

6/13/14

Dear All –

Though I can't be there today, I have asked Ray to read my letter so that it is reflected in the minutes because I think it important to share my perspective as a board member and CPC on the proposed regulations for the expanded scope of practice contained in SB155. I'm sorry this is not timelier. I would have responded earlier but didn't receive a draft of the proposed regulations until yesterday.

Though I can appreciate the time and effort the proposed regulations took, I am both disappointed and disheartened to see the specifics of what has been proposed. They are needlessly onerous. Instead of protecting the public, they will lead to irreparable harm by unnecessarily restricting access to qualified mental health professionals. The public deserves a better balance between the harm that will be done to those unable to access needed services, and striving to achieve acceptable entry-level competence.

I know it may be hard to understand how it is that the proposed policies are so heavy-handed so I will use an example that I hope makes it clear: I have heard complaints and dismay from marriage and family therapists and interns, as well as clinical program directors, that MFTs are not trained in how to do effective group work. Many MFTs become fully licensed without ever understanding core group therapy skills or concepts, or understanding the important differences with the approaches and theories they learned in their graduate studies.

Now let's say the tables were reversed with CPCs holding more seats on the BOE than MFTs, MFTs currently restricted from working with groups, and SB155 detailing an expansion of MFTs' scope of practice to include groups. Would it be any more fair, right, just, or sensible to insist on a similar level of rigor? That is to say, that MFTs would need to take an additional 4 – 6 graduate level courses in group work and ethics, earn another 500 hours of supervised practice counseling groups, and pass a national exam measuring group competencies.

If you feel the answer is "yes," then by all means continue as you are. Consider this before you do, though: 48 states, according to the research I am familiar with, have not gone down the road being proposed. The two professions, though approaching therapy from different perspectives and with different strengths, have recognized that each profession has something of value to offer. They have accorded each other the professional courtesy of not needlessly limiting their respective scopes of practice. Furthermore, they have accepted that at the very least, the other is trained well enough to refer when outside their respective areas of competence. Quality of client care has not been compromised as indicated by similar rates of ethical complaints and malpractice filings against CPCs and MFTs.

I ask that you start from scratch and revisit this. The example hopefully points out a main consideration that has been lost in translation: that MFTs and CPCs are trained to work

with clients from divergent yet complimentary perspectives. To judge one perspective from the other perspective – *without understanding and appreciating the context from which each profession approaches their work* – is a set-up for finding the other lacking.

I would prefer, as has been recognized across the United States, that the expertise and competencies of CPCs be recognized as sufficient for them to work with families and couples. I presume this will not be satisfactory to some on the board. As such, I would support a proposal that allows graduates from CACREP accredited programs since 2009 and who have passed the NCMHCE and/or national MFT exam the ability to work with families and couples, since entry-level competencies are required and assessed.

For older graduates, I would reluctantly support the additional requirements proposed such as additional coursework and supervised hours. I think there are several factors that overreach and/or are problematic, and I would like to say more but, in the interest of brevity, will stop here.

Thank you for your time.

Sincerely,

Erik Schoen, BOE Member