continue in specialized training.

All 50 states license Counselors to diagnose and treat mental health and emotional disorders. Many federal programs already recognize counselors including the National Health Service Corps, the Department of Veterans' Affairs and TRICARE. On behalf of citizens whose lives will be drastically impacted, I urge you to support and pass HB 4325 without amendments.

Thank you for your time and immediate attention to this issue.

Nicole Throop, MA, LPC, CAADC
10386 Schomaker Rd.
Saginaw, MI 48609
989-996-0379

Dear Representative,

I am contacting the Ways and Means Committee to voice my support for HB 4325 and ask that you PASS it out of committee ASAP WITHOUT AMENDMENTS.

If LARA revises the rules and the HB4325 bill does not pass, the impact will render profound economic ramifications in Michigan:

- You will be cutting out a massive revenue stream.

Indeed states, "\$90,704 The average salary for a Licensed Professional Counselor is \$90,704 per year in Michigan, which is 44% above the national average." With LARA reporting over 10,000 LPC licenses this year, that would equal over \$907 BILLION in income. By allowing LARA to revise the rules and if HB 4325 is denied, it will result in income tax REVENUE LOSS OF \$38 MILLION PER YEAR to the State of Michigan.

- This will put 10k Michigan LPCs out of business placing them, their dependents and support staff in financial ruin.

Many of us are in private practice as small business owners here in Michigan and would be forced to shut down our practices. We would not only lose our businesses and our household income, but since our degree and license would be worthless, we would not be qualified to get a financially equivalent job anywhere else. This would ultimately cause over ten thousand families to go bankrupt, foreclose on their homes and also be unable to continue paying back the government for their \$80,000+ student loans.

- Unemployment rates will skyrocket.

10,000+ LPCs will instantly be unemployed ...for an EXTENDED period of time due to their nullified degree/qualifications to get another professional job. Furthermore, we are also career counselors that support unemployed or underemployed individuals to help them get back out into the workforce. Without counselors to help them, the number of citizens who will remain unemployed is incalculable.

- A ripple effect crisis will occur when more than 200,000 Michiganders will instantly be without their counselors and unable to contribute to our economy

- We are in the middle of an opioid crisis, a suicide epidemic, and record-breaking rates of depression and anxiety issues. We need to be expanding access to mental health services right now, not contracting it, so that we have more high-functioning citizens positively contributing to our society.

Once again, I am asking for your support for HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS.

Thank you for your time and consideration,

Eddie Sleeper

From: Cassie Perez <cassieandra2005@gmail.com>
Sent: Tuesday, October 1, 2019 9:40 PM
To: Eddie Sleeper
Subject: HB4325 Ways and Means Committee Written Testimony

Greetings,

Thank you for the work you do on behalf of the citizens of Michigan. I am writing regarding HB 4325, which you will soon be discussing. It is critical that HB 4325 move through the Ways and Means Committee unamended.

The changes LARA is going to be requesting October 4th are not reasonable, and will cost the livelihoods of 10,000 counselors in Michigan, have devastating consequences for up to 300,000 clients we are serving, and lead to home foreclosures, business closures, defaulting on student loans, and other catastrophic consequences. I want to bring special attention to the number of individuals that will be affected by this change. As a counselor, it is in Code of Ethics and our responsibility to do no harm to our clients. Imagine HUNDREDS of THOUSANDS of constituents waking up to learn they no longer have a counselor. This can be detrimental to their mental health and their process to healing. In respects to the 10,000 MICHIGAN residents, professionals, constituents who can lose their employment and their livelihood I would ask you think of us. I would personally like to say I am a single mother to two children and am the only source of income in my household. I ask you to think about how this affects families. While the decisions made may impact 10,000 counselors, you also impact our families, our partners, children, etc. Please also think of the economic consequences of 10,000 individuals losing their income.

What LARA is seeking to do directly contravenes they work they have done with us for thirty years. In that time, they have been receiving our disclosure statements (which state forthrightly the nature of the work we do), our transcripts, and our supervision experience forms, and granting us licenses to do the work they are now saying we cannot do. Make no mistake, we are **highly trained to diagnosis and treat mental illness is simply beyond question. A brief list of my educational courses that myself and my colleagues have received training in are: Psychopathology, Research Methods, Psychometrics, Clinical Assessment, and the list goes on.**

That being said, HB 4325 seeks to do what LARA has been asking the Board of Counseling to do for years, which is get our profession and its proper scope of practice enshrined permanently into law, like it is for the Limited Licensed Psychologists and the Licensed Master Social Workers, two other professions beside whom we work shoulder to shoulder and are verifiably trained to an equivalent level or beyond as we go to school just to counsel and providing psychotherapy and diagnosing.

I ask that you please allow HB 4325 to move through the Ways and Means Committee unamended, and that you support it unanimously. The bill itself, the 10,000 LPCs in Michigan carrying sky high rates of student debt for our education, up to 300,000 clients who will lose mental health coverage, and the current anxiety, depression, opioid, and mental health shortage crises all make that the right thing to do.

Respectfully,

Cassandra Perez, MS, LPC, NCC
Behavioral Health Clinical Supervisor
MS in Mental Health Counseling
BA in Psychology
Mother/Sole Provider
Michigan constituent

Eddie Sleeper

From: Laura Fuller <laura.a.fuller@gmail.com>
Sent: Tuesday, October 1, 2019 10:22 PM
To: Eddie Sleeper
Subject: Proposed LARA Changes and Support of Passing HB 4325 Unrevised

Dear Mr. Sleeper,

My name is Laura Fuller and I am a Licensed Professional Counselor (LPC) currently working at The Guidance Center, a Community Mental Health (CMH) agency in Wayne County. I am writing to address my concerns regarding the proposed LPC rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer as I believe they will have significant negative consequences and threaten the livelihood of all LPC's, and most importantly, the mental health status of the clients these professionals serve.

I have been a practicing therapist in the metro-Detroit area (primarily Wayne County) for the past 7 years. This follows the completion of my post-graduate education at Eastern Virginia Medical School, located in Norfolk, VA, a graduate school specializing in health professions. While there I earned my Masters of Science in Art Therapy and Counseling. During my program I received rigorous training through my coursework which consisted of almost 70 credit hours. Within the program requirements were courses focusing on Group Counseling and Psychotherapy, Theory of Human Psychological Development, Psychopathology, Assessment, Individual Counseling and Psychotherapy, Addictions, and Family Counseling and Psychotherapy (amongst other courses). Additionally, I was able to apply these theories and techniques in several internship settings including an early childhood development center, a juvenile detention center, and a state psychiatric hospital. Since having graduated, I have taken additional steps to further my knowledge by obtaining and maintaining additional credentials as a National Certified Counselor (NCC), a Certified Advanced Alcohol and Counselor (CAADC), and completed the necessary courses to provide clinical supervision to limited licensed practitioners.

Out of my 7 years of practice, the last 6 have been with local CMH agencies who are dedicated to serving an often disenfranchised population. CMH is generally viewed as a "stepping stone" or a "2 year sentence" for individuals to earn their required hours before obtaining full licensure and leaving for a higher paying position in the private sector. However, there are some individuals, myself included, who are more focused on helping others and have chosen to remain employed at CMH agency for the consumers we serve. If LARA decides to pass the purposed changes, the board would be eliminating the ability for a significant number of highly qualified and trained professionals to provide quality care to the community. In a world where budgets for much needed community programs are consistently being cut and leaving people empty-handed, it seems unethical to remove a whole field of helping professionals who have dedicated their time to serving others with the hope of making society a better, safer place. If there are fewer mental health professionals available to help those in need, inevitably the lack of care will fall back onto the community as there are likely to be increased costs as tax payer dollars will be applied for psychiatric hospitalizations, more "high utilization" hospital patient, and increased detainees in jails - just to name a few.

I hope my letter will assist with informing the Board of Professional Licensing about the negative consequences of LARA'S proposed LPC Scope of Practice Rules changes. Instead, please advocate for the passing of HB-4325 (without revisions) immediately which would address the needed concerns/updates and negate the need for LARA'S Scope of Practice Revisions. Please do not hesitate to reach out with any additional questions, comments, or concerns. Thank you for your time and have a great day.

Sincerely,

Laura Fuller, MS, LPC, ATR, CAADC, NCC
586-431-0323
laura.a.fuller@gmail.com

Eddie Sleeper

From: Elizabeth Treger <eftmci@gmail.com>
Sent: Tuesday, October 1, 2019 11:21 PM
To: Eddie Sleeper
Subject: HB4325 Ways and Means Committee written testimony

I would like first to thank you for taking the time to read this letter and consider the matter at hand. I am a Licensed Professional Counselor that has been in practice since 2015. I have had a full licensure for the last two years and specialize in Substance Use Disorders and Trauma. I am passionate about my work and the people that I serve.

The proposed changes that LARA is attempting to make to the scope of practice of LPC's (Licensed Professional Counselors) are deeply troubling. I, as well as most of my colleagues, have received extensive training via our CACREP accredited school, passed a national exam, engaged in nearly 3000 practicum and internship hours, as well as 2 years, 100 supervised hours and 3,000 clinical hours as a Limited Licensed Counselor, in order to be considered for licensure through LARA. Upon completion of these requirements, I submitted my transcripts, supervision record and a professional statement to LARA explaining my scope of practice and therapeutic point of view, all of which was approved and I was awarded the designation of LPC. This I have renewed yearly. I have gladly done all of these things and more, as this does not include the 100 hours of continuing education that I have done in the past 3 years, so that I may be able to sit across from my clients and offer them the highest quality care. We enter into a relationship that implies that I have done all that is required of me, so that they can trust that I will be with them as they become vulnerable and open themselves up to better possibilities in their lives. I am good at my job because I have been adequately training in areas of diagnosis and treatment and I am able to use that knowledge to assist those in need.

However, the proposed rule changes by LARA will not only place 10,000+ Counselors out of work, but more importantly, it will place more than 150,000 Michiganders at risk. These are clients that have taken the painful step of asking for help and opening up and trusting another person to help them with that journey. Children and Adults who have experienced abandonment, trauma, addiction, loss, all will be re-exposed to that by a system that is looking to regress in mental health treatment instead of taking the opportunity to advance language that would move mental health therapy forward.

HB 4325 unamended, will offer the security that is need to assist us in continuing our work in fighting the mental health crisis, opioid crisis, and suicide epidemic that is plaguing our state and affection thousands of Michiganders daily. Additionally, simply put HB 4325 places into law what LLPC/LPCs have already been doing at a high level for 30+ years.

Again, I thank you for your time and consideration.

Elizabeth J.F. Treger MS, LPC, NCC, CAADC

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Elizabeth J.F. Treger MS, LPC, NCC, CAADC
Therapist
Milford Counseling Inc.
120 S Main St Ste C
Milford, MI, 48381
248-529-6383
Fax: 866-250-6455

This information has been disclosed to you from records protected by Federal Confidentiality Rules (42 CFR Part 2). The Federal Rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the

written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is NOT sufficient for this purpose. The Federal Rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patient.

Eddie Sleeper

From: Rena Kassel <newdaycounseling3rivers@gmail.com>
Sent: Tuesday, October 1, 2019 11:45 PM
To: Eddie Sleeper
Subject: testimony for HB 4325 Ways and Means

Ways and Means Committee

Dear Representative Sleeper,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,

Rena Kassel MA, LPC, NCC

Southwest Michigan Psychological Solutions

New Day Counseling Three Rivers

57239 N. Main St.

Three Rivers, MI 49093

I have also added CACREP mandatory requirements for LPC's which includes diagnosis. This is the sticking point of MPA and LARA but as seen is moot as is covered in the educational and professional expectations of an MA, LPC.

Clinical Mental Health Counseling – Clinical Mental Health Counseling programs prepare graduates to work with clients across a spectrum of mental and emotional disorders, as well as to promote mental health and wellness. Clients may be seen individually, in couples, families, or group settings. **Clinical Mental Health Counselors are knowledgeable in the principles and practices of diagnosis, treatment, referral and prevention and often work in interdisciplinary teams with other health professionals (e.g., psychiatrists, social workers, MDs).** Employment opportunities may include private practice, community-based mental health centers, hospitals and other treatment centers.

Eddie Sleeper

From: Tobi Russell <tobi@rochesterareacounselors.com>
Sent: Wednesday, October 2, 2019 1:41 AM
To: Eddie Sleeper
Subject: Written testimony regarding HB 4325

Hello---

My name is Tobi Russell. Thank you for allowing me the opportunity to give my written testimony on this very important bill --House Bill 4325. First, I realize that part of the job of your committee is to look at the financial consequence of the legislation. Let me instead explain to you the financial consequence of not passing this bill. There has been misinformation shared regarding the fact there will be no impact to small business. This is incorrect. There are many licensed professional counselors in private practice, I am one of them. I have owned a private practice for 8 years and have invited other clinicians to participate in private practice by renting space in the suite. Of the 6 clinicians in our office, 4 of us are licensed professional counselors. If HB 4325 is not passed expeditiously, it will cause many private practices to close their doors or at the very least be significantly impacted financially.

If the LARA rule changes are accepted prior to HB 4325 being passed, it will prevent licensed professional counselors from being able to diagnose or provide psychotherapy services. If licensed professional counselors are unable to provide services to their clients, they will be unable to pay rent for the suites they are in, they will be unable to pay for the liability insurance that they hold, they will be unable to pay for the utilities to keep the lights on, and they certainly will be unable to maintain a household income to care for their families and keep their homes.

There is also a financial impact on clients because if licensed professional counselors are unable to diagnose, then clients can no longer use their insurance benefits for services. At a time where more and more individuals are experiencing anxiety, depression, and substance use disorders, this is not the time to pull the rug out from under them and add an out of pocket expense for clients trying to reach out for help.

There has also been a fair amount of misinformation given regarding the training and education that licensed professional counselors receive. Students that have gone through a CACREP accredited program have to complete 60 credit hours that includes courses in diagnosis and treatment planning, therapeutic techniques, theories, and group counseling just to name a few. Students also have to complete a 40 hour practicum supervised by an experienced licensed professional counselor. Students then have to complete a 600 hour internship prior to graduating from the master's program. Post graduation, limited licensed professional counselors have to obtain 3000 clinical hours in practice as well as 100 hours under direct supervision by a licensed professional counselor who has received specific training in supervision before obtaining their LPC licensure. Personally, I have a masters degree in counseling from Oakland University and am currently a doctoral candidate in counselor education also at Oakland University. Prior to completing my masters degree in counseling, I graduated with a masters degree in clinical psychology from Eastern Michigan University. I have a child and adolescent specialization from Oakland University and obtained my certification as an advanced alcohol and drug counselor and clinical supervisor in addictions from the Michigan Certification Board for Addiction Professionals.

Moving sections of wording defining our work to the education section, literally changes the fundamental nature of the counseling profession. To my knowledge, there are no other professions that are getting the same level of change to their rules. Why is this happening for the field of counseling? Imagine for a moment that you had been doing your job for 30 years and someone who does not even work in your profession came along and said you could no longer do your job because "rules needed to be updated". I am sure you would advocate as hard as you could to protect your profession. That is what the 10,372 licensed professional counselors in Michigan are trying to do. But we need your support. It is understood that LARA is trying to update their rules, however I believe there are so many more efficient

ways to go about this. Passing HB 4325 will update the LARA rules but also preserve the counseling profession and protect approximately 300,000 Michiganders from losing access to their mental health care.

Please vote yes on HB 4325 and encourage your colleagues to support this bill without amendments when it comes to the House floor. Thank you for your time.

Sincerely,

Tobi Russell LPC, CAADC, CCS-M, BCETS
Director, Rochester Area Counseling Services

This information has been disclosed to you from records protected by federal confidentiality rules (42 CFR part 2). The federal rules prohibit you from making any further disclosure of information in this record that identifies a patient as having or having had a substance use disorder either directly, by reference to publicly available information, or through verification of such identification by another person unless further disclosure is expressly permitted by the written consent of the individual whose information is being disclosed or as otherwise permitted by 42 CFR part 2. A general authorization for the release of medical or other information is NOT sufficient for this purpose (see § 2.31). The federal rules restrict any use of the information to investigate or prosecute with regard to a crime any patient with a substance use disorder, except as provided at §§ 2.12(c)(5) and 2.65.

Eddie Sleeper

From: Ari Levy-Hussen <arilevyhussen@gmail.com>
Sent: Wednesday, October 2, 2019 6:50 AM
To: Eddie Sleeper
Subject: Please Get HB 4325 Out ASAP, Without Amendments!

Dear Representative Sleeper and others members of the Ways and Means Committee:

I am a proud Michigander and Licensed Professional Counselor (LPC). I am writing to express my concerns about LARA's proposed Rules changes for LPCs--or, more accurately, my objection to LARA's carelessness in pushing for a Rules change in the particular way it has chosen. I ask that you oppose these proposed changes and HB 4325 passed as quickly as possible, and without amendments, and offer a much more practical, explicable, and commonsense solution to updating the rules that govern the counseling profession. Here are the reasons why:

1. **HB 4325 does NOT seek an expansion of LPCs' scope of practice; rather, it is simply meant to protect and codify into law the kind of clinical practice in which Michigan LPCs have already been engaging for 30 years.** Additionally, as someone who has lived and practiced in a neighboring state, it is also important to note that HB 4325 puts Michigan into alignment with how other states regard and regulate LPCs' work. It is also so important to note, that should there be a gap between LARA's Rules go into effect and HB 4325 getting passed, I will lose my practice. Thousands of LPCs will lose their practices. And hundreds of thousands of clients will be without care. The insurance companies will be confused about how to reinstate us on panels if we are licensed and then not and then licensed again. It will be chaos. Please support efforts (delaying or pulling the Rules changes) that prevent such needless and reckless disruption to so many people's lives.
2. Given the misinformation circulating around key provisions related to LPC scope of practice, my colleagues and I want to make sure all state officials understand that formalization of existing practices via HB 4325, along with the bill's accompanying updates to things like continuing education (which we all enthusiastically support), not only streamline oversight of the profession and uphold our joint commitments to the general welfare of the public, but they protect the livelihoods of 10,000 Michigan LPCs and ensure there are no disruptions to care for hundreds of thousands of Michiganders. As you are likely aware, mental health services are increasingly in demand throughout Michigan. As a practical matter, then, it is unconscionable to add to a scarcity of services so needlessly, as LARA's proposed rules changes would undoubtedly do. In short, letting LARA's changes take effect and NOT passing HB 4325 does so much harm to so many people. Needlessly.
3. It also feels important to address another piece of misinformation currently circulating amongst some state lawmakers, policy makers, and lobbyists. I recently met with a state rep who described herself as a "generalist" and her constituents with expertise in particular areas as "specialists." In that vein, it is completely reasonable that you and other state officials would not possess deep knowledge of how a variety of mental health professionals are trained, supervised, and licensed. Accordingly, it would make sense that you might take as truth false or inaccurate information mental health professionals outside of counseling (particularly psychologists or psychiatrists) have given you about LPCs' training. Contrary to the outdated and uninformed testimony given by MPA representatives last year, for example, counselors who have attended either APA or CACREP-accredited programs must complete coursework in psychopathology/diagnosis, assessment, and counseling techniques/interventions. My colleagues and I are rigorously trained, university-credentialed professionals whose expertise and deep commitment to our communities make us a crucial part of the social fabric. Most of us have made a very intentional choice to work as counselors, as counseling (as a field) offers as much, if not more, clinical training than social work, whose curricula may divide its attention between clinical and administrative content, and is not organized around learning to do research, as psychology doctoral programs overwhelmingly are.
4. Additionally, as part of completing our degrees, counselors not only complete a range of clinically-specific coursework, we also complete several hundred practicum hours, where our implementation of knowledge and skills, including those centered on diagnosis and treatment interventions, acquired throughout coursework are put into practice under the supervision of licensed providers.

After graduation from our programs, counselors must pass national exams that, among other things, test us in the areas of diagnosis and counseling techniques/interventions. Post-graduation, we also undergo thousands of hours of supervised practice before we can earn our licenses and practice independently. And, although Michigan has not required it to date, I have never met a LPC who did not prioritize continuing education post-licensure. We are bound to a national code of ethics that mandates our continued investment in seeking knowledge, awareness, and skills that supports ethical and effective practice throughout the professional life span.

One last bit of “specialist” knowledge: In the mental health world, a doctoral degree alone does not predict a provider’s ability to work competently across all presenting mental health concerns, nor does a credential generally predict therapeutic outcome. Psychologist, Bruce Wampold, who is on faculty at the University of Wisconsin-Madison, where I received my M.S. in Counseling Psychology, famously documents this fact in his canonical research on therapeutic outcomes). In my own program, doctoral and master’s level students shared a core curriculum; the master’s program was a terminal degree designed to produce graduates capable of doing clinical work, while the doctoral program focused on training students to do research in counseling. Doctoral degrees are, in many ways, research degrees; not always or necessarily advanced practice degrees. As such, for many of us interested primarily in doing clinical work, pursuing a research degree does not serve our career interests.

Whatever one’s degree, foundational coursework across mental health care disciplines is vital; however, clinical training and supervision ultimately precondition who can competently treat what kinds of issues and in what kinds of settings. For example, just because someone is a psychologist does not mean that they have the training or skills to competently work with schizophrenia. No psychologist with whom I have ever worked, for example, would say they felt competent to treat this kind of issue just by virtue of being a psychologist. Like any provider who is not trained to work in depth with a particular issue, that psychologist would abide by best practices and make an appropriate referral to someone who did have that training—and that someone could, in fact, be a master’s level provider.

The suggestion by some representatives of the MPA that no counselor is qualified to diagnose and treat significant mental health concerns with the implied claim that all psychologists would be just by virtue of being psychologists is completely misinformed. From what I have read of the MPA’s testimony, these representatives also have submitted inaccurate testimony about the kinds of coursework the overwhelming majority of counselors must complete, per my discussion of coursework above. And, as a reminder, the MPA does NOT regulate counselors and should not have the power to determine guidelines for an entirely different profession within the field of mental health; the ACA, NBCC, CACREP, and other counseling governing bodies do, and they all require training in diagnosis, counseling techniques/interventions, and assessment. Allowing the MPA to dictate the terms under which counselors can operate sets a dangerous precedent for who gets to govern whom.

9. Lastly, I am very concerned that, given how LARA has handled forwarding their proposed Rules changes, it has undermined itself as a state actor and regulatory authority. It most certainly has injured, unnecessarily, the reputation of counseling and LPCs, but it also has discredited itself as a regulatory body. I want to reiterate that many of the Rules changes it is pursuing are completely reasonable—it’s the way LARA has chosen to pursue them that is objectionable. If we can’t trust our state regulatory body to act responsibly and sensibly in executing their duties to the professions they oversee and the public whose interests they are supposed to serve, it opens up a whole set of dire public, political, and policy-related concerns.

Finally, LPCs like me want you and your colleagues to know that we serve your mothers and fathers, your sisters and brothers, and your partners and children. We serve your neighbors and friends and the strangers who sit by you in church. We are those neighbors and friends and strangers. We give our lives to the welfare of our fellow Michiganders, and that LARA’s new rules governing practice would disrupt our ability to serve so needlessly is just not right.

With all my heart and might, I ask that you delay or retract LARA’s proposed rules changes and let HB 4325 pass and resolve this situation. Please support continued provision of mental health care services to thousands and thousands of Michiganders. Thank you for your consideration.

Sincerely,
Ari Alyssa Levy-Hussen

Eddie Sleeper

From: Jarrette Wright-Booker <introspectivecounselingllc@gmail.com>
Sent: Wednesday, October 2, 2019 7:27 AM
To: Eddie Sleeper
Subject: COMMENTS FOR HB 4325

SUPPORT HB 4325!!!

PLEASE push this bill through before the LARA decision to repeal our scope of practice. To be clear, this bill is no expanding the scope of practice but solidifying the work we are already do. It also provides for more stringent educational and supervision requirements.

To be clear, failure to pass this bill will result in a loss of livelihood for over 10,000 LPC's who will be unable to bill insurance AND practice counseling in the state of Michigan.

It will severely limit access to quality mental health care for the over 250,000 people we already care for. It will significantly impact the economy and ruin thousands of small business and complementary businesses and greatly impact state tax revenue and LARA licensure revenue.

We need your support with getting the bill pushed through!

My name is Jarrette Wright-Booker. I am a Licensed Professional Counselor and Certified Advanced Addictions Counselor. I am married, the breadwinner, and mother to two boys. We own a home in Detroit, Mi and had plans on purchasing additional real estate until I learned of the potential of my livelihood being jeopardized. Can you imagine your entire profession being decimated? The career you've invested time, money, sacrifice, blood, sweat and literal tears being taken away from you? Loss of my license may mean loss of my home, inability to pay private school and class tuition for my children, loss of my vehicle, inability to repay student loans, eviction from my office, negatively impacted credit that may result in bankruptcy and the difficulty of reestablishing a new career with my current skill set.

I am the sole proprietor of Introspective Counseling, LLC a private practice located in Southfield, Mi dedicated to helping people women who suffer with depression, anxiety, bipolar disorder and trauma. I have been licensed now for just over a year and prior to starting my practice, I worked as a home based contractual therapist for Child Protective Services.

I graduated from the University of Detroit- Mercy (a CACREP program) with a Masters Degree in Community Counseling. My plan of study required the completion of diagnosis, assessment, evaluation, consultation and research methods courses, to name a few. I completed my practicum in the school counseling clinic, internship at the Detroit Medical Center and 3,000 hours of clinical supervised work experience with 100 hours of clinical supervision as a home based therapist in community mental health.

During my supervised work experience, I worked with people experiencing co-occurring disorders, substance use disorders, mood disorders and psychotic disorders. I was responsible for identifying symptoms, administering and interpreting assessments, reviewing psychiatric and psychological evaluations to create effective treatment plan for both the diagnosis and reunification. Currently, I am responsible for diagnosis, assessment, evaluation and treatment. I am very skilled in assessment and evaluation and coordinate care with psychiatrists and psychologists when necessary.

Because of my additional credential, I am required to maintain a minimum of 20 CEU's, yearly. I maintain a reading library to keep abreast of new approaches, theories and interventions. I also subscribe to an online training platform.

I am very concerned about our future as counselors. We make up 10,000 people in Michigan's workforce and that does not include LLPC's and counseling program students . The work that we do is integral to maintaining the quality of public health in the state. We also contribute to the economy through tax dollars, licensing fees and through our support of other complementary businesses such as training companies, real estate companies/building owners, and insurance companies to name a few.

Failure to pass HB4325 would mean that our already strained mental health system would become overburdened. Over 300,000 people would not have access to mental health care and would be dropped into an abyss where they'd have to start all over with someone new, but not after waiting weeks to months to get an appointment. Some people will not be able to wait that long, what will happen to them? What will happen if an entire sector of behavioral health professionals is eliminated? How will the elimination of this group of mental health clinicians effects hospitals, non-profit organizations, foster care facilities, child protective services and community mental health programs? How will it impact university programs, including students who are currently completing counseling programs? How will it impact the backlog of court related substance abuse, family therapy, gambling addiction and domestic violence referrals?

Please pass HB 4325, the livelihood of 10,000 people and mental health of 300,000 people depend on it.

Thank you,

Jarrette Wright-Booker, LPC, CAADC

--

Jarrette S. Wright-Booker MA, LPC, CAADC

Clinical Therapist

Introspective Counseling, LLC

(313) 207-5581

www.introspectivecounselingllc.com

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Eddie Sleeper

From: Karen Bailey <kbailey@perspectivetherapyservices.com>
Sent: Wednesday, October 2, 2019 7:35 AM
To: Eddie Sleeper
Subject: Please support LPC's

Hello!

As a LPC of Perspectives Therapy Services, LLC, one of the largest outpatient group mental health practices in Michigan, I humbly ask for you to oppose LARA's recent proposed changes to the rules for Licensed Professional Counselors and support/pass HB 4325. HB 4325 simply puts into law what Licensed Professional Counselors have already been doing at a high level for 30+ years.

With more than 10,000 LPCs and LLPCs contributing to the economic and health care landscape of our State, I ask you to consider the wellness of Michigan residents to be at stake. Without professional counselors, thousands and thousands of residents will not have access to quality mental health treatment. Not to mention, the thousands of clients currently working with professional counselors (I see approx 30 per week!) and making progress toward their health goals will be abandoned with no other providers available to step in and answer the calls. Not passing HB 4325 has the potential to launch Michigan into a health crisis of tremendous magnitude.

An additional consequence is the likelihood of a mass exodus of highly educated professionals leaving our state with their families as their livelihood would be rendered extinct. Displacing this segment of our population and watching them go across the state's borders to set up successful businesses and contribute to the wellness of a new place is a reality that needs to be considered. Michigan is a state that attracts professionals.

The long-lasting consequences of disallowing Professional Counselors from practicing meaningfully will be damaging for years, and generations to come. LPCs are not only significant to our healthcare service delivery, but vital. Entire departments at colleges and universities such as Western Michigan University, Michigan State University, Oakland University, the University of Michigan, Eastern University, Central Michigan University, Siena Heights and Spring Arbor will be forced to close due to lack of enrollment as students will be opt for educational degrees in a place where they end up being useless. Eager students wanting to pursue a career in professional counseling will flee our state, likely not to return.

Motivation to change the rules by LARA and oppose HB4325 are politically-driven by lobbying dollars of the American Psychological Association and by extension, the Michigan Psychological Association. I sincerely hope that you can see through these efforts and do what is right and just for your neighbors and constituents.

I am grateful for your time and consideration. Thank you for your service and on-going commitment to serving the best interests of all Michigan residents.

Kindest regards,

Karen A. Bailey MA, LPC
517.719.4048

Perspectives Therapy Services
1701 Lake Lansing Rd Lansing, MI 48912
home address: 406 Westmoreland Ave Lansing, MI 48912

www.perspectivetherapyservices.com

Eddie Sleeper

From: Halene Waytes <hwaytes@perspectivestherapyservices.com>
Sent: Tuesday, October 1, 2019 3:58 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

To the Representatives/Members of the Ways and Means Committee,

I am writing today as an advocate for mental health services, as both a professional and a citizen who has benefited from receiving my own counseling. In addition to being closer to family, I moved back to Michigan from Illinois because I read a newspaper article that described the need for more mental health professionals in Michigan. I wanted to be a part of the vast group of therapists who helped turn that problem around at home.

I am a licensed professional counselor (LPC) and a certified advanced alcohol and other drug counselor (CAADC), and have dedicated my career since 2012 to helping those who come to me to better their mental health. I have a Masters Degree in Clinical Counseling, and have been trained in diagnosis, assessment, counseling theories, therapy techniques, etc. To see clients thrive and use tools acquired through therapy to make better life choices makes me smile and think of how fortunate I have been as their therapist to be a part of their transition into better mental health. I have had clients describe the hour that they come in to be heard and do therapeutic work as the best hour of their week; something they look forward to.

The current repeal of a counselor's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR), particularly the ability to diagnose, has significant negative consequences. It threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan in the following ways:

- Under LARAs's proposed changes to LPCs' Scope of Practice, roughly 10,000 Licensed Professional Counselors will no longer be able to diagnose clients, because it will be unethical by the standards of the American Counseling Association (which I am a member of). Under Michigan Public Health Code, LPCs are legally required to comply with our professional code of ethics.
- Licensing boards are meant to protect the citizens; in this case, LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will cause immediate termination of clients who need therapy services, further causing them neglect and abandonment, due to LPCs immediately being unable to provide counseling services. This is highly unethical as abandonment goes against the American Counseling Association (ACA) code of ethics.
- If LARAs's proposed changes to LPCs' Scope of Practice takes place, diagnosing clients becomes a violation of Michigan's Public Health Code, and I—along with thousands of other LPCs-- will immediately have no employment and will be forced to move out of state to find work in our field. Those of us who do not already have supervision hours out of state, or conducted by LPCs trained to be supervisors, will not be able to be hired as counselors out of state.
- Inability to diagnose clients means that insurance companies will not reimburse me or others for our work, which makes it hard to maintain gainful employment in the state of Michigan, or renders us unable to be hired. This would impact the employment of thousands of LPCs like me who have dedicated their careers to helping improve the mental health of the citizens in Michigan. It will also put Michigan further into a Mental Health crisis.
- It will be financially devastating on a state level. The Michigan government will lose the tax revenue from all the LPCs who no longer are employed as therapists if this proposal is put into effect. Michigan government will need to report to the 150,000+ individuals needing therapy who abruptly lost their therapists and figure out how to support them. The state will have lost the therapeutic support of LPCs who can no longer run DUI groups, parenting groups, mental health treatment, and other programs to which government systems refer community members. Children and adults who are no longer being seen by a therapist, or cannot get one due to shortages and wait lists, may not function well mentally/emotionally at school or at work, thus hurting company productivity and children's future abilities to be successful members of the workforce, which can in turn affect Michigan's economy. Emergency rooms may be saturated with individuals who cannot maintain their mental health issues on their own, and there may be a rise in suicidal ideations or attempts.

My clients express looking forward to their therapy hour, and to the support they receive. It pains me and scares me immensely to think about what my clients and their families will have to go through mentally and emotionally, and what my family and I will have to go through, if the career that I have trained in for years and is my livelihood suddenly ceases to exist in Michigan. LPCs who can no longer work may have to take entry-level positions to support their families while figuring out where to go next. Some are already just able to support their families, and losing their employment will be a financial burden on thousands of families. Families who rely solely on the income of an LPC will be in dire straits financially and emotionally.

I encourage you to please support and vote yes on the the HB 4325 bill that has been introduced. HB 4325 does not expand LPCs' scope of practice, it makes necessary and appropriate changes while still allowing LPCs to diagnose and clinically assist clients. It puts into law what counselors have been doing for 30 years—being able to diagnose and adequately provide therapy to Michigan citizens. As a result, it will help both clients in need of mental health services and the careers of licensed professional counselors that are so eager to assist. Passing HB 4325 is critical to the mental health care of 150,000+ Michigan residents, and the therapists who assist them. It is imperative to pass HB 4325 as soon as possible and without amendment.

Thank you so much for taking time to listen to my concerns for my clients and my career!

Kindest Regards,

Halene Waytes, LPC, CAADC

Eddie Sleeper

From: Christine Foster <christinefoster325@gmail.com>
Sent: Tuesday, October 1, 2019 2:46 PM
To: Eddie Sleeper
Subject: HB 4325-Ways and Means Committee Written Testimony

Dear Ways and Means Committee,

My name is Christine Foster Seburg and I am a Licensed Professional Counselor practicing in Kalamazoo, MI. I have been practicing for over 5 years seeing a variety of types of clients within my community and surrounding areas.

If the State of Michigan is to lose LPCs, it would only further and exasperate the already existing mental health epidemic. There are already so many obstacles in seeking mental health treatment including availability, societal stigmas, cost, etc. and this would only be making it more challenging and inaccessible for many people. Not only would it potentially deter people from entering treatment, it would also be devastating to the clients who are already in treatment and benefiting from their working relationships with their counselors. I have had many clients share with me the profound impact the work we have done together on their lives and their ability to engage fully and presently. I have been with clients through some of their darkest days and they have disclosed some of their deepest secrets with me in order to seek support and move through the experiences that have inhibited their growth as humans. To take that away would be wrong; completely unethical and immoral.

I didn't get involved in this profession to make money or boast my ego. I chose this profession because I want to make a difference and support others through their experiences. I want people to feel connection and vulnerability and find strength in being their authentic selves in the world. I have been a recipient of counseling and it has changed my life. It has shaped the way I have been able to engage in my life and for that I will always be grateful and inspired. Please don't take LPCs away from the people of Michigan, especially when so many of us need support and connection.

I urge you to please pass HB 4325 out of the committee as soon as possible without amendments.

Sincerely,
Christine Foster Seburg, MA, LPC, NCC

Eddie Sleeper

From: Larena Cherry <larenacherry255@gmail.com>
Sent: Tuesday, October 1, 2019 2:50 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Hello,

I wanted to take a moment to educate you on the importance of **HB 4325** and dispel any misinformation you may have heard about Professional Counselors.

I am strongly opposed to the Michigan Department of Licensing and Regulatory Affairs' proposed rule change: 2019-063 LR. These proposed changes would repeal nearly the entire scope of practice for Licensed Professional Counselors (LPCs) in the state of Michigan. Without a clearly defined scope of practice, LPCs like me will be unable to play our vital role in mental health treatment in the state. **HB 4325** does not expand LPC Scope of Practice, it only solidifies how Professional Counselors have been practicing for the past 3 decades in the state of Michigan.

If these proposed rule changes are adopted, my scope of practice will be limited so severely that insurance companies will likely cease reimbursing me for any services. At a time when mental health is a growing concern in the state, we should not be imposing rules that would limit the number of available providers.

If these proposed changes are enacted, thousands of LPCs in the state will be at risk of losing their jobs. Clinics that employ LPCs will no longer be able to bill insurances for services and will have to make cuts. LPCs working in private practices like mine will likely be out of business in months.

2019-063 LR would also repeal all requirements for training and supervision of counselors in Michigan. Without these guidelines, LPCs in the state will be in violation of the American Counseling Association's Code of Ethics and could face expulsion from the profession altogether, through no fault of their own.

There has been controversy and misinformation regarding the educational and supervision training and requirements of Professional Counselors. As an LLPC, I completed a 48-hour Graduate-level Master's program of study that included the following courses: **Counseling Ethics, Theories of Counseling, Developmental Counseling, Counseling techniques, Group Counseling, Marriage and Couples Counseling, Career development & practice, Testing and Assessment in Counseling, Concept and treatment Planning, Counseling Practicum, Internship in Counseling.** **Bolded headings indicate classes where techniques, diagnosis, and assessments were integrated into the course.*

All of these courses were in compliance with Council for Accreditation of Counseling & Related Educational Programs (CACREP) standards and are in alignment with the National Board for Certified Counselors (NBCC), as follows:

CACREP Domains

1. Human Growth and Development
2. Social and Cultural Diversity
3. Counseling and Helping Relationships
4. Group Counseling and Group Work

5. Career Counseling
6. Assessment and Testing
7. Research and Program Evaluation
8. Professional Counseling and Ethical Practice

Work Behavior Domains

1. Fundamental Counseling and Counseling Issues
2. Counseling Process
3. Diagnostic and Assessment Services
4. Professional Practice
5. Professional Development, Supervision and Consultation

These categories show that I have been trained and have knowledge for diagnosis and counseling techniques. Professional Counselors are qualified to both diagnose and treat clients who have a mental disorder or emotional disturbance.

After my course work was completed, I was expected to complete a practicum and internship. The **practicum experience** included a minimum requirement of 100 total hours onsite with a required 40 hours of direct client contact with site supervision as well as university supervision. **Internship** requirements included a minimum of 600 total hours onsite with a required 240 hours of direct client contact with site and university supervision. As a condition of graduation, I was required to take an exit exam called the National Counselor Examination (NCE). With a passing score on the NCE, I am also a National Certified Counselor. Before provisional licensure, LARA reviewed my transcripts, Professional Disclosure statement and exam grade on the NCE. Once my provisional license was granted, I am required to complete a minimum of 3,000 hours with 100 supervision hours over a period not less than 2 years, a process in which I am still engaged. As you can conclude, my education, supervision, and experience are equivalent to both Counseling Psychologists and Counseling Social Workers.

These proposed changes would devastate the counseling profession in Michigan and leave the hundreds of thousands of Michiganders currently receiving treatment from LPCs in the state with nowhere to turn for help. I urge the House of Representatives, Senate, and Governor to **support and pass HB 4325 WITHOUT AMENDMENTS** to codify my Scope of Practice to allow me to continue providing quality and much needed mental health care in the state of Michigan.

These proposed rules changes would financially devastate my family and myself. Although I am a LLPC in the state of Michigan, I am a relatively new practitioner that holds \$95,000 in student loan debt. Additionally, I am a small business owner of a private counseling practice with several other LPCs. We are expected to service thousands of sessions this year and have over 300 active clients spread over 2 counties that our location reaches. We have developed a strong referral base with local schools, shelters, and other health practitioners. These rules changes would devastate my business. Without my income, I am fearful about defaulting on those loans.

I urgently request your **support for HB 4325 WITHOUT AMENDMENTS** so that the citizens of Michigan can have the availability of quality mental health practitioners like Professional Counselors, especially during a shortage of services and providers in this state.

I appreciate and respect your position and understand that you have the authority to change the direction of this bill. I hope you make the decision to give Professional Counselors of Michigan a chance to continue our

practice of mental health counseling with the quality, dedication, and calling bestowed upon us to change the lives of so many hurting citizens.

Kindest Regards,

Larena Cherry, MA, LLPC, NCC
New Horizons Counseling Center PLLC
Clinical Therapist
9844 Dixie Hwy
Ira MI 48023-2813
(586)716-7600

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(586) 716-7600
(586) 716-7659 Fax

Eddie Sleeper

From: Jane p <jpatterson4109@gmail.com>
Sent: Tuesday, October 1, 2019 2:51 PM
To: Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Jason Wentworth (District 97); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Eddie Sleeper
Subject: Support of HB 4325

To Representatives of the Ways and Means Committee:

I am a practicing attorney in Ottawa County, and for the last 35 years I have been working in the area of criminal law. I have also served on the boards of Center for Women In Transition, (now Resilience), Arbor Circle, and currently serve on the Holland Zeeland Community Foundation, 58th District Court Section 1090 Court (mental health treatment court) and Mosaic Counseling, formerly TCM Counseling. I tell you all this to lend credibility to my statement that your support of HB 4325 is critical, especially now. The increase in need for mental health counseling and accessability has never been greater. We need as many qualified professionals on the front lines as possible.

Thank you for your support of this bill.
Jane L. Patterson
P36970

I have also attached a letter from Sarah Lewakowski, Executive Director of Mosaic Counseling urging your support.
September 25, 2019

To: Representative of the Ways and Means Committee;

I am writing you to urge your support of HB 4325 in order to protect Licensed Professional Counselor's (LPC's) ability to continue to provide critical services for their clients. Losing 10,000 LPC's statewide would push our current mental health crisis into a **mental health catastrophe**, as approximately 150,000 people across the state would lose access to their counselors. Many of them, children.

I am the executive director of a nonprofit mental health agency, serving Ottawa County where one third of our 70 therapists are LPC's or LLPC's. In a time when suicide is at an all time high, intentionally leaving thousands without services that could save their lives (or the lives of others) is absolutely inhumane and unforgivable. Suicide is preventable because depression and other mental health issues are treatable, but not if they are not accessible.

There must be another solution for LARA and the State of Michigan legislature than to deny LPC's their ability to diagnose and use the techniques of psychotherapy. I have been a Limited License Psychologist for 23 years and the executive director of Mosaic Counseling for 16. Based upon my experience "in the trenches," good people (including children) of Michigan will lose their lives if LPC's ability to practice is taken away.

Feel free to contact me at (616) 842-9160.

Respectfully,

Eddie Sleeper

From: Jaclynn George <jaclynnrenee@gmail.com>
Sent: Tuesday, October 1, 2019 3:16 PM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means Committee Written Testimony

Hello Mr. Edward Sleeper,

Today I am writing you to document my support for HB 4325 and would like to see the Ways and Means Committee pass this bill without amendments. I am a Limited Licensed Professional Counselor (LLPC), working toward my full licensure. HB 4325 will solidify the scope of practice that LPC's have been operating under for the past 30 years. It is important that this bill gets signed into law to ensure the 10,000 LPC's in Michigan can continue to provide professional services to their clients. There are well over 100,000 people currently being treated by LPC's who could lose their mental health care provider if this bill does not go into law. It is very important that the citizens of Michigan have access to mental health providers; in a current study it was noted that a major barrier to mental health care is a shortage of providers (<https://www.mihealthfund.org/hundreds-of-thousands-lack-behavioral-health-treatment>).

There is an urgency to getting this bill passed ASAP because as I am writing you LARA is proposing changes to LPC's rules that will take away the ability for all LPC's to diagnose and treat their clients.

Best
Jaclynn George LLPC, NCC, MA
License # 640101486

Eddie Sleeper

From: Kathrine Flavin <kathrineflavin@gmail.com>
Sent: Tuesday, October 1, 2019 3:24 PM
To: Eddie Sleeper
Subject: HB 4325

Dear Ways and Means Committee Members,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need, which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope, which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,
Kate Flavin, LLPC, CAADC
300 E. Malcolm X St., Apt. 122 Lansing, MI 48933

Eddie Sleeper

From: Paul LeBlanc <leblanp88@gmail.com>
Sent: Tuesday, October 1, 2019 3:29 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Mr. Sleeper,

Please accept the following written testimony for the Ways and Means Committee's hearing on HB 4325:

I am writing to the committee as a Michigan resident who is a user of mental health services and who has a wide network of family, friends, and colleagues who utilize them as well. I am very concerned by the proposed rule changes by LARA that would significantly limit the scope of practice for Licensed Professional Counselors (LPCs) in Michigan. With our mental health system already overburdened and unable to cope with the full extent of community mental health needs, I fear that these rule changes will diminish the number of qualified mental health professionals in the state. HB 4325 will ensure that the scope of practice for LPCs is commensurate with their state-mandated educational qualifications; this should be a completely non-controversial and common sense measure to take. Most importantly, this bill will prevent the potentially grave effects of these rule changes on the thousands of mental health users such as myself in the state. I am asking that you move forward and pass this legislation as soon as possible, without amendments, to avoid these negative effects on your constituents.

Thank you to yourself and the committee for your speedy consideration of this legislation.

Best,
Paul

--
Paul Andrew LeBlanc
leblanp88@gmail.com
(248) 408-7203

Eddie Sleeper

From: Gina Hardy <ginahardy31@yahoo.com>
Sent: Tuesday, October 1, 2019 3:29 PM
To: Eddie Sleeper
Subject: Ways and Means Committee Written Testimony - HB4325

Ways and Means Committee Testimony,

My name is Gina Hardy, I am a Licensed Professional Counselor working in Private Practice in Madison Heights. My practice, The Mindful Self, employs 1 biller, and 9 other counselors, 7 of whom are also Licensed Professional Counselors. Our practice which consistently has a waiting list or we refer new clients out to other practices, also whom have waiting list has approximately 800 active clients. The majority of these clients would be immediately effected by LARA's rule changes as they would no longer have access to their Counselor, and have littler choice in other practitioners as they are likely to see their wait list grow 10 fold. In addition to the impact to the clients which is my main concern, there would be an economic impact which is understated in the consequences of LARA's proposed changes. As I am partner in a small business we would be forced to close our practice as 2/3s of our clinicians are not able to practice. This would be a devastating impact to myself and many other private practices as we all have financial investments to our landlords, along with many other contractual obligations that we would be forced to break. When I read that there is no "economic impact" of these rule changes I wanted to make sure the members of the Ways and Means committee truly understood that there would be a profound impact financially on more than just the counselors that the rules relate to.

I urge you to move HB4325 out of the Ways and Means committee with out amendments ASAP.

Thank you for your consideration in such a time sensitive manner, if there are any questions or I can be helpful in any way please do not hesitate to contact me.

Thank you,

Gina Hardy, MS, LPC
Clinical Therapist /Partner
The Mindful Self, LLC
28303 Dequindre Rd
Suite 200
Madison Heights, MI 48071
248-543-0033
248-548-5309 Fax

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Eddie Sleeper

From: Cambria Jill <cammiejill@gmail.com>
Sent: Tuesday, October 1, 2019 3:37 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Dear Mr. Sleeper,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,

Cammie Myers, MA, LPC
117 Reiniche Rd Horton, MI 49246

Eddie Sleeper

From: Kelly <kellychaiken@yahoo.com>
Sent: Tuesday, October 1, 2019 1:20 PM
To: Eddie Sleeper
Subject: Unethical LARA

Kelly Chaiken, MS, LLPC
Program Manager
Intensive Home Based Services for Wayne County
20303 Kelly Rd, Detroit, MI 48225
(248) 990-2410
Kellychaiken@yahoo.com

10/1/2019

The proposed Licensed Professional Counselor (LPC) rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer has significant negative consequences and threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan. As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR). These are rules that have been recognized as part of the LPC scope of practice after the passage of our LPC statute in 1988. LARA insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. This change would artificially limit LPC's current scope of practice.

Included in LARA's repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem." Without these and numerous other definitions, the LPC scope of practice is severely limited. Restricting LPC's scope of practice in this way will most certainly reduce the availability of mental health counseling services in Michigan and at a time when there is a growing demand for these services.

The Institute of Medicine states that there is a "conspicuous lack" of national attention to ensuring sufficient numbers of mental health service providers to Americans. Matters are further complicated by 54% of Michigan counties being designated as a mental health service coverage shortage area by the Health Resources and Services Administration. With the citizens of Michigan currently struggling to get access to counseling services, LARA's proposed LPC Scope of Practice Rules changes will put all LPCs immediately out of practice and will ensure that the citizens of Michigan will have less access to mental health care.

Further, LARA's proposed changes in the LPC scope of practice would put LPCs in violation of ACA's Code of Ethics standard E.5.a. Proper Diagnosis, which requires the proper diagnosis of a client's mental disorder before treatment. Furthermore, third-party payers will immediately stop paying for the counseling services provided by LPCs because the billing process REQUIRES a diagnosis for a counseling services third party claim to be paid.

This means that when LARA's proposed Scope of Practice Rules change goes into effect, thousands of people across the state of Michigan will immediately be stripped of current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association's (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that "Counselors do not abandon or neglect clients in counseling." If LPCs

cannot bill third party payers because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA's LPC Scope of Practice Rules change.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. If LARA makes the proposed changes, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving. This would occur because supervision training is a national standard for LPCs. Additionally, if LARA makes the proposed changes, counselors who provide supervision without appropriate training (as would now be allowed under LARA's new proposed changes) would be practicing in violation of the ACA's Code of Ethics standard F.2.a Supervisor Preparation.

It is the job of state licensing boards to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, I would ask that LARA allow the legislative process to provide the necessary changes.

LARA's proposed LPC Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) must not be adopted. The legislature should instead pass HB 4325, introduced by Rep. Aaron Miller (R Sturgis), which would address legitimate concerns and needed updates and negate the need for LARA's LPC Scope of Practice Rules changes altogether.

If you desire additional information from me, please contact me via phone at 248-990-2410 or e-mail kellychaiken@yahoo.com

Sincerely,

Kelly Chaiken, MS, LLPC.

Eddie Sleeper

From: Anna Richards <anna.richards520@gmail.com>
Sent: Tuesday, October 1, 2019 1:32 PM
To: Eddie Sleeper
Subject: Re: HB 4325

<https://www.psychologytoday.com/us/blog/compassion-matters/201612/the-importance-the-relationship-in-therapy>

I would also like to include this article by the APA discussing the importance of the therapeutic relationship and how it outlines the devastation that would happen if you took clients away from their trained professional. As a reminder, we have been practicing this way for the past 30 years. We are NOT asking for an increase in scope of practice, and our CACREP accredited programs trained us as a mental health clinician. Please take this article into consideration when you are thinking about the importance of the therapeutic relationship.

Warmly,
Anna Richards (Arciero) MA, LPC, NCC

On Mon, Sep 30, 2019 at 9:34 AM Anna Richards <anna.richards520@gmail.com> wrote:

Good morning and thank you so very much for meeting in regards to HB4325. As you well know, this is an urgent matter. As a trained LPC and a private practice therapist, I would like to urge you to note that we are in no way, shape or form requesting to increase our scope of practice but instead continue as we have for the past 30 years. Please pass this through the Ways and Means Committee as soon as possible so that we can assure the continuity of care for those that need it so dearly.

I would like to also note that I went to OU and graduated in 2007. I, myself, completed the Community/Agency track which was absolutely designed to become a mental health practitioner. I am a therapist who is also trained in career counseling theory and assessment and it has been a beautiful marriage for my clinical vantage point.

I trained for 3000 hours to become fully licensed. I hold my NCC, national certification which I maintain with 100 hours of CEU's every 5 years. It is essential to what I do and the fabric of my being.

Please note - my specialization is child loss. I work with parents who have lost children. If any of you understand this excruciating loss and trauma, you will understand the secondary loss of losing the trained person you are going to, to try and breathe again in this world. The decisions you are making right now matter deeply. Please take this all into consideration and THANK YOU for all you have done and are doing.

Warmly,
Anna Richards (Arciero), MA, LPC, NCC
Only Human Counseling Services, LLC
2010 Hogback Rd. Ste 7
Ann Arbor, MI 48105
734-320-7838

Eddie Sleeper

From: shirley faleer <shfaleer@me.com>
Sent: Tuesday, October 1, 2019 1:32 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

To the House Ways & Means Committee members,

I am a Licensed Professional Counselor LPC living in Michigan. I have practiced counseling for over 20 years, and I am writing to you in support of HB4325, and in opposition to the Scope of Practice rule changes being proposed by the Bureau of Licensing and Regulatory Affairs (LARA).

I invite you to consider some of the financial ramifications involved. For example:

If LARA revised the rules and the HB4325 bill does not pass, you will be cutting out a revenue stream. How? LARA licensed over 10,000 LPCs. They all pay income tax. If each LPC earns an average of \$50k per year, that is a total income for all LPCs of HALF A BILLION DOLLARS. With a tax break of 4.25%, this is \$21.25 MILLION DOLLARS in lost revenue stream to the State of Michigan if this bill does not pass.

Indeed states, "\$90,704 The average salary for a Licensed Professional Counselor is \$90,704 per year in Michigan, which is 44% above the national average." So you can use that number x 10,000 (LARA reported over 10,000 LPC licenses), which equals over \$904 BILLION in income. Michigan's income tax break is 4.25%.

By allowing LARA to revise the rules and if HB 4325 is denied, it will result in LOST REVENUE OF \$38 MILLION PER YEAR to the State of Michigan.

Please keep these facts in mind as the Ways and Means Committee learns more about this crisis and the bill that could solve it.

Thank you,

Shirley Faleer, MA, LPC

Heartbound Counseling, PLLC
Shirley@HeartboundCounseling.org
989-400-2367

Eddie Sleeper

From: Cindy Braun <cindyjbraun@gmail.com>
Sent: Tuesday, October 1, 2019 1:46 PM
To: Eddie Sleeper
Subject: HB4325 WAYS AND MEANS COMMITTEE WRITTEN TESTIMONY

Dear Representatives:

I am deeply concerned that many representatives that have been elected (or appointed) on behalf of the people of Michigan are seemingly unconcerned, uninformed (or both) about the ramifications of LARA's proposed regulatory changes for Licensed Professional Counselors in the state of Michigan. These changes will effectively put as many as ten thousand LPCs out of work while simultaneously leaving many of our most vulnerable citizens without the mental health options that they have come to expect and rely on. I believe this is unconscionable.

Imagine spending years to be educated, including continuing education after licensing, years of unpaid internships and mandatory supervision, and the costs associated with all that, and after doing everything that the licensing body (LARA) required to practice your profession, *now* that same regulatory body is proposing that you were never allowed to practice as a therapist or use the "counseling techniques" you were trained in. Now, after a thirty year history of issuing licenses to LPCs, there is to be no "grandfathering" allowed for existing therapist (no matter how long you have practiced) and to add insult to injury you cannot move to one of the many states that recognize Licensed Professional Counselors without redoing the many hours of supervision that you had to complete (and pay for) in Michigan because these will also be voided by LARA. Frankly, this doesn't make sense outside the framework of the unethical political motives by the supporters and lobbyists of these actions.

I am not an LPC, but I know personally the invaluable work that they do. My daughter is a Licensed Professional Counselor with her own practice. She is a board certified counselor and a National Certified Counselor who offers the highest standards in her practice. She has met stringent CACREP education, examination, supervision, experience, and ethical requirements. I know her training and how dedicated she is to her clients. I know personally how many people have been helped through their ability to utilize her expertise and others like her for their mental health needs.

Please know, we vote and our many friends and family vote, too!

We ask you to:

- Support HB4325 to be passed as soon as possible **with no amendments.**
- Support immediate action being taken to postpone the regulatory changes by LARA until HB4325 can be put into law.

Please do your job on behalf of the people of Michigan!

Sincerely,

Cindy J. Braun

Eddie Sleeper

From: Anna Walton <nan48842@yahoo.com>
Sent: Tuesday, October 1, 2019 1:54 PM
To: Eddie Sleeper
Subject: LARA rule change for LPC's

Dear Representative,

I am contacting the Ways and Means Committee to voice my support for HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS.

SEP

If LARA revises the rules and the HB4325 bill does not pass, the impact will render profound economic ramifications in Michigan:

- You will be cutting out a massive revenue stream.

Indeed states, "\$90,704 The average salary for a Licensed Professional Counselor is \$90,704 per year in Michigan, which is 44% above the national average." With LARA reporting over 10,000 LPC licenses this year, that would equal over \$907 BILLION in income. By allowing LARA to revise the rules and if HB 4325 is denied, it will result in income tax REVENUE LOSS OF \$38 MILLION PER YEAR to the State of Michigan.

- This will put 10k Michigan LPCs out of business placing them, their dependents and support staff in financial ruin.

Many of us are in private practice as small business owners here in Michigan and would be forced to shut down our practices. We would not only lose our businesses and our household income, but since our degree and license would be worthless, we would not be qualified to get a financially equivalent job anywhere else. This would ultimately cause over ten thousand families to go bankrupt, foreclose on their homes and also be unable to continue paying back the government for their their \$80,000+ student loans.

- Unemployment rates will skyrocket. SEP

10,000+ LPCs will instantly be unemployed ...for an EXTENDED period of time due to their nullified degree/qualifications to get another professional job. Furthermore, we are also career counselors that support unemployed or underemployed individuals to help them get back out into the workforce. Without counselors to help them, the number of citizens who will remain unemployed is incalculable.

- A ripple effect crisis will occur when more than 200,000 Michiganders will instantly be without their counselors and unable to contribute to our economy. SEP

- SEP We are in the middle of an opioid crisis, a suicide epidemic, and record-breaking rates of depression and anxiety issues. We need to be expanding access to mental health services right now, not contracting it, so that we have more high-functioning citizens positively contributing to our society. SEP

On a personal note, I am a human trafficking survivor and it is due to a LPC I was able to receive the help I needed to survive and recover!! I have since spent my life working to give back to others. I currently have my own practice in

Lansing where I supervise several other therapists and we service over 200 clients with Medicaid—they honestly have NO where else to turn!!!!

PLEASE— I am asking for your support for HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS. I will be attending your meeting this Wednesday and look forward to hearing your opinions on the matter.

Thank you for your time and consideration,

Anna M. Walton, LPC
THRIVE C.S.
4221 S. MLK
Lansing, MI 48910
amwtcs@yahoo.com
Cell: 517-898-4303
Fax: 517-709-3332

Eddie Sleeper

From: Carolyn Madry <carolyn.madry@ihcwestmichigan.com>
Sent: Tuesday, October 1, 2019 1:56 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Dear Mr. Sleeper,

Please include my testimony on the record for the Ways & Means Committee's hearing.

I am a Licensed Professional Counselor practicing in the state of Michigan. I have over 40 clients that I am currently providing services to and I have helped many more over the years to become healthier, happier people. I constantly have waitlists for my services due high need for mental health services in the community and also my very specialized areas of treatment (PTSD, Eating Disorders, and Obsessive-Compulsive Disorder). I received a Master's Degree in Clinical Mental Health Counseling and my 60 credit curriculum included intensive courses and supervised practical experience to prepare me to provide high quality, evidence-based care. Clinical Mental Health Counseling programs require more courses in clinical practice than your average Clinical Social Work program.

To protect my clients, support the mental health needs of the community and state, and also to protect my profession, please support and move HB4325 out of the committee as soon as possible without amendments. Without HB4325, there is a risk that my practice and the practices of over 10,000 Licensed Professional Counselors in the state of Michigan will not be protected by the proposed LARA rule changes and thousands of Michigan residents could be left without mental health services.

Thank you for your time and consideration,
Carolyn

--

Carolyn Madry, LPC
Therapist, Integrative Health Consultants of West Michigan, LLC.

IHC / 1843 RW Berends Dr SW | Wyoming, MI 49519
Phone [616.773.2908](tel:616.773.2908) x107 | Fax [616.532.3046](tel:616.532.3046)

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Eddie Sleeper

From: Justin McCoy <jm78@calvin.edu>
Sent: Tuesday, October 1, 2019 2:02 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

To whom it may concern:

Please pass HB 4325 without amendments on to the House floor.

As an LLPC in the State of Michigan who completed a three year Clinical Mental Health Counseling masters degree with CACREP accreditation, I can attest to the rigorous training and education that prepared me to provide psychotherapy and diagnose clients. Almost all other states have a comparable license for individuals who completed this program and allow these licensees to provide psychotherapy and diagnose clients. The law regulating LPCs in the State of Michigan needs to be updated to match our clinical ability.

Thank you,

Justin McCoy
Area Coordinator
Kalsbeek – Huizenga - van Reken | Calvin University
Office: (616) 526 – 7161

Eddie Sleeper

From: Annen Weber <annen@deepwatermichigan.com>
Sent: Tuesday, October 1, 2019 2:06 PM
To: Eddie Sleeper
Subject: HB4325

Good afternoon. I am one of the 10,000 terrified counselors that is worried about my job and livelihood. I am also concerned for 150,000+ Michigan residents that are going to find themselves without their mental health care professional. We desperately need HB 4325 to pass without amendment so it can get put into law and protect our careers, clients, and overall mental health in Michigan going forward. Please help get this through!

Sincerely, Dayna Ruth Weber, LPC

Sent from my iPhone

Eddie Sleeper

From: Kotecki, Marianne <MarianneK@WMCMS.org>
Sent: Tuesday, October 1, 2019 2:20 PM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means Committee Written Testimony

Dear Representatives of the Ways and Means Committee,

I will be directly impacted by a bill that will be placed in the Senate for a vote very soon. I wanted to take a moment to educate you on the importance of HB 4325 and dispel any misinformation you may have heard about Professional Counselors.

I am strongly opposed to the Michigan Department of Licensing and Regulatory Affairs' proposed rule change: 2019-063 LR. These proposed changes would repeal nearly the entire scope of practice for Licensed Professional Counselors (LPCs) in the state of Michigan. Without a clearly defined scope of practice, LPCs like me will be unable to play our vital role in mental health treatment in the state. HB 4325 does not expand LPC Scope of Practice, it only solidifies how Professional Counselors have been practicing for the past 3 decades in the state of Michigan.

If these proposed rule changes are adopted, my scope of practice will be limited so severely that insurance companies will likely cease reimbursing me for any services. At a time when mental health is a growing concern in the state, we should not be imposing rules that would limit the number of available providers.

If these proposed changes are enacted, thousands of LPCs in the state will be at risk of losing their jobs. Clinics that employ LPCs will no longer be able to bill insurances for services and will have to make cuts. LPCs working in private practices will likely be out of business in months.

2019-063 LR would also repeal all requirements for training and supervision of counselors in Michigan. Without these guidelines, LPCs in the state will be in violation of the American Counseling Association's Code of Ethics and could face expulsion from the profession altogether, through no fault of their own.

These proposed changes would devastate the counseling profession in Michigan and leave the hundreds of thousands of Michiganders currently receiving treatment from LPCs in the state with nowhere to turn for help. I urge the House of Representatives, Senate, and Governor to support and pass HB 4325 WITHOUT AMENDMENTS to codify my Scope of Practice to allow me to continue providing quality and much needed mental health care in the state of Michigan.

The client's wellbeing and safety are at the forefront of my concern. Please allow me to continue my dedicated work to help these individuals achieve peace in their chaotic lives.

I urgently request your support for HB 4325 WITHOUT AMENDMENTS so that the citizens of Michigan can have the availability of quality mental health practitioners like Professional Counselors, especially during a shortage of services and providers in this state.

I appreciate and respect your position and understand that you have the authority to change the direction of this bill. I hope you make the decision to give Professional Counselors of Michigan a chance to continue our practice of mental health counseling with the quality, dedication, and calling bestowed upon us to change the lives of so many hurting citizens.

Kindest Regards,

Marianne Kotecki

Marianne Kotecki, LPC
WCMHS/Family Link
Site Team Clinician
231-233-1210

Eddie Sleeper

From: Jennifer Roberts <jroberts00@gmail.com>
Sent: Tuesday, October 1, 2019 2:26 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony.

Testimony to be included for October 2nd House Ways and Mean Committee in RE to HB 4325.

My name is Jennifer Roberts, MA, LPC of Grand Rapids Michigan. As my title includes, I am a Licensed Professional Counselor with a specialty in trauma and grief. Over the course of the past few weeks I have been reading how LARA intends to change the formatting and definition of what an LPC and LLPC can and cannot do. Based on research and legality of language, it is my understanding a change from one area of a definition to another will in reality change what the definition meant in the first place. In truth it will void a population of professionals dedicated to the safety and mental health well being of Michigan's residence.

My testimony is not meant to go over the bill or the LARA changes in detail, but rather to say help us be better as clinicians, therapist, and licensed professionals. By passing HB 4325 you are allowing us to continue our services both in public and private practice, but also allowing us to raise the bar for the future to add requirements of continuing education and licensing hours.

With the rise in depression, anxiety, suicides, shootings, domestic violence, rape, and more, clinicians are in need. We go to school, we train, we continue to keep current with new practices, and hone our knowledge to be what we need to be for our clients.

The MPA continues to try and speak for our education yet they miss represent. Please be reminded of the facts: 1) we take all classes required of our license, of our specialties, and do not claim to know more than we do, 2) Our classes are specific to train us to diagnose and treat mental illness and they are not "survey classes", Our entire Master's courses are directed toward diagnosing as well as 4,000 extra hours of training in addition to the degree. We also have to successfully pass a national counseling exam to verify we have the knowledge and skills. Please be reminded of this as you look over the facts. 3) We have almost the exact training of any MSW - feel free to download courses and compare. There is a reason in the first place we have a license, 4) We are required to ONLY treat within our scope of training, this is true of any professional, and we take referrals very seriously.

Our job is more than dedication to our clients - it is providing qualified and professional services of stability, empowerment, and emotional/mental safety.

Thank you
Jennifer Roberts, MA, LPC

Eddie Sleeper

From: Jennifer Jones <srijjones@comcast.net>
Sent: Tuesday, October 1, 2019 1:17 PM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means committee hearing written testimony

Dear Representative,

My name is Jennifer Jones. I have been a Licensed Professional Counselor (LPC) since 2002. I have been a mental health provider for many years and enjoy the work that I do. I have worked with many different people including women with substances use disorders and mental health issues, individuals with traumatic brain injuries, and many people with trauma histories, past and current legal issues, and individuals affected by the opioid epidemic.

I am contacting the Ways and Means Committee to voice my support for HB 4325 and ask that you pass it out of committee ASAP WITHOUT AMENDMENTS.

If LARA revises the rules and the HB4325 bill does not pass, the impact will render profound economic ramifications in Michigan:

- You will be cutting out a massive revenue stream.

Indeed states, "\$90,704 The average salary for a Licensed Professional Counselor is \$90,704 per year in Michigan, which is 44% above the national average." With LARA reporting over 10,000 LPC licenses this year, that would equal over \$907 BILLION in income. By allowing LARA to revise the rules and if HB 4325 is denied, it will result in income tax REVENUE LOSS OF \$38 MILLION PER YEAR to the State of Michigan.

- This will put 10k Michigan LPCs out of business placing them, their dependents and support staff in financial ruin.

Many of us are in private practice as small business owners here in Michigan and would be forced to shut down our practices. We would not only lose our businesses and our household income, but since our degree and license would be worthless, we would not be qualified to get a financially equivalent job anywhere else. This would ultimately cause over ten thousand families to go bankrupt, foreclose on their homes and also be unable to continue paying back the government for their \$80,000+ student loans.

- Unemployment rates will skyrocket.

10,000+ LPCs will instantly be unemployed ...for an EXTENDED period of time due to their nullified degree/qualifications to get another professional job. Furthermore, we are also career counselors that support unemployed or underemployed individuals to help them get back out into the workforce. Without counselors to help them, the number of citizens who will remain unemployed is incalculable.

- A ripple effect crisis will occur when more than 200,000 Michiganders will instantly be without their counselors and unable to contribute to our economy.

-
- We are in the middle of an opioid crisis, a suicide epidemic, and record-breaking rates of depression and anxiety issues. We need to be expanding access to mental health services right now, not contracting it, so that we have more high-functioning citizens positively contributing to our society.

Thank you for this opportunity to voice my concerns.

Sincerely,

Jennifer Jones, LPC

Licensed Professional Counselor

Eddie Sleeper

From: Linnea Sieh <linneas@allthingspossiblewc.com>
Sent: Tuesday, October 1, 2019 1:18 PM
To: Eddie Sleeper
Subject: HB 4325- Written Testimony for Ways and Means Committee

Dear Representatives,

I am writing today with some additional information in support of HB 4325. As I am sure you have been made aware, LLCs and LPCs have been threatened with losing the ability to practice independently and losing the ability to bill insurance companies, effectively ending access to affordable mental health care services for over an estimated 150,000 Michigan residents. This would be devastating, especially in light of the mental health crisis occurring both statewide and nationally.

To give a more personal example, my current caseload as a Licensed Professional Counselor in a private practice setting is around 58 people. I work in a practice that includes 10 other LLCs/LPCs. Assuming that we all have an average of 50 people on our caseloads, 500 people would suddenly be unable to access their mental health providers. 500 people would need to potentially attempt to build trust with another provider, assuming they would be able to find another one quickly and one that they were able to trust. This would be an incredibly difficult burden on an already vulnerable population and could lead to catastrophic and tragic results.

In addition to this, all of us would be without an income, which when added with the other LPCs statewide, would have a very negative effect on Michigan's economy. In rural communities especially, there could potentially be no mental health care available at all. My mother works for a community mental health care agency that has difficulty keeping psychiatrists and psychologists. Often times, they resort to telehealth, which is only a stopgap measure. Her agency is staffed primarily by LPCs and to lose them would essentially shut it down.

It is my understanding that there is some confusion of what HB 4325 entails and some concerns about it expanding our scope of practice. The bill does not do this; it protects and honors the scope of practice under which we have been practicing for 30 years, with no concerns reported by any of our other credentialing boards, such as the National Board of Certified Counselors, The American Counseling Association, or in fact, by LARA itself.

In order to obtain a Professional Counselor License, we must complete a Master's Degree in Counseling (roughly 3-4 years of graduate school,) including training in diagnosis, treatment, and multiple techniques to assist those in crisis, pass the National Counselor's Exam, and obtain two years of additional supervision by a fully licensed LPC before we can even apply for our full license. We must also provide proof of our education, training, national exam, and provide a letter stating exactly what our scope of practice will be. These are all submitted to the Bureau of Professional Licensing/LARA for approval before they grant the license. My question to you is, if we are required to provide all of this information and have our licenses granted, why is it suddenly not enough for us to continue to practice, as we have been doing for 30 years?

I implore you to pass HB 4325 quickly and without amendments through the committee and to the House for a vote, so that the lives of myself, my colleagues, and above all our most vulnerable citizens can be protected.

Thank you for your support.

--
Warm Regards,

Linnea Sieh, MA, LPC
Clinical Psychotherapist
All Things Possible Wellness Center
37211 Harper Ave, Ste 2A
Clinton Township, MI 48036
Phone (Cell): 586.738.0352
Phone (Office): 586.213.5505
Fax: 586.213.5504
www.allthingspossiblewc.com

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Eddie Sleeper

From: Bryan Funk <bryan.funk@outlook.com>
Sent: Tuesday, October 1, 2019 9:46 AM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Dear Senators and Representatives,

I am contacting you to get your support for HB 4325.

This bill will allow myself and the other 10,000 Licensed Professional Counselors in the State of Michigan to continue to practice and provide highly qualified mental health care. This is needed in our state. Without this bill being approved without amendments, my professional practice and my clients will be hurt as I will no longer be able to provide mental health diagnosis and counseling techniques.

I have been a Licensed Professional Counselor for over 15 years. I have been a Licensed Mental Health Counselor (Indiana) for over 20 years. I have two master's degrees - psychology and counseling. I have all but a dissertation from completing my Ph.D. in Counseling Education and Supervision. I am highly trained in the assessment, diagnosis, and treatment of mental health illnesses listed in the DSM-V. I have taught graduate counselors these same skills. I have 26 years of professional experience in the service, assessment, diagnosis, and treatment of children and families in child welfare and juvenile justice.

This expertise is put into practice daily for the benefit of Michigan children and families. I have treated a minimum of 180 juveniles and their families in my Michigan practice. I have provided intensive treatment and services to families who have suffered extensive neglect, emotional, physical, and sexual abuse. My clients and their families have been supportive and grateful for their counseling services. For example, "*Dear Mr. Funk, We have been helped so much by all the care, attention and therapy you have given us and [son]. Thank you for all that you have poured into our family. We can look forward to the future again because of the program you oversee... Gratefully, [W&G]*" This is one example of many of the impact a licensed professional counselor that can assess, diagnose, and treat will have on Michigan people.

I am asking for the Senators and Representatives to support the Michigan HB 4325.

Bryan A. Funk, MA, LPC
License #: 6401010973

Eddie Sleeper

From: R. Christopher DeBoer <chris@redcedarcounseling.org>
Sent: Tuesday, October 1, 2019 10:01 AM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

First, thank you for your time. I am submitting this card in support of House Bill 4325. There are currently circumstances going on which will deprive Michigan of approximately 10,000 qualified mental health providers which will affect over 100,000 Michiganders. Licensed Professional Counselors (LPCs) have been working in Michigan communities for over 30 years to provide cost-effective mental health services across the state.

House Bill 4325 is not an expansion of the scope of practice but clarifies in statute how LARA has been implementing the existing statute for those 30 years. LARA has been accepting Licensed Professional Counselors professional disclosure statements which have described our services, including diagnosis and treatment and has not contested them. This flies in the face of LARA's current position that Licensed Professional Counselors have been misinterpreting the existing rules to include these things. In addition, neither the existing statute or HB 4325 allows Licensed Professional Counselors to diagnose other illnesses or prescribe medications.

There have been questions about public safety regarding Licensed Professional Counselors and their competence to diagnose. One example used to challenge has involved the situation in which a career counselor, which is a program offered by exactly six universities in Michigan and none of them in the State of Michigan, would be allowed to treat someone with serious mental illness. This situation is misleading because it is not allowed under the current statute or once HB 4325 is passed.

Under current statute (MCL 333.18105) licensees are forbidden to perform any act, task or function they have not been trained to perform. The theoretical career counselor would already be forbidden to diagnose or use counseling techniques to treat mental or emotional disorders because they have not been trained to do so. Under HB 4325, in the amended MCL 333.18101 (f.i) requires that for licensure that Licensed Professional Counselors must have received education from a qualified institution which includes coursework in the diagnosis and treatment of mental and emotional disorders. Additionally, our professional ethics are clear in that Licensed Professional Counselors are forbidden from treating clients that have conditions that are outside of our training to deal with. We are ethically required to refer to a professional who has the knowledge and skills to treat competently in those situations.

As far as our education and training in diagnosis and treatment of mental and emotional disorders, I will describe the training received by every potential counselor that comes through a qualified program as defined by HB 4325. During our training, regardless of specialization or track we receive a full course in diagnosis and treatment planning for disorders outlined in the Diagnostic and Statistical Manual of Mental Illnesses, 5th edition. Those on the clinical mental health counseling track also receive a second full semester course in diagnosis and treatment planning. Almost every course of our program revolves around the application of counseling techniques and therapeutic interventions (92% of the 60-credit program for my degree program at Eastern Michigan University). This is followed by a 100-hour practicum under the direct supervision of our faculty (often by videotape) and a 600-hour clinical internship at a local agency or business under an established professional. After graduation, every limited license professional counselor is under clinical supervision for 3,000 hours prior to applying for their full license which must take two years or more. That is a total of 3,700 under supervision before being granted our full license which is greater or comparable to other professions in this field.

A final point on this topic is to financial implications of not passing HB 4325, which will have catastrophic impact for thousands of families across the state. If the rules proposed by LARA can take effect, thousands of businesses across the state will be closed in contradiction of their regulatory impact statement. Small business owners, like myself, will be left

with crushing debt from leases on office space and student loans which would be without use. We are also employers to other clinicians and office support staff. In addition, thousands of counselors use their salaries or fees to support their families and engage in economic activity across the State of Michigan which will have effect on other businesses. In addition, the State of Michigan will lose hundreds of thousands of dollars (counseling licenses must be renewed every 3 years for \$190.80) in licensing fees per year and even more in tax revenues from our income and other economic activity.

I ask that you pass HB 4325's H-3 substitute through the Ways and Means Committee immediately and without amendment. Our state is in the midst of an opioid crisis (which LPCs are qualified to work with) and suicide is the second highest cause of death among adolescents, which makes the need for mental health practitioners critical to the future of our state. We already have a shortage of practitioners in the state, and to allow thousands of providers to be removed is a public health risk. I also ask that when it comes to the full House for a vote, that you vote in favor of its passage without amendment or revision.

--

Sincerely,
Ryan Christopher DeBoer MA LPC NCC
Clinical Director
Red Cedar Relationship Counseling

Eddie Sleeper

From: Julia Ellis <ellisj444@hotmail.com>
Sent: Tuesday, October 1, 2019 10:03 AM
To: Eddie Sleeper
Subject: HB 4325

Dear Representative Sleeper,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need. This will result in a statewide mental health emergency.

Our nation is facing a mental health crisis and there simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,

Julia Ellis
2976 Sunset Rd
Kalamazoo, MI 49009

Eddie Sleeper

From: Todd Rooney <tnrooney@gmail.com>
Sent: Tuesday, October 1, 2019 10:04 AM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

To the Ways and Means Committee:

I am writing in support of Licensed Professional Counselors (LPC) and in support of passage of HB 4325 to properly state the scope of practice for these professionals.

I personally know several licensed LPC's and can attest to the critical service they provide to Mental Health patients throughout Michigan. They are compassionate, skilled, and well-trained to deliver high quality care to their patients. Numerous of our fellow citizens suffer from all-too-common ailments such as: Trauma, Depression, Anxiety, Abuse, Substance Addiction, Suicidal Ideations, and more. For more than thirty years, LPC's have brought their training and expertise to bear for treatment and healing of their patients.

The failure to pass HB 4325 puts at risk the ability of this entire profession to provide these services throughout Michigan. The proposed ruling change by LARA would remove the ability of all LPC's to diagnose and provide treatment. This would be a huge blow to the thousands of the Michigan citizens who rely on LPC's for help with their mental health struggles. Access to care for these critical services would be greatly diminished – clearly a step in the wrong direction for our State.

Additionally, there would be a large economic blow to Michigan if this bill is not passed. The 10,000 LPC and LLPC professionals who have made Michigan their home would be forced to relocate to neighboring states in order to practice their profession. This massive loss of talent, jobs, and economic activity again, would clearly be a step in the wrong direction for our great State of Michigan.

I urge you to support passage of HB 4325, without amendments.

Kindest Regards,

Todd Rooney

Phone: 810-772-0116

Home address: 4863 Aljoann, Brighton, MI 48116

Eddie Sleeper

From: Stephanie Stromberger <se.stromberger@gmail.com>
Sent: Tuesday, October 1, 2019 10:13 AM
To: Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Bronna Kahle (District 57); Rep. Jason Wentworth (District 97); Rep. Rebekah Warren (District 55); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Kevin Hertel (District 18); Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony.

Hello,

My name is Stephanie Stromberger. I am a Licensed Professional Counselor.

I am writing each of you to express the importance of passing HB 4325 without amendments through the Ways and Means Committee.

LPC's are made up of mental health counselors, marriage and family therapists, and career counselors. While concerns have been raised about career counselors diagnosing and treating mental illnesses, the impact of the proposed rule changes to LARA's professional counseling license would be far worse.

Tens of thousands of LPC's and hundreds of thousands of Michiganders with mental health needs would be negatively impacted. LPC's may lose their employment and financial means. Individuals and families who obtain services by LPC's could lose their mental healthcare. In this day and age, we need as many mental health professionals as possible.

HB 4325 protects LPC's by putting into law what we've already been doing at a high level for 30+ years. Concerns regarding LPC's ability to diagnose have been exaggerated. Mental health counselors have rigorous training in diagnosing, treatment, and supervision to provide the highest quality services possible. Please support Michiganders and LPC's by passing this bill to the House for a vote.

Thank you,

Stephanie Stromberger, MS, LPC

Eddie Sleeper

From: K. Myricks <kmyricks@yahoo.com>
Sent: Tuesday, October 1, 2019 10:18 AM
To: Eddie Sleeper
Subject: RE: HB4325

Ways and Means Chair Sleeper,

As a lifelong resident of the great State of MICHIGAN, I urge you to support and pass along HB 4325 through to the House for a vote, HB4325 would protect the work of licensed professional counselors in Michigan. This bill is of interest to me because I am one of them.

I have been providing counseling services for the past 10 years to survivors of domestic violence, sexual assault, substance abuse and returning citizen who have been incarcerated with the Department of Corrections. It is vital that mental health services be available to all in need, especially given the spike in violence and the opioid epidemic which is quickly on its way to becoming a pandemic if the proposed restrictions of LARA are allowed. In order to provide a picture of the negative impact that will be felt if counselors are suddenly unable to provide services, please be advised of the statistical data. In the State of Michigan just 2 years ago there were just shy of 93,000 victims of violent-related offenses including but not limited to rape, murder, and felonious assault. Imagine the number of victims and survivors that were impacted not only physically but also mentally. The 10th leading cause of death in Michigan is suicide. On average according to the CDC and MDHHS, Michiganders experience mental health related issues between 3%-6% higher than the nation's average. Michigan has one of the highest rates of heroin addiction. In 2017 CDC reported that 2694 Michiganders succumbed to fatal overdose. 633 prescription related deaths. In Wayne County alone there were 690 fentanyl-related deaths. Lastly in Michigan 25910 treatment admissions were specifically attributed to heroin overdose. To say the need for counselors are at an all-time high is putting it mildly. At this time efforts are being made to greatly restrict our scope of practice as counselors, which would in turn negatively affect people who suffer from various emotional and mental disorders. It is vital that we are able to maintain this scope of practice. This scope is encompassed of skills that are mastered during the rigorous training of mental health counselors, and these proposed restrictions by LARA would severely limit the services LPCs can provide, as well as infringe on our ability to bill medical insurance. The access of quality health mental health care to Michiganders would be greatly reduced at a time when they are needed more than ever. HB 4325 rectifies this problem by updating the language of the Public Health Code to reflect the current training and practices of LPCs in Michigan, while bringing the code into alignment with the national standards for professional standards.

As a professional counselor who has a vested interest in the health and wellness of the citizens in your district, I believe that you can appreciate the challenges that we face. If HB 4325 is not passed, and our scope of practice is restricted, thousands of Michigan LPCs see their livelihoods severely impacted, while hundreds of thousands of people will lose access to their mental health counselors. Listed below are the qualifications that all counselors have to master while attending a CACREP accredited Masters Programs:

Counselors training

- Required to complete 52-60hrs of course work that includes the following: Ethics of Counseling, Multicultural counseling, Testing & Assessment, Diagnosis & Case Conceptualization, Theories of Counseling & Psychotherapy, Group Counseling, Individual & Family Counseling, Research in Counseling, Techniques, Career Development Theory & practice, Mental Health counseling, Addictions Counseling, Practicum, and Internship (600 hours + additional 400 hrs. for specializations)
- Licensure requirements: Supervision for 3000 hrs. Work experience hrs.(2 years); 100 hrs. of direct supervision, pass NCE (national counseling exam used nationwide as a requirement of all states)
- Supervision of LLPC requirements: Completion of 30 hours of specific supervision training(training is a national standard for professional counseling), 3 years of practice with full license

Why support HB4325?

- HB4325 would codify into statute the existing rules that have come into question by the Attorney General which LARA is trying to repeal concerning "Diagnosing the problem" and "Counseling techniques" and secondly the rules required to provide counseling supervision for limited licensed counselors
- HB4325 defines "counseling techniques" as a.) Diagnosing the problem b.) Formulating preventative treatment or rehabilitation plan c.)Facilitating appropriate interventions
- HB4325 defines "Diagnosing the problem" as identifying the problem through the application of recognized counseling techniques & psychotherapy skills including the use of DSM-V obtained through the successful completion of a qualified program
- Failing to support HB4325 would impact at least 10,000 licensed counselors and at minimum 150,000 consumers that receive counseling services
- Failing to support HB4325 will lead to a shortage of qualified mental health professional which would lead to an increase of suicide, substance use, and violence
- Failing to support HB4325 will severely impact the economy as counselors will not have the ability to earn a living as they will lose the ability to bill insurances which in turn will impact private practices or counselors ability to find employment, secondly counselors would not be able to obtain their license in another state as their supervision would not be recognized as the proposed changes by LARA would mean their supervisor as not qualified to provide supervision

With the vast number of Michiganders that need mental health services, it is only fair that they have an ample number of choices as far as mental health professionals that they can go to. Thank you for your attention to this issue.

Sincerely,

Kelly D. Myricks MA, LPC, CADC

Clinical Supervisor

Sent from [Mail](#) for Windows 10

Eddie Sleeper

From: Abby Norris <abby.s.norris@gmail.com>
Sent: Tuesday, October 1, 2019 10:36 AM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means Committee Written Testimony

Dear Ways and Means Committee,

I am writing to express my concern with LARA's proposed rules changes for Licensed Professional Counselors (LPC) that have significant consequences on the counseling profession and the workforce in Michigan's public mental health system. I urge you to support HB 4325, which would protect the work of over 10,000 licensed professional counselors in the state of Michigan, preserving access to needed mental health care for an estimated 150,000 Michiganders.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751. These are rules that have been recognized as part of the scope since they were first promulgated after the passage of the Licensed Professional Counselor statute in 1988. Instead, the department insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. Included in this repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem". Without these and numerous other definitions, the counseling scope of practice is severely limited.

These changes in scope would also put Michigan's LPCs in violation of the American Counseling Association's Code of Ethics (E.5.a. Proper Diagnosis), which requires the proper diagnosis of a client's mental disorder before treatment, and could subject them to permanent expulsion from the profession. Additionally, insurance companies will likely stop reimbursing for the services of LPCs due to the significant limits on scope these rule changes would impose.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. This training is a national standard for professional counseling. Again, if this rule is rescinded, counselors who provide supervision without training would be practicing in violation of the ACA's Code of Ethics (F.2.a Supervisor Preparation). Furthermore, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving.

If these changes go into effect, access of quality health mental health care to 150,000 Michiganders would be greatly reduced at a time when they are needed more than ever. HB 4325 rectifies this problem by updating the language of the Public Health Code to reflect the current training and practices of LPCs in Michigan, while bringing the code into alignment with the national standards for professional standards. Your support of HB 4325 would not change the scope of practice for LPCs in the state of Michigan, rather it would codify the privileges that LPCs currently perform.

In summary, I strongly encourage the legislature pass HB 4325 (sponsored by Rep. Miller), which would overturn these proposed changes.

Thank you in advance for your consideration.

Sincerely,

Abigail Norris, LLPC

Eddie Sleeper

From: Alexandria Phelps <aphelps@bloomfield.org>
Sent: Tuesday, October 1, 2019 10:55 AM
To: Eddie Sleeper
Subject: HB 4325 - Ways and Means Committee Written Testimony

Hello my name is Alexandria Phelps and I am an LLPC (Limited License Professional Counselor residing and continuing supervision hours for my LPC in Michigan.

I am calling to urge you to support HB 4325 when it comes up for a vote in the House Floor. This bill, sponsored by Rep. Aaron Miller, simply codifies some provisions of counselors' scope of practice that have been in rules and in practice since the law was passed in 1988.

The key provision in these long standing rules is the ability to diagnose, for which counselors receive substantial training. However, new directives affecting LARA require that scope of practice is codified in legal statute, rather than Administrative Rules. If such changes are not made, the proposed rule changes by LARA will result in the inability of counselors to continue practicing, leaving Michigan's 10,000 licensed professional counselors unable to practice and far more clients without mental health care.

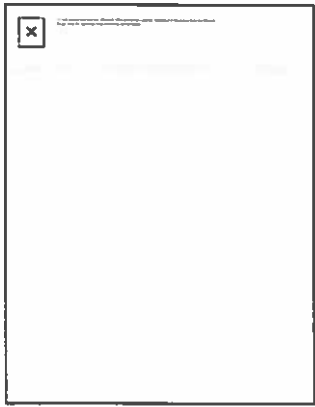
This bill in no way changes a counselors scope of practice or who is eligible for licensure -- it would continue the same as it has been for more than 30 years. Again, please vote yes on HB 4325. The passage of this bill is vital to retaining strong mental health counseling services for Michiganders.

I thank you for your time.

Sincerely,

Alexandria Phelps, LLPC

--
Alexandria Phelps, MA, SCL, LLPC, NCC
she/her/hers
Counselor
International Academy- East Campus
248-823-8362



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International Academy
www.iatoday.org



Eddie Sleeper

From: Melissa Bertini <sanfomel@gmail.com>
Sent: Tuesday, October 1, 2019 11:00 AM
To: Eddie Sleeper
Subject: HB 4325- Ways & Means Committee Written Testimony

I am a LPC that has been practicing in Michigan for the past 7 years. Now more than ever there is a need to make mental health services readily available to Michigan residents, and many agencies already struggle with short staffing and high caseloads.

Any action that restricts our ability to use counseling techniques and diagnose would not only severely limit the counseling scope of practice, but it would also put Michigan's LPCs in violation of our professional code of ethics. This could leave hundreds of thousands of Michigan residents without crucial services, over 10,000 LPCs without the ability to practice, and numerous small businesses closed.

I think we can all agree that the current statute and rules governing LPCs are in desperate need for an update. I believe HB4325 addresses these necessary changes and ensures that all counselors are qualified to provide the services that LPCs have been offering in Michigan for the last 30 years. Making rule changes before this legislation can be voted on could have a devastating impact on our entire community. Thank you for your time and consideration.

Eddie Sleeper

From: Katie Christensen <kssleiso@gmail.com>
Sent: Tuesday, October 1, 2019 11:07 AM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Dear Committee Members,

As a professional counselor, I am deeply troubled by LARA's proposed rule changes that would force our practice and many other practices run by Licensed Professional Counselors (LPC's) to shutdown. This would leave our clients scrambling to find new care. For our clients that are in the midst of crisis and at risk for self-harm, suicide, or substance abuse, this disruption could have grave consequences. Altarum conducted a study this summer that found 650,000 Michiganders with mental health issues were not receiving treatment. If LARA's rule change goes through you would be adding thousands more to that list. Counselors make up 25-30% of mental health professionals in Michigan. How can this truly be "protecting the safety" of Michiganders as LARA has stated when it would be leaving thousands of vulnerable michigan residents and their families without help? Michigan already has a severe shortage of mental health providers particularly in rural counties.

https://www.mlive.com/news/g661-2019/09/0b945778f15035/see-which-michigan-counties-have-highest-lowest-ratio-of-mentalhealth-providers-.html?utm_campaign=mlivedotcom_sf&utm_source=facebook&utm_medium=social

Mental Fitness Center has been in practice in Rochester for over a decade serving local residents with a range of mental health issues. I have been dedicated to helping children, teens and families cope and thrive through severe life stressors including, divorce, grief/loss of a loved one, work and life stage transitions (changing careers, retirement, empty nest, new move,etc.), and interpersonal conflict. I have also treated clients individually for depression, anxiety, OCD, oppositional defiant behaviors, anger issues, and social isolation. I have been very effective in diagnosing and treating my clients and have seen the transformation of my clients through the use of therapeutic techniques and the therapeutic relationship that has been built. already faces a shortage of clinicians to serve the ever growing mental health population. I hope that you value mental health and understand the need for access to mental health services is greatly needed in light of our current opioid epidemic, rising teen depression, and suicide rates rising.

Lastly, I want to add a few important points to consider:

- 1.) LPC's have been practicing "as is" for 30 years without incident or complaint.
- 2.) There is a discrepancy between statute (Public Health Code) and LARA rules that needs to be fixed, HB4325 will do that!
- 3.) Thousands of people will be without mental health care and thousands (LPC's) will be without jobs if LARA changes the rules as proposed. A study by Altarum this summer already found that 650,000 people in Michigan with mental health issues are not being treated!
- 4.) There has been confusion with the quality of our professional supervision compared to other health professionals. Here are the requirements for clinical supervision for the helping profession licenses here in Michigan. As you can see they are equivalent between LPC, LP, and LMSW:

-LPC: 3,000 hours post-degree + the 700 hours completed during grad school

-LMSW: 4,000 hours post-degree

-LP: 2,000 hours during grad school, 2,000 hours post-degree

-LMFT: 300 hours during grad school and 1,000 hours post-degree

5) Research consistently shows there are no differences in client outcomes among the professional disciplines.

6) Counselors complete intensive coursework specifically covering therapy techniques and theories, diagnosis and case conceptualization and testing and assessment. In addition to coursework, counselors have to apply techniques learned with clients from the community in a supervised lab environment. This is followed by completion of field experience for another 2 semesters at an internship site.

I kindly urge you to do the following:

REJECT LARA's proposal that would deny us from diagnosing, billing, and supervising (all things our profession has been doing for the past 30 years) that would make it near impossible for counselors to practice.

PASS HB 4325 that simply codifies into law what we have already been practicing for the past several decades. It is NOT an expansion of our scope of practice in any way.

I sincerely appreciate you taking a few minutes to listen to my concerns and hope that you will become an ally for those in need of mental health services.

Sincerely,

Katherine Christensen, LLPC

248-250-2966

Eddie Sleeper

From: Judy Jacobs PhD <judyjacobsphd@gmail.com>
Sent: Tuesday, October 1, 2019 11:23 AM
To: Eddie Sleeper
Subject: HB4325 Written Testimony

Dear Mr. Sleeper- I am writing to you a short note to implore you to pass this particular bill. If it is not passed and the Licensed Professional Counselors' ability to diagnose and treat patients with mental health disorders will have devastating effects on this State. There are 10,000 LPCs in this State- think about the numbers of patients we see every day and help with their particular problems- who would they see if we are not available? The ripple effect to the mental health care system, as well as the State's economic viability would be great, especially if the preponderance of us are out of work.

So, Mr. Sleeper, please consider the devastating effects if this bill is not passed. Thank you for your time-
Judy Jacobs, PhD, LPC
248-310-5973

Eddie Sleeper

From: Josh Santiago <mr.joshsantiago@gmail.com>
Sent: Tuesday, October 1, 2019 11:26 AM
To: Eddie Sleeper; Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Bronna Kahle (District 57); Rep. Jason Wentworth (District 97); Rep. Rebekah Warren (District 55); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Kevin Hertel (District 18)
Subject: Support HB4325

Joshua Santiago MS
Assistant Registrar
125 Woodland Drive, Negaunee MI
906-250-6782
mrjoshsantiago@gmail.com

October 1, 2019

Dear members of the Ways and Means Committee:

I am emailing you today because I cannot attend the Ways and Means Committee meeting this week but I would like to submit a testimony in my absence. Although I am not an LPC or LLPC this affects my community greatly. Living in a rural area with limited access to mental health care, both LPC and LLPC's help our community greatly. We often have to refer students from our campus-counseling center to our local LPCs for student mental health. Even then both campus and local waitlists are full. Our community could not support the loss of these counselors. The LPC and LLPC ability to diagnose allows our community to visit these counselors as a health service, allowing the use of insurance.

For counselors of Michigan, and citizens who struggle with Mental Illness I am asking you to please support House Bill 4325.

Additionally, some have described that individuals with an LPC/LLPC in the state of Michigan do not have the proper education to diagnose, treat and counsel clients with various diagnoses. This is simply not true. While some University Programs vary slightly I would like to point out that Western Michigan University's Counselor Education programs (who attain LLPC/LPCs after graduation) and are accredited by CACREP take the following classes relevant to this argument: Psychopathology (class which covers both diagnosing and treatment), Counseling Techniques and Group Dynamics and Procedures (Covers Group Counseling Techniques/Treatment). Additionally, they are required to take Counseling Practicum which is under the supervision of fully licensed faculty and includes a minimum 40 hours Direct-Client hours as well as almost 100 hours reviewing video-tape of counseling sessions, writing case notes, discussing cases with supervision and researching diagnoses/treatments to best meet client's needs. After students complete this they then are required to complete a Field Practicum (internship) which is an additional 600 hours as working in the counseling field (240 hours must be directly working with clients). This education is comparable to other Masters-level clinicians including LMSW and LLP. You can review WMU's Counselor Education requirements here: <https://wmich.edu/sites/default/files/attachments/u1635/2019/masters%20handbook%20August%202019%20v17%20%282%29%20Final.pdf>

After one attends a program similar to that of WMU's there are additional hours of highly supervised work that LLPs, MSWs and LPCs need to complete. This includes diagnosing and counseling techniques being supervised, often videotaped and reviewed by fully licensed clinicians. Below are the requirements:

LPC: 3,000 hours post-degree

LMSW: 4,000 hours post-degree

LP (PhD-level psychologist): 2,000 hours post-degree

LLP (Master's degree-level Limited License in Psychology): 2,000 hours post-degree

As you can see the hours of supervision vary but they are very comparable and therefore are all qualified to provide treatment including using techniques and diagnosing.

The proposed policy changes by LARA would be devastating to the state of Michigan. This would leave over 10,000 counselors without jobs. Some have private practices which are small businesses and could not survive this detrimental blow to their scope of practice. Most importantly, over 150,000 clients would lose their mental health provider leaving them without support to treat their symptoms of mental illness. Many settings that provide counseling are OVERWHELMED with clients/patients. Waitlists are common practice and hospitals are usually unable to care for patients longer than necessary. As it is currently, the state of Michigan is already in a state of MENTAL HEALTH CRISIS and this would only increase that exponentially. Again please support House Bill #4325.

Thank you so much for your time and your service to Michigan.

Josh Santiago

Eddie Sleeper

From: Kayla Thrushman <kaylathrushman.we@gmail.com>
Sent: Tuesday, October 1, 2019 11:31 AM
To: Eddie Sleeper
Subject: Fwd: HB 4325

----- Forwarded message -----

From: Kayla Thrushman <kaylathrushman.we@gmail.com>

Date: Tuesday, October 1, 2019

Subject: HB 4325

To: BrandtIden@house.mi.gov, JimLilly@house.mi.gov, EricLeutheuser@house.mi.gov, BethGriffin@house.mi.gov, RogerHauck@house.mi.gov, BronnaKahle@house.mi.gov, JasonWentworth@house.mi.gov, RebekahWarren@house.mi.gov, wendellbyrd@house.mi.gov, SheldonNeeley@house.mi.gov, KevinHertel@house.mi.gov

Kayla Thrushman, MA, LLC

981 E Woodruff Ave., Hazel Park, MI, 48030

(248) 804-5984

Kaylathrushman.we@gmail.com

09/28/2019

Dear Representative/Senator,

I am writing to express my strong opposition to the Michigan Department of Licensing and Regulatory Affairs' proposed rule change: 2019-063 LR. These proposed changes would repeal nearly the entire scope of practice for Licensed Professional Counselors (LPCs) in the state of Michigan. Without a clearly defined scope of practice, LPCs like myself will be unable to play our vital role in mental health treatment in the state.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751. These are rules that have been recognized as part of the scope since they were first promulgated after the passage of the Licensed Professional

Counselor statute in 1988. Instead, the department insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. Included in this repeal is the practice of “counseling techniques” and the related ability to “diagnose and identify the problem”.

If these proposed rule changes are adopted, my scope of practice will be limited so severely that insurance companies will likely cease reimbursing me for any services. At a time when mental health is a growing concern in the state, we should not be imposing rules that would limit the number of available providers. These changes in scope would also put Michigan’s LPCs in violation of the American Counseling Association’s Code of Ethics (E.5.a. Proper Diagnosis), which requires the proper diagnosis of a client’s mental disorder before treatment, and could subject them to permanent expulsion from the profession.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. This training is a national standard for professional counseling. Again, if this rule is rescinded, counselors who provide supervision without training would be practicing in violation of the ACA’s Code of Ethics (F.2.a Supervisor Preparation). Furthermore, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving.

I urge you to support **HB 4325**, which would protect the work of over **10,000** licensed professional counselors in the state of Michigan, preserving access to needed mental health care for an estimated **150,000** Michiganders when it is needed more than ever. **HB 4325** rectifies this problem by updating the language of the Public Health Code to reflect the current training and practices of LPCs in Michigan, while bringing the code into alignment with the national standards for professional standards. Your support of **HB 4325** would not change the scope of practice for LPCs in the state of Michigan, rather it would codify the privileges that LPCs currently perform.

There has been controversy and misinformation regarding the educational and supervision training and requirements of Professional Counselors. As an LPC, I completed a **76 credit Graduate-level Master’s CACREP** program of study at Wayne State University that included the following courses: **Career Development and Counseling,**

Psychiatric Treatment and Planning, Theories of Counseling, Group Counseling, Human Development, Techniques of Counseling, Counseling Practicum, and a year long Counseling Internship. According to Wayne State University's Clinical Mental Health Counseling program, individuals who complete the program have the following qualifications and career opportunities: "The Clinical Mental Health Counseling (CMHC) concentration is intended to train professional counseling generalists. Typically, students completing this concentration are employed in public and private mental health settings, employment agencies, youth service bureaus, human resource development agencies, employee assistance programs, hospice organizations, post-secondary educational settings, correctional institutions, welfare departments, local community service agencies, and religious institutions. Students are encouraged to use elective courses and their practicum and internship clinical experiences to develop additional areas of specific expertise for their preferred setting. Individuals who complete the CMHC concentration receive training in the knowledge and skills necessary to work with clients to promote mental wellness across the lifespan. Students who complete the CMHC concentration are eligible to apply for licensure as professional counselors (LPC), provided they fulfill state mandated requirements, which include passing a background check and licensure exam and completing supervised hours as a Limited Licensed Professional Counselor (LLPC)" (<http://coe.wayne.edu/tbf/counseling/ma-index.php>). After completing this program and my provisional license was granted, I was required to complete a minimum of 3,000 hours with 100 supervision hours over a period not less than 2 years and must pass the National Counselor Exam before being granted full licensure. I recently have completed these requirements and have been studying and planning to take the NCE in order to receive my Professional Counseling License.

I grew up in Lake Orion, Michigan. At a young age, I had an empathetic positive regard for others and I've always had a strong passion for helping my community. Since 2006, I've lost 13 friends and classmates to suicide and drug related deaths, attended more funerals than I can count, and have personally experienced a close-knit community left in shambles, despair, and sorrow. This community loss and heartbreak that affected so many lives motivated and inspired me to want to help others in my community, especially young individuals experiencing anxiety and depression in order to prevent continuous mental health issues in future generations to come. According to the United States Department of Health and Human Services in 2017 alone, "37%, consisting of 27% male and 48% female adolescents in the state of

Michigan reported they felt sad or hopeless almost every day for 2 or more weeks in a row so that they stopped doing usual activities (during the 12 months before the survey" (<https://www.hhs.gov>).

I've been working as an LLPC at a developing private practice in Oakland County for the last five years consisting of 8 LLPC's and LPC's. We are expected to service 5,000 sessions this year and have over 300 active clients spread over (2) locations. Our outreach covers approximately (6) other townships and we have developed a strong referral base with local schools, shelters, and other health practitioners. I personally currently counsel and treat 48 active clients on a weekly, biweekly, or monthly basis, and I've counseled 74 clients and their families over the past five years specializing in the adolescent population, anxiety and depressive disorders, group counseling, art therapy, ADHD, Autism, developmental disorders, and CBT and other mindful practices. I've also developed a counseling and art therapy program at Crossroads for Youth; a nonprofit treatment agency, serving at least 60 at-risk adolescents over the span of two years. Some personal testimonies from my clients and their families include:

- "She has found a group of friends that are real, and I'm so thankful for that. And her confidence is right up there on most days. You are amazing at what you do! I admire you both professionally and personally."-Anonymous client's parent
- "She loves her time with you and I have seen her blossom and become a more confident, balanced and happy person under your care! Thank you from the bottom of my heart"-Anonymous client's parent
- "Thank you for all of your help, your caring heart. I can't explain how much I truly appreciate you!"- Anonymous client's parent
- "I can't imagine this life without Kayla. She has helped my daughter in ways I thought were not possible. I am so grateful for Kayla! Thank you!" -Anonymous client's parent

If LARA's proposed rule changes were to be implemented, I would fear for the future of our state's mental health, as well as future generations and their families. On a personal level, if bill HB 4325 does not pass or LARA does not reconsider their proposed rule changes, I will be forced to apply for unemployment as I am currently working full

time as an LLPC, and it is my sole source of income. I will also no longer be able to afford to pay my student loan debt of \$90,000, and I will not be able to afford to go back to college to pursue an alternative career choice. In addition, my degree and license issued by LARA would no longer allow me to diagnose individuals or continue to see my clients and bill through insurance; therefore, I do not see why I should be obligated to continue to pay my student loan if I cannot utilize my degree.

Furthermore, I would be forced to unethically abandon my clients and their families; some of which I have developed relationships with for multiple years. LARA's proposed Scope of Practice Rules change would strip thousands of people across the state of Michigan of their current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association's (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that "Counselors do not abandon or neglect clients in counseling." If LPCs cannot bill third party payers because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA's LPC Scope of Practice Rules change. I am extremely passionate about my job as an LLPC in my community and have built connections and therapeutic relationships with all of my clients. Where will they go to receive mental health services if I am deemed no longer qualified to see them?

These proposed changes would devastate the counseling profession in Michigan and leave the hundreds of thousands of Michiganders currently receiving treatment from LPCs in the state with nowhere to turn for help. I urge the House of Representatives, Senate, and Governor to **support and pass HB 4325 WITHOUT AMENDMENTS** to solidify my Scope of Practice to allow me to continue providing quality and much needed mental health care in the state of Michigan. I love my job, my coworkers, and my clients and their families and I am truly passionate about mental health and continuing to help my community for years to come. Thank you for your consideration and I hope that my letter will help inform the Board of Professional Licensing about the negative consequences of LARA's proposed LPC Scope of Practice Rules change. If you desire additional information from me, please contact me via phone at (248) 804-5984 or e-mail: kaylathrushman.we@gmail.com.

Kindest Regards,

Eddie Sleeper

From: Heather Willis-Dixon <heatherwillisdixon@gmail.com>
Sent: Tuesday, October 1, 2019 11:39 AM
To: Eddie Sleeper
Subject: HB 4325 Ways and Means Committee Written Testimony

Heather Willis MA LPC

29460 Marimoor Dr Southfield MI 48076

10/1/2019

Greetings,

Michigan LPCs make up one third of services providers to those who need mental health and substance abuse services. We have been an integral thread of the tapestry of support provided to our citizens. We would like to continue. We have been educated and trained to work in crisis situations, hospitals, communities, private agencies, with seniors, millennials, and children. We work in jails and the VA. We work for the state and counties and with individuals on a one on one basis. We do not want to suddenly abandon the individuals that we have committed to help, potentially over 100,000 people. Please move this out of committee quickly and without amendments.

See below:

The proposed Licensed Professional Counselor (LPC) rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer has significant negative consequences and threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan. As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR). These are rules that have been recognized as part of the LPC scope of practice after the passage of our LPC statute in 1988. LARA insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. This change would artificially limit LPC's current scope of practice.

Included in LARA's repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem." Without these and numerous other definitions, the LPC scope of practice is severely limited. Restricting LPC's scope of practice in this way will most certainly reduce the availability of mental health counseling services in Michigan and at a time when there is a growing demand for these services.

The Institute of Medicine states that there is a “conspicuous lack” of national attention to ensuring sufficient numbers of mental health service providers to Americans. Matters are further complicated by 54% of Michigan counties being designated as a mental health service coverage shortage area by the Health Resources and Services Administration. With the citizens of Michigan currently struggling to get access to counseling services, LARA’s proposed LPC Scope of Practice Rules changes will put all LPCs immediately out of practice and will ensure that the citizens of Michigan will have less access to mental health care.

Further, LARA’s proposed changes in the LPC scope of practice would put LPCs in violation of ACA’s Code of Ethics standard E.5.a. Proper Diagnosis, which requires the proper diagnosis of a client’s mental disorder before treatment. Furthermore, third-party payors will immediately stop paying for the counseling services provided by LPCs because the billing process REQUIRES a diagnosis for a counseling services third party claim to be paid.

This means that when LARA’s proposed Scope of Practice Rules change goes into effect, thousands of people across the state of Michigan will immediately be stripped of current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association’s (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that “Counselors do not abandon or neglect clients in counseling.” If LPCs cannot bill third party payors because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA’s LPC Scope of Practice Rules change.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. If LARA makes the proposed changes, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving. This would occur because supervision training is a national standard for LPCs. Additionally, if LARA makes the proposed changes, counselors who provide supervision without appropriate training (as would now be allowed under LARA’s new proposed changes) would be practicing in violation of the ACA’s Code of Ethics standard F.2.a Supervisor Preparation.

I believe that it is the job of state licensing boards to protect the citizens of the state. LARA’s proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, I would ask that LARA allow the legislative process to provide the necessary changes.

LARA’s proposed LPC Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) must not be adopted. The legislature should instead pass HB 4325, introduced by Rep. Aaron Miller (R Sturgis), which would address legitimate concerns and needed updates and negate the need for LARA’s LPC Scope of Practice Rules changes altogether.

Regards,

Heather L. Willis MA LPC, QMHP, QIDP, CMHP 248.499.2000

Eddie Sleeper

From: AnneMarie Slater <aslater@cac-kent.org>
Sent: Tuesday, October 1, 2019 11:58 AM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Hello Committee Members,

I am writing to urge you to pass HB4325 (unamended) as soon as possible.

The proposed Licensed Professional Counselor (LPC) rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer would have significant negative consequences and threatens the livelihood of all LPCs, as well as the mental health status of clients currently seeing counselors in the state of Michigan. **Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR).** As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Michigan's LPCs desperately need HB4325 to pass, unamended, as quickly as possible. LARA's rule changes could go into effect as soon as November 1st. If this happens, over 150,000 Michiganders will lose their mental health provider. Included in this number are the families I serve as a therapist at the Children's Advocacy Center of Kent County. I provide trauma therapy to children ages 3-18 who have experienced sexual abuse. If there is delay in the passage of HB4325, I could be legally required to cease providing therapy to these children who have come to count on their sessions as a safe place to process and heal from their trauma. To deprive these already underserved children and families suddenly of their trauma therapy is despicable. Our agency already has an extensive waitlist, as do many of the agencies we refer to. If LPCs were to lose the ability to practice, these waitlists would grow exponentially; current clients would have their services interrupted for undeterminable amounts of time; and we would be directly harming one of our most vulnerable populations at a time when they are trying to heal from previous harm.

As it is, Michigan struggles to meet the mental health needs of our population. 54% of Michigan counties are designated as a mental health service coverage shortage areas by the Health Resources and Services Administration. There are approximately 10,000 Licensed Professional Counselors in our state who need your help to continue addressing the mental health needs of your constituents.

I cannot emphasize the urgency of this matter enough. HB4325 in its current form addresses the concerns that have been brought forward by LARA. Passage of this bill would negate the effort to strip Michigan's LPCs of their ability to practice as mental health therapists. This ability has been earned and established as a part of LPCs' scope of practice since the passage of our LPC statute in 1988. This is what we were trained for in our Master's level studies. It's what we put to use under supervision in practicum, internship, and 2 years of limited licensed practice. We are qualified to diagnose and treat mental health disorders. We just need your support. **Pass HB4325 to legally reflect the Michigan LPCs' scope of practice that has been in place for over 30 years.**

Thank you for your consideration.

AnneMarie Slater, LPC



children's
ADVOCACY CENTER
OF KENT COUNTY

Anne Slater, LPC | Therapist

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Eddie Sleeper

From: Jordan Bont <jordanbont@gmail.com>
Sent: Tuesday, October 1, 2019 12:06 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Ways and Means Committee Members,

I am a Licensed Professional Counselor (LPC) in Newaygo County. For those of you who may not know where Newaygo County is, hold out your left hand and look at where your pinky finger meets your ring finger. I grew up in this County and returned along with my wife after we had completed graduate school. I currently work for a small not for profit organization. My clients range in ages from 7 to 70. I meet with students in several schools throughout Newaygo County, provide counseling one day every week in an adult day care facility, and have in-office appointments as well. My clients depend on me to help them process the many issues they face, from severe depression and anxiety to relationship issues and everything in-between. I have worked in the school systems for the past two years and have been overwhelmed with the significant occurrence of school related anxiety in children as young as first graders. Every day I am faced with a lack of resources as I see families struggling just to make ends meet, not to mention address their significant mental health issues. There are not enough counselors and social workers in my county currently to meet the demand for mental health services.

Recently I became aware that my license is at risk of being stripped of the scope of practice that has been in place for the last 30 years in Michigan. LARA is moving forward with restricting my ability to diagnose and treat mental illness (psychotherapy) due to the incorrect belief that these necessary services are out of my scope of practice. In order to obtain my LPC in Michigan, I had to complete 4 years of undergraduate school, 2 years of graduate school in a qualifying program (which included training in diagnoses and psychotherapy), and work under the supervision of a fully licensed counselor for an additional 2 years. If eight years dedicated to the pursuit of education and training in the field of counseling is not enough to make diagnosis and psychotherapy within my scope of practice, what is?

Unless HB4325 passes before the changes proposed by LARA take effect, I will no longer be able to provide counseling services to the people in Newaygo County who need it the most. Please, for the sake of my clients and the clients of the other 10,000 LPCs in Michigan (which have been estimated to be between 150,00 and 300,000 people), allow HB4325 to pass through your committee without revisions so that it can be presented for a vote in the House of Representatives as soon as possible. Without your action, this state will soon face a mental health crisis and hundreds of thousands of people will be left without mental health services.

Thank you for your consideration.

Sincerely,

Jordan Bont, MA, LPC

Phone: (231) 519-1693

E-Mail: jordanbont@gmail.com

Eddie Sleeper

From: Garvelink,Courtney <courtney.garvelink@kentcountymi.gov>
Sent: Tuesday, October 1, 2019 12:12 PM
To: Eddie Sleeper
Subject: HB4325 - Ways & Means Committee Written Testimony

Good Morning,

I am writing in support of Michigan's counselors and HB4325.

I am a licensed professional counselor (LPC) and have worked with Michigan's most at-risk populations.

I began my professional career serving as a crisis mental health provider at West Michigan CMH (Lake, Mason, Ocean Counties) and N180 CMH (Kent County), and currently, I work with at risk juveniles in Kent County. I also have additional training as an advanced substance abuse counselor. My education, supervision, continued education and years of experience qualifies me to do this work.

I have grave concern for LARA's drastic rule changes for LPC's and fear how these will impact the mental health services of Michiganders. LPC's play a vital role in meeting the mental health needs of those in our state, and these changes would limit LPC's ability to provide for them.

I urge/plead with you to move HB4325 out of committee ASAP without amendments.

Sincerely,

Courtney Garvelink MA LPC CAADC

Eddie Sleeper

From: Heidi Weipert <heidi@heidiweipertcounseling.com>
Sent: Tuesday, October 1, 2019 12:16 PM
To: Eddie Sleeper
Subject: Ways & Means Committee Written Testimony

Dear Committee:

Please support HB 4325 without amendments! The mental health of our communities is at increased risk should LARA's proposed rule changes take effect before HB 4325, without amendments, is signed by the Governor. If this were to occur, it would make it illegal for LLPCs (Limited Licensed Professional Counselors) and LPCs (Licensed Professional Counselors) to diagnose or use counseling techniques. LLPCs and LPCs would also be unable to "bill under" another provider (as has been allowed in the past) because LLPCs and LPCs would be restricted from using counseling techniques.

I am an LPC. I will have to close my private practice effective 11/1/19 if the proposed rule changes by LARA come to fruition before HB 4325, without amendments, is signed. I will be restricted from practicing professional counseling despite having practiced for over 18 years. Please do not allow this negligence to occur in my community that depends on me! Please do not allow this negligence to occur in other Michigan communities! We need more mental health services, not less!

If HB 4325, without amendments, is signed by the governor before LARA's proposed rules go into effect, then the LLPC/LPC scope of practice will be defined, as will counseling techniques and supervision. Passing HB 4325, without amendments, will negate the need for LARA's proposed rule changes. *HB 4325, without amendments, does NOT expand LLPCs and LPCs scope of practice. It only solidifies what we have already done for over three decades.*

LLPCs and LPCs are well educated, trained and work hard! To obtain our licenses, we have met LARA's criteria for licensure at the time of application for renewal of licensure. For those of us who are board certified (NCCs), we have met additional certification qualifications for this national credential.

LLPCs and LPCs work hard to help heal mental illnesses throughout Michigan. We are also working hard to advocate for our right to practice as we have been doing for over three decades! We are working hard to save our small businesses and our jobs! We are working hard to advocate that our communities have access to mental health services by keeping LLPCs and LPCs practicing as they have been! Please support HB 4325, without amendments, and support ALL of this hard and necessary work done by your local LLPCs and LPCs! ***I strongly encourage that you support HB 4325 without amendments as sponsored by Representative Miller!***

Thank you in advance for considering my viewpoints and the sincerity of my request.

With Respect,

Heidi D. Weipert, MA, LPC, NCC, ACTP, DCMHS-T
MI State Licensed Professional Counselor (#6401007895; Exp. 05/31/2021)
Nationally Board Certified Counselor (#71129; Exp. 01/31/2021)
Advanced Certified Trauma Practitioner
Diplomate Clinical Mental Health Specialist in Trauma

Work Address:
218 S. Warren Ave.
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Mecosta County
231-683-2101

Home Address:
16903 Wer Hee Gen Lane
Leroy MI 49655
Osceola County
231-557-0163

Eddie Sleeper

From: Erin Oldford LPC <erinoldford@comcast.net>
Sent: Tuesday, October 1, 2019 12:27 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Please accept the following written testimony as it relates to the HB4325 before the Ways and Means Committee tomorrow, October 2, 2019-

The purpose of this correspondence is to urge you to vote yes on HB 4325 WITHOUT AMENDMENTS.

I am a Licensed Professional Counselor working in private practice in Brighton, Michigan. My education and training includes thousands of hours of evidence-based instruction and supervision in **assessing and testing, diagnosing, psychotherapy skills** and theories and treatment planning (and more!) as they relate to mental and emotional disorders. I completed 700 hours of internship and practicum, 3,000 hours and two years of in-practice supervision, passed 3 mandatory and rigorous board exams, 2 state required and 1 national. I'm a nationally certified counselor and complete hundreds of hours of continued education to maintain that certification. I am highly qualified to diagnose and treat mental health disorders and have been doing so successfully for 6 years.

In my private practice I see an average of 25 clients per week. I receive calls daily from people in search of mental health care and the wait time to get on my calendar is now at about 6 weeks. I have over 100 clients in my caseload who consist predominantly of adolescents ages 13-25 who suffer from suicidal ideation. Many have attempted suicide and struggle with self-harm caused by depression and anxiety. I also serve clients struggling with depression and anxiety due to challenging and devastating life issues such as grief and loss, divorce, relationship issues, job loss and any of the multitude of life experiences that can be debilitating and life altering. IF LARA's proposed rule changes take effect, I will no longer be allowed to diagnose and treat or bill insurance companies (clients would lose insurance coverage), which would effectively shut down my practice and my 100 clients will lose their mental health provider. Please understand that the therapeutic relationship between a counselor and client is the cornerstone of effective treatment. I have been working with many of my clients for several years. Being suddenly cut off from an extremely important source of support would be nothing short of catastrophic for them. **Literally thousands of Michigan residents stand to lose their mental health provider.**

Additionally, LARA's Small Business Impact Statement **falsely claims the proposed changes will have no impact on small businesses.** In fact, thousands of Licensed Professional Counselors will lose their livelihood, their means of income which they devoted hundreds of thousands of dollars and hours (literally blood, sweat and tears) towards education, certification, supervision, etc. to achieve licensing in the state of Michigan. We are first and foremost concerned for our clients, but we are also deeply concerned for our own welfare and the welfare of the families we support. The ramifications of the LARA proposed changes are far-reaching and catastrophic.

It is my understanding that there are some discrepancies between statute and rules as they apply to LPC's that need to be addressed as a matter of clarification and practicality. **HB4325 effectively codifies/clarifies what counselors have been educated, trained and certified to do and have been practicing for 30 years, INCLUDING DIAGNOSIS AND PSYCHOTHERAPY.**

PLEASE help see this bill and its passage through legislation AS IS to make sure hundreds of thousands of Michigan residents can continue to receive effective, quality mental health care!

Thank you for your consideration in this matter.

Respectfully,

Erin R. Oldford

Erin R Oldford MA, LPC, NCC

150 N. First St., Suite 400
Brighton, MI 48116
Ph: 248.255.5172

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Eddie Sleeper

From: Jennifer Feil <jenniferfeil08@gmail.com>
Sent: Tuesday, October 1, 2019 12:38 PM
To: Eddie Sleeper
Subject: Support HB 4325

Jennifer Feil, MA, LLPC
32767 Oakville Dr.
Chesterfield, MI 48047
586-322-4108
jenniferfeil08@gmail.com

Dear Representative Edward Sleeper,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will severely limit the scope of practice of LPCs - LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will codify some provisions of counselors' scope of practice that have been in rules and in practice since the law was passed in 1988. The key provision in these long standing rules is the ability to diagnose, for which counselors receive substantial training. New directives affecting LARA require that scope of practice is codified in legal statute, rather than Administrative Rules. The bill in no way changes counselors scope of practice or who is eligible for licensure. The passage of this bill is vital to retaining strong mental health services for Michigan residents.

Please pass HB 4325 without amendment as quickly as possible. I thank you for your time.

Most Respectfully,
Jennifer Feil, MA, LLPC



Eddie Sleeper

From: leann austin <leannaustin15@gmail.com>
Sent: Tuesday, October 1, 2019 12:39 PM
To: Eddie Sleeper
Subject: Hb 4325

Dear Representative Sleeper,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,
Leann Austin, LPC

120 E. Hampton Rd.

Essexville, MI 48732

Eddie Sleeper

From: Michelle Harrast <michelleharrast@gmail.com>
Sent: Tuesday, October 1, 2019 12:39 PM
To: Eddie Sleeper
Subject: HB4235 Ways & Means Committee-Written Testimony

Good afternoon Ways & Means Committee,

I am writing to encourage the committee to move the bill out of committee as soon as possible without amendments. Your support of licensed professional counselors and their clients is critical at this time. Thousands of mental health clients will be negatively impacted if LPCs are no longer allowed to diagnose mental health disorders.

I am completing my MA in Mental Health Counseling from Central Michigan University in December 2019. I would appreciate being able to practice in the state of MI. If LARA changes the rules for LPCs, I do not see how counselors would be able to effectively practice. For the past 30 years, LPCs have diagnosed presenting concerns and offered effective psychotherapy techniques for their clients. As a student, I have been taught that in order to work on a mental health disorder, the client and the professional counselor need to understand the symptoms as well as, the duration, intensity and frequency of the presenting concerns. If counselors are not allowed to communicate with clients about diagnosis, they will be severely hampered in their ability to support and assist clients with their presenting problems.

I would assume that the members of this committee are concerned for the well-being of the thousands of clients currently being served by LPCs. If LARA's rules are ratified, many clients will be cut off from mental health support and effective psychotherapy treatment. I would assume that the safety and well-being of mental healthy clients would be a priority for LARA as well as the members of this committee.

I encourage the Ways & Means Committee members to pass HB 4235 out of committee as soon as possible WITHOUT AMMENDMENTS.

Your support and advocacy are critical. Please address these concerns appropriately and encourage the vote for HB4325 to support the LPCs of MI as well as their 150,000 + Michigan residents. Please know that your dedicated service is appreciated. Thank you for your attention to this matter.

With concern,
Michelle Harrast

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Michelle M. Harrast
Graduate Assistant, Central Michigan University
Counselor in Training, CMU Counseling Center
Public Relations Coordinator, Mu Kappa Chapter of Chi Sigma Iota
michelleharrast@gmail.com

Eddie Sleeper

From: brandi.kennedy09@gmail.com
Sent: Tuesday, October 1, 2019 12:43 PM
To: Eddie Sleeper
Subject: FW: HB4325 - Ways and Means Written Testimony

Good afternoon,

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

I have Masters degrees both in Counseling and Clinical Psychology. Due to technicalities imposed by LARA, I'm now at risk of not being able to practice psychotherapy with either degree. (Although, I possess all the educational requirements, I'm unable to receive my (T)LLP due to a LARA change that occurred in 2017, but that's another testimony for another time). CACREP-accredited institutions, such as Oakland University, requires coursework in diagnosis as well as counseling techniques. These institutions also require practice and implementation under supervision with the 100 hour practicum and 600 internship, along with the 3000 hours of supervision with the Limited License. Having completed all the required clinical coursework in Clinical Psychology at the Ph.D. level, I do not believe my coursework received at the Counseling level was lacking. LPCs are qualified to diagnosis and treat mental health conditions. Please pass this bill without amendments, so LPCs can continue the work they have been doing for over 30 years. We are in a mental health crisis with suicides and opioid addictions on the rise, now is not the time to remove qualified individuals from the front line.

Most Respectfully,
Brandi Kennedy, MA, LLPC

Eddie Sleeper

From: Meghan Parvin <MeghanP@lbscares.com>
Sent: Tuesday, October 1, 2019 12:54 PM
To: Eddie Sleeper
Subject: HB4325-Ways and Means Committee Written Testimony

Dear Edward Sleeper

I am writing to implore you to pass HB 4325 without amendment as quickly as possible. At stake are the livelihoods of 10,000+ Licensed Professional Counselors (LPCs) and the well-being of over 150,000 mental health therapy clients that depend on these counselors for treatment. Moreover, every LPC and every mental health therapy client has a family that will be affected by your decision as well.

I am a Licensed Mental Health therapist and Intake Coordinator at a Community Mental Health agency in Wayne County. From the perspective of a clinician that works with severe and persistent mental health the clients that will be affected is devastating. These individuals that fit this criteria are the most vulnerable and often overlooked. They rely on having available and knowledgeable clinicians that can help them through this dark time in their lives. This change of the scope of practice for LPCs would most likely result in a substantial increase in hospitalizations and incarcerations which impact financially the the State of Michigan. The majority of these individuals have government insurance.

The Department of Licensing and Regulatory Affairs (LARA) is currently working toward implementing rules that will change the scope of practice for LPCs – so severely limiting the scope that LPCs will no longer be able to diagnose or provide psychotherapy services. These proposed rule changes could be in effect as early as November of this year immediately rendering Michigan's 10,000+ LPCs unable y also result in increase hospital to legally practice in our state. This means most LPCs will immediately be out of work including those who work in: emergency rooms, counseling agencies, private practices, substance abuse rehabilitation, Community Mental Health (over 25% of their therapists are LPCs), veterans, inpatient/outpatient detoxification, mental health facilities and agencies, residential care facilities, half-way houses, geriatric related facilities, VA medical hospitals and outpatient clinics, rehabilitation centers, correctional facilities and prisons. This will leave hundreds of thousands of Michigan residents without the mental health treatment they need which will result in a statewide mental health emergency.

Our nation is facing a mental health crisis. There simply aren't enough counselors and other mental health professionals to meet the burgeoning demand for services, according to a recent analysis by the U.S. Health Resources & Services Administration (HRSA).

HRSA estimates nationally we need to add 10,000 providers in each of seven separate mental healthcare professions by 2025 to meet the expected growth in demand.

In Michigan there are nearly 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. The majority of these individuals are not receiving the care they need. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

There is a misconception that HB 4325 would expand LPCs' scope of practice, but this is not true. Rather, HB 4325 will clearly put into law LPCs' current scope which has been in place for the past 30 years.

Please pass HB 4325 without amendment as quickly as possible. Lives are at stake.

Most Respectfully,

Meghan Parvin, MA LPC, NCC

41175 E Village Green Blvd

Canton MI 48187

Sent from my iPhone

Eddie Sleeper

From: Timothy Cole <tcole@gocavs.net>
Sent: Tuesday, October 1, 2019 12:55 PM
To: Eddie Sleeper; Jim Lilly; Brandt Iden; Eric Leutheuser; Beth Griffin; Bronna Kahle; Jason Wentworth; Rebekah Warren; Wendell Byrd; Sheldon Neeley; Kevin Hertel
Subject: Support for HB 4325

Good Afternoon,

I am writing to you in an effort to encourage your support for House Bill 4325, which would define the scope and practice of Licensed Professional Counselors (LPCs). As an LPC for the past 8 years, I have worked as an outpatient therapists as well as a crisis intervention specialist for a local Community Mental Health Authority. My experience in the counseling field has always involved the scope of diagnosis and therapeutic techniques. My professional training began in graduate school with a specific course devoted to consultation and diagnosis. The purpose of this course was to train us in using the Diagnostic and Statistical Manual (at that time, the DSM-IV TR) as a tool in assessing our clients and developing appropriate treatment plans. This course, however, was just the beginning. In my practicum and internship experiences, I worked under the supervision of a trained clinician, honing my skills in completing intake assessments and providing provisional diagnoses that were later refined as we progressed in the counseling relationship. I continued to receive supervision upon graduation until I had accrued enough hours to apply for my full license. Full licensure as and LPC in the state of Michigan includes passing the National Counseling Exam (NCE); an exam which includes a section on diagnostic and assessment services.

In my professional career, I am continuously receiving continuing education that deepens my understanding of the nuances involved in diagnosing clients. Most recently, I attended a two-day training on Motivational Interviewing, a research-based practice that enables clinicians to develop rapport while gathering essential information from the client and establishing goals based on the client's needs. These experiences build upon my training and help me become a better clinician.

I currently work part-time for a company that contract with our local community mental health authority as a crisis intervention specialist. I screen consumer who present to our local emergency room with severe mental health concerns, assessing their needs and determining if inpatient placement is appropriate. Every step of my job relies on my ability to diagnose and provide therapeutic options to my consumers. For many of these individuals, the stakes could not be higher.

While this has been an incredibly stressful time for me and my colleagues, one thing I am grateful for is that it has allowed us to shine a light on the important work that we as Licensed Professional Counselors do. Our work, which includes diagnosing and providing therapeutic techniques to our clients, helps to improve the lives of those in our community and state. Please take this opportunity to help us continue the struggle in providing quality mental health care for all Michiganders.

Sincerely,

Timothy Cole

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Timothy Cole, MA, LPC
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Eddie Sleeper

From: Brown, Kathryn A <brown4ka@cmich.edu>
Sent: Tuesday, October 1, 2019 12:59 PM
To: Eddie Sleeper
Subject: HB4325 - Ways and Means Committee Written Testimony

Clerk Sleeper,

I am writing this letter to ask the Ways and Means Committee to please oppose LARA's proposed changes to LPC scope of practice rules, and instead support the passing of HB 4325 without amendments.

I am a Licensed Professional Counselor at Center of Hope Counseling in Mount Pleasant, Michigan. Additionally, I am a National Certified Counselor, a Certified Clinical Trauma Professional, and am working on obtaining certification as an Eating Disorder Specialist as well as certification in EMDR (for trauma treatment). Throughout my years of experience, I have successfully diagnosed and treated hundreds of individuals who have struggled with various mental health issues. My advanced training and ongoing educational experiences in evidence-based practices and theories, including diagnosing, make myself as well as other LPCs qualified to provide professional and effective treatment.

At Center of Hope Counseling we specialize in treating Eating Disorders, PTSD, anxiety, and depression. We serve several hundreds of clients and have a waiting list for our services. Eating disorders have the highest mortality rate of all mental illnesses. I am extremely concerned that if LARA's proposed changes to LPC's scope of practice passes that this would be tragic and potentially life-threatening for the clients we are currently treating. Our clients, amongst countless people, would have to find alternative services after having already established positive relationships and rapport with their current qualified providers. This would place added stress and consequences on an already vulnerable population of people especially given that Michigan already has a limited number of mental health professionals. Some people may therefore choose to go without services altogether which, of course, negatively affects not only the individual, but so many more on a systemic levels. Other consequences would include increased suicide rate and unemployment levels thus creating legal disputes and mental health and financial crises.

The work of counselors is imperative in the socioeconomic health of the State of Michigan, and compromising an entire profession's ability to do the work they have been doing for decades is not only absurd but will render profound economic ramifications.

Again, I ask that you strongly consider opposing LARA's proposed changes and instead, support the passing of HB 4325 without amendments.

Thank you for your time and consideration.

Kathryn Brown, MA, LPC, NCC

Eddie Sleeper

From: Mallori Hayden <mallorihayden5@gmail.com>
Sent: Tuesday, October 1, 2019 1:01 PM
To: Eddie Sleeper
Subject: HB 4325--Written testimony

Dear Ways and Means Committee:

I am writing to respectfully ask that the Ways and Means Committee move HB 4325 out of committee ASAP and with no amendments. The proposed Licensed Professional Counselor (LPC) rules changes formally submitted by the Department of Licensing and Regulatory Affairs (LARA) this summer has significant negative consequences and threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan. As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via Counseling – General Rules (ORR 2019-063 LR). These are rules that have been recognized as part of the LPC scope of practice after the passage of our LPC statute in 1988. LARA insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. This change would artificially limit LPC's current scope of practice.

Included in LARA's repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem." Without these and numerous other definitions, the LPC scope of practice is severely limited. Restricting LPC's scope of practice in this way will most certainly reduce the availability of mental health counseling services in Michigan and at a time when there is a growing demand for these services.

The Institute of Medicine states that there is a "conspicuous lack" of national attention to ensuring sufficient numbers of mental health service providers to Americans. Matters are further complicated by 54% of Michigan counties being designated as a mental health service coverage shortage area by the Health Resources and Services Administration. With the citizens of Michigan currently struggling to get access to counseling services, LARA's proposed LPC Scope of Practice Rules changes will put all LPCs immediately out of practice and will ensure that the citizens of Michigan will have less access to mental health care.

Further, LARA's proposed changes in the LPC scope of practice would put LPCs in violation of ACA's Code of Ethics standard E.5.a. Proper Diagnosis, which requires the proper diagnosis of a client's mental disorder before treatment. Furthermore, third-party payers will immediately stop paying for the counseling services provided by LPCs because the billing process REQUIRES a diagnosis for a counseling services third party claim to be paid.

This means that when LARA's proposed Scope of Practice Rules change goes into effect, thousands of people across the state of Michigan will immediately be stripped of current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association's (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that "Counselors do not abandon or neglect clients in counseling." If LPCs cannot bill third party payers because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA's LPC Scope of Practice Rules change.

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. If LARA makes the proposed changes, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving. This would occur because supervision training is a national standard for LPCs. Additionally, if LARA makes the proposed changes, counselors who provide supervision without appropriate training (as would now be allowed under LARA's new proposed changes) would be practicing in violation of the ACA's Code of Ethics standard F.2.a Supervisor Preparation.

It is the job of state licensing boards to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, I would ask that LARA allow the legislative process to provide the necessary changes.

LARA's proposed LPC Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) must not be adopted. The legislature should instead pass HB 4325, introduced by Rep. Aaron Miller (R Sturgis), which would address legitimate concerns and needed updates and negate the need for LARA's LPC Scope of Practice Rules changes altogether.

I hope that my letter will help inform the Ways and Means Committee about the negative consequences of LARA's proposed LPC Scope of Practice Rules change. If you desire additional information from me, please contact me via phone at 517-918-6003 or e-mail mallorihayden@gmail.com.

Sincerely,
Your name and credentials

Mallori Mangus-Hayden, M.A., LPC
A Brand New Start Counseling
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Lansing, MI 48912