

MEMORANDUM

To: The Department of Licensing and Regulation (LARA) / BPL-BoardSupport@Michigan.gov
Governor Gretchen Witmer / Honorable State of Michigan House of Representatives / Senators

From: CAROL TILLOTSON, B.S., M.A., LLPC

Date: 10-1-2019

RE: Proposed Scope of Practice Rules Change for LPC's

Page: 1

I sent an email to the LARA BPL Board Support regarding the Proposed Scope of Practice Rules Change for LPC's, and the harm it will do to me, my clients, and the 10,000 + LPC's in the state along with 150,000+ of their clients seeking mental health treatment.

LARA's proposed Scope of Practice Rules Change creates a mental health crisis in the State of Michigan because it RESTRICTs LPC's in the State of Michigan ability to practice counseling techniques, diagnose and identify mental health problems when we are educated to the equivalent level of course work as Mastered Degreed Psychologist. Additionally, LPC's are trained, supervised and have met the requirements of current Michigan LARA licensure at great cost in time, money, and effort.

Due to life circumstances, I graduated with M.A. in Counseling when I was 61 years old, and have a State of Michigan LLPC license #6401012238. I will be applying for my LPC licensure in the next year. The proposed changes to RESTRICT my ability to practice counseling techniques and diagnose and identify mental health problems will limit my ability as a LPC to gain work; to bill government and private insurance providers; affect my ability to obtain liability insurance. Additionally, I would be at risk by violating APA Code of Ethics for Professional Counselors by counseling clients without diagnosing and identifying the mental health problem.

Furthermore restricting my scope of practice would create severe hardship in my ability to earn an income commensurate with my expertise, educational level of a 72 credit hour M.A. Degree in Counseling; 10+ years of experience.

- 2 years of time in master degree education
- 100 hours of Supervised Practicum
- 600 hours of Supervised Internship
- 100 Supervision Hours
- 7,165 Face to Face Client Hours (Groups / Individual / Couples / Children)
- 3,445 Support / Paperwork Hours
- \$28,000 Educational Expenses (Tuition, Books, etc.)
- \$28,000 FASFA accumulated interest rate at 6.9% (loan has doubled)
- \$250 LARA Licensure Fees (Several years re-newed by LARA)
- \$3,650 Supervision Costs
- \$1,040 Professional Liability Insurance

TOTAL \$60,940 FINANCIAL INVESTMENT

TOTAL 10,709 HRS OF TIME INVESTMENT ALONG WITH 2 YRS OF M.A. SCHOOLING

MEMORANDUM

To: The Department of Licensing and Regulation (LARA) / BPL-BoardSupport@Michigan.gov
Governor Gretchen Witmer / Honorable State of Michigan House of Representatives / Senators
From: CAROL TILLOTSON, B.S., M.A., LLPC
Date: 10-1-2019
RE: Proposed Scope of Practice Rules Change for LPC's
Page: 2

LARA has on file my PROFESSIONAL DISCLOSURE STATEMENT that lists my education, supervision and my varied counseling experience that I submitted to LARA for renewal of my LLPC license for several years. Currently, I perform Substance Abuse Group Counseling with parolees that violate parole, and are housed in a Residential Re-entry Program. Restricting my scope of practice could affect nearly 300+ male and female clients annually who I use counseling techniques in Substance Abuse Group Counseling that have been 18 closed sessions per group.

I feel we are not asking LARA to expand our scope of practice in treatment because LPC's have been educated, trained, supervised, and LARA licensed in accordance with LARA standards to perform this scope of practice for 30+ years now. But, in essence, I understand your perspective that you would be expanding our scope of practice because there has not been Michigan law that clearly defines it. As you know, the state legislators are currently working on passing HB 4325 which is very much needed.

Therefore, I am asking LARA to reconsider restricting LPC's scope of practice while HB4325 is being acted upon, and/or until state statute is passed that defines LPC Scope of Practice. Additionally, I am asking LARA to provide a grandfather clause for licensure to the new rules for all LPC's and LLPC's who invested considerable time, money, and emotional and physical resources.

Finally, I am asking Governor Witmer, Honorable State House of Representatives and Senators to understand the mental health crisis LARA Proposed Scope of Practice Rule Change creates in the State of Michigan. LARA will restrict the scope of practice for 10,000+ LPC Professional Counselors educated to the equivalent level of coarse work for this scope of practice as a mastered degreed Psychologist, leaving their 150,000+ clients without mental health counseling.

Thank you for your consideration in this matter.

Carol Ann Tillotson, B.S., M.A., LLPC
225 S. Higbee St.
Reed City, MI 49677
231-629-0287

Good afternoon,

It is imperative that you take a moment to acknowledge these words as it concerns the state of our community at large.

Currently, the Licensing and Regulatory Affairs in Michigan is proposing new rule changes that will severely limit, albeit strip-down-to-nothing, the scope of practice for highly trained, credentialed, and competent professionals, the Licensed Professional Counselors (LPCs). If this passes, it would take immediate effect and instantly rob clients of their mental health providers. Currently, there are about 10,000 LPCs in the great state of Michigan. If we consider the case loads for each professional, there is north of 150,000 clients currently being treated for mental health issues!

The effects of this would be devastating and traumatic to clients statewide. I can confidently say that lives would be lost if this occurs. Consider this from a macro-level and sociological perspective: For every one client seeking therapy for mental health recovery, friends and family sharing their lives with this person would also be greatly impacted if LPCs are no longer able to diagnose and properly treat people.

There are still many clients that do not have access to mental health services due to socioeconomic status, psychological limitations, inability to locate providers accepting new clients, etc. It is a well-known fact that we need more Licensed Professional Counselors that are able to tend to the public needs! Our state should continue to fight the stigma of mental health recovery and empower mental health professionals, including LPCs, to continue doing their jobs!

By supporting the proposed rule changes by LARA, lives will be lost and devastation will be upon our state in more ways than we could imagine. Furthermore, this would harm the most vulnerable, our clients and community in need of help! Mental health issues impact every single living person. If LPCs lost their right to diagnose in order to properly treat clients and practice counseling techniques, the ability for people to seek help and recovery would be severely limited. EVERYONE would be greatly affected, including you.

I ask you as it is imperative to our community, please pass this word along to whomever necessary and do your part as it is ethical and responsible to do so:

1. DELAY and STOP the proposed rule changes by LARA.

2. Pass along HB 4325 as quickly as possible to the Governor, Gretchen Whitmer, to sign and pass it into law. HB 4325 is a proposed law which will protect the counseling profession and negate LARA's proposed rule changes. HB 4325 would maintain the current scope of practice for licensed and trained LPCs that has been in place for over 30 years, without incident.

WE NEED TO HELP, NOT HARM, THE MOST VULNERABLE!

Sincerely concerned,

Katelin Bovee Jobin,

Current Graduate Student and Intern completing the final semester of the Clinical Mental Health Counseling and Art Therapy Masters of Education program at Wayne State University,

Future Licensed Professional Counselor,

Care Coordinator for individuals in addiction recovery

Currently in debt to student loans by over \$50,000 for this degree.

Eddie Sleeper

From: michaelgeorge75@att.net
Sent: Tuesday, October 8, 2019 12:25 PM
To: Eddie Sleeper
Subject: HB4325

I would like to voice my support for: HB 4325. Please pass it out of committee ASAP WITHOUT AMENDMENTS.

Thank you,

Mandy George
LLPC

Sent from [Mail](#) for Windows 10

Eddie Sleeper

From: Jennifer Place <jenniferplacelpc@gmail.com>
Sent: Wednesday, October 2, 2019 2:31 PM
To: Eddie Sleeper
Subject: HB4325

Dear Representative Sleeper,

I suspect at this point, your office has been inundated with form letters summarizing the arguments against the proposed rule changes due to the unintended consequences for the scope of practice for Licensed Professional Counselors and necessity for passing HB4325 without amendments. In respect for your time, I will not wax poetic on these factors. My intention is to share with you the impact to my family and to my clients.

My husband and I are both Licensed Professional Counselors practicing in the State of Michigan since 2010. As my career has progressed, the population that I serve has shifted to predominately persons diagnosed with eating disorders. You may not be aware, but this is a population that is notoriously underserved. While my master's degree from Oakland University trained my cohort in diagnosis and therapeutic techniques for use with a variety of populations, it also trained us to recognize and refer out any clients with whom we do not have the appropriate training and expertise. Said plainly, anyone with a master's degree in Counseling *cannot* treat eating disorders but in order to comply with our ethical code most clinicians opt not to in order to ensure that the population receives the most appropriate and informed care. This has resulted in a shortage of trained professionals that work with people with eating disorders—a category of diagnoses with the highest mortality rate of any category in the DSM-V. I serve a fragile population and consistently hold a waitlist for new clients. My clients have never asked what license I hold or if I am under supervision or have a specialization—they want to know if I can help them and if they can afford to see me. Should I lose my ability to diagnose and utilize therapeutic techniques I would be unable to serve this fragile population.

In a time that we need to be expanding access to skilled providers that can and will accept insurance, these regulatory changes would ultimately make mental health services less accessible and far more costly. Many clients are bound by their insurances to find in network providers. If I currently struggle to refer to skilled clinicians *of any licensure* when I am unable to accommodate a client with an eating disorder, where will these clients go to receive skilled services?

In the case of my family, our sources of income both rely on the ability to diagnose and utilize therapeutic techniques. We have worked diligently to pay off our student loans, but how can we expect to pay our mortgage if neither of us are able to work in the field we were trained and licensed? The unintended consequences of trying to make outdated regulatory language match outdated public health codes will be dire and far reaching. Surely, there must be a way to resolve the legal challenges without rendering more than 10,000 clinicians unable to diagnose the most fragile population.

There are various rumors floating around from professions outside of counseling that have purported that counselors are nothing more than guidance counselors helping the unemployed to find meaningful work. To suggest that for 30 years counselors misinterpreted their scope of practice and have been diagnosing and providing services to clients without adequate training and supervision is ludicrous. My academic coursework and practical training are robust—any perusal of the coursework required by CACREP would dismiss these rumors flat out. As with other professions: nursing, medicine, physical therapy—new graduates with a masters of arts in counseling that pass their national boards are qualified to work with any population but continue to develop their skills in their unique area of interest via supervision and continuing education. No professional knows everything upon completing training—we all have to continue developing our knowledge and skills under appropriate supervision. In my case I logged 3600 hours under supervision. While it is no longer required, I continue to confer with respected clinicians of all training backgrounds, attend trainings, and do self directed study to provide the best services that I can for the unique population that I serve. This is what good

clinicians do. Requiring increased education would be an undue burden in a profession/population that is already underfunded/underresourced.

I implore you to do what you can to block the proposed changes and push HB4325 through as quickly as possible. Without this bill the fallout will be dire, not only to my family and my clients, but to the residents of Michigan.

Jennifer Place, MA, LPC, NCC
Treeside Psychological Clinic, PC
45 N. Lapeer Street
Lake Orion, MI 48362
248-238-8617

www.treesidecounseling.com

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Treeside Psychological Clinic, PC
45 N. Lapeer Street
Lake Orion, MI 48362
248-238-8617

www.treesidecounseling.com



Virus-free. www.avq.com

Eddie Sleeper

From: Brad P <bradp200@gmail.com>
Sent: Wednesday, October 2, 2019 3:01 PM
To: Eddie Sleeper
Subject: testimony HB 4325

I am writing to express my strong opposition to the Michigan Department of Licensing and Regulatory Affairs' proposed rule change: 2019-063 LR and ask for your support in HB 4325 without any amendments. These proposed changes from LARA would repeal nearly the entire scope of practice for Licensed Professional Counselors (LPCs) in the state of Michigan. If these changes go through it will completely eliminate my wife's career here in Michigan. She not only has a private practice but also works as a mental health specialist with Lansing School District. Without a clearly defined scope of practice, LPCs like my wife Christine Zouaoui they will be unable to play our vital role in mental health treatment in Michigan, during a time where mental health should be at the forefront. I work part time at UPS am home to help take care of our kids one of whom suffers from an auto-immune disorder that requires a lot of extra attention and care. My wife is our homes provider, if these changes go through we will be forced to move out of state which is something we do not want to do, we love Michigan, our families and lives are here in our great state.

If these proposed rule changes are adopted, my wife and other LPC's will not be able to diagnose or administer practice therapy techniques to help people such as myself that use an LPC for their own mental health. These changes will also make it so LPC's will not be able to be reimbursed by insurance companies, which is how my wife provides for her family. 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 including my wife 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 practice will likely be out of business in months. By allowing these changes they are essentially evicting 10,000 residents from the state of Michigan, so they can go do the job they have been doing, been trained to do, have the education to do, are licensed to do, and have a code of ethics they follow to provide essential mental health care to the residents of Michigan but will now have to practice in a different state.

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 LARA to reject 2019-063 LR and protect the counseling profession and the public by supporting HB 4325 with no amendments.

Thank you for your time

Brad Przystas

6101 Stevenson Avenue, Suite 600
Alexandria, Virginia 22304
ph 703-823-9800
800-347-6647
fx 703-823-0252

Experiential Requirements for Michigan LPCs:

First, the educational requirements and training are intense and specific, in order to prepare graduate students to effectively assist their clients with their individual mental health needs:

LPCs ARE WELL EDUCATED AND TRAINED

Today, I would like to focus on four areas to inform you who your LPCs are and why H.B. 4325 is an important piece of legislation that is vital to Licensed Professional Counselors and the thousands of constituents that rely on LPCs every day.

The licensed Professional Counselors (LPCs) that practice in Michigan are well trained and because of their efforts they are able to assist your constituents when they are in their most vulnerable mental health state. Our LPCs are available when other mental health professionals may not immediately be accessible in the urban areas of the state, as well as in the rural areas that often lack qualified mental health professionals. For example the National Provider identification data file informs us that, in places such as Lapper, St. Clair, Mason and the majority of the northern part of your state, Licensed Professional Counselors make-up more than 50 percent of the mental health workforce.

On behalf of the American Counseling Association, and the more than 10,000 counselors in the great state of Michigan, I would like to thank Chair Iben, Vice Chair Lilly and the distinguished members of the House Ways and Means Committee for the opportunity to provide written testimony *in support* of House Bill 4325.

Before The Michigan House of Representatives Ways and Means Committee

Testimony of: Brian D. Banks, Director of Government Affairs
The American Counseling Association

October 2, 2019

To maintain the ability of licensed Professional Counselors to properly diagnose and treat individuals with mental disorders.

In Support of House Bill 4325

AMERICAN COUNSELING
ASSOCIATION
counseling.org



- Master's degree or higher in professional counseling from a program that reflects the Council for the Accreditation of Counseling and Related Educational Programs (CACREP) curriculum, including a minimum of 48 semester hours and a 600 clock-hour internship. Two years/3,000 hours of post-degree supervised counseling experience. This includes 100 hours under the immediate physical presence of a supervisor who must be an LPC. For persons with 30 semester hours of 45 quarter hours beyond the master's degree: One year/1,500 hours post-degree supervised experience, to include a minimum of 50 hours under the immediate physical presence of a supervisor. Supervision must be under an LPC.

VITAL FOR MENTAL HEALTH CARE

Second, H.B. 4325 is vital to your constituents who practice counseling, as well as to the thousands of constituents who rely on LPCs. Without passage of H.B. 4325, the counseling profession in the State of Michigan is at risk, and that translates to clients going without the guidance they rely on to lead a productive life at home and at work.

- Without this bill, thousands of people will be without mental health care. In many cases, it can take two to three months for a person to find a new mental health-care provider. This wait often results in increased anxiety, stress—and sometimes leads clients to rely on medications containing opioids, which may lead to additional health concerns. Without this bill, the more than 10,000 LPCs that call Michigan home will be without jobs. The proposed regulatory changes from the Department of Licensing and Regulatory Affairs limit the ability for counselors to effectively practice. This bill corrects that problem.
- Licensed Professional Counselors have practiced for more than 30 years without incident or complaint.

RESOLVES DISCREPANCIES IN LAW

Third, there is a discrepancy between the Public Health Code and LARA rules that requires your immediate attention. H.B. 4325 is written to correct any discrepancies that currently exist.

This bill would codify into statute the existing rules that have been in place since 1988. This preferred solution allows counselors to maintain their ability to properly diagnose and treat individuals with mental and emotional disorders. This bill will also make needed technical updates to the 30-year-old law.

HELPS SUFFERING CONSTITUENTS

Last, in Michigan alone, there are nearly 1.4 million adults with a mental illness and 67,000 minors suffering from a major depressive episode. The majority of these individuals are not receiving the care they require to lead a productive life. The cost of treatment is the primary

reason nearly half of adults are not receiving the treatment they need. Licensed Professional Counselors are qualified to meet the challenges of providing high-quality care in a cost-effective manner.

YOUR SUPPORT IS CRITICAL

The American Counseling Association humbly requests that the Committee support voting H.B. 4325 out of committee to a full House vote. This legislation is vital in supporting the mental health of Michigan's residents—and to support the chosen career path of Michigan's LPCs. On behalf of the well over 10,000 LPCs in the State of Michigan, I sincerely thank you for the opportunity to submit this testimony. If you have any additional questions, please contact the American Counseling Association at 1-800-347-6647.

Brian D. Banks

Director of Government Affairs & Advocacy

Ph. 1-800-347-6647 ext. 242

E-mail: BBanks@counseling.org

Eddie Sleeper

From: Daniel Cherrin <dcherrin@northcoaststrategies.com>
Sent: Wednesday, October 2, 2019 3:14 PM
To: Eddie Sleeper
Subject: HB 4325 - Support
Attachments: MI Behavioral Health and Wellness Collaborative - RESPONSE.pdf

On behalf of the MI Behavioral Health & Wellness Committee, I am submitting the following testimony in support of HB 4325. Please feel free to contact me with any questions and we are sorry we will not be there in person.

**NOW LET'S START THE CONVERSATION,
DANIEL CHERRIN**

(313) 300-0932 | DCHERRIN@NORTHCOASTSTRATEGIES.COM

NorthCoastStrategies.com | @dancherin

Please take a moment to write a review on Google.

Eddie Sleeper

From:
Sent:

Ian Shafer <ianshaferipc@gmail.com>
Wednesday, October 2, 2019 4:39 PM

To:

Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leuthouser (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 (18);

Subject:

HB4325 - Ways and Means Committee Written Testimony

Dear Committee Members and Committee Clerk,

My name is Ian Shafer, and I am a licensed Professional Counselor (LPC) here in the state of Michigan. My license number is 6401012915. I have been practicing as an LPC since 2015, and was practicing as a limited-license Professional Counselor (LLPC) prior to that since 2012. In a concerted effort to save my practice and livelihood, though, I am writing to you and to numerous other governmental officials because, as a licensed Professional Counselor, mental health practitioner, and small business-owner, I will be directly impacted by a bill that will be discussed for a vote very soon, if it has not been already. I wanted to take a moment to discuss with you the importance of HB 4325, and to dispel any misinformation you may have heard about licensed Professional Counselors.

First and foremost, please understand 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 scope of practice for Licensed Professional Counselors (LPCs) in our state in such a way that we would no longer be able to diagnose mental health issues. Without the authority to diagnose, LPCs like me will be unable to ethically play our vital role in mental health treatment in the state. HB 4325 does not expand LPC Scope of Practice in any way, shape or form; the bill clarifies the language with which LARA has found issue, it better codifies what Licensed Professional Counselors have been doing for the past 3 decades in the state of Michigan, and it adds necessary quality control elements that would strengthen requirements for LPCs to obtain continuing-education units (CEUs) and counseling program content (in terms of requirements to be CACREP accredited or follow CACREP guidelines for program structure). HB 4325 will ONLY benefit the profession and those we serve.

If the proposed LARA rule change is adopted, my scope of practice will be limited so severely that insurance companies will likely cease reimbursing me for any services. This would happen at a time when mental health concerns are reaching epidemic levels not only in our state, but in our country and across the world. We should not be imposing rules that would limit the number of available providers in this fashion.

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. Losing the authority to diagnose and the ability to receive reimbursement from insurance providers would literally kill my private practice. I am the sole owner and operator of Peace of Mind Counseling, Consulting, and Supervision LLC, at 4025 Holt Road Suite 205 Holt, MI 48842. My practice, and as such, my livelihood, will not survive if I am not ethically allowed to diagnose and treat mental and behavioral health concerns as LPCs have for the past 31 years.

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. This would happen at a time where LPCs are actually advocating for STRONGER requirements of us and our programs. We WANT to be held to a higher standard in terms of continuing education requirements and more uniformity and quality control of counselor-education programs.

There has been significant controversy and misinformation regarding the educational and supervision training and requirements of Licensed Professional Counselors. To become an LPC, I completed a 51-hour Graduate-level Master of Arts program through Central Michigan University that included courses involving: Theories of Counseling, Counseling Techniques, Theories of Counseling, Counseling Techniques, Theories and Techniques of Group Counseling, Career Development & Counseling, Community Counseling, Counseling Ethics and Professional Issues, Lifespan Development, Multicultural Issues in Counseling, Professional Counseling & Consulting. (Bolded headings indicate classes where techniques, diagnosis, and assessments were directly integrated into the course.) After my course work was completed, I completed an external practicum and internship in the community. For me, practicum and internship were a combined experience in the community, but this is not always the case. My practicum experience included a minimum requirement of 100 total hours on-site, with a required 40 hours of direct client contact, site supervision, and university supervision. Internship requirements included a minimum of 700 total hours on-site, with a required 280 hours of direct client contact, site supervision, and university supervision. I completed my practicum and internship hours over a period of 12 months, with over 1100 total hours and over 280 hours of direct client contact. As a condition of graduation, I was required to take an exit exam called the Counselor Preparation Comprehensive Examination (CPE). Before obtaining provisional licensure as a Limited-Licensed Professional Counselor (LLPC), LARA reviewed my transcripts and Professional Disclosure statement. With my provisional licensure was granted, I was required to complete a minimum of 3,000 work hours with 100 direct supervision hours over a period no less than 2 years, and to pass the National Counselor Exam (NCE) before being granted full licensure. For what it's worth, I passed the NCE in the 95th Percentile. My post-graduate log recorded well over those required totals, and I have continued to meet with my former supervisor since obtaining my full LPC in 2015, because I understand and appreciate the value of ongoing professional support. LARA reviewed my application for full licensure along with my NCE test scores, Professional Disclosure statement, and post-graduate counseling experience before granting my full license. As I hope you can conclude, my education, supervision, and experience are equivalent to both Counseling Psychologists and Counseling Social Workers, and despite the current lack of requirement for continuing education and further professional development, I have also made it a point throughout my professional career to continue learning and growing my ability in areas of clinical need.

In addition to all of this, I am also qualified as a supervisor for LLCs within the state. I completed the 30-hour continuing education Clinical Supervision Comprehensive Program (in compliance with Michigan Administrative Rule R 338.1757, Rule 7) through Advanced Counselor Training, LLC, and am taking steps to complete the Approved Clinical Supervisor (ACS) credential through the Center for Credentialing & Education. This means that a portion of my profession is dedicated not only to my own knowledge and ability within the field, but also ensuring the quality development of LLCs as well. Through my supervision, I push the importance of ethics, cultural competence, self-care, consultation, knowing limitations, and when to refer cases to a professional with a higher degree of specialization (i.e. psychiatry, clinical psychology, etc.). While other organizations and mental health professions might suggest that, "a career counselor could be diagnosing schizophrenia," such simply is not the norm for our profession, and it is not acceptable to us, let alone anyone else, that a counselor focused on career counseling would do ANY diagnosis, let alone something as severe as schizophrenia. We are trained carefully, and it is frequently reinforced, this disorders such as schizophrenia

require a higher degree of care than we are capable of offering, and as such, need a referral to those specialized professionals when we come across those cases.

To digress, 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. LMSWs and LLPs cannot bear the burden of additionally having to support our clientele. I urge the BPL, House of Representatives, Senate, and Governor to support and pass HB 4325 WITHOUT AMENDMENTS and better codify my Scope of Practice to allow me to continue providing quality and much-needed mental health care in the state of Michigan.

With hope,

Ian D. Shafer, MA, LPC

Owner/Licensed Professional Counselor

Peace of Mind Counseling, Consulting, and Supervision LLC

4025 Holt Rd Ste 205

Holt, MI 48842-6019

Office: (517) 881-7231

IanshaferLPC@gmail.com

<http://www.peaceofmindccs.com>

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Eddie Sleeper

From: Charissa Isaacs <cisaacs@renewalcenter.org>
Sent: Thursday, October 3, 2019 9:21 AM
To: Eddie Sleeper
Subject: Testimony for HB 4325

My name is Charissa Isaacs. I have held an active LPC since 2010 and have treated a thousand or more clients in the diagnostic range of SPMI (Severe and persistent mental illness) SUD (Substance Use Disorder - with a CADDC and in Ohio with a LICDC) and mild to moderate mental health. The proposed changes to scope of practice will eliminate my ability to treat these clients.

This change also directly impacts my family and local economy. If I am unable to bill insurance for my services the number of clients who are willing to be seen for counseling without a diagnosis, insurance coverage or formal psychotherapy treatments will render me a hobbyist at best. I certainly will not earn a viable income for my family with my license. While there are other career paths to choose, the cost of my current path is great and incurring another degree to continue in this work would be financially crushing.

All of the therapy techniques I use are evidence based and endorsed by the state and local DHS such as cognitive behavioral therapy, dialectical behavioral therapy, emotion focused therapy and solution focused therapy, motivational interviewing (all of which I have been thoroughly trained in and am certified to use, most of these training were required by employers funded by the state.)

I am passionate about my work and have seen lives saved and changed through the services I offer. I am not alone. I am not sure the origins of this proposal, but it seems fool-hearty to eliminate providers who are proven effective and have met the rigors of graduate school, licensing, continuing education and ethical boards for their profession while the population of our state is in great need of mental health support. We have wait-lists at our agency and at most of the professional agencies in the Macomb county area. These wait lists have forced providers to only serve the most severe clients. Forcing others to go without services. Community Mental Health organizations do not see clients in the mild to moderate range. This includes depression, anxiety, ADHD, most childhood behavioral diagnosis, bipolar without psychotic symptoms and a host of personality disorders, not to mention substance use disorders. Mental health disorders are progressive, by forcing clients to wait for services because this proposal has eliminated providers will increase the incidences of suicide, homicide and mental health related crimes that could have been avoided through pro-active intervention.

This proposal not only impacts me, it impacts the entire state of Michigan negatively. I urge you to not allow these changes. The gross scope of this proposal is overbearing and unsustainable.

Charissa Isaacs, MA, LPC

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Eddie Sleeper

From: THOMPSON FAMILY PRACTICE <tfp4221@gmail.com>
Sent: Thursday, October 3, 2019 9:43 AM
To: Eddie Sleeper
Cc: Business Office; senherter@senate.michigan.gov
Subject: Public hearing on HB4325 on 10/02/2019

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 (LPC) in Michigan. As a citizen and a patient of a Licensed 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. The mental health system is already overwhelmed with a shortage of mental health professionals and to take away the LPC's ability to practice in Michigan would be devastating.

Sincerely,

Pam Thompson, D.O.

Eddie Sleeper

From: kathleen august <kaug63@aol.com>
Sent: Thursday, October 3, 2019 12:06 PM
To: Eddie Sleeper
Subject: HB4325-ways and means committee written testimony

Dear Sir/Ms-

Pleased be advised that I am a LPC with a full time practice in Oakland County MI. I am writing to urge you to pass the HB4325 bill without amendments as soon as possible. If this bill is not passed immediately it will cause significant harm to the 42 clients currently on my case load in my practice. DO NO HARM is an important medical credo that I take seriously. If this bill is not passed I have no doubt that I will be harming my clients. The majority of my client load consists of children and adolescents and as we know mental health in that population has been consistently declining. Many of them have difficulty accessing a mental health professional and also have significant anxiety around starting the therapeutic process. Please do not put me in a position to cause harm to my clients.

On a personal note - I am a 63 year old single female and have no doubt that unless this bill is passed I will not be able to continue to work as an LPC in a financially viable way. As we know it is difficult for individuals in their 60's and beyond to find viable employment to support themselves. Without my ability to continue my private practice I fear that I will not be able to support myself ultimately making it impossible for me to meet my monthly household expenses. I do not want to become a burden to my community or government and wish to continue being financially independent.

Again - I implore you to pass HB4325 with no amendments as quickly as possible to save my job and that of approximately 10,000 LPC's currently working in Michigan.

I thank you and I have no doubt, if possible, my client's would also thank you for allowing them to continue on their current path to mental health wellness with me.

Sincerely,
Kathleen M. August, MA, LPC

Eddie Sleeper

From: Ross Flynn <rossflynn@me.com>
Sent: Thursday, October 3, 2019 12:11 PM
To: Eddie Sleeper
Subject: LPC rule changes

I am writing to express my objections to the proposed LPC rule changes (QR 2019-063 LR) which would revoke the longstanding practice of counselors to diagnose and utilize counseling techniques.

I am in a unique position to understand the educational and training requirements necessary to do work as an LPC including diagnosing and treating problems with psychotherapy techniques. I have a CACREP- accredited MA in Counseling, two post-masters specializations in Mental Health and Marriage & Family, and a PhD in Counselor Education with a dissertation on the contribution of personal epistemology to the working alliance between counselor and supervisor. I've worked in private practice for 20 years as an LPC and 16 years as an LMFT. I've been a part-time graduate school instructor at the masters and doctoral level for 17 years. I have supervised many LLPcs and LLMTs. I observe LPCs in action with their clients, and I understand what competence looks like in this field.

I am aware that counselors-in-training take classes in diagnosis, treatment planning, techniques of counseling, practicum and internship. They are taught and supervised at every level, and then work thousands of hours under supervision to hone their craft. I have experienced them as skilled in building relationships, competent in hearing what their clients are saying and not saying, and capable in diagnosis and in utilizing counseling techniques.

It seems incomprehensible and unconscionable to imagine that after 20+ years of thousands of LPCs spending tens of thousands of hours journeying successfully with clients, the state would take action on a difference between policy and practice, and opt to embrace an outdated policy from the early days of guidance and counseling, long before counselors were trained in diagnosis and psychotherapy techniques.

I urge our state decisionmakers to embrace the reality that LPCs have been trained in diagnosis and psychotherapy over the years in serving the hurting people of our state of Michigan. I believe these professionals deserve to be honored for their significant sacrifices by these professionals. I believe the public deserves to continue to be served

Sincerely,

Ross L. Flynn, PhD
LMFT, LPC, NCC
Rochester Family Therapy Clinic, PLLC
71 Walnut Blvd, Suite 109
Rochester, MI, 48307
586-242-5512 (cell)
www.rossflynn.com
Adjunct Instructor
Oakland University

Department of Counseling
School of Education & Human Services
Pawley Hall, Rochester, MI, 48309
rossflynn@me.com

Eddie Sleeper

From: Norcara Moye <nmoye@newoakland.org>
Sent: Thursday, October 3, 2019 4:56 PM
To: Eddie Sleeper
Subject: testimony in support of HB 4325

Good Afternoon,

Emailing, as I am terribly concerned about my limited professional counselor license as well as the pending Michigan mental health crisis in the event that HB 4325 is not supported. My name is Norcara Moye and I'm a limited licensed professional counselor in our great state of Michigan, born and raised. I am a 2017 Oakland University alumnus (a CACREP accredited counseling Master's program,) and I'm currently employed at New Oakland Family Centers which provides a variety of mental health services. I am apart of our trauma team who conducts trauma assessments for children referred by CPS and within the foster care system. I treat consumers across Oakland, Wayne, Genesee and Macomb County. In the future I would like to treat clients and provide individual psychotherapy in a clinical practice of my own.

LARA is proposing that professional counselors are practicing out of their scope. While the language used in our rules and statutes are outdated, I assure you that our rigorous training we receive while in school is not. Licensed professional counselors and are very well equipped to address Michigan's needs for mental health treatment. As this amendment aims to limit the scope of licensed professional counselors I am exploring you to think of the 10,000 counselors who will be unable to practice as we will not be reimbursed by thousands of consumers we treat and how displaced they would be in an already overburdened mental health system. Please pass HB 4325 when it reaches your floor. Please voice your opposition to these proposals LARA has felt pressured to impose. Please help myself and many others keep our ability to diagnose and treat clients.

Best,

Norcara Moye, MA, LLC

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Eddie Sleeper

From: Michael Butkus <mbutkus4@gmail.com>
Sent: Thursday, October 3, 2019 9:26 PM
To: Eddie Sleeper
Subject: HB 4325

I have a PhD in clinical psychology, have a small private practice, and before retiring have trained many students in diagnosing and treating patients with mental health issues. My daughter is in her final year at Oakland University's Masters in Counseling Program. She and I often discuss clinical issues and thorny diagnostic problems as well as the course work she's had. I can say without any hesitation that her training in diagnosis and treatment has been comprehensive, detailed, and very practitioner-oriented (as opposed to clinical doctoral programs emphasizing research). It is easily on par with the training I received in diagnosis and treatment. I would not hesitate to send individuals to her suffering with mental health problems. I should also mention that I have not read of any study that shows patients treated by mental health counselors have been harmed to a degree exceeding that found among those practicing with more advanced training and degrees. It is really unfortunate that students from the program would be denied practicing because of the proposed changes to LARA licensing rules. In my opinion HB 4325 does not enhance the scope of practice of counselors, it only puts into law what they have already done for the past 30 years. And most importantly if counselors can no longer practice in Michigan as a result of legislative changes, mental health patients treated by Licensed Professional Counselors (LPCs) (estimates of upwards of 150000 lives) would have to find someone else to help them. As I am sure you are aware, there are far more individuals needing mental health treatment than receive it in no small measure because there aren't enough qualified professionals to treat them. De-licensing LPCs would unconsciously make this situation worse. I strongly urge you to pass HB 4325 with the utmost haste.

Eddie Sleeper

From: Jarrette Wright-Booker <introspectivecounselingllc@gmail.com>
Sent: Friday, October 4, 2019 8:49 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 LLC'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

Intropective Counseling, LLC

(313) 207-5581

www.intropectivecounselingllc.com

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Eddie Sleeper

From: Jennifer Standish <jen.anne.standish@gmail.com>
Sent: Friday, October 4, 2019 12:29 PM
To: Eddie Sleeper
Subject: LARA and HB4325

Hello Representative Sleeper,

Recently, I saw that LARA was in the process of changing some definitions pertaining to Licensed Professional Counselors that would make it impossible to practice and bill insurance companies for their services and treatment. As someone who has received treatment from two therapists that are LPCs, this news left me feeling disheartened. Let me share my story with you to show how helpful LPCs have been to me over the years and to urge you to make sure these providers can still practice as they have for many years.

One day in early Fall of 2003, I found myself on the floor of my bedroom feeling sick. It was a sickness that had been building within me for some time, but something I didn't recognize. There was a constant fear and panic following me throughout my day. This time, it was so strong that I could not bring myself to do anything. I was sure that something horrible was about to happen and I remained frozen there until my roommate came home and found me. I had been crying and forgotten to eat or drink anything all day. This roommate urged me to talk to a doctor, she thought that if I did not, it would worsen and become even more unmanageable.

We went together to see a doctor and I was diagnosed with anxiety and depression. While the doctor directed me to start medication, he said that treatment would be most effective if I saw a therapist. While the thought of talking to someone about something I didn't even understand terrified me, I was too exhausted to continue my life as it was. If I did not get better, I would not be able to continue college and the life I was trying to build would slip through my fingers. The thought of that potential future scared me more, so to therapy I went. At the time, my medical insurance would not cover mental healthcare. This meant that my therapist would put her services on a sliding scale, and I would have to pay \$50 for each session that I desperately needed. This amounted to \$200 a month for a poor college student. But the LPC that was recommended to me came up with a plan to reach some therapy goals in as short an amount of time as we could muster, and I went until I could no longer pay. While it was helpful, it was not enough. For the next portion of my life I attempted to self-medicate, tried to ignore my emotions, continuing on a slow decline until the stress of life became too much. Addiction and isolation was my reality for years.

Fast forward to 2014. I had just gotten married and wanted to start a family. Once again, the anxiety and depression became debilitating. I could not concentrate at work and struggled constantly with my emotional well being. I was sure there was no answer for me and I grappled with wanting to continue on every day. I desperately wanted the suffering to stop, but had no clue what to do. One day at work, I learned that our insurance covered therapy visits 100%. Finally, the hurdle of paying for therapy was lifted and I found someone who seemed compassionate and specialized in anxiety and self-esteem issues. This therapist was an LPC and she became my guide to dealing with my anxiety, depression, and taught me to cope with my symptoms. See, I learned that my issues were something that I would have to manage my entire life rather than something to cure or fix. Importantly, I had support from someone who knew how to help and would be available to me when things were hard.

This was a huge turning point in my life. The journey was very hard, but at least I knew where I was going for the first time. My therapist was a much needed beacon. Like many people, I did not value my mental health. I can say that along with the improvement of my symptoms, my physical health improved and today I have the skills I desperately needed all those years ago. I also have a beautiful baby girl and she will know the importance of her mental health. Above all, I want her to have access to the same care that saved me.

Sure, I could have found another therapist if mine could no longer practice, but building that relationship was paramount to my improvement. I worry for the thousands of clients that now hang in limbo. They may have taken years to develop a relationship with their therapist too and it could be all for nothing if LARA's changes

go into effect. If I need to go back to therapy, I want to have the same options as I do now. As I said, this battle is lifelong for me.

Poor mental health is an insidious problem. It impacts daily life and ripples throughout families and communities. It may not be obvious what the actual problem is because poor mental health can be quiet and isolating, but it is there in the background driving bad decisions and behavior. People are just trying to cope. Michigan needs more mental health professionals, not less. I believe that this is one of the biggest problems we face. LPCs are fighting for those who really need it and giving them the tools to be mentally healthy.

I implore you, please do not allow LPCs to lose their ability to help. If my therapist could not bill my insurance, I would not have been able to see her. Opposing LARA and supporting HB4325 would ensure that no one would lose the care they have already established and allow those seeking mental health care in Michigan options to fit their needs.

Thank you for your consideration,

Jennifer Standish

From: Gaylia Ignacio <gayliaignacio@gmail.com>
Sent: Friday, October 4, 2019 2:14 PM
To: Eddie Sleeper
Subject: LPCs - What do writers have to do with career counseling and schizophrenia?

Although the Ways and Means meeting on LPCs is completed, here is something to think about before voting on Tuesday.

Think for a moment about writers. In order to be a good writer, one must learn many skills, such as basic grammar, punctuation, spelling, and proper sentence structure. They also must be trained to organize their thoughts, research their topic, articulate their ideas, understand their audience, increase their vocabulary, develop their creativity, as well as be able to problem-solve, focus, meet deadlines, and cope with rejection.

Being trained as a counselor is more analogous to being trained as a writer, than being trained as a psychologist. When one understands this, it is easy to understand why the MPA's career counselor/schizophrenia argument does not make sense. It is as silly as saying a master level writer can write a novel but does not have the skill to write for a newspaper or a biographer lacks the skills to write a vacuum cleaner manual. A writer's core skills are writing skills and can be used to write anything. The skills are universal and transferable.

That is how counseling works! A counselor is trained in core skills:

- how to build relational rapport and trust,
 - how to listen empathetically,
 - how to instill hope,
 - how to be genuine with unconditional positive regard for the client,
 - how to identify client strengths,
 - how to determine client problems,
 - how to identify mental health symptoms,
 - how to navigate the DSM (i.e., comprehend its language, its coding system, its diagnostic criteria, its rule out method, its dual diagnose method)
 - how to match the best therapeutic techniques to the client's current struggle,
 - how to set goals and create a plan of success with the client (treatment planning)
 - how to help a client move toward change,
 - how to motivate a client,
 - how to problem-solve with a client,
 - how to read evidenced-based research,
 - how to stay abreast of the newest research and be a lifelong learner,
 - and how to refer a client to other services, such as a psychologist for testing or a psychiatrist for medication.
- These are just some of the counseling skills taught, learned, and practiced in a master's level counseling education program. These are the skills demanded of and monitored by our professional associations and code of ethics. These are the skills we are tested on by the national exam. These skills are universal to counselors and they are transferable – these skills can be used when working with a client who is seeking to

identify a career path, and these skills can be used to help a person with schizophrenia stay on his or her medication and follow treatment plan steps.

So when people understand what counseling is, it is easy to see that counselors can indeed diagnose appropriately, develop proper treatment plans, and apply counseling interventions to all sorts of people and mental health disorders.

"The mind is a scary place; you don't want to go there alone." Unknown

Gayla Ignacio, MA, LPC
Family & Child Play Therapist
517-416-3115

"I saw the angel in the marble and I carved to set him free" ~ Michelangelo

Eddie Sleeper

From: Christine Sutherland <cmsutherland1@yahoo.com>
Sent: Friday, October 4, 2019 2:45 PM
To: Eddie Sleeper
Subject: LARA proposed changes/HB 4325

To Representative Sleeper,

I am writing you regarding proposed rule changes from the Michigan Department of Licensing and Regulatory Affairs (LARA).

Within their newly proposed rule changes, LARA attempts to remove the ability of Licensed Professional Counselors (LPCs) to diagnose and treat mental health clients. LARA falsely claims LPCs have never had this ability.

While LARA makes this claim, they have spent the past 30 YEARS confirming, and giving authority to LPCs to diagnose and treat clients. They claim LPCs don't receive training in diagnosis and treatment in their Grad Level university courses. A cursory check of university course requirements prove this utterly false.

LARA's motive is clearly not for the benefit of the mentally ill in Michigan. Hundreds of thousands of mentally ill clients are treated by LPCs across Michigan; and hundreds of thousands are still left without treatment. The implications of these rule changes would leave over 10,000 + LPCs without jobs and hundreds of thousands more without care. All this in the middle of an opioid, suicide, and overall mental health crisis.

LARA's motive is quite clear when reading the Michigan Psychological Association's 3rd quarter newsletter where they claim outright to be seeking aid from LARA to prevent LPCs from claiming reimbursement from insurance (i.e. BCBSM). It's money. It comes down to money.

As overseer of rule changes, I ask you to put a hold on LARA's proposal which is dated for 10/04/2019. This will allow time for House Bill 4325, which protects the rights of LPCs, to be sent through the House and Senate.

Thank you for your consideration,

Christine Sutherland MA LPC NCC

Eddie Sleeper

From: Erin Arwady <erin.arwady@lmsw@gmail.com>
Sent: Friday, October 4, 2019 4:07 PM
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: HB 4325
LARA LPC letter.docx

Dear Ways and Means Committee:

I am contacting you again to reiterate my support for LPC's in the state of MI and the passage of HB 4325. I am unable to attend the hearing next week as an ally but wanted to make my stance known. I am attaching my detailed stance against the LARA rule changes and support for HB4325. Thanks in advance for your time and consideration.

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*The information contained in this communication is highly confidential and is intended solely for the use of the individual(s) to whom this communication is directed. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information is prohibited. Please notify the sender, by electronic mail or telephone, of any unintended receipt and delete the original message without making any copies.

Erin Arwady, LMSW
Tuesdays, Wednesdays, Thursdays
Psychologist for Individuals, Children, & Families
269-743-7360
erin.arwady.lmsw@gmail.com
www.erinarwady.com

Eddie Sleeper

From: Martie Gerecke <lifepathways@att.net>
Sent: Friday, October 4, 2019 5:49 PM
To: Eddie Sleeper; Rep. Eric Leuthouser (District 58); Rep. Brandt Iden (District 61); Rep. Beth Griffin (District 66); Rep. Jason Wentworth (District 97); Rep. Roger Hauck (District 99); Rep. Bronna Kahle (District 57); Rep. Rebekah Warren (District 55); Rep. Kevin Hertel (District 18); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Jim Lilly (District 89)
Subject: HB4325

Hello,

Thank you for hearing testimony from my LPC colleagues this week. Your action and continued support are very much appreciated. I won't waste your time by reiterating the education and training that makes LPCs qualified. Before you vote on sending the bill to the full House, I simply wanted to direct your attention to requirements for licensing on page 3 of the LARA application for Professional Counselors. Among the things applicants need to submit are:

Counselor License by Exam

Applicants must submit the following:

• Official transcripts confirming having received a master's or doctoral degree in counseling or student personnel work

submitted directly to this office from a regionally accredited educational institution. An applicant must have

completed

not less than 48 semester hours or 72 quarter hours in counseling topics which includes studies in all of the following:

career development; consulting; counseling techniques; counseling theories; counseling philosophy; group techniques; professional ethics; research methodology; multicultural counseling; testing procedures; practicum; an

internship that consists of not less than 600 hours of supervised clinical experience in the practice of counseling.

• Certification of Counseling Education form submitted to this office directly from your educational institution.

• A Professional Disclosure Statement (See specifications on Page 5).

Not only have the ACA and MCA listed such practices in fact sheets on what LPCs do, LARA is endorsing them in the application for license. These practices are expected otherwise there would be no need for education and training to provide them.

Thank you for your time and consideration.

Respectfully,

Martie Gerecke, LPC, NCC
Life Pathways Counseling & Coaching, LLC
4345 Meigs Ave., Ste. 109
Waterford, MI 48329
ofc. (248) 599-7590
fax (844) 270-3954

Eddie Sleeper

From: Nancy S Kingma <nkingma@comcast.net>
Sent: Friday, October 4, 2019 7:45 PM
To: Eddie Sleeper
Subject: Please support HB 4325

October 4, 2019

Dear Representative Sleeper,

I urge you to support HB 4325, which would protect the work of licensed professional counselors in Michigan. This bill is of interest to me because I am one of them. I am a Licensed Profession Counselor who is nationally certified with the National Board of Certified Counselors (NBCC), a Limited Licensed Psychologist, and a Registered Nurse in the great State of Michigan. My caseload consists of forty to forty-five clients per week, most of who suffer from symptoms of traumatic loss, PTSD and/or postpartum depression. I am both highly qualified and experienced.

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. In your C.A.R.E.S. Progress Report of 2018 it was recommended that you provide incentives for mental health professionals to work in Michigan. Why would you then want to decrease mental health professionals?

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. 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.

With Regards,

Nancy S. Kingma, RN, LLP, LPC, NCC

Counseling Associates of West Michigan

Eddie Sleeper

From: April Dungan <tiffany.a.dungan@wmich.edu>
Sent: Saturday, October 5, 2019 10:56 AM
To: Eddie Sleeper
Subject: Vote yes on HB 4325 as soon as possible
Attachments: Edward Sleeper Letter.docx

Hello Mr. Sleeper,

Please see my attached letter and request for my letter to get my written testimony on record for the hearing on October 8, 2019 regarding HB 4325 on the agenda for the Ways and Means Committee.

Sincerely,

Tiffany April Dungan

Eddie Sleeper

From: Nancy Curtis <run4mylife56@gmail.com>
Sent: Sunday, October 6, 2019 8:43 AM
To: Eddie Sleeper
Subject: Concern about proposed rule changes by LARA affecting LPC's
Attachments: My name is Nancy Curtis.docx

Please read and pass on to the Ways and Means Committee.

Eddie Sleeper

From: Linda Herrin <lindaherrin@gmail.com>
Sent: Sunday, October 6, 2019 1:13 PM
To: Eddie Sleeper
Subject: House Bill 4325

Dear Representative,

I am writing to once again ask the Ways and Means Committee to pass HB 4325 on Tuesday without amendments. The consequences if Licensed Professional Counselors are not allowed to practice, even for a brief period of time, are not trivial for them, their businesses, their clients or the state of Michigan.

I believe that everybody who isn't protecting their turf by objecting to HB4325 as it stands now understands that LPCs are not entry level practitioners, that we have had excellent education, supervision and training in both diagnosis and treatment modalities and that we are employed in a variety of capacities in Michigan.

Most of LPCs, like me, have had training in testing and assessment but prefer treating to testing. There is no one group of clinicians that has that training and capability. In this day and age most of us choose a focus area to practice within because there is simply too much new information coming out to be a good generalist. Psychologists, social workers and counselors need to stand together to bring the best care to Michiganders.

Please pass HB 4325 so it can move on for a full House vote.

Thank you,

Linda L Herrin, LPC
LPC# 6401015414

Eddie Sleeper

From: Fedele, Stephanie <sfedele@oaklawnhospital.com>
Sent: Monday, October 7, 2019 10:32 AM
To: Eddie Sleeper
Subject: HB 4325

Dear Ways and Means Committee,

My name is Stephanie Fedele and I work as an outpatient therapist for Oaklawn Hospital in Marshall, Michigan. I have been a Limited Licensed Psychologist (LLP) in the state of Michigan for the past 15 years. In an effort to expand my career opportunities, I have recently (this week) become a Limited Licensed Professional Counselor (LLPC) as well. All the Licensed Professional Counselors I have worked with over the years have been very competent and caring individuals. LPC's in Michigan, and in many other states, have been afforded a degree of respect from insurance companies and professional organizations that LLP's have not. You can imagine my shock and dismay when I learned the Department of Licensing and Regulatory Affairs is proposing changes to LPC licensure which would seriously impair an LPC's ability to perform his or her job duties.

LARA wants to move the majority of definitions in the rules section to a new education section. By doing this, LARA would seriously limit what an LPC would be allowed to do in his/her practice. This change has the potential to cripple the close to 10,000 LPC mental health providers in our state. If each of those providers sees at least 20 clients per week, we could easily see 200,000 clients each week not receiving the mental health services they need. At a time when mental health support is in short supply, this would be devastating.

At our own facility, new clients have to wait six weeks before they can get an appointment. I know the other providers in our practice could not handle absorbing all the clients who could potentially lose their therapists. The Oaklawn Hospital's psychiatric unit would also be negatively impacted. We have an LPC who is the intake coordinator. She handles all the cases that come in through the emergency room. We also have LPC's who run the psychotherapy groups at the unit each weekend. Without these key therapists, the good reputation we've worked so hard to achieve would diminish. Our LPC's are quality providers who are essential to our program. LARA's proposed changes would not only be detrimental to the LPC's here at Oaklawn Hospital, but to all the other hospitals and agencies who employ them.

LARA would also like to do away with the training requirements for LPC's who supervise LLP's who are obtaining their permanent licenses. Specific training to become a supervisor is widely recognized in the therapy world. To do away with this rule would diminish the supervisory position and potentially reduce the quality of supervision provided to LLP's.

LARA's proposed changes would devastate our state's provision of mental health services. In lieu of their proposed changes, I am urging you to vote yes on HB 4325 when it comes before you this week. If you read HB 4325, you will find reasonable proposed changes to the scope of practice for LPC's. The proposed changes help clarify, and retain, those practices LPC's have been successfully engaging in for the past 30 years. I sincerely hope you will look into these matters and realize HB 4325 is the right thing for Michigan's LPC's and for Michigan's constituents.

With respect,

Stephanie Fedele, MA, LLP, LPC | Outpatient Therapist

Certified Therapist in EMDR

Outpatient Psychiatric & Psychological Services

15209 W. Michigan Ave., Marshall MI 49068

Ph 269-781-9119 Fx 269-781-7872



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Eddie Sleeper

From:

Brian Marody <marodybrian@gmail.com>
Monday, October 7, 2019 11:31 AM

To:

Rep. Lee Chatfield (District 107); Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89);
Rep. Eric Leuthouser (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
Support an Amendment Free HB4325

Subject:

Please support a clean version, without amendments of HB4325 to protect LPCs scope of practice. 10,000 LPCs are at risk of losing their livelihoods and 150,000-300,000 patients are at risk of losing their mental health providers.

Eddie Sleeper

From: Langlois, John <John.Langlois@morcin.org>
Sent: Monday, October 7, 2019 1:48 PM
To: Eddie Sleeper
Subject: Please support HB 4325 and pass it out of committee ASAP without amendments.

Please support HB 4325 and pass it out of committee ASAP without amendments.

Thank you very much.

John Langlois

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Eddie Sleeper

From: David.Szczepanski@midmichigan.org
Sent: Monday, October 7, 2019 1:52 PM
To: Eddie Sleeper
Subject: HB 4325

I just learned that my suicidal daughter may no longer be able to see her counselor due to some silly move by LARA. I am absolutely devastated and sick. I want to know who will be held responsible if you cut off her therapy. Please let me know who will be held responsible this is wrong and careless. You are messing with people's lives.

Dave Szczepanski
HR Director
MidMichigan Health
Phone (989) 839-1855
david.szczepanski@midmichigan.org

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Eddie Sleeper

From: Tina Felcyn <tinaf@allthingspossiblewc.com>
Sent: Monday, October 7, 2019 3:10 PM
To: Eddie Sleeper
Subject: Please Pass HB-4325 on 10/8/19
Attachments: LPC Quick Fact Sheet updated 3-15.pdf

Dear Mr. Sleeper,
I am a strong advocate for accessible mental health services to all persons. I am in support of passing House Bill 4325 (proposed substitute H-3). Licensed Professional Counselors ARE trained and educated in diagnosing and psychotherapy techniques. Licensed Professional Counselors provide the psychotherapy and diagnosis needed to our clients when they feel they are at the lowest point in their lives. We don't get called when someone is feeling great and everything is going well in their lives. We are called in when a tragedy occurs at a high school, middle school or elementary school to help our students cope with the tragedy that has occurred. Have you sat down and talked to a teenager who has attempted suicide? Have you heard their thoughts? Have you had the chance to sit down with an adolescent who is finally able to tell someone about being abused? How about that young person who the social worker referred to us because they are being released from an Inpatient Mental Health Treatment Hospital and needs follow up psychotherapy? I have provided the psychotherapy and the diagnosis which helps create the treatment plan, goals and objectives to help these clients go back to a normal sense of well-being. Who will provide these services if HB 4325 is not passed, because the social workers and licensed psychologist alone can not meet the needs of our communities. Attached you will find a LPC Quick Fact Sheet created by the Michigan Counseling Association Licensee which defines the Licensed Professional Counselor. Please share this honest information about who we are and how LPC's are qualified to continue serving the citizens of Michigan.

I am asking the Ways & Means Committee to pass HB 4325 out of the committee on Tuesday, October 8, 2019, and for the Speaker of the House to please put it up for a vote without amendments ASAP. I am asking for your help to make sure LPC's continue to be aligned with our Ethical Standards set forth by the American Counseling Association. I am asking my all my state representatives to support HB 4325 and to allow me and my co-workers to continue to provide the needed mental health services in Clinton Township and the great State of Michigan!
Take Care,
Christina Felcyn, MS, MA, LPC NCC
Licensed Professional Counselor
License #6401013964

Christina Felcyn, MS MA LPC NCC
Clinical Psychologist
Board Certified Counselor
www.allthingspossiblewc.com

All Things Possible Wellness Center
Counseling and Assessment
7211 Harper Ave, Ste 2A
Clinton Township, MI 48036
Phone/Text (Cell): 586.765.0576
Phone (Office): 586.213.5505

Eddie Sleeper

From: Liesen, Ann <Ann.Liesen@morcing.org>
Sent: Monday, October 7, 2019 10:51 PM
To: Eddie Sleeper
Subject: Please pass HB 4325

Dear Representative Edward Sleeper,

I am writing to voice my support for HB 4325 and to request that you pass it out of the Way and Means committee as soon as possible and without amendments.

I am a Nationally Certified Licensed Professional Counselor, adjunct professor at Oakland University, certified counseling supervisor. I earned both my Master's in Counseling and my Doctorate in Counseling Education from Oakland University. OU has a rigorous CACREP accredited counseling curriculum that is concentrated in testing and assessment, diagnosis, theory, research, and therapeutic practice.

As a practicum instructor at OU, I have had the honor to endorse several incredibly talented, compassionate, dedicated, and clinically sophisticated students into the counseling profession. Like myself, LPCs have invested substantial time, resources, money, and years of sacrifice to earn the right to practice. Education is expensive. Student debt is at an all-time high. Without the passage of HB 4325 our scope of practice could be limited so severely that thousands of LPCs will be unemployed. This will obviously have a negative impact on the well-being of the clinician and their families. This would also be fiscally detrimental as LPC who are no longer employable cannot pay back student loan debt or pay taxes. Please pass HB 4325 and honor their academic commitment and their well-deserved right to practice within the growing complexity of the mental health community in Michigan.

I currently manage the counseling and behavioral health department for MORC Inc., a well-established non-profit mental health agency that serves children and adults with developmental disabilities and emotional challenges across Macomb, Oakland, and Wayne County. I have a task force of 30 clinicians who service on average 1400 children and adults with severe development challenges across the tri counties. One third of our work force are LPCs and LLC's. Persons with developmental disabilities are the most marginalized and disenfranchised members of our society. They are 4 times at risk of being abused and neglected. Without the passage of HB 4325 LPCs could lose their right to practice. This would significantly limit access to mental health prevention, creating greater risk of hospitalization for risk management. This is not cost effective and impose irreversible trauma on individuals and their families.

Please pass HB 4325.

Respectfully,
Ann Liesen, PhD, LPC, NCC, LBSW, QIDP



ANN LIESEN, PH.D., LPC, NCC, LBSW
Counseling and Behavioral Support Manager
MORC, Inc.
1270 Doris Road

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Eddie Sleeper

From: Michelle <mherterl3@comcast.net>
Sent: Tuesday, October 8, 2019 8:10 AM
To: Eddie Sleeper
Subject: Fwd: LPC bill 4325

Please forward this email to committee members as I see you meet today. Please support the passage of bill 4325 which is so important to the health of Michigan residents!

Thank you,
Michelle Hertel

Sent from my iPhone

Begin forwarded message:

From: Michelle <mherterl3@comcast.net>
Date: October 8, 2019 at 7:44:47 AM EDT
To: sgorodon@house.mi.gov
Subject: LPC bill 4325

Sondra
I am writing this to urge the house health policy committee to approve bill 4325 introduced by representative Miller. This bill would overturn proposed LARA rule changes for Licensed Professional Counselors. The proposed LARA changes to LPC practice would have devastating effects on the mental health of the Michigan public at large. Many people depend on the services of these professionals and the proposed changes would prevent many from obtaining their services and force many good professionals out of work. As a consumer of the services of a LPC I can't tell you how invaluable their services are. I urge the support of bill 4325 so these professionals can continue to do the amazing work they do. Please forward this to the committee, thank you

Sincerely,
Michelle Hertel

Sent from my iPhone

