LCB File No. R091-14

NOTICE OF INTENT TO ACT UPON A REGULATION

NOTICE OF HEARING FOR THE ADOPTION AND AMENDMENT OF REGULATIONS OF THE BOARD OF EXAMINERS FOR MARRIAGE AND FAMILY THERAPISTS AND CLINICAL PROFESSIONAL COUNSELORS

The Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors will hold a public hearing at 10 a.m. on April 29, 2016, connected by videoconference at the following locations: University of Nevada Las Vegas, Systems Computing Services Building, Room 102, 4505 S. Maryland Parkway, Las Vegas, NV 89154 and University of Nevada Reno, Systems Computing Services Building (133), Room 47, 1664 N. Virginia St., Reno, NV 89557.

The purpose of the hearing is to receive comments from all interested persons regarding the adoption and amendment of regulations that pertain to chapter 641A of the Nevada Administrative Code (NAC).

The following information is provided pursuant to the requirements of NRS 233B.0603:

1. The need for and the purpose of the proposed regulation or amendment.

The practice of clinical professional counseling is defined in NRS 641A.065 as the assessment or treatment of couples or families, if the assessment or treatment is provided by a person who, through the completion of coursework or supervised training or experience, has demonstrated competency in the treatment of couples or families as determined by the Board. LCB File No. R091-14 establishes how the Board will determine competency for clinical professional counselors and clinical professional counselor interns in the treatment of couples or families.

Section 2 provides that the Board will issue such an endorsement to a clinical professional counselor clinical professional counselor intern who completes the required coursework, examination and supervised experience.

Sections 3 and 4 list the coursework, examination and supervised experience a clinical professional counselor or clinical professional counselor intern must successfully complete to obtain an endorsement from the Board that authorizes the clinical professional counselor or clinical professional counselor intern to assess or treat couples or families.

Section 5, NAC 641A.035: The proposed changes to NAC 641A.035 are needed to define endorsement.

Section 6, NAC 641A.095: The proposed changes to NAC 641A.095 are needed to clarify how often a failed examination may be retaken and to specify when an application for an endorsement lapses.

Section 7, NAC 641A.111: The proposed changes to NAC 641A.111 are needed so that the Board can issue an interim endorsement permit to an applicant for an endorsement if the applicant holds an equivalent license from another state and the only requirement not yet satisfied is the passing of the examination. The interim endorsement permit allows the applicant to assess or treat couples or families under supervision, and expires if the applicant does not pass the examination.

Section 8, NAC 641A.116: The proposed changes to NAC 641A.116 are needed so that a holder of an endorsement is required to reapply for the endorsement if the licensee allows his or her endorsement to lapse.

Sections 9 and 10, NAC 641A.131 and 641A.133: The proposed changes to NAC 641A.131 and 641A.133 are needed to provide the continuing education requirements for the renewal of an endorsement.

Section 11, NAC 641A.176: The proposed changes are needed to provided that the Board may, for good cause show, grant, deny, suspend or revoke the endorsement of any clinical professional counselor intern.

Sections 12-14, 16 and 17, NAC 641A.243, 641A.256, 641A.258, 641A.441 and 641A.595: The proposed changes to NAC 641A.243, 641A.256, 641A.258, 641A.441 and 641A.595 subject the endorsement of a clinical professional counselor or clinical professional counselor intern to the same professional standards as licensure and provide that the Board may take the same disciplinary measures against the holder of such an endorsement as against other licensees.

Section 15, NAC 641A.306: The proposed changes to NAC 641A.306 are needed to define applicant to include endorsement.

2. A statement explaining how to obtain the approved or revised text of the proposed regulation prepared by the Legislative Counsel pursuant to NRS 233B.063.

A copy of the proposed amendment to the regulation is attached to this notice.

3. The methods used by the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors in determining the impact on a small business prepared pursuant to NRS 233B.0608(3).

The Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors held public workshops on September 5, 2014, December 5, 2014 and April 10, 2015 to solicit comments from small businesses. At the September 5, 2014 workshop, comments were received regarding the potential cost of adding the endorsement, which lead to a survey. The survey was sent to all licensed

clinical professional counselors and clinical professional counselor interns to determine the impact on their small business if they chose to expand their clinical practice to work with couples and families through an endorsement.

4. The estimated economic effect of the regulation on the business which it is to regulate and on the public:

(a) Both adverse and beneficial effects;

The economic effect of the proposed regulation on businesses will be on only those clinical professional counselors and clinical professional counselor interns who choose to expand their scope of practice through the endorsement. The adverse effect would be the cost of meeting the endorsement requirements. The cost to obtain the endorsement will vary based and could range from supervision in conjunction with the accrual of hours (\$30 to \$100 per hour in supervision visits), educational credits (\$269-\$943 per credit hour), and the national examination sponsored by the Association of Marital and Family Therapy Regulatory Boards (\$350). The beneficial effect would the expansion of scope of practice and additional professionals to provide services to members of the public.

(b) Both immediate and long-term effects.

These regulations will have immediate and long-term beneficial effects through the expansion of the scope of practice for clinical professional counselors and clinical professional counselor interns.

5. The estimated cost to the agency for enforcement of the proposed regulation.

The estimated cost incurred by the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors will be the cost of staff time to process applications, conduct academic review of required coursework, verify supervision hours, and issue endorsements.

6. A description of and citation to any regulations of other state or local government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the proposed regulation overlaps or duplicates a federal regulation, the notice must include the name of the regulating federal agency.

The Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors is not aware of any similar regulations of other state or local government agencies that the proposed regulations overlap or duplicate.

7. If the regulation is required pursuant to federal law, a citation and description of the federal law.

The Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors is not aware of these regulations being required by federal law.

8. If the regulation includes provisions which are more stringent than a federal regulation that regulates the same activity, a summary of such provisions.

The Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors is not aware of any similar federal regulations of the same activity in which the regulations are more stringent.

9. Whether the proposed regulation establishes a new fee or increases an existing fee.

These regulations do not provide a new or increase of fees.

Persons wishing to comment upon the proposed action of the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors may appear at the public hearing or may address their comments, data, views, or arguments, in written form, to the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors, P.O. Box 370130, Las Vegas, Nevada 89134, or at the e-mail address: mftbd@mftbd.nv.gov. Written submissions must be received by the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors by April 28, 2016 at 5:00 p.m. If no person who is directly affected by the proposed action appears to request time to make an oral presentation, the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors may proceed immediately to act upon any written submissions.

A copy of this notice and the regulation to be adopted and amended will be on file at the State Library, 100 Stewart Street, Carson City, Nevada, for inspections by members of the public during business hours. Additional copies of the notice and the regulation to be adopted and amended will be available at the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors, 9436 W. Lake Mead Blvd, Suite 11-J, Las Vegas, Nevada, and in all counties in which an office of the agency is not maintained, at the main public library, for inspection and copying by members of the public during business hours. This notice and the text of the proposed regulation are available on the Board's website at www.marriage.nv.gov. This notice and the text of the proposed regulation are also available in the State of Nevada Register of Administrative Regulations, which is prepared and published monthly by the Legislative Counsel Bureau the **NRS** 233B.0653, and on pursuant to http://www.leg.state.nv.us/Register/2014Register/R091-14RP2.pdf. Copies of this notice and the proposed regulation will also be mailed to members of the public upon request. A reasonable fee may be charged for copies if it is deemed necessary.

Upon adoption of any regulation, the agency, if requested to do so by an interested person, either before adoption or within 30 days thereafter, will issue a concise statement

of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

A copy of this notice of intent to act upon a regulation has been mailed to all persons who have requested in writing that they be placed upon a mailing list, which has been kept by the Nevada Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors for this purpose.

This notice of intent to act upon a regulation has been posted at the following locations:

Nevada Board of Marriage and Family Therapists and Clinical Professional Counselors 9436 W. Lake Mead Blvd., Suite 11-K Las Vegas, NV 89134 State Library and Archives 100 North Stewart Street Carson City, NV 89701

Carson City Library 900 North Roop Street Carson City, NV 89701 Churchill County Library 553 South Main Street Fallon, NV 89406

Douglas County Library 1625 Library Lane Minden, NV 89423 Elko County Library 720 Court Street Elko, NV 89801

Goldfield Public Library P.O. Box 430 Goldfield, NV 89013

Eureka County Library P.O. Box 293 Eureka, NV 89316

Humboldt County Library 85 East 5th Street Winnemucca, NV 89445 Battle Mountain Library 625 South Broad Street Battle Mountain, NV 89820

Lincoln County Library 63 Main Street Pioche, NV 89043 Lyon County Library 20 Nevin Way Yerington, NV 89447

Mineral County Public Library P.O. Box 1390 Hawthorne, NV 89415 Pershing County Library 1125 Central Avenue Lovelock, NV 89419

Storey County Public Library P.O. Box 999 Virginia City, NV 89440 Tonopah Public Library 167 Central Street Tonopah, NV 89049

Washoe County Library 301 South Center Street Reno, NV 89501 White Pine County Library 950 Campton Street Ely, NV 89301

SECOND REVISED PROPOSED REGULATION OF THE BOARD OF EXAMINERS FOR MARRIAGE AND FAMILY THERAPISTS

LCB File No. R091-14

AND CLINICAL PROFESSIONAL COUNSELORS

January 22, 2016

EXPLANATION - Matter in italics is new; matter in brackets [omitted-material] is material to be omitted.

AUTHORITY: §§1, 2, 4-8 and 11-17, NRS 641A.160; §§3, 9 and 10, NRS 641A.160 and 641A.180.

A REGULATION relating to mental health; providing for an endorsement to the license of a clinical professional counselor or a clinical professional counselor intern which authorizes the licensee to assess and treat couples or families; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Existing law provides for the licensure by the Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors of clinical professional counselors and clinical professional counselor interns. (NRS 641A.160) The practice of clinical professional counseling is defined in existing law as including the assessment or treatment of couples or families, if the assessment or treatment is provided by a person who, through the completion of coursework or supervised training or experience, has demonstrated competency in the assessment or treatment of couples or families as determined by the Board. (NRS 641A.065) Sections 3 and 4 of this regulation list the coursework, examination and supervised experience a clinical professional counselor or clinical professional counselor intern must successfully complete to obtain an endorsement from the Board that authorizes the clinical professional counselor or clinical professional counselor intern to assess or treat couples or families. Section 2 of this regulation provides that the Board will issue such an endorsement to a clinical professional counselor or clinical professional counselor intern who completes the required coursework, examination and supervised experience. Section 7 of this regulation authorizes the Board to issue an interim endorsement permit to an applicant for an endorsement if the applicant holds an equivalent license from another state and the only requirement not yet satisfied is the passing of the examination. The interim endorsement permit allows the applicant to assess or treat couples or families under supervision, and expires if the applicant does not pass the

examination. Section 8 of this regulation requires the holder of an endorsement to reapply for the endorsement if the licensee allows his or her endorsement to lapse. Section 9 of this regulation provides continuing education requirements for the renewal of an endorsement. Section 11 of this regulation provides that the Board may, for good cause shown, grant, deny, suspend or revoke the endorsement of any clinical professional counselor intern. Sections 12-14, 16 and 17 of this regulation subject the endorsement of a clinical professional counselor or clinical professional counselor intern to the same professional standards as licensure and provide that the Board may take the same disciplinary measures against the holder of such an endorsement as against other licensees.

- **Section 1.** Chapter 641A of NAC is hereby amended by adding thereto the provisions set forth as sections 2, 3 and 4 of this regulation.
- Sec. 2. 1. A clinical professional counselor or a clinical professional counselor intern who seeks an endorsement must submit to the Board:
 - (a) An application completed on a form provided by the Board; and
- (b) Proof of successful completion of the requirements of section 3 of this regulation, including, without limitation, official transcripts from each institution of higher learning he or she attended to complete the requirements of paragraph (a) of subsection 1 of section 3 of this regulation.
- 2. Upon receipt of an application and proof of successful completion of the requirements of section 3 of this regulation from a clinical professional counselor or a clinical professional counselor intern, the Board will issue an endorsement to the clinical professional counselor or clinical professional counselor intern.
- 3. An endorsement issued pursuant to this section is valid for the same term as the license of the clinical professional counselor or clinical professional counselor intern. A clinical professional counselor or clinical professional counselor intern who wishes to renew his or her endorsement must submit to the Board:

- (a) An application for renewal on a form provided by the Board; and
- (b) Proof of completion of any other requirements for renewal prescribed by the Board.
- Sec. 3. 1. To qualify for an endorsement, a clinical professional counselor or clinical professional counselor intern must:
- (a) Except as otherwise provided in subsections 3, 4 and 5, successfully complete at least six graduate level courses, each of which must be worth at least 3 semester hours or 4 quarter hours, and each of which must cover one of the following areas of study:
- (1) Marital and family studies, including, without limitation, couple and family development and dynamics;
 - (2) Marital and family systems theory and systemic therapy approach;
 - (3) Couples counseling;
 - (4) Family counseling;
 - (5) Ethical and legal issues in marriage and family counseling; or
 - (6) Diagnosis and assessment with couples and families.
 - (b) Meet the supervised training or experience requirements of section 4 of this regulation.
- (c) Pass the national examination sponsored by the Association of Marital and Family
 Therapy Regulatory Boards or its successor organization.
- 2. A course may not be used to satisfy the requirements for more than one area of study set forth in paragraph (a) of subsection 1.
- 3. The Board may consider years of clinical experience counseling couples or families in another state in lieu of specific courses required pursuant to paragraph (a) of subsection 1. An

applicant for an endorsement must submit to the Board a request for such consideration at the time of application.

- 4. A clinical professional counselor or clinical professional counselor intern who has a graduate degree in marriage and family counseling from a marriage and family counseling program accredited by the Council for Accreditation of Counseling and Related Educational Programs or its successor organization is not required to complete the course requirements of paragraph (a) of subsection 1 to qualify for an endorsement.
- 5. A clinical professional counselor or clinical professional counselor intern who earned a graduate degree in clinical mental health counseling on or after January 1, 2010, from a clinical mental health counseling program accredited by the Council for Accreditation of Counseling and Related Educational Programs or its successor organization is not required to complete the course requirements of subparagraph (2) of paragraph (a) of subsection 1 in marital and family systems theory and systemic therapy approach to qualify for an endorsement.
- Sec. 4. 1. Except as otherwise provided in subsection 5, upon completion of the educational requirements of paragraph (a) of subsection 1 of section 3 of this regulation, an applicant for an endorsement must obtain supervised training or demonstrate experience in assessing and treating couples or families. Such training or experience must consist of at least 750 hours of face-to-face couples or family counseling and at least 150 hours of supervision related to that counseling, provided by a supervisor who meets the requirements of subsection 3. An applicant may:

- (a) Obtain supervised training through an endorsement internship conducted in this State pursuant to subsection 2 and pursuant to subsection 5, if applicable;
- (b) Demonstrate supervised training or experience conducted outside this State pursuant to subsection 4 and pursuant to subsection 5, if applicable; or
- (c) Demonstrate supervised training or experience which is completed partially outside this State and partially in this State, provided that any hours obtained:
- (1) In this State meet the requirements of subsection 2 or subsection 5, as applicable; and
- (2) Outside this State meet the requirements of subsection 4 or subsection 5, as applicable.
- 2. Except as otherwise provided in subsection 5, before starting a supervised training endorsement internship pursuant to paragraph (a) of subsection 1 in this State, a clinical professional counselor or clinical professional counselor intern must submit to the Board:
 - (a) An endorsement internship proposal on a form prescribed by the Board; and
- (b) A contract for an endorsement internship with a supervisor who meets the requirements of subsection 3.
- 3. For the purposes of this section, a person is qualified to supervise a clinical professional counselor or clinical professional counselor intern seeking to complete the supervised training or experience required pursuant to subsection 1 if the person is:
- (a) Designated by the American Association for Marriage and Family Therapy or its successor organization as an Approved Supervisor;

- (b) A marriage and family therapist who has been designated as a primary supervisor approved by the Board pursuant to NAC 641A.182;
- (c) A marriage and family therapist who the Board has determined possesses qualifications that are substantially equivalent to the qualifications required for a primary supervisor approved pursuant to NAC 641A.182; or
- (d) A clinical professional counselor who the Board has determined possesses qualifications that are substantially equivalent to the qualifications required for a primary supervisor approved pursuant to NAC 641A.182.
- 4. Except as otherwise provided in subsection 5, a clinical professional counselor or clinical professional counselor intern may meet the requirements for supervised training or experience required pursuant to subsection 1 by demonstrating to the satisfaction of the Board that the clinical professional counselor or clinical professional counselor intern completed outside this State at least 750 hours of licensed face-to-face couples or family counseling and at least 150 hours of supervision related to that counseling by a supervisor. A clinical professional counselor or clinical professional counselor intern must provide proof to the Board that the supervisor met, at the time of the supervised experience, the requirements of subsection 3.
- 5. An applicant for an endorsement pursuant to this section may apply not more than 200 hours of supervised face-to-face couples or family counseling performed in the course of earning his or her graduate degree in clinical mental health counseling towards the supervised training or experience required pursuant to subsection 1. To obtain credit for such

hours, the applicant must provide proof to the Board that the supervisor met, at the time of the supervised training or experience, the requirements of subsection 3.

- Sec. 5. NAC 641A.035 is hereby amended to read as follows:
- 641A.035 As used in this chapter, unless the context otherwise requires:
- 1. "Approved supervisor" has the meaning ascribed to it in NRS 641A.025 and includes an approved primary and secondary supervisor.
 - 2. "Board" has the meaning ascribed to it in NRS 641A.030.
 - 3. "Clinical professional counselor" has the meaning ascribed to it in NRS 641A.031.
- 4. "Clinical professional counselor intern" means a person licensed as a clinical professional counselor intern pursuant to NRS 641A.288.
- 5. "Endorsement" means an authorization added to the license of a clinical professional counselor or a clinical professional counselor intern pursuant to section 2 of this regulation which indicates that the Board has determined that the licensee has demonstrated competency in the assessment or treatment of couples or families and authorizes the clinical professional counselor or clinical professional counselor intern to expand the scope of his or her practice to include the assessment or treatment of couples or families.
- 6. "Intern" means a marriage and family therapist intern or a clinical professional counselor intern.
- [6.] 7. "Internship" means the period of supervised experience required of a marriage and family therapist intern pursuant to NRS 641A.287, [or] a clinical professional counselor intern pursuant to NRS 641A.288 [-] or a clinical professional counselor or clinical professional counselor intern seeking an endorsement pursuant to section 4 of this regulation.

- 7. "License" has the meaning ascribed to it in NRS 641A.040.
- [8.] 9. "Marriage and family therapist" has the meaning ascribed to it in NRS 641A.060.
- 10. "Marriage and family therapist intern" means a person licensed as a marriage and family therapist intern pursuant to NRS 641A.287.
- 110.1 11. "Practice of clinical professional counseling" has the meaning ascribed to in NRS 641A.065.
- "Practice of marriage and family therapy" has the meaning ascribed to it in NRS 641A.080.
 - Sec. 6. NAC 641A.095 is hereby amended to read as follows:
- 641A.095 1. A failed examination required pursuant to NRS 641A.230 or section 3 of this regulation may be retaken at the next scheduled offering of the examination, except that the examination may be taken only one additional time within the 12 months following the date of the original examination. Thereafter, only one examination in any calendar year may be taken. If an applicant fails the exam for a third time, the Board may require additional courses of study or may impose other conditions before allowing the applicant to retake the examination.
 - 2. The application for licensure or endorsement of an applicant who does not:
 - (a) Take an examination within 1 year after being notified of his or her eligibility; or
 - (b) Retake an examination within 1 year after failing the examination,
- ⇒ shall be deemed lapsed. An applicant seeking to pursue licensure *or endorsement* whose application has lapsed must fulfill all requirements at the time the new application is submitted and provide documentation concerning the lapsed application.
 - **Sec. 7.** NAC 641A.111 is hereby amended to read as follows:

- 641A.111 1. The Board will, after verifying that an applicant for licensure meets the requirements of NRS 641A.220 or 641A.231 and holds an active, equivalent license in good standing from another jurisdiction, issue an interim permit authorizing the applicant to practice as a marriage and family therapist or clinical professional counselor, under the supervision of a person approved by the Board, until the results of the examination required by NRS 641A.230 or 641A.231 are received.
- 2. If the applicant *for licensure* does not pass the examination, the interim permit expires upon notification by the Board. The interim permit is not renewable.
- 3. The Board will, after verifying that an applicant for endorsement meets the requirements of paragraph (a) of subsection 1 of section 3 of this regulation, the requirements of section 4 of this regulation and holds an active, equivalent license as a clinical professional counselor in good standing from another jurisdiction, issue an interim endorsement permit authorizing the applicant to practice as a clinical professional counselor authorized to assess or treat couples or families, under the supervision of a person approved by the Board, until the results of the examination required by paragraph (c) of subsection 1 of section 3 of this regulation are received.
- 4. If the applicant for endorsement does not pass the examination, the interim endorsement permit expires upon notification by the Board. The interim endorsement permit is not renewable.
 - **Sec. 8.** NAC 641A.116 is hereby amended to read as follows:

- 641A.116 If a licensee allows his or her license *or endorsement* to lapse, the licensee must apply to the Board for reinstatement. The Board may place additional requirements on the application for reinstatement, including the requirement of an interview.
 - Sec. 9. NAC 641A.131 is hereby amended to read as follows:
- 641A.131 1. To maintain licensure, a marriage and family therapist or clinical professional counselor must complete at least 20 hours of continuing education each year, at least 3 hours of which must be on ethics issues specifically pertaining to the field of practice of the marriage and family therapist or clinical professional counselor. If the marriage and family therapist or clinical professional counselor is an approved supervisor, at least 1 hour of the requirements of this subsection must be on issues specifically pertaining to supervising in the field of practice of the approved supervisor and must include education in at least one of the following:
 - (a) An overview of a supervision model;
 - (b) Areas of focus for a supervisor and the roles of a supervisor;
 - (c) The process of supervising and the practical application of that process;
 - (d) Ethical dilemmas involved in supervising;
 - (e) Methods of effectively addressing and preventing ethical dilemmas in supervising; or
- (f) An overview of the supervision standards of the American Association for Marriage and Family Therapy, the National Board for Certified Counselors or the Association for Counselor Education and Supervision, or the provisions of this chapter and chapter 641A of NRS relating to the practice of marriage and family therapy or the practice of clinical professional counseling, as applicable.

- If a clinical professional counselor holds an endorsement, at least 3 hours of the continuing education required by subsection 1 must be on issues related to the assessment or treatment of couples or families to renew the endorsement.
- 3. A marriage and family therapist or clinical professional counselor shall not use more than 10 hours of distance education to satisfy the requirements of subsection 1.
- With the approval of the Board, a marriage and family therapist or clinical professional counselor may satisfy the requirements of subsection 1 by teaching at an institution, seminar, workshop, conference or other program. The content of the teaching material must be related to the field of practice of the marriage and family therapist or clinical professional counselor and may not be part of the primary or regular employment of the marriage and family therapist or clinical professional counselor. For each such hour taught, 2 hours of continuing education may be credited pursuant to this subsection.
- 5. A marriage and family therapist or clinical professional counselor is subject to disciplinary action by the Board if he or she fails to satisfy the requirements for continuing education set forth in subsection 1.
- [5.] 6. To reactivate an inactive license, an inactive licensee must complete at least 20 hours of continuing education in the year immediately preceding his or her application for reactivation.
- [6.] 7. As used in this section, "distance education" means education, training, courses or programs that are delivered to a student who is geographically separate from the instructor.
 - Sec. 10. NAC 641A.133 is hereby amended to read as follows:
- 641A.133 1. An application for the renewal of a license *or endorsement* must be accompanied by an affidavit and the form for reporting continuing education provided by the

Board evidencing the completion by the marriage and family therapist or clinical professional counselor of at least 20 hours of continuing education required pursuant to NAC 641A.131 during the year immediately preceding the date of the expiration of the current license.

- 2. A marriage and family therapist or clinical professional counselor shall maintain sufficient documentation verifying the information included in the affidavit relating to his or her continuing education for at least 3 years after the date on which the affidavit is executed. A marriage and family therapist or clinical professional counselor will not be given credit for any hours of continuing education that are not supported by documentation.
- 3. The Board may audit such affidavits and forms as the Board deems necessary to verify the authenticity of the information set forth in the affidavit or form.
 - Sec. 11. NAC 641A.176 is hereby amended to read as follows:
- 641A.176 1. The Board may, for good cause shown, grant, deny, suspend or revoke the license *or endorsement* of any intern.
- 2. An intern is subject to the same standards of professional ethics as a marriage and family therapist or clinical professional counselor, as applicable.
- 3. The Board may, for good cause shown, approve, deny or revoke the proposed supervisor or approved supervisor of any intern.
 - Sec. 12. NAC 641A.243 is hereby amended to read as follows:
 - 641A.243 A marriage and family therapist, clinical professional counselor or intern:
- 1. Shall not misrepresent, in advertising or otherwise, his or her education, training, type of license, *endorsement*, qualifications, competence or service, or the results to be achieved if he or she provides service to a client.

- 2. Shall not engage in the practice of marriage and family therapy or the practice of clinical professional counseling while impaired by:
 - (a) Alcohol, drugs or any other chemical; or
- (b) A mental or physical condition that prevents him or her from safely engaging in the practice of marriage and family therapy or the practice of clinical professional counseling.
- 3. Shall not use his or her relationship with a client to further his or her own personal, religious, political or business interests.
- 4. Shall set and maintain professional boundaries with clients, interns and persons with whom he or she works.
- 5. Shall not give or receive, directly or indirectly, a fee, commission, rebate or other compensation for professional services that he or she has not actually and personally provided.
- 6. Shall not knowingly offer service to a client who is receiving treatment from another marriage and family therapist, clinical professional counselor or intern, or a holder of a license, certificate or registration issued by any other similar board, without prior consultation between the client and the other marriage and family therapist, clinical professional counselor, intern or holder of the license, certificate or registration.
- 7. Except as otherwise provided in subsection 8, shall not disparage the qualifications of any colleague.
- 8. Shall report to the Board any unlicensed, unauthorized, unqualified or unethical practice of marriage and family therapy or the practice of clinical professional counseling that is occurring.

- 9. Shall not attempt to diagnose, prescribe for, treat or provide advice for any problem which is outside of his or her field of competence, the scope of the practice of marriage and family therapy or the practice of clinical professional counseling, as applicable, or the scope of his or her license \(\frac{1}{2}\) or endorsement, as applicable.
- 10. Shall base his or her practice upon the recognized knowledge relevant to marriage and family therapy or clinical professional counseling, as applicable.
- 11. Shall critically examine and keep current with emerging knowledge relevant to the practice of marriage and family therapy or the practice of clinical professional counseling, as applicable.
- 12. Based upon recognized knowledge and standards for the practice of marriage and family therapy or the practice of clinical professional counseling, as applicable, shall prepare and maintain in a timely manner a record for each of his or her clients which:
- (a) Sets forth his or her assessment of the problems of the client, plan of action for the client, course of treatment for the client and progress notes regarding the course of treatment of the client; and
 - (b) Includes copies of other relevant documentation, including, without limitation:
 - (1) All documents relating to the informed consent given by the client;
 - (2) All documents relating to the release of information regarding the client; and
 - (3) All other legal documents regarding the client.
- → As used in this subsection, "assessment" means an evaluation of the impairment in the functioning of a client that is based upon comprehensive information about the client.

- 13. Shall complete and submit any reports required by this chapter and chapter 641A of NRS, or pursuant to any rule, order or instruction of a court of competent jurisdiction, in a timely manner.
- 14. Shall comply with the provisions of this chapter and chapter 641A of NRS and all other applicable federal laws and regulations.
- 15. Shall not authorize a person under the supervision of the marriage and family therapist or clinical professional counselor to perform services that are outside of the scope of the license, *endorsement*, training or experience of the person performing the services, or allow such a person to hold himself or herself out as having expertise in a field or activity in which that person is not qualified.
 - 16. Shall notify the Board in writing within 10 days after:
- (a) An action is taken against any license, certification, registration or other credential held by the marriage and family therapist, clinical professional counselor or intern that was issued by another state or territory of the United States;
- (b) A criminal charge is filed against the marriage and family therapist, clinical professional counselor or intern;
- (c) The marriage and family therapist, clinical professional counselor or intern is convicted of a criminal offense, other than a traffic offense which is a misdemeanor that does not involve alcohol or controlled substances;
- (d) A civil action, including, without limitation, an action for malpractice, is filed against the marriage and family therapist, clinical professional counselor or intern; or

- (e) A settlement or judgment is made in any civil action, including, without limitation, an action for malpractice, in any case filed against the marriage and family therapist, clinical professional counselor or intern for any act relating to the practice of marriage and family therapy or the practice of clinical professional counseling, as applicable.
 - Sec. 13. NAC 641A.256 is hereby amended to read as follows:
- 641A.256 1. For the purposes of subsection 7 of NRS 641A.310, the Board will interpret the term "unprofessional conduct" to mean a lack of knowledge, skill or ability in discharging a professional obligation, and to include, without limitation, malpractice and gross negligence.
- 2. The Board will consider the following acts by a marriage and family therapist, clinical professional counselor or intern to constitute unprofessional conduct:
- (a) Performing services relating to the practice of marriage and family therapy or the practice of clinical professional counseling as an intern outside the scope of an approved plan of internship.
- (b) Performing services relating to the practice of marriage and family therapy or the practice of clinical professional counseling as a marriage and family therapist, clinical professional counselor or intern under a license *or endorsement* that has lapsed or been deactivated.
- (c) Failing to cooperate with any investigation of a complaint filed against the marriage and family therapist, clinical professional counselor or intern, including, without limitation, denying or failing to cooperate with a request for records made by the Board.
 - 3. As used in this section:

- (a) "Gross negligence" means conduct in the practice of marriage and family therapy or the practice of clinical professional counseling which represents an extreme departure from the standard of care required from a marriage and family therapist, clinical professional counselor or intern under the circumstances.
- (b) "Malpractice" means conduct in the practice of marriage and family therapy or the practice of clinical professional counseling which falls below the standard of care required from a marriage and family therapist, clinical professional counselor or intern under the circumstances.
 - Sec. 14. NAC 641A.258 is hereby amended to read as follows:
- 641A.258 1. Any violation of this chapter or chapter 641A of NRS by a marriage and family therapist, clinical professional counselor or intern constitutes unprofessional conduct and subjects the marriage and family therapist, clinical professional counselor or intern to disciplinary action by the Board.
- 2. If a marriage and family therapist, clinical professional counselor or intern violates any provision of this chapter or chapter 641A of NRS or engages in any other unprofessional conduct while his or her license *or endorsement* is in effect, the Board will take disciplinary action against the marriage and family therapist, clinical professional counselor or intern, including, without limitation, taking action against the marriage and family therapist, clinical professional counselor or intern after his or her license *or endorsement* has expired or been suspended.
- 3. If a board or entity in this State or in another state which has issued a license, certificate, registration or other credential to a marriage and family therapist, clinical professional counselor or intern for the practice of marriage and family therapy, the practice of clinical professional

counseling or practice in a related field revokes or suspends the license, certificate, registration or other credential, or takes any other disciplinary action against the marriage and family therapist, clinical professional counselor or intern, the revocation, suspension or disciplinary action is a ground for disciplinary action by the Board against the marriage and family therapist, clinical professional counselor or intern for unprofessional conduct.

- 4. The failure of a marriage and family therapist, clinical professional counselor or intern to comply with a stipulation, agreement, advisory opinion or order issued by the Board constitutes unprofessional conduct and is a ground for disciplinary action by the Board against the marriage and family therapist, clinical professional counselor or intern.
- 5. As used in this section, "related field" means a field related to the social sciences or the study of the human mind and mental illness, including, without limitation, social work, alcohol and drug abuse counseling, psychology, psychiatry, nursing or medicine.
 - Sec. 15. NAC 641A.306 is hereby amended to read as follows:
- 641A.306 "Applicant" means a person who applies for any privilege, license, *endorsement* or authority from the Board.
 - Sec. 16. NAC 641A.441 is hereby amended to read as follows:
- 641A.441 1. During an investigation of an informal complaint, the staff or investigator, if any, may demand that a respondent produce his or her records or other evidence for inspection or copying, with or without prior notice to the respondent and with or without a subpoena. A respondent shall not deny any such request for records or other evidence if the record or other evidence is not subject to the provisions of 42 C.F.R. Part 2.

- 2. If the respondent initially refuses or fails to cooperate with a request for records in violation of this section, the Board may immediately suspend his or her license *or endorsement*, *if applicable*, until the respondent complies with the request for records or other evidence.
- 3. If the respondent continues to refuse or fail to cooperate with a request for records or other evidence in violation of this section after the Board has suspended his or her license *or endorsement, if applicable,* pursuant to subsection 2, the Board may take such further disciplinary action against the respondent as the Board determines necessary.
 - Sec. 17. NAC 641A.595 is hereby amended to read as follows:
 - 641A.595 The Board may hold an informal hearing to:
 - 1. Mediate problems;
 - 2. Discuss factual or legal questions relating to the propriety of certain conduct;
- 3. Discuss certain conduct and warn holders of licenses *and endorsements* that engaging in the conduct would be in violation of law or the Board's regulations; or
 - 4. Determine the appropriateness of holding a formal hearing on any matter.

SMALL BUSINESS IMPACT STATEMENT R091-14

(NRS 233B.0609) (Updated 3/28/16)

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) conducted public workshops on September 5, 2014, December 5, 2014 and April 10, 2015 in Carson City, Nevada and in Las Vegas, Nevada to solicit comments from small businesses. Notice of these workshops were 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.gov, 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 list.

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, or on its website at www.marriage.nv.gov.

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

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 clinical professional counselors and clinical professional counselor interns.

A survey was sent to all licensed clinical professional counselors 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 clinical professional counselor endorsement survey)

- 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 be on only those clinical professional counselors and clinical professional counselor 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 of practice and additional clients that the clinical professional counselors and clinical professional counselor interns would be able to see with an endorsement.

Based on the proposed educational, supervision and exam requirements for the endorsement, the Board examined the range of costs that could be incurred to secure such an endorsement.

A comparison of the educational requirements for clinical professional counselors and marriage and family therapists revealed a few areas in which the required course content for clinical professional counselors and marriage and family therapists were totally different and where the graduate education of clinical professional counselors may not include content specific to working with couples and families. These differences led to the proposed educational requirements with six areas of study specific to working with couples and families. The Board recognizes that many clinical professional counselors may already have graduate coursework in some, if not all, of these areas of study. To that end, the Board will ascribe credit for all completed graduate coursework in these six 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, clinical professional counselors and clinical professional counselor 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 to obtain the required coursework for working with couples and families -- up to a maximum of six courses.

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 clinical professional counselors and clinical professional counselor 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 national examination, if the clinical professional counselor or clinical professional counselor intern has not already taken the national examination sponsored by the Association of Marriage and Family Therapy Regulatory Boards, s/he would have to pay to take the exam.

The adverse effects are the expenses that would be incurred to obtain the necessary courses, supervision and exam.

The Board investigated the expenses for coursework from a variety of institutions that could provide the requisite coursework, the cost of supervision and the national examination fee. The cost to obtain the endorsement will vary based on a combination of costs to meet the requirements which include supervision in conjunction with the accrual of face-to-face client hours (\$30 - \$100/hour supervision fees), educational credits (\$269 - \$943/credit), and the national examination requirements (\$350). Thus the range of the estimated endorsement cost

would be 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 clinical professional counselor couple & family endorsement costs and also see clinical professional counselor endorsement survey)

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 examination 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 marriage and family therapists working with couples and families and determined what the minimal course requirements would be in order for clinical professional counselors and clinical professional counselor interns to demonstrate competency in working with couples. Rather than require all of the nine courses in the marriage and family therapists areas of study, the Board identified six 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 Marriage and Family Therapists and Clinical Professional Counselors 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.

These regulations do not provide a new or increase of fees. There is no statutory authority for the Board of Examiners for Marriage and Family Therapists and Clinical Professional

Counselors to charge a fee for the endorsement.

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.

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 clinical professional counselors and clinical professional counselor 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.

Board President

Question #1

Are you interested in an endorsement to work with couples and families? (Choose one)

Answered: 23

Skipped: 0

Created with Highcharts 3.0.10

YesNo

0%10%20%30%40%50%60%70%80%90%100%

Answer Choices -	Responses –					
_	82.61%					
Yes	19					
_	17.39%					
No	4					
Total	23					

Question #2

What would be the Projected Educational Cost for an endorsement? (See Estimated Tuition Cost Table below and choose one institution to estimate with.)

Answered; 21

· Skipped: 2

Created with Highcharts 3.0.10

UNLV UNR Capella University Grand Canyon University University of Phoenix North Central University 012345678910

-	One Course	Two Courses	Three Courses –	Four Courses	Five Courses	Six Courses	N/A -	Total -	Average Rating –
_ UNLV	8.33% 1	8.33% 1	8.33% 1	8.33% 1	0.00%	16.67% 2	50.00% 6	12	3.67
– UNR	7.69% 1	7.69% 1	0.00% 0	7.69% 1	7.69% 1	15.38% 2	53.85% 7	13	4.00
– Capella University	0.00%	0.00%	0.00% 0	0.00%	10.00% 1	20.00% 2	70.00% 7	10	5.67
– Grand Canyon University	0.00%	0.00%	0.00%	0.00%	0.00%	22.22% 2	77.78% 7	9	6.00
_ University of Phoenix	0.00% 0	0.00%	0.00% 0	0.00%	0.00%	12.50% 1	87.50% 7	8	6.00
– North Central University	0.00%	0.00%	0.00%	0.00%	0.00%	12.50% 1	87.50% 7	8	6.00

CPC ENDORSEMENT SURVEY RESULTS - 11-17-2014

Question #3

Enter Dollar Amount Estimated Cost \$:

- Answered: 18
- Skipped: 5

w Responses (18) C Text Analysis z My Categories



(2 - 1/2 y

\$4,842

700.00

Showing 18 responses

11/17/2014 9:56 AM View respondent's answers \$3228.00 11/16/2014 3:15 PM View respondent's answers 2500.00 11/14/2014 12:41 PM View respondent's answers 15000 11/12/2014 10:42 AM View respondent's answers over \$12,000.00 11/12/2014 10:08 AM View respondent's answers 3252 11/12/2014 8:44 AM View respondent's answers 4140 11/11/2014 11:11 AM View respondent's answers 11/11/2014 10:13 AM View respondent's answers 8910 11/11/2014 8:21 AM View respondent's answers 900.00 11/10/2014 11:12 PM View respondent's answers 1614 11/10/2014 10:45 PM View respondent's answers D. Already meet requirements. 11/10/2014 10:25 PM View respondent's answers 4878 11/10/2014 9:59 PM View respondent's answers 11/10/2014 8.22 PM View respondent's answers 813

Dependent upon the program availability and whether they would accept a "part time" applicant into their program (an applicant who is not seeking a master's degree) 11/10/2014 3:44 PM View respondent's answers

11/10/2014 6:50 PM View respondent's answers

11/10/2014 5:45 PM View respondent's answers

11/10/2014 5:41 PM View respondent's answers

Question #4

What would be your projected Supervision costs for an endorsement? (See Estimated Supervision Cost Table below.)

- Answered: 21
- Skipped: 2

w Responses (21) C Text Analysis z My Categories

7



Carl Pay

Showing 21 responses 11/17/2014 9:56 AM View respondent's answers \$11,250,00 11/16/2014 3:16 PM View respondent's answers 7500.00 11/14/2014 12:42 PM View respondent's answers 11/12/2014 11:49 AM View respondent's answers 7500 11/12/2014 10:43 AM View respondent's answers \$12,000.00 11/12/2014 10 09 AM View respondent's answers 11/12/2014 8:44 AM View respondent's answers 4500 11/11/2014 12:51 PM View respondent's answers 11/11/2014 11:11 AM View respondent's answers 11/11/2014 10:13 AM View respondent's answers 15000 11/11/2014 8:22 AM View respondent's answers 15.000 11/10/2014 11:13 PM View respondent's answers

11.250 11/10/2014 10:45 PM View respondent's answers 0. Already meet requirements. 11/10/2014 10:25 PM View respondent's answers 15000 11/10/2014 10:00 PM View respondent's answers 11,250 11/10/2014 10:45 PM View respondent's answers Already meet requirements. 11/10/2014 10/25 PM View respondent's answers 15000 11/10/2014 10:00 PM View respondent's answers 11/10/2014 8:22 PM View respondent's answers 4500 11/10/2014 6:53 PM View respondent's answers 11.250 11/10/2014 5:45 PM View respondent's answers 50 11/10/2014 5:41 PM View respondent's answers 4500 11/10/2014 5:12 PM View respondent's answers \$10000 11/10/2014 3 45 PM View respondent's answers

Question #5

Have you attained a passing score on the AMFTRB MFT Exam? (Choose One)

Answered: 21

Skipped: 2

Created with Highcharts 3.0.10

YesNo

0%10%20%30%40%50%60%70%80%90%100%

Answer Choices -	Responses –
-	9.52%
Yes	2
	90.48%
No	19
Total	21

Question #6

Financial Impact (Circle number on scale of 1-10, 1=Easy and 10=Hard)

Answered: 21

· Skipped: 2

Created with Highcharts 3.0.10

(no label) 012345678910

_	Easy –	2 –	3 –	4 —	5 —	6 –	7	8	9 –	Hard	Total -	Average Rating –
- (no label)	9.52%	0.00%	4.76% 1	0.00%	0.00%	4.76% 1	0.00%	19.05% 4	4.76% 1	57.14% 12	21	8

Question #7

What is the endorsement impact on small business?

Answered: 17 Skipped: 6 w Responses (17) C Text Analysis z My Categories
s

Carl Pay

CPC ENDORSEMENT SURVEY RESULTS - 11-17-2014

Showing 17 responses

It will help me serve the community. I dont understand why an additional license is necessary. If MFT's are not required to take the NCMHCE exam to work with individuals, CPC's should not be required to take an exam to work with couples and families. If the counselor has the appropriate education, training, and experience, that should be acceptable.

11/17/2014 10:00 AM View respondent's answers

Unknown --except that mental health companies may not be able to fully utilize the LCPCs due to the prohibitive cost of obtaining this specialized endorsement. It is also unclear to me why it is being proposed that LCPCs must take extensive courses, obtain excessive hours of supervision, AND pass another licensing exam to work with families, when our LCSW and Licensed Psychologist colleagues are able to practice with families without obtaining special endorsements for marriage and family work. In researching doctoral and master's level programs in psychology and social work. I found that both social work and psychology programs may require ONE (1) "family" based course in their entire program and yet the NRS states the scope of their practice includes working with individuals AND families. As a clinician, previously a LMHC in another state who practiced extensively with couples, families, and individuals to have now become a LCPC here in Nevada this process seems excessive and unfair compared to other professionals working in this field. Individuals with CPC licensure should be evaluated on a case by case basis, to determine if the board is satisfied with their experience and education. There should be a grandfather component for those of us who have been practicing or who have experience from other states.

11/16/2014 3:37 PM View respondent's answers

Too expensive and too much time, NOT worth it, 11/14/2014 12:43 PM View respondent's answers

Almost impossible to attain.

11/12/2014 10:44 AM View respondent's answers

? 11/12/2014 10:09 AM View respondent's answers

10,000 11/11/2014 12:52 PM View respondent's answers

I own my own counseling practice. If these are the requirements, it will not be financially possible for me to get the couples and family endorsement. My license in another state allowed me to do couples and family cousneling, which I did for seven years. There does not seem to be any recognition of that experience in these requirements. This seems like yet another example of the state of Nevada being excessively restrictive and territorial instead of allowing reciprocity and recognizing the experience that counselors from other states can bring. It further hinders the provision of counseling services to this state, where they are desperately needed. This endorsement essentially does nothing to expand the practice of the majority of CPCs due to its prohibitive regulations and costs.

11/11/2014 11:18 AM View respondent's answers

high 11/11/2014 10:17 AM View respondent's enswers

For those in private practice, the cost could be as much as 30% of their income.

11/11/2014 8:23 AM View respondent's answers

Cost and time prohibitive. 11/10/2014 11:14 PM View respondent's answers

Have no idea; I'm a clinician, not a businessman. 11/10/2014 10:46 PM View respondent's answers

Unsure 11/10/2014 10:26 PM View respondent's answers

hard 11/10/2014 10:00 PM View respondent's answers

minimal 11/10/2014 5:46 PM View respondent's answers

Very harsh, This is not a regulation found in most states. 11/10/2014 5:42 PM View respondent's answers

unrealistic and bias, not equal to the requirements placed on MFTs. 11/10/2014 5:13 PM View respondent's answers

I would have to finance my educational cost through my business; I would have to see less clients in order to focus on obtaining the endorsement 11/10/2014 3:45 PM View respondent's answers

Question #7

CLINICAL PROFESSIONAL COUNSELOR ESTIMATED COUPLE & FAMILY ENDORSEMENT COSTS

ESTIMATED TOTAL COST RANGE: \$75 -- \$33,399

TUITION COST

Tuition cost varies by institution and ranges from \$269 - \$943 per credit.

INSTITUTION	FEE PER CREDIT	TOTAL
UNLV^	\$269/credit (semester)	18 Units = \$4,842*
UNR	\$271/credit (semester)	18 Units = \$4,878*
Capella University	\$487/credit (quarter)	24 Units = \$11,688
Grand Canyon University	\$495/credit (semester)	18 Units = \$8,910
University of Phoenix	\$510/credit (semester) + \$115 per	18 UNITS = \$9,180 + \$690 fee = \$9,870
	course fee	
North Central University^	MA degree \$2,517 per course	6 Courses = \$15,102 (\$839/semester credit)
	Certificate \$2,829 per course	6 Courses = \$16,974 (\$943/semester credit)

^{*} Additional university fees not included (e.g. one-time or differential fees)

SUPERVISION COST

Supervision cost varies by supervisor and ranges from \$30 - 100 per hour.

SUPERVISION FEE PER HOUR	TOTAL
\$30	\$30 x 150 = \$4,500
\$50	\$50 x 150 = \$7,500
\$75	\$75 x 150 = \$11,250
\$100	\$100 x 150 = \$15,000

AMFTRB NATIONAL MFT EXAM FEES

After 1/1/2015

\$350	

[^] Couple & Family Therapy certificate option