

**SMALL BUSINESS IMPACT STATEMENT**

(NRS 233B.0609)

(updated 11/4/14)

1. Describe the manner in which comment will be solicited from affected small businesses, a summary of the response from small businesses and an explanation of the manner in which other interested persons may obtain a copy of the summary. *(Attach copies of the comments received and copies of any workshop attendance sheets, noting which are identified as a small business.)*

The Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors (Board) will conduct public workshops on September 5, 2014 and December 5, 2014 in Carson City, Nevada and in Las Vegas, Nevada to solicit comments from small businesses. Notice of these workshops will be posted at the University of Nevada Reno Getchell Library, Reno; Grant Sawyer Building, Las Vegas; Office of Attorney General, Carson City; University of Nevada Las Vegas Lied Library, Las Vegas; Clark County District Library, Las Vegas; on the Board's website, [www.marriage.nv.us](http://www.marriage.nv.us), and at the Board office, Las Vegas.

The Workshop notice and the proposed regulation will also be mailed to all county libraries in Nevada as well as to individuals on the Board's mailing lists.

Copies of comments submitted by the Public and from the small businesses will be accessible in the workshop minutes after the workshop on the Meetings Page of the Board's website or obtained from the Board Office directly upon request.

The Minutes of the workshops will contain summaries of the public response to the proposed amendments. A copy of the minutes may be obtained from the Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors, 9436 W. Lake Mead Blvd., Suite 11-J, Las Vegas, NV 89134, 702-486-7388, e-mail to [nvmftbd@mftbd.nv.gov](mailto:nvmftbd@mftbd.nv.gov), or on its website at [www.marriage.nv.us](http://www.marriage.nv.us).

2. The manner in which the analysis was conducted (if an impact was determined).

A survey was sent to all licensed Clinical Professional Counselors (CPC) and Clinical Professional Counselor Interns to determine the impact, if they choose to expand their clinical practice to work with couples and families through an endorsement, on their small business.

(See attached copy of the CPC Endorsement Survey)

At the September 5, 2014 workshop comments were received regarding the potential cost of adding the endorsement which led to the decision to send a survey to all CPCs and CPC-interns. No additional comments were received at the adoption hearing regarding further impact of the regulations on small business.

3. The estimated economic effect of the proposed regulation on small businesses:

a. Both adverse and beneficial effects

The economic effect of the proposed regulation on small business would only be on those CPCs and CPC-interns who choose to expand their scope of practice through the endorsement. The

adverse effect could be the cost of meeting the endorsement requirements. The beneficial effect could be the expansion of scope and additional clients that the CPCs or CPC-interns would be able to see with an endorsement.

Based on the proposed Educational, Supervision and Exam requirements for the CPC Couple and Family Endorsement, the Board examined the range of costs that could be incurred to secure such an endorsement.

A comparison of the educational requirements for CPCs and MFTs revealed a few areas in which the required course content for CPCs and MFTs were totally different. These differences led to the proposed educational requirements with 6 Areas of Study. The potential impact for those wishing to expand their scope of practice is that they will have to document meeting the Areas of Study requirements. For those Areas where they do not have the requisite graduate coursework, CPCs and CPC-interns will need to obtain it. As a result, if they already have the coursework, there would not be an additional expense. However, if they do not, there is the potential expense of tuition for up to 6 courses to meet those requirements.

With regard to clinical experience working with couples and families and corresponding supervision oversight, the Board determined, with feedback from the September 5, 2014 Workshop, that those CPCs and CPC-interns seeking endorsement to work with couples and families will need to document “at least 750 hours of face-to-face couples or family counseling and at least 150 hours of supervision related to that counseling.” As a result, if they can document that they have already obtained such counseling and supervision experience, there would not be an additional expense. However, if they do not, there is the potential expense of up to 150 supervision hours.

With regard to the required exam, if the CPC or CPC-intern has not already taken the National Marriage and Family Therapy Exam produced and overseen by the Association of Marriage and Family Therapy Regulatory Boards (AMFTRB), s/he would have to pay to take the exam.

The adverse effects are the expenses that would be incurred to obtain the necessary course, supervision and exam, as well as the endorsement application fee.

The Board investigated the expenses for coursework from a variety of institutions that could provide the requisite coursework, the cost of supervision and the AMFTRB National MFT Exam fee. The cost to obtain the endorsement will vary based on a combination of costs to meet the requirements which include the application fee (\$75), supervision in conjunction with the accrual of face-to-face client hours (\$30 - \$100/hour supervision fees), educational credits (\$269 - \$943/credit), and the MFT Exam requirements (\$350). Thus the range of the estimated endorsement cost would be from a minimum of \$75 (application fee with the applicant meeting all of the requirements) to a maximum of \$9,577 (low)/\$32,324(high) (with the applicant needing to meet all of the requirements).

(See attached copy of the Estimated CPC Couple & Family Endorsement Costs and also see CPC Endorsement Survey Results)

b. Both direct and indirect effects

The direct effect is those seeking an endorsement will have to apply for the endorsement and provide documentation of meeting the endorsement requirements

The indirect effect is that those seeking an endorsement may have to obtain additional education, supervision and take the National MFT exam, including incurring any associated costs.

4. A description of the methods that the agency considered to reduce the impact of the proposed regulation on small businesses and a statement regarding whether the agency actually used any of the methods. *(Include a discussion of any considerations of the methods listed below.)*

A. Simplification of the proposed regulation

The Board considered the current educational requirements for MFTs working with couples and families and determined what the minimal course requirements would be in order for CPCs and CPC-Interns to demonstrate competency in working with couples. Rather than require all of the courses in the MFT Areas of Study (9), the Board identified 6 courses that could be used to demonstrate competency.

B. Establishment of different standards of compliance for a small business

N/A

C. Modification of fees or fines so that a small business is authorized to pay a lower fee or fine.

N/A

5. The estimated cost to the agency for enforcement of the proposed regulation. *(Include a discussion of the methods used to estimate those costs.)*

The estimated cost to the Board of Examiners for MFTs and CPCs is the cost of staff time to collect and process endorsement applications, conduct Academic Reviews of required coursework, track and verify face-to-face client and supervision hours, and issue and track endorsement certificates.

6. If this regulation provides for a new fee or increases an existing fee, the total annual amount the agency expects to collect and manner in which the money will be used.

The regulation provides for an endorsement application fee. This money will be used to cover staff time. The endorsement application fee is the same amount as a license application fee.

7. If the proposed regulation includes provisions which duplicate or are more stringent than federal, state or local standards regulating the same activity, provide an explanation of why such duplicative or more stringent provisions are necessary.

The Proposed Regulations do not include provisions which duplicate or are more stringent than any federal, state or local standards regulating the same activity.

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8. The reasons for the conclusions regarding the impact of a regulation on small businesses.

The review of the endorsement requirements, including investigating the cost of graduate coursework through various institutions of higher education, as well as the survey of CPCs and CPC interns provided the basis of the conclusions regarding the impact of regulations on small businesses.

I certify that to the best of my knowledge or belief, a concerted effort was made to determine the impact of the proposed regulation on a small business and that the information contained in this statement is accurate.

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Board President

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Date