

## Eddie Sleeper

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**From:** Naomi Avril <naomiruthavril@gmail.com>  
**Sent:** Sunday, September 29, 2019 5:46 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 testimony

Dear Representatives of the Ways and Means Committee,

I am writing to express my views to you on how critical passing HB4325 is for the mental health care of 150,000+ Michigan residents currently in treatment provided by 10,000+ LPCs (Licensed Professional Counselors) and LLPCs (Limited Licensed Professional Counselors) in the state. If this bill does not pass, it would be devastating for these 150,000+ clients who are receiving counseling for a variety of issues such as depression, bipolar disorder, post-traumatic stress disorder, anxiety, suicidal ideation, etc. to be abandoned by their therapists. It would put 10,000+ Michigan LPCs/LLPCs out of business who have extensive Master's level training in diagnosis and evidence based treatment of mental health conditions. These counselors would be at risk to lose their income and the ability to use their training to support themselves and their families financially.

If the bill does not pass, it would result in a statewide mental health emergency. We already have a shortage of mental health clinicians in the state. We need more counselors, not fewer.

LARA is wanting to change a rule that has been in place for 30 years. HB4325 is moving through the legislative process and would update the antiquated language of the original law regarding LPCs/LLPCs scope of practice and would eliminate the need for LARA to change their rule. This whole crisis could be avoided if the bill passes as is, with no amendments added.

There is a misconception about HB4325, that it would expand LPCs/LLPCs scope of practice, but this is not true. It is not an expansion of the scope of practice but will rather codify the current scope which has been in place for the past 30 years, with much more clear language. Please help make this abundantly clear to all other Representatives and make members of the Senate aware of this crucial point as well.

Thank you for your time and consideration of this critical issue.

Best,

Naomi Avril, MA, LLPC, NCC



## Eddie Sleeper

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**From:** Julie Artinian <julieartinian@gmail.com>  
**Sent:** Sunday, September 29, 2019 5:48 PM  
**To:** Eddie Sleeper  
**Subject:** HB-4325 Ways and Means Committee Written Testimony

Dear Ways and Means Committee,

Hello. I am a licensed professional counselor (LPC) and limited license social worker (LLMSW) in Michigan. I am writing to urge you to support HB 4325, which would protect the work of licensed professional counselors in Michigan.

As you may have already heard, efforts are being made to greatly restrict the scope of practice of LPCs, which would in turn negatively affect people who suffer from various emotional and mental disorders. There are 10,000 LPCs in Michigan who are estimated to currently treat over 200,000 Michigan citizens for issues from PTSD to depression, divorce, anxiety, childhood trauma, sexual abuse, domestic violence, just to name a few. I have been fully licensed in Michigan since 2002 and I have worked with Michigan citizens with all kinds of mental health issues. Many of my clients have been small children in foster care, while others are both men and women who have suffered from sexual assault as children but are still picking up the pieces of their lives as adults.

It is imperative that you understand that as an LPC I was trained in assessment and counseling, giving me the ability to diagnose and treat clients. I was supervised for 700 hours in my graduate program and for 3000 hours post graduate, while working. I have passed the NCE, National Counselor Exam, a requirement to obtain my LPC. This training has allowed clients the opportunity to benefit from services in a variety of my practice settings from non-profits to the private practice where I am now. I am also a National Certified Counselor (NCC), which means that I have kept up on CEs since 2002.

My practice is an individual LLC, but I rent space with four other therapists: two LPCs and two LMSWs. If LARA's rules go uncontested and HB 4325 is not passed, then myself and the other LPCs will default on our 4-year office lease. Hundreds of clients will go without services indefinitely, possibly forever, since my county, like many, is an underserved population. Furthermore, the impact LARA's rules on individual business owners and non-profits combined statewide is unthinkable. Every inch of our state will be affected should HB4325 not pass.

It is vital that counselors are able to maintain their scope of practice. This scope is encompassed of skills that are mastered during the rigorous training of mental health counselors, and these proposed restrictions by LARA would severely limit the services LPCs can provide, as well as infringe on our ability to bill medical insurance. The access of quality health mental health care to Michiganders would be greatly reduced at a time

when they are needed more than ever. HB 4325 rectifies this problem by updating the language of the Public Health Code to reflect the current training and practices of LPCs in Michigan, while bringing the code into alignment with the national standards for professional standards.

If HB 4325 is not passed, and LPC's scope of practice is restricted, thousands of Michigan LPCs see their livelihoods severely impacted, while hundreds of thousands of everyday citizens will lose access to their mental health counselors and likely be severely limited in how long it takes to find counseling services.

I am asking you to vote **YES on HB 4325**. I need you to help the 200,000+ citizens in Michigan, the 10,000 LPCs, thousands of LLPCs, and those still in counseling programs with student loan debt. Our clients need you: individuals with trauma and families in need of support during difficult times. These are our friends, our neighbors and ourselves. Please help.

Thank you for your time,

Julie Artinian Callaway, LLC  
Trillium Counseling Group  
117 E. Maumee Street, Ste 300A  
Adrian, MI 49221  
517-442-2777

## Eddie Sleeper

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**From:** Catherine Baughey <cbaughey@comcast.net>  
**Sent:** Sunday, September 29, 2019 6:07 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325

Good morning

I am an LPC and have been working in the field for years and started a private practice 18 years ago and just recently went full-time. I have a 12 year old daughter that I love very much and take care of financially with my income from my practice. I have worked very hard to attend school, graduate and successfully pass the national exam. I have 39,000 thousand dollars in student loans. I am the first in my family to attend college and start a business. This business is my life and very important to me and my family and our livelihood.

Our world is such a fallen place and we are so much in need of mental health support. LPCs provide support to many clients and my clients would suffer greatly if they had to try to find another therapist, as most of them have already gotten the run around and been rejected from the local community mental health.

I am begging you to please support the HB 4325 so I can continue to work in the field in my private practice and support my child.

Thank you for your time and support.

Everyone should look out not only for his own interests, but also for the interests of others- Philippians 2:4

God Bless!

Sent from my iPhone



## Eddie Sleeper

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**From:** Benjamin Reisterer, MA, LPC <benjamin@mindfulcounselinggr.com>  
**Sent:** Sunday, September 29, 2019 6:10 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325 - Written Testimony

Dear Mr. Sleeper,

Thank you for your work on behalf of the Ways and Means Committee and the state of Michigan. I respectfully request that you add the below as written testimony in support of HB 4325 to the committee's meeting on Wednesday, Oct. 2nd.

Thank you,

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To the members of the Ways and Means Committee,

My name is Benjamin Reisterer and I am a Licensed Professional Counselor (LPC) and an Afghanistan veteran.

I used my post-9/11 GI Bill to earned my Masters degree in Counseling to become an LPC. My training during my graduate studies included classes on diagnosis, assessment, testing, psychotherapeutic techniques, etc. Overall, to earn my full licensure I passed a national exam and completed 3,700 hours of supervised clinical hours in addition to other trainings and post-degree learning that I have paid for out of my own pocket. I fear that my GI Bill, the time, the money, and the energy I have put into becoming and excelling at providing mental health services for my clients will be wasted if HB 4325 is not passed without amendments as soon as possible. If this bill is not passed, I will be forced to loss my income and start over or move to another state that recognizes my hard work and my value to their mental health system. Either way this would be devastating to my families stability and for my clients that I currently work with.

It is important to note that HB 4325 DOES NOT codify anything into law that LPCs have not already been doing for over 3 decades. LPCs have 3 decades of precedent of obtaining good training and education to then provide exceptional mental health care in our communities all over the state. Please do not allow this to be disrupted.

Over the last 30 plus years LPCs have been actively sought out and fully integrated into the mental health system in Michigan. We now account for aprox. 30% of the practitioners in our state, which is about 10,000 providers. We are in community agencies, private practice, schools, the VA, etc. We have been fully integrated into this system by being allowed to do what HB 4325 would simply codify into law. HB 4325 adds NO new powers or rights, only additional training requirements to keep up with national standards for LPCs.

Please do not allow 10,000 people to suddenly go without their income or ability to do what they have been doing for 30+ years. Please do not allow all the clients (an LPC can see anywhere from 15-30+ clients a week) of LPCs to suddenly be without their provider. This could have devastating consequences across the state of Michigan. A recent study released by Altarum in July of this year (<https://altarum.org/news/most-michigan-residents-substance-use-disorder-and-over-third-mental-illness-go-untreated>) showed that Michigan is so short staffed with mental health providers that over 600,000 individuals are unable to get some type of care that need it. Additionally, the CDC released a study last year (<https://www.cdc.gov/vitalsigns/suicide/infographic.html#graphic1>) that shows that from 1999 - 2016 suicide rates across the US increased over 25%, while Michigan saw an increase of about 33%. Clearly, pulling 10,000 mental health providers off the board would have a negative impact on these numbers that represent real people and real lives right here in Michigan.

On behalf of my clients, myself, my family, and my community I am strongly urging you to protect our state by voting yes on HB 4325 and add no amendments. I am also asking that you all please do whatever is in your power to fast track this bill through the house so all LPCs in Michigan can get back to focusing our efforts 100% on what we have been fully trained to do and not have to split our focus away from providing mental health care to our clients.

I thank you for your time and your service to our great state.

Warm regards,

Benjamin Reisterer, MA, LPC



**BENJAMIN REISTERER, MA, LPC**

PSYCHOTHERAPIST

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## Eddie Sleeper

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**From:** Karen Oberhill <karen.m.oberhill@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:14 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325

Dear Ways and Means Committee members,

I urge you to pass HB 4325 out of the Ways and Means Committee on Wednesday October 2, 2019, so the bill can get to the House for a full vote.

The need to move HB 4325 quickly to Governor Whitmer is critical. 10,000 + mental health professionals and the 200,000+ clients they serve depends on it.

HB 4325 puts into law what the practice of Licensed Professional Counselors (LPCs) has been for over 30 years. This bill will protect counselors and help them maintain their ability to appropriately and properly diagnose and treat individuals with mental and emotional disorders.

LPCs must complete supervised practicum, an internship, and 3000 hours post-graduate counseling under the supervision of an LPC certified to provide supervision. It equates to at least 3700 hours. Many more Counselors are CACREP accredited and study for the a National Counselor Examination and are tested in the following dimensions:

### CACREP Domains

1. Human Growth and Development
2. Social and Cultural Diversity
3. Counseling and Helping Relationships
4. Group Counseling and Group Work
5. Career Counseling
6. Assessment and Testing
7. Research and Program Evaluation
8. Professional Counseling and Ethical Practice

### Work Behavior Domains

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

My most important contribution to society is providing quality mental health services. LPCs are highly trained to help individuals better understand symptoms, gain coping skills, heal from trauma, build resilience and thrive both personally and in the workplace. LARAs proposed rule changes would severely affect my ability to earn a living a remove a seasoned clinician from providing services to Michigan's citizens.

I greatly appreciate your support in this serious matter to codify the important work of LPCs. Michiganders deserve access to mental health therapy and your support of HB4325 supports that access.

Sincerely,  
Karen Oberhill, MA, LPC, NCC, GCDF

## Eddie Sleeper

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**From:** Rebekah Reynolds <rreynolds@andrews.edu>  
**Sent:** Sunday, September 29, 2019 6:18 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

Hello,

My name is Rebekah Reynolds and I am a Clinical Mental Health Counseling student at Andrews University in Berrien Springs, Michigan. I am graduating in three months. I am writing to ask you to please pass HB 4325. When I graduate, I will have thousands of dollars in student debt. How will I pay off all of my student debt if I cannot find a job to do what I was trained to do? Michigan does not have hurricanes and earthquakes, but it would be a man-made disaster for 10,000 Licensed Professional Counselors to be out of work and 150,000 people out of necessary mental health care. Please consider this and pass HB 4325.

Thank you for your time,

Rebekah Reynolds



## Eddie Sleeper

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**From:** Michele Figueroe <seachele47@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:22 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - Ways and Means Committee Written Testimony

Good Evening,

At this point, you know the figures about how many individuals will be affected should LARA's proposed rule changes go through. And, yet, I have realized that you do not know the faces, the stories, or the true picture of what this will look like for these hundreds of thousands of individuals who will lose care in the same way that we counselors do. It is not because you do not want to, but because that is not what you realistically have access to and it is our job to inform you. For us counselors, these individuals are our life's mission, our passion, our purpose. We are horrified to imagine the expression on the faces of those we serve and care about should we have to inform them that we, too, are forced to abandon them in their time of need. Therefore, I would like to illustrate these harsh realities without exaggeration.

Over the past 5 years, a smaller school district in Kent country began reducing the number of school counselors available in buildings to address students' mental health needs. Within a year of beginning this removal, their district saw an increase in suicide attempts as well as completed suicides among middle and high school students culminating in a 7th grader hanging himself from a tree behind the middle school. This is a matter of public record, but I will use a pseudonym, Kyle Smith, to represent this individual out of respect for his family's privacy. The district has since taken measures to increase counselors available after recognizing the devastating effects that lack of access to mental health care can have on a community. Unfortunately, it took the gruesome loss of lives in this small community for this realization to occur, but at least it is being remedied.

I use this as an example, on a very minute scale, for what removal of life-saving individuals can look like and truly shudder at the repercussions of removing over 10,000 highly qualified professionals who have been successfully practicing, without complaint, for over 30 years. We KNOW, statistically and inferentially, that lack of access to critical mental health services increases suicide rates and dysfunction in society. We KNOW that suicide is ugly and devastating to the immediate family and the ripple effects are long-lasting. These will not affect individuals for weeks, months, or even years, but forever.

I work with clients who have histories of trauma and am trained in EMDR (Eye Movement Desensitization and Reprocessing) Therapy which required extensive training and specialized supervision additional to the many counseling techniques I was thoroughly trained for in my master's program. I work with veterans, first responders, and women with past sexual abuse as they attempt to heal from appalling traumas. These are individuals who have experienced traumatic experiences through service to our country, service to the general public, or as a child, and are now struggling to function and live normal lives. I have several individuals who travel over 40 miles to see me as they either do not have somebody who specializes in trauma in their area or because other practitioners are full. The bleak reality is that loss of support for many of these individuals will be, truly, dangerous. It is not an exaggeration to say, if LPCs are not allowed to continue practicing, there will be 'Kyle Smiths' within each counselor's caseload, and this is why we are standing up for their rights and safety now.

After conducting a search on Psychology today, over 1/3 of mental health professionals in Grand Rapids who are trained in EMDR and work with trauma population are LPC/LLPC licensure. This is going to leave the most vulnerable population, most prone to self harm and suicidal ideation, without their lifeline.

Therefore, to prevent these horrible things from transpiring, we ask that you please support and pass House Bill 4325 through without amendments. This will ensure that we are able to continue serving the citizens of Michigan and provide for our own families.

I welcome you to contact me with any questions or concerns at (616) 558-6295. Thank you for your willingness to serve the people of our state.

Michele Figueroa, MA, LLPC

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Michele Figueroa  
616-558-6295



## Eddie Sleeper

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**From:** Beth Kowalczyk <beth@mtpleasantcounselors.com>  
**Sent:** Sunday, September 29, 2019 6:21 PM  
**To:** Eddie Sleeper  
**Cc:** Rep. Lee Chatfield (District 107)  
**Subject:** HB4325 Ways & Means Committee Written Testimony

To whom it may concern:

As one of the ten thousand Licensed Professional Counselors in the state of Michigan, I am requesting that HB 4325 goes up for vote WITHOUT AMENDMENTS. I am not looking to change our scope of practice, just clarify and stabilize what we have already been doing for 30 years.

My name is Elizabeth Kowalczyk. I graduated from Central Michigan University in 1995 with a Master's Degree in Counseling. I have owned a group private practice since 1998. Mt. Pleasant Community Counseling Associates has twelve Licensed Professional Counselors and 2 Masters level Social Workers. The LPC's serve on average 200 clients a week. We not only bill the majority of health insurance companies, including Medicaid, but we also offer a sliding fee scale to those uninsured clients or clients that have insurance with enormous unmet deductibles.

If Licensed Professional Counselors are no longer allowed to provide mental health counseling, I am gravely concerned regarding the irreparable consequences that would incur. If 10,000 LPC's are no longer allowed to provide mental health care to their clients, who would these clients see and how long would they go without services? Michigan already has a shortage of mental health providers. The mental anguish, abandonment and neglect that these clients would experience is incomprehensible. The shortage of mental health providers would create a mental health crisis.

I ask that you oppose LARA's proposed changes and instead support the passing of HB4325. This bill clearly defines the LPC scope of practice and addresses other needed updates to the law. Please make passing HB4325 your urgent priority, so the mental health care of over 150,000 Michigan residents isn't disrupted and 10,000 LPC's are not forced out of practice.

Sincerely,

Elizabeth Kowalczyk, MA, LPC

Mt. Pleasant Community Counseling Associates

500 S. Main St., Suite B

Mt. Pleasant, MI 48858

(989)773-0222/beth@mtpleasantcounselors.com





## Eddie Sleeper

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**From:** Theresa Weaver MA <TWeaver@twlpc.net>  
**Sent:** Sunday, September 29, 2019 6:23 PM  
**To:** Eddie Sleeper  
**Subject:** Written Testimony For HB 4325

Dear Committee Clerk,

My name is Theresa Weaver, I am a Licensed Professional Counselor (LPC) in Michigan and have proudly served the Great Lakes Bay residents for the past **26 years**.

My story is similar to all the stories told before me through the passionate letters and emails you may have received. Stories that voiced not only the financial ruin and impact on our families by potentially losing our careers, but also the devastation of continued loss of Mental Health providers in Michigan.

Additionally, this will impact Michigan's economy with another 10K plus unemployed Michigan residents who will be unable to pay back the millions of dollars in Graduate school student loan debt.

Limiting our ability to practice is not a solution. So, I write you today using my voice; **asking for your help** to pass **HB NO. 4325**. It is in this very notion of **asking for help** our clients reach out to us LPCs and other Mental Health colleagues. **Asking for help** is the exact depiction of the courage and vulnerability needed for people to reach out and ask for Counseling and Mental Health help. If we are not able to continue to provide complete Mental Health services including diagnosing, which is needed for appropriate treatment planning and third-party reimbursement, the very population we protect and serve will be once again abandoned and untrusting of Michigan's already struggling mental health system.

Again, I am imploring for your help to oppose LARA's proposed rule changes and encourage passing **House Bill NO. 4325** which does **NOT** expand Licensed Professional Counselors (LPC) scope of practice but updates and solidifies what we have already done for over three decades.

In Wellness,  
Theresa Weaver, LPC



200 S. Wenona St. #280  
Bay City, Michigan 48706  
Office 989-893-6162  
[tweaver@twlpc.net](mailto:tweaver@twlpc.net)

**NOTICE TO RECIPIENT(S) OF INFORMATION:** Information disclosed to you pertaining to certain conditions, such as treatment for alcohol or drug abuse, HIV/AIDS and other sexually transmitted diseases, behavioral health, and genetic marker information is protected by various federal and state laws which prohibit any further disclosure of this information by you without the express written consent of the person to whom it pertains or as otherwise permitted by such laws. Any unauthorized further disclosure in violation of state or federal law may result in a fine or jail sentence or both. A general authorization for the release of medical or other information is **NOT** sufficient consent for release of these types of information. The federal rule at 42 CFR Part 2 restricts use of the information disclosed to criminally investigate or prosecute any alcohol or drug abuse patient.

## Eddie Sleeper

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**From:** Beth Kowalczyk <beth@mtpleasantcounselors.com>  
**Sent:** Sunday, September 29, 2019 6:32 PM  
**To:** Rep. Lee Chatfield (District 107)  
**Cc:** Eddie Sleeper  
**Subject:** Fwd: HB4325 Ways & Means Committee Written Testimony

----- Original Message -----

**From:** "Beth Kowalczyk" <beth@mtpleasantcounselors.com>  
**Sent:** 9/29/2019 6:21:18 PM  
**To:** Esleeper@house.mi.gov  
**Cc:** LeeChatfield@house.mi.gov  
**Subject:** HB4325 Ways & Means Committee Written Testimony

To whom it may concern:

As one of the ten thousand Licensed Professional Counselors in the state of Michigan, I am requesting that HB 4325 goes up for vote WITHOUT AMENDMENTS. I am not looking to change our scope of practice, just clarify and stabilize what we have already been doing for 30 years.

My name is Elizabeth Kowalczyk. I graduated from Central Michigan University in 1995 with a Master's Degree in Counseling. I have owned a group private practice since 1998. Mt. Pleasant Community Counseling Associates has twelve Licensed Professional Counselors and 2 Masters level Social Workers. The LPC's serve on average 200 clients a week. We not only bill the majority of health insurance companies, including Medicaid, but we also offer a sliding fee scale to those uninsured clients or clients that have insurance with enormous unmet deductibles.

If Licensed Professional Counselors are no longer allowed to provide mental health counseling, I am gravely concerned regarding the irreparable consequences that would incur. If 10,000 LPC's are no longer allowed to provide mental health care to their clients, who would these clients see and how long would they go without services? Michigan already has a shortage of mental health providers. The mental anguish, abandonment and neglect that these clients would experience is incomprehensible. The shortage of mental health providers would create a mental health crisis.

I ask that you oppose LARA's proposed changes and instead support the passing of HB4325. This bill clearly defines the LPC scope of practice and addresses other needed updates to the law. Please make passing HB4325 your urgent priority, so the mental health care of over 150,000 Michigan residents isn't disrupted and 10,000 LPC's are not forced out of practice.

Sincerely,

Elizabeth Kowalczyk, MA, LPC

Mt. Pleasant Community Counseling Associates

500 S. Main St., Suite B

Mt. Pleasant, MI 48858

(989)773-0222/beth@mtpleasantcounselors.com

## Eddie Sleeper

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**From:** Chrissie Reitmeyer <chrissie.reitmeyer@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:36 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

To Whom it May Concern:

I am writing to urge you to support passing HB 4325 as quickly as possible.

I am an LPC in the state of Michigan and not able to attend Wednesday's meeting because I will be seeing clients. I am allowed to see these clients because I am a fully-licensed counselor, meaning I have attended Western Michigan University's CACREP-accredited (Council for Accreditation of Counseling & Related Educational Programs) counselor education program, received necessary training, completed 600 hours of an internship, worked for 3000 hours as a Limited Licensed Professional Counselor (while completing and paying for an additional 100 hours of professional supervision), and passed the National Counseling Exam (NCE). These standards are comparable to LPC requirements in other states as well as the requirements to become a Licensed Master Social Worker (LMSW). I am also a licensed school counselor, having completed the necessary coursework and exam.

I mention all of this because I am appalled that my professional identity as well as those of my colleagues who carry the LPC title are being called into question. I am not sure who really stands to benefit from removing my ability to diagnose and treat patients in a private practice setting because, at least where I live, there are plenty of people seeking treatment and not enough providers to go around. In my first few weeks of private practice, I was inundated by client referrals, many of whom pay me through their Medicaid insurance, and I wonder who else would be seeing them if I could not. I live in a semi-rural community and I don't feel like it's ethical to charge clients out-of-pocket; those who are often most in need would simply forgo counseling because they can't afford it.

On my side of things: I worked for years for an agency where I did not diagnose or bill insurance and I was barely able to support myself. Though I have the degree and all the qualifications listed above, I was paid \$15 an hour. If HB 4325 does not pass in time, I will have to switch careers or go back to barely getting by. Again, I'm not sure who would stand to benefit from severely limiting my ability to support myself or contribute economically to my region. I would also lose the resources invested in setting up my private practice. I could name countless other LPCs who would suffer the same fate.

Again, I urge you to support a quick passage of HB 4325 and thank you deeply for all that you do.

Best,  
Chrissie Reitmeyer, LPC



## Eddie Sleeper

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**From:** christinanortonlpc <christinanortonlpc@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:37 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

Hello,

I write you today as an LPC, practicing at a private practice in West Bloomfield, MI.

I love my job. Like, smiling like an idiot all day because it's exactly what I should be doing. I cannot put into words the immense gratitude that I have for being able to be a counselor.

I have saved people's lives. I have given them hope and guided them through some of the hardest times of their lives. This is not an exaggeration. Every minute of school, practicum, internships, and hour toward my full license was worth it. There is no other job I would rather have.

My worry for myself comes secondary to my worry for my clients. My husband and I have postponed buying a house because I am not certain if the state will take away LPC's ability to practice... but I still think of my clients more.

Hundreds of thousands of clients across our great state suddenly without access to their clinicians?? This is terrifying. Michigan is already underserved in the mental health area. Making that worse by eliminating 10,000 LPC's is wrong.

Please pass HB 4325 on so that myself and so many others can continue to serve our communities.

Thank you,  
Christina Norton MA, LPC

Sent from Samsung Galaxy smartphone.





## Eddie Sleeper

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**From:** Elizabeth Neymeiyer <elizabethannneymeiyer@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:41 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

Greetings Mr. Sleeper,

I am writing this on the behalf of all LPCs in the state of Michigan who would be gravely impacted by these proposed new changes, including myself. It is increasingly apparent that our state needs MORE mental health providers as people are shedding the stigma of depression, addiction, anxiety, suicidality, etc. We need MORE mental health professionals who are educated to diagnose, create proper and ethical treatment plans, and implement techniques and theory with our clients in order to help increase their quality of life and mental health. I was appalled to read the proposed changes that LARA may make and based on what? The decrease in resources for the people suffering with mental illness and addiction in the state of Michigan will be devastating. I believe that there are many assumptions being made on our education and what is considered continued and appropriate continued education. I am hoping that if you are still reading I can help clarify.

I have been in mental health working as an LPC since 2008. I waited a year to be accepted into a CACREP accredited University (Oakland University, Rochester Hills, MI). Oakland University has a robust counseling curriculum that includes mandatory courses in DSM and diagnostics and proper assessment and evaluation, among many others. Not only did we have a practicum and two semesters of diagnosing and assessment, we then had a rigorous internship that was also monitored and supervised. As a result, I have a refined ability to properly diagnose clients based on my education, experience, and further studies that I have pursued. I am also a Certified Advanced Addictions Counselor and a comprehensively trained DBT therapist. While this is overlooked as continuing education, I can tell you it is not for the faint of heart and I put many hours in outside of working more than forty hours a week to accomplish those things. I have logged over 40 hours of continued education per year since 2008. I am also certified on a National level which was a requirement to become fully licensed in the State of Michigan. That alone, requires 100 hours per every 5 years of continuing education. I spent three years post graduate school to get my CAADC certification and will now not be able to potentially deliver those services. Given the opiate crisis nationwide I am so saddened that this could also impact this. It is important to note that several counties I have worked in are some of the highest in the state of Michigan for overdoses. On top of this I have been trained in Clinical Supervision by The Mentoring Institute. I am so proud to be a MITS trained supervisor and to help new clinicians navigate this field only to know that all this could be null and void because someone can't see that we have way more important needs in this country and state.

Please stop keeping score and wasting time on who is "better."

As mentioned in my first statement, this is not just about me -- this is about the other 10,000 Licensed Professional Counselors in the state of Michigan who will be impacted I believe that should LARA feel these changes are necessary, perhaps it would be better practice to implement CEUs for LPCS, much like social workers are required to pursue. Please do not overlook that just because someone is an LPC they aren't continuing their education as evidenced by my credentials and requirements to maintain those outside of the actual license. CEUs that would help us to continue to refine our diagnostic knowledge so that we can continue to practice with integrity and confidence is necessary for all helping professionals. Please, do not take away my career and more importantly my ability to help people, care for them, and properly and ethically treat them.

HB 4325 is a viable solution to solve the concerns that LARA has. I ask you, please seek HB 4325 out as a resolution that would be effective and reasonable, and would not limit the mental health care available to thousands of people here in the state of Michigan. Without the LPCs who serve the people in this state, we do

not have enough professionals to service them. The proposed changes that LARA would like to make do not make logical sense; they are destructive and will result in despair for many.

Lastly, I am proud to be an LPC and I am proud of how all of our mental health allies are supporting us. I beg you to not take what I was born to do away. Please, do not take that away from our clients. Please do not force me to abandon my clients against my will and theirs. Please do not hurt the people of Michigan in this way; we are all better than that. Please, consider HB 4325. I am heading into my next session now and will continue to pray that you reconsider what is at stake.

Respectfully,

Liz Neymeiyer MA, LPC, NCC, CAADC, MITS.

Sent from my iPad

## Eddie Sleeper

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**From:** Rachel Menger <rachel@springforestcounseling.com>  
**Sent:** Sunday, September 29, 2019 7:48 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

Dear Mr. Edward Sleeper,

I am writing to provide my testimony in favor of HB4325.

My name is Rachel Menger and I am a Licensed Professional Counselor. I was granted my degree from Oakland University where I was required to receive 100 hours in practicum, 600 hours in internship, and take courses specifically in diagnosing and psychopathology. After graduation, in order to become fully licensed with LARA, I was required to obtain 3000 hours of supervision in no less than two years. I, along with so many of my colleagues, voluntarily take continuing education because we feel it is ethically necessary and are completely supportive of this becoming a requirement to maintain our license in HB4325.

I work in private practice with a case load of 30-35 clients per week and mainly treat teens and young adults struggling with depression, suicidal ideation, victims of sexual assault, anxiety disorders, and addiction. These clients count on treatment every week to ensure their safety and overall emotional health. House bill 4325 is not looking to expand our scope of practice, but simply to allow us to continue to diagnose and treat as we have been for 30 years and have been adequately trained to do so, as outline in our requirements above. We are already in a mental health crisis. We need more mental health professionals, not fewer. So I ask you to please support HB4325 to ensure 150,000+ people are still able to receive the treatment they need and rely on to be able to function in society.

Thank you for your time,

Rachel Menger  
[Rachel@springforestcounseling.com](mailto:Rachel@springforestcounseling.com)



## Eddie Sleeper

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**From:** Marnie Thomas <MThomasLPC@IntentionalGrowthLLC.com>  
**Sent:** Sunday, September 29, 2019 6:50 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

I am concerned about the news of potential rule changes that Licensing and Regulation Affairs (LARA) is trying to make that would seriously and negatively impact mental health providers with the LPC license. This would drastically impact the livelihood of nearly 10,000 counselors in the state of Michigan, but the impact on clients who see them would be over 150,000. If this change were to be made, it would cause a mental health crisis wherein many existing clients of LPC-licensed counselors would face abandonment at no longer being able to maintain long-established relationships with their counselors. This decrease in insurance-paneled counselors would dramatically and negatively affect our state. This has already made local and national news!

The other concern to the economy would be the 1,000's of small businesses that would be forced to close and lost revenue for the state. I have been in private practice for 10 years and own my own LLC with three other LPC providers and have 100's of client's that depend on us to be there for them. This would be devastating for them as we are their trusted professionals to handle their needs. I have client's that are already in tears over the potential emotional loss they would have to endure.

I would also like you to consider the additional education and certifications that many of us possess to do our jobs. I personally have two Master's Degrees one as a Limited License Psychologist and a Licensed Professional Counselor. Not to mention the state licensing exam the (NCE) that I had to pass to get my full license. During this exam topics such and diagnosis and psychotherapy techniques were extensively covered. My certifications include specialties in Suicide Preventions, Mindfulness Training and Human Trafficking Training. We have LPC's in the office that have additional certifications in Opiate Addiction and Substance Abuse. These are vital areas in Michigan that need our assistance.

I am requesting the following action from you:

OPPOSE these rule changes at the forthcoming public hearing on October 4th.

PASS HB 4325, introduced by Rep. Aaron Miller (R-Sturgis) BEFORE OCT 4TH, which would negate the need for LARA's rule changes altogether.

Please stand up for LPCs and the people who depend on their services.

Sincerely,

Marnie Thomas, M.A., LPC  
Licensed Professional Counselor

Westwood Office Plaza

Intentional Growth LLC  
5360 Holiday Terrace Suite 18  
Kalamazoo, MI 49009

Ph. (269)447-1211  
Fax (269)222-9007



## Eddie Sleeper

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**From:** Emily Darling-Funk <edarlingfunk@gmail.com>  
**Sent:** Sunday, September 29, 2019 6:56 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

I urge you to pass HB 4325 out of the Ways and Means Committee on Wednesday October 2, 2019, so the bill can get to the House for a full vote.

The need to move HB 4325 quickly to Governor Whitmer is critical. The livelihoods of 10,000 + mental health professionals and the well-being of the hundreds of thousands of clients they serve depends on it.

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

LPCs are well trained in diagnosing and providing mental health therapy. We must complete a supervised practicum, an internship, and 3000 hours post-graduate counseling under the supervision of an LPC certified to provide supervision.

There is a general misunderstanding regarding continuation of education following LPC licensure. I have achieved NCC status (National Board Certified Counselor), which requires me to complete 100 CEU's in a five year period. Many practicing counselors have also earned NCC status and hold this in high esteem.

Additionally, I worked to earn endorsement in the State of Michigan as an Infant Mental Health Specialist. This specialty, which works to provide mental health support to our most vulnerable population and their caregivers, requires ongoing continuing education (15 hours annually) and additional supervision (12 hours annually). Continuously learning, sharpening my skillset, and growing in my field is of the utmost importance to me, as it is to thousands of my fellow LPCs.

LPCs are highly trained to help individuals better understand symptoms, gain coping skills, heal from trauma, build resilience and thrive both personally and in the workplace. LARAs proposed rule changes would severely affect my ability to earn a living and remove a seasoned clinician from providing services to Michigan's citizens. If I were unable to continue my practice of providing high quality mental health care, the forty patients whom I serve would be affected and without care. I cannot imagine the gravity of the impact of taking 10,000 professionals out of practice.

I greatly appreciate your support in this serious matter to codify the important work of LPCs. Michiganders deserve access to mental health therapy and your support of HB4325.

Sincerely,

Emily Darling-Funk, LPC, NCC, IMH-E





## Eddie Sleeper

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**From:** Margaret Spoelman <spoelmanmargaret@gmail.com>  
**Sent:** Sunday, September 29, 2019 7:00 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

Hello,

My name is Margaret Spoelman and I am an LPC practicing in Grand Haven, with a caseload of about 100 or so families that I am supporting. I am one of a few therapists in this area that are willing to work with Medicaid to help foster children and other low-income families that are struggling with issues. I also have several adolescents that struggle with depression and suicide ideation. This note is my written voice and strong advocacy for supporting HB 4325, and getting it passed as quickly as possible. It is difficult to fathom what would happen across the state if 10,000 plus LPC providers were disallowed to do their work.

There is an abundance of evidence that the Counseling Masters degree and the LPC License criteria have the rigor and training for us to do our work. We all have had the coursework, the 700-hour internship and the 3000 hours of supervised clinical work. We have had classes in our training that DO teach making diagnoses and counseling techniques. We have all had to take and pass the national NCE exam for licensing. We have been in business for thirty years, and are integrated into communities all across the state. There is more need for mental health support than there are providers as it is, let alone to even consider reducing the workforce by 10,000 counselors.

Please expedite the passing of HB 4325 without allowing any addendums or amendments. If LARA changes the rule before this bill is passed, we will not be able to do our work. This will impact the lives and livelihoods of close to 200,000 clients that are being supported by the current LPC workforce.

We need your help to address this urgent matter.

Thank you,  
Margaret Spoelman MA LPC



## Eddie Sleeper

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**From:** Stacie Polcyn <stacielpo@gmail.com>  
**Sent:** Sunday, September 29, 2019 7:06 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

Hello my name is Stacie Polcyn.

I am a Licensed Professional Counselor residing and practicing in your district. My counterparts and I work for Macomb County Community Mental Health. We are on the front lines of assessing, and providing referral to the appropriate level of treatment for the severely mentally ill, and substance addicted population. This may sound like a small majority of the general population, but I reassure you, we are reaching thousands of individuals and their families at a time of uncertainty and despair.

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

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

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

Stacie Polcyn, MA, LPC



## Eddie Sleeper

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**From:** Linda Herrin <lindaherrin@gmail.com>  
**Sent:** Sunday, September 29, 2019 7:22 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

Linda L. Herrin, LPC #6401015414, PLLC  
1424 Fulton St.  
Kalamazoo, MI 49001  
[Linda@kalamazoo-psychotherapy.com](mailto:Linda@kalamazoo-psychotherapy.com)

Dear Representatives:

I am writing to urge the Ways and Means Committee to pass House Bill 4325 without amendments, which will delay its passage. I'm sure that by now you are all aware that LARA has proposed rules changes for the scope of practice for Licensed Professional Counselors. The changes are an attempt to artificially restrict the scope of practice of LPCs. For 30 years LPCs have been diagnosing and treating mental disorders, based on the DSM and all its many revisions. We all know that changes are needed to codify the best practices for LPCs and probably for other mental health providers as well. Please act responsibly on Wednesday so this process can begin!

In a study done in 2019, funded by the Michigan Health Endowment Fund, Michigan was found to have a critical shortage of mental health providers to meet the needs of its population. For example, the final report stated that "Behavioral health conditions that are most prevalent among Michiganders are also the most likely to go untreated. For instance, 46 percent of people with anxiety disorders, 53 percent of people with depressive episodes, and 85 percent of people with alcohol use disorders are not treated for their conditions." (<https://www.mihealthfund.org/hundreds-of-thousands-lack-behavioral-health-treatment>)

The report lists many barriers to this happening, including provider shortages and affordability of care. The top two recommendations to remedy this situation are 1) increasing retention of behavioral health providers in Michigan, 2) removing restrictions on the scope of practice to fully leverage all members of the health care team. Another recommendation is for the institution of peer training so peers can provide mental health support (Is that really a better way to handle the problem than by leveraging LPC's ability to practice here?) **HOW DOES TAKING AWAY THE ABILITY OF LICENSED PROFESSIONAL COUNSELORS TO PRACTICE IN MICHIGAN MAKE ANY SENSE?**

One of the arguments cited in favor of this rule change is that LPCs are not capable of diagnosing mental health problems. I understand that some LPCs have not been required to take courses on abnormal psychology and diagnosis. However, I graduated from a CACREP university way back in 1990. Among my required courses were one on abnormal psychology and another on evaluation and assessment. The current curriculum at all CACREP universities, including WMU, requires these courses to graduate. Many of us are very well trained and prepared to be fully functioning clinicians. If the Rules have not been comprehensive enough to ensure high quality counselors, put in provisions that help current counselors to be more effective and qualified. It seems Michigan has failed to do this. It's the only state I've practice in where CEUs are not required for all mental health providers. The state has been remiss in not updating the law pertaining to LPCs. Fix that! Don't just toss out LPCs in Michigan.

Since my graduation the Diagnostic and Statistical Manual of Mental Disorders has had many incarnations from DSM III (3) to DSM 5 and yearly revisions between the new editions. To be able to correctly diagnose a psychotherapist must study and/or take courses on the newest version (including revisions), something I continue to do to be up-to-date in using DSM 5 diagnoses. The standard used to allow licensure should be graduation from a CACREP school and perhaps on going education in the current DSM and other subjects, along with other common sense requirements like supervision. I know there are lots of Licensed Psychologists and Social Workers who haven't kept themselves current with the DSM. Should they be allowed to diagnose?

These are the courses I took back in the dark ages when I graduated with an MA in counseling psychology in 1990:

Principles and Theories of Learning  
Introduction to Graduate Research and Statistics  
Theories of Counseling  
Theories of Personality Development  
Legal and Ethical Issues in Counseling  
Abnormal Psychology  
Psychology of Prejudice  
Community Mental Health  
Consultation in Counseling  
Group Dynamics and Facilitation  
Psychological Testing and Measurements  
Family Systems  
Human Growth and Development/Lifespan Psychology  
Systems Analysis and Consultation Theory  
Introduction to Supervised Practicum  
Supervised Practicum 2  
Supervised Practicum 3  
Externship with Dept. of Social Services

Additionally I have an all but dissertation PhD in clinical sexology. I believe my education speaks volumes for my education and my preparedness to both diagnose and treat people with mental health problems. I have been in practice for over 30 years.

I moved here three years ago from another state for the express purpose of providing much needed counseling services in Michigan. Since then I have taken 200 hours of ongoing (and not mandated) continuing education in the areas of PTSD, complex trauma, DBT, suicidality and self-harm, DSM 5, Internal Family Systems, Emotion Focused Therapy, transgender mental health care, anger management, the function of neurobiology in mental health problems and in somatic techniques to augment talk therapy. I am about to become certified as a level 2 trauma specialist so I will be even more competent to work with veterans and other traumatized populations. My clients universally say I am the most effective therapist they have ever had.

Additionally I volunteer twice a month at Outfront to facilitate a transgender youth group. Several of these teens come from low income households and have no therapist, no support and no guidance. I am required to be licensed as a mental health provider in Michigan to volunteer in this capacity. And I see some clients on a pro bono basis or extremely reduced fee basis because they would not access therapy otherwise.

Without question there is another way to address the problems LARA is finding with the way LPCs are regulated. In fact, House Bill 4325 effectively addresses them. I urge LARA not to rescind the current rules governing the scope of practice of Licensed Professional Counselor – both for the good of the citizens of Michigan, for the current clients of LPCs in Michigan and for all of us LPCs who work so diligently and with so much passion for the welfare of our clients.

I am sure there are long-term ramifications for the state of Michigan if LARA institutes these Rules, including class-action lawsuits to compensate LPCs for loss of income, job training and more and class-action lawsuits filed by clients and family member of LPCs for damages they incur as a result of losing their counselors.

Sincerely,  
Linda L. Herrin, LPC, PLLC

## Eddie Sleeper

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**From:** Leah Marcus <lfaleermarcus@gmail.com>  
**Sent:** Sunday, September 29, 2019 7:39 PM  
**To:** Eddie Sleeper  
**Subject:** Written testimony about HB 4325

To the members of the House Ways and Means Committee,

I am a Limited License Professional Counselor here in Michigan and I am writing with urgency and concern after learning about the proposed changes that LARA is seeking to the scope of practice of counselors in this state.

I practiced as a licensed counselor and art therapist for several years in Ohio in a community mental health setting. I graduated from a CACREP-compliant college that has since become CACREP accredited— this means that the program included mandatory courses on abnormal psychology, diagnosis and assessment/evaluation. It has been my vision to continue this work in some form after I moved to Michigan and started a family.

I have already invested tens of thousands of dollars in earning my degree, and I have invested thousands more dollars (and hours) in sharpening my skills and taking steps to begin a practice. My mother is a fellow counselor (LPC) in Michigan from a CACREP-accredited education, and she has brilliantly served her clients for decades.

I have sought continuing education in ethics, trauma, attachment, ACES, positive psychology, Solution Focused Brief Therapy, and the DSM-V, among other areas of study. The DSM is revised frequently and it is every professional's responsibility to keep updated on such changes. I am also certified as an Advanced Trainer in the Nurtured Heart Approach®, which has applications within and outside the therapeutic milieu. I have also been planning ways I might serve clients on a pro bono basis, including for more vulnerable populations.

This change would put over 10,000 LPCs (including myself) almost immediately out of business, and hundreds of thousands of clients would lose their therapists. Studies show that we have a need for more, not fewer, mental health providers in Michigan. You can find a 2019 study that showed this here: [https://www.mihealthfund.org/hundreds-of-thousands-lack-behavioral-health-treatment?fbclid=IwAR2WfYgNxPMV\\_2nuAnnSvbiUHGMAmsYwj\\_e-X5Vrx5Lbf5Atttfwxt0U9sq](https://www.mihealthfund.org/hundreds-of-thousands-lack-behavioral-health-treatment?fbclid=IwAR2WfYgNxPMV_2nuAnnSvbiUHGMAmsYwj_e-X5Vrx5Lbf5Atttfwxt0U9sq). This study noted that "Michigan, like most of the country, has a shortage of psychiatrists and other behavioral health providers" and recommended (among other things) that Michigan "increase retention of behavioral health providers in Michigan" and "remove restrictions on the scope of practice to make full use of all members of the healthcare team."

If the Board of Professional Licensing is not motivated by the ACA Code of Ethics violations that would result, as well as the financial and emotional crisis that would be experienced by thousands of LPCs, their clients, and their client's family members, has LARA considered the ramifications of their proposed LPC Scope of Practice Rules change long term? Just a few points to consider might be:

- A class-action lawsuit of all LPCs and Limited License LPCs (LLPC) in the state of Michigan seeking compensation for lost wages, job loss, educational costs required for licensure as an LPC or LLPC, re-training to a new profession and job loss during retraining, mental anguish, and other damages. (For me personally this would equal more than \$75,000 for initial/continuing education alone, and not including all the lost income from future clients I was preparing myself to begin serving)
- Lawsuits filed by the clients and client family members of LPCs and LLPCs in the state of Michigan seeking compensation for mental anguish, abandonment, neglect, and other damages.

It is the job of state licensing boards to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will unnecessarily and recklessly place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, LARA would find it very difficult to justify the proposed LPC Scope of Practice Rules change in legal disputes since LARA will immediately be responsible for inflicting counseling client neglect and abandonment. Additionally, LARA will be immediately responsible for more citizens of Michigan having less access to mental health care when there is already a crisis from a lack of mental healthcare services

in the state of Michigan. Once again, a state licensing board would not be protecting the citizens of the state if this were to occur and it would be unlikely that this behavior would hold up well in legal disputes.

LARA's proposed LPC Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) must not be adopted. The legislature should instead pass HB 4325, introduced by Rep. Aaron Miller (R Sturgis), WITHOUT AMENDMENTS. This bill passage would address legitimate concerns and needed updates and negate the need for LARA's LPC Scope of Practice Rules changes altogether.

It would also avoid utterly destroying tens of thousands of livelihoods and career trajectories or harming hundreds of thousands of clients' wellbeing.

I am passionate about helping others and I have significant concern for all the clients in Michigan, all of our residents in need of mental health care, and for the thousands of LPCs who would no longer be able to practice.

Thank you for your consideration of this crucial matter, especially in light of the very short timeline involved.

Sincerely,

Leah F. Marcus, MA, LLPC

[lfaleermarcus@gmail.com](mailto:lfaleermarcus@gmail.com)

440-574-9187

She/Her/Hers

MI Counseling license # 6401015823



## Eddie Sleeper

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**From:** Christina Polk <cpolk@newoakland.org>  
**Sent:** Sunday, September 29, 2019 7:42 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325 10/2/19 hearing

Dear Committee,

As I am unable to attend the hearing on 10/2/19 related to HB 4325, I wanted to submit written testimony in support of this bill. I'm a Licensed Professional Counselor in the state of Michigan and I have been practicing for nine years. I'm an Oakland University Alumnus (a CACREP accredited program) and my coursework consisted of introduction to counseling, multicultural classes, theories, testing and assessment, research, diagnostic principles and more.

While I understand the statues and rules regarding my profession and old and outdated, I wanted to make sure the committee understands that my colleagues and I are NOT outdated. We are more than able to provide therapy and diagnoses to the consumers that we serve, and HB 4325 will take care of updating our scope of practice and making sure we are in compliance with LARA's needs.

I also wanted to bring to the committee's attention the blatant special interest related to opposition of our bill. The MPA has voiced opposition to our bill on the basis that it is harmful to consumers, but I truly believe this is a smoke screen for their real intentions: to be able to capture more revenue from a bigger consumer pool. In a recent newsletter by Michigan Psychological Association (3rd Quarter) there was a segment entitled, "Your Clinical Practice Impacted by Advocacy Work of the MPA Insurance Committee" on page 14, the author says "We have been talking with BCBSM regarding their reimbursing Licensed Professional Counselors for clinical services, which in our opinion is outside the scope of practice of LPCs. MPA's position has had some support from LARA. We intend to continue to persist on this issue."

This is clearly a "turf war" which has no place in politics and is just so incredibly shameful in regard to how it will effect hundreds of thousands of consumers. I urge the committee to unanimously pass HB 4325 to protect the many consumers that need professional counselors in Michigan.

Warmest Regards,

Christina Polk, MA, LPC, ACS  
Director of Clinical Resources  
(248) 406-4440, ext. 3302 (office)  
(586) 747-3708(mobile)  
[cpolk@newoakland.org](mailto:cpolk@newoakland.org)  
[www.newoakland.org](http://www.newoakland.org)

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## Eddie Sleeper

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**From:** Alicia Birdsong <aliciabirdsong@gmail.com>  
**Sent:** Sunday, September 29, 2019 7:48 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

I'm writing you today to voice concern I have in regards to the proposed LARA changes that would impact the ability of LPC's to diagnose and therefore treat patients.

LPC's like myself have been specifically trained to diagnose, make treatment plans, and utilize psychotherapy techniques to assist patients in their therapy goals.

I'm asking for your support of HB 4325, as this bill would codify LPC's scope of practice, in which we have been operating under for the past 30 years without incident or complaint.

Without the passing of HB 4325, Michiganders are in a vulnerable state, as LPC's may not be able to continue to practice. This would leave tens of thousands without mental health care. We already are experiencing a shortage of mental health providers. If HB 4325 does not pass, and the LARA changes are approved, it will devastate Michigan's mental health care.

I appreciate your time!

Sincerely,

Alicia Birdsong, MA, LPC

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Your cooperation is greatly appreciated.



## Eddie Sleeper

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**From:** Sarah Watson <sarahewatson82@gmail.com>  
**Sent:** Sunday, September 29, 2019 8:05 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

Dear Mr. Sleeper,

I hope this email finds you well. I am an LPC in Michigan, I own my own private practice. I love my job and I love my clients. I gladly pay my taxes on time.

**I am fearful for my ability to support my family, pay my bills and my student loans back if HB 4325 isn't passed. I am sincerely fearful of what could happen to some of my clients if this bill isn't passed.**

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

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

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

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

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

In summary, I strongly encourage the legislature pass HB 4325 (sponsored by Rep. Miller) **WITHOUT AMMENDMENTS**, which would overturn these proposed changes.

Thank you in advance for your consideration.

Sincerely,

Sarah Watson , LPC, CST, ATR

248-895-0187

## Eddie Sleeper

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**From:** Katrina Sweetman <ksweetman@oakland.edu>  
**Sent:** Sunday, September 29, 2019 8:18 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

Mr. Sleeper,

I am writing to you to encourage you to support HB4325 without amendment. There has been much discussion about this bill, including misinformation from those opposing the bill that may have created confusion of the issue.

I would first like to address the misinformation being presented by our opposition. HB4325 simply legislates scope of practice for LPCs that has been in existence for 30 years. This bill in no way expands the scope of practice or allows for unqualified mental health providers to be treating patients. A small group from MPA would have you believe that counselors are unqualified to assess or diagnose, which is inaccurate. All counselors completing a CACREP accredited program are required to pass classes on assessment and diagnosis.

In addition to this, I have heard claims that we do not have enough supervised training before we qualify for full licensure, which is also inaccurate. We are required to complete at least a 600 hour supervised internship and then must complete 3,000 hours of supervised clinical work in no less than two year's time and pass a national examination in order to become an LPC.

The final claim that I would like to address is the assertion that unqualified counselors would be allowed to assess and diagnose, with the most common example being mentioned as a career counselor. This is inaccurate in a two-fold manner. All counselors, regardless of areas of specialization are trained to assess and diagnose. Anyone who is a specialized counselor has completed the same core training as a generalist, but has then received additional training and supervision to specialize in that aspect of mental health treatment. This is the case for marriage and family, substance abuse, career, or school counseling.

It is important to emphasize that HB4325 is vital to ensuring LPCs, who represent a third of mental health services provided in the state of Michigan, are able to continue to provide these services. The state of Michigan is already facing a shortage of services available, particularly for in-patient services and disrupting the services provided by LPCs would only make this crisis worse. As such, please support passing HB4325 without amendment.

Sincerely,  
Katrina Sweetman, MA, LPC, NCC





## Eddie Sleeper

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**From:** Marianne Kotecki <mkotecki70@gmail.com>  
**Sent:** Sunday, September 29, 2019 8:26 PM  
**To:** Eddie Sleeper  
**Subject:** Ways and Means CommitteeHB 4325 written testimony

Dear Ways and Means Committee:

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

I am requesting the following action from you:

OPPOSE these rule changes at the forthcoming public hearing on October 4th.

PASS HB 4325 without ammendment, introduced by Rep. Aaron Miller (R-Sturgis), which would negate the need for LARA's rule changes altogether.

Please stand up for LPCs and the people who depend on their services.

Respectfully,

Marianne Kotecki LPC, CAADC

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## Eddie Sleeper

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**From:** Krystin Sankey <ksankey@reclaimingfuturescounseling.com>  
**Sent:** Sunday, September 29, 2019 8:45 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 testimony

Good evening. I'm writing in regards to HB4325, scope of practice for counselors, which is on the agenda 10/2.

Due to the impending LARA proposed rule changes, it is vital that hb4325 be passed as quickly as possible to ensure that hundreds of thousands of Michigan citizens' mental health services is not disrupted. As a LPC in private practice, I specialize in working with trauma and see 25+ clients every week. I cannot meet the needs of the ongoing 3-5+ weekly referrals I continue to receive.

As a 2007 graduate of a CACREP program at Indiana University, I've been trained in assessment/diagnosis and therapeutic techniques. I've also received post graduate training in numerous evidence-based therapeutic approaches along side social workers, psychologists, and other counselors. These therapeutic models took 12-18 months each of in person trainings and ongoing consultation/supervision and include Eye Movement Desensitization Reprocessing therapy, Trauma Focused-Cognitive Behavioral Therapy, Child Parent Psychotherapy, Child Family Traumatic Stress Intervention. I am also a certified trauma specialist through the National Institute for trauma and loss in children. I am not alone in meeting these training requirements.

Our current statute and national code of ethics requires that we only use therapeutic/counseling techniques that we are trained to use. If we do not have proper training to work with a certain population or client, we are ethically obligated to refer out. Serving clients outside of our training is an ethical issue, which legislative statute cannot address in such individualized detail.

A recent Michigan Psychological Association (MPA) newsletter acknowledges advocacy and lobbying efforts with BCBS to stop reimbursing LPCs for providing clinical services allegedly outside of the scope of our practice. As stated above, this is absolutely untrue and misleading. I urge you to see through to the true intent behind MPA's opposition, which is nothing other than an attempt to monopolize mental health services, even at the expense of hundreds of thousands of Michiganders' mental health care that Psychologists alone cannot absorb within their caseloads.

Please vote to send HB4325 to the House floor and continue to support it.

Thanks for your time,

Krystin Sankey, MS, LPC

Owner/Therapist

Reclaiming Futures Counseling, LLC

810-777-2000



## Eddie Sleeper

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**From:** Kelly Hill <khill2422@gmail.com>  
**Sent:** Sunday, September 29, 2019 8:46 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325

Dear Chairman,

My name is Kelly Hill, MS, LLPC and I am writing to you to voice concerns regarding LARA's proposal relating to Licensed Professional Counselors and advocate for HB4325, which as you know has made its way to the Ways and Means Committee. After much thought about what I would include in this letter, the main goal I want to convey is the passion, education, hard work, and dedication we as Professional Counselors (LLPC/LPCs) have when it comes to the quality of care we provide not only to our clients directly, but the mental health community as a whole. Upon finding out about LARA's proposal and how it would negatively affect tens of thousands of LLPC/LPC professionals but more importantly the populations we serve, I knew I had to voice my concerns and advocate for my profession. Thousands of LLPC/LPC therapists do important and incredible clinical work that cannot be taken lightly as we owe it to our communities to provide the best care for all individuals with mental health needs.

As counselors our number one priority is to "do no harm" but in this case, if this LARA's proposal passes, it would be detrimental and harmful to the people who desperately need and count on our assistance. With suicide rates on the rise, the opioid crisis, mass shootings, and other mental health related tragedies it seems unjust that thousands of LLPC/LPCs would no longer be able to diagnosis and provide therapy to those who desperately need our professional expertise. As it stands, with all the active mental health disciplines, people are still suffering because there are not enough clinical therapists across disciplines to manage all aspects of mental health needs. Therefore taking away an entire discipline of mental health professionals would negatively impact the quality of care people would receive and I believe thousands of people would fall through the cracks.

Myself and the thousands of LLPC/LPCs have superior education from accredited schools with rigorous programs that have more than prepared us to effectively provide quality diagnostic and psychotherapy to the people we serve. Our education and experience in the mental health field have armed us with the therapeutic skills necessary to provide quality care to those we serve. We are passionate about our profession and work tirelessly to serve our clients. We are compassionate and go above and beyond to provide quality services for the mental health population. We volunteer our time and own resources, we are on committees, we are involved in mental health organizations, and we continue to educate ourselves. The profession feverishly works to continue learning, growing, and evolving of our profession so that we may continue to accurately diagnose and provide the quality psychotherapy that has tremendously helped people with mental illness for over 30 years. Taking away our ability to practice therapy due to an outdated scope of work dismisses all the hard work and education to grow the profession over the past 30 years into what it is today. No longer being able to provide psychotherapy services would mean that all this work would be in vain.

I am proud of my education and LARA's proposal marginalizes the efforts, education, and skills we as LLPC/LPCs have worked for and the people we have significantly helped. Our education and training is similar to the scope and practice of other mental health disciplines and to say we are unable to diagnoses or provide therapy is absurd. I challenge you to learn more about the education and practice of LLPC/LPCs. All mental

health disciplines have evolved overtime and to say that the counseling profession has not grown, changed, or evolved since 1988 without proper and thorough research is alarming as this effects the lives of not only the thousands of counselors in Michigan but more so the mental health population. Taking away Professional Counselors ability to diagnosis and provide therapy would decimate the discipline, devastate the people we serve, and displace thousands of competent mental health professionals.

Thank you for your time and consideration. I implore you, Chairman, to do right by Professional Counselors and the people of Michigan who desperately need our assistance by passing HB4325. It would be a tragedy to put the people we serve at risk, potentially increase unemployment rates, perpetuate the mental health crisis in our great state of Michigan, and other possible undesirable outcomes.

Sincerely,

Kelly Hill, MS, LLPC  
Clinical Therapist  
New Oakland Family Center

## Eddie Sleeper

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**From:** Jarrette Wright-Booker <introspectivecounselingllc@gmail.com>  
**Sent:** Sunday, September 29, 2019 8:52 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325 WAYS AND MEANS COMMITTEE WRITTEN TESTIMONY

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

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

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

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

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

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

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

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

Thank you,

Jarrette Wright-Booker, LPC, CAADC

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Jarrette S. Wright-Booker MA, LPC, CAADC

Clinical Therapist

Introspective Counseling, LLC

(313) 207-5581

[www.introspectivecounselingllc.com](http://www.introspectivecounselingllc.com)

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## Eddie Sleeper

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**From:** Tara Michener <whoiamnotwhatiam@yahoo.com>  
**Sent:** Sunday, September 29, 2019 8:53 PM  
**To:** Eddie Sleeper  
**Subject:** TESTIMONY FOR WAYS AND MEANS IN SUPPORT OF HB4325

I have been in practice now for over five years. My work as a mental health counselor has afforded me the opportunity to meet one on one with clients, run and curate support groups, write and present on vital issues that impact those in Michigan who need treatment when it comes to their mental and emotional well-being. I have helped vulnerable populations with my background amongst those includes children. Children that have been bullied, who are afraid to go to school because of the lack of support available to them. The positive impact of LPC's allows children like this to be heard, empowered and treated. I remember the work that I invested in New Hope Center For Grief Support during internship and after graduate school working with kids as young as four years old who lost the most important person in their lives...typically this was a parent. The pain that I have seen in the eyes of children talking about feeling alone, misunderstood and lost is something that has made me grateful for my training because I am more than equipped to help them. I have the tools and I worked very hard for them. I passed the NCE (National Counselor Exam), I am degreed from a CA-CREP program, I have attained CEU's that continue to help me to grow as a professional because my clients deserve it. Those children deserve it. I am not exactly sure why now I and my colleagues who also have their own stories of hard work are being called into question professionally but it is not really me that this attempt to disqualify is hurting. Please do not get me wrong...my livelihood is important...it is a vital part of my income...but the ones that will hurt more than anyone are my clients. The people who will be impacted severely are those who need a LPC. The threat against mental health care is appalling especially when it is obvious that there is a need and so many rely on those who are being targeted. Please support HB4325.

Tara Michener, MA, LPC, NCC

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My books were featured in Essence Magazine <https://www.essence.com/beauty/natural-hair-books>



## Eddie Sleeper

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**From:** Shannon Jordan <sjordanpc@gmail.com>  
**Sent:** Sunday, September 29, 2019 9:10 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

Dear Ways and Means Committee Members,

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

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

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

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

There has been controversy and misinformation regarding the educational and supervision training and requirements of Professional Counselors. As an LPC, I completed a 60-hour Graduate-level Master's program of study that included the following courses: Theories of counseling, **Individual appraisal and assessment**, **Psychopathology and counseling**, Research and program evaluation, Social and cultural foundations in counseling, Counselor professional identity, function, and ethics, Human growth & development, Theories of counseling, **Counseling techniques**, **Group processes**, **Integration of psychology & theology**, Theology & spirituality in counseling, **Marriage and family counseling**, **Career development & counseling**, **Diagnosis and Treatment of addictive behaviors**, **Crisis counseling**, **Clinical diagnosis and treatment**. *\*Bolded headings indicate classes where techniques, diagnosis, and assessments were integrated into the course.* After my course work was completed, I was expected to complete a practicum and internship. The **practicum experience** included a minimum requirement of 100 total hours onsite with a required 40 hours of direct client contact with site supervision as well as university supervision. My actual practicum experience log recorded 331 total hours with 118 hours of direct client contact. **Internship** requirements included a minimum of 600 total hours onsite with a required 240 hours of direct client contact with site and university supervision. My internship was recorded over a period of 12 months with 957 total hours with 283 hours of direct client contact. As a condition of graduation, I was required to take an exit exam called the Counselor Preparation Comprehensive Examination (CPCE). Before provisional licensure LARA reviewed my transcripts and Professional Disclosure statement. Once my provisional license was granted, I was required to complete a minimum of 3,000 hours with 100 supervision hours over a period not less than 2 years and pass the National Counselor Exam before being granted full licensure. My post-graduate log recorded 3,676 total hours with 162 supervision hours and 1,766 Direct client

hours. 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 you can conclude, my education, supervision, and experience are equivalent to both Counseling Psychologists and Counseling Social Workers.

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

I am a Certified Trauma Professional and I am concerned about my clients and many have made tremendous progress towards their treatment goals whom have responded favorably to their individualized treatment plans and are showing decreases in symptoms of PTSD and finally showing signs of healing. Others are just starting to trust the therapeutic relationship and moving in the direction of positive and healthy change. Ethically how do I explain to these clients that they will no longer have access to their counselor? Trust is the cornerstone of building a counseling rapport with a client and it takes time and patience. It cannot be easily nor quickly duplicated with another provider of services. The client's wellbeing and safety are at the forefront of my concern. Please allow me to continue my dedicated work to help these individuals achieve peace in their chaotic lives.

These proposed rules changes would financially devastate my family and myself. Although I am a fully licensed LPC in the state of Michigan, I am a relatively new practitioner that holds \$85,000 in student loan debt. Additionally, I am a small business owner of a private counseling practice that employs (8) other LPCs. We are expected to service 5,000 sessions this year and have over 300 active clients spread over (2) locations. Our outreach covers approximately (6) other townships and we have developed a strong referral base with local schools, shelters, and other health practitioners. These rules changes would devastate my business. Without my income, I am fearful about defaulting on those loans. Without the business income, my counselors will also lose the ability to support themselves and their families.

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

Kindest Regards,

Shannon Jordan, NCC, LPC, CCTP, CCATP

## Eddie Sleeper

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**From:** Justina Crow <jcrow@chcmi.org>  
**Sent:** Sunday, September 29, 2019 9:11 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

Representatives,

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

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

If these proposed rule changes are adopted, my scope of practice will be limited so severely that insurance companies will likely cease reimbursing me for any services. At a time when mental health is a growing concern in the state, we should not be imposing rules that would limit the number of available providers. If these proposed changes are enacted, thousands of LPCs in the state will be at risk of losing their jobs. Clinics that employ LPCs will no longer be able to bill insurances for services and will have to make cuts. LPCs working in private practices like mine will likely be out of business in months.

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

There has been controversy and misinformation regarding the educational and supervision training and requirements of Professional Counselors. As an LPC, I completed a 60-hour Graduate-level Master's program of study that included the following courses: Theories of counseling, Individual appraisal and assessment, Psychopathology and counseling, Research and program evaluation, Social and cultural foundations in counseling, Counselor professional identity, function, and ethics, Human growth & development, Theories of counseling, Counseling techniques, Group processes, Integration of psychology & theology, Theology & spirituality in counseling, Marriage and family counseling, Career development & counseling, Diagnosis and Treatment of addictive behaviors, Crisis counseling, Clinical diagnosis and treatment. \*Bolded headings indicate classes where techniques, diagnosis, and assessments were integrated into the course. After my course work was completed, I was expected to complete a practicum and internship. The practicum experience included a minimum requirement of 100 total hours onsite with a required 40 hours of direct client contact with site supervision as well as university supervision. My actual practicum experience log recorded 421 total hours with 287 hours of direct client contact. Internship requirements included a minimum of 600 total hours onsite with a required 240 hours of direct client contact with site and university supervision. My internship was recorded over a period of 12 months with 855 total hours with 453 hours of direct client contact. Before provisional licensure LARA reviewed my transcripts and Professional Disclosure statement. Once my provisional license was granted, I was required to complete a minimum of 3,000 hours with 100 supervision hours over a period not less than 2 years and pass the National Counselor Exam before being granted full licensure. My post-graduate log recorded 4,208 total hours and 121 supervision hours. 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 you can conclude, my education, supervision, and experience are equivalent to both Counseling Psychologists and Counseling Social Workers. These proposed changes would devastate the counseling profession in Michigan and leave the hundreds of thousands of Michiganders currently receiving treatment from LPCs in the state with nowhere to turn for help. I urge the House of Representatives, Senate, and Governor to support and pass HB 4325 WITHOUT

AMENDMENTS to codify my Scope of Practice to allow me to continue providing quality and much needed mental health care in the state of Michigan.

I am a Certified Advanced Alcohol and Drug Counselor and worry for my clients whom have made tremendous progress towards their treatment goals following responding favorably to their individualized treatment plans and are showing signs of healing. Others are just starting to trust the therapeutic relationship and moving in the direction of positive and healthy change. Ethically how do I explain to these clients that they will no longer have access to their counselor? Trust is the cornerstone of building a counseling rapport with a client and it takes time and patience. It cannot be easily nor quickly duplicated with another provider of services. The client's wellbeing and safety are at the forefront of my concern. Please allow me to continue my dedicated work to help these individuals achieve peace in their chaotic lives.

These proposed rules changes would financially devastate my family and myself. Although I am a fully licensed LPC in the state of Michigan, I am a relatively new practitioner that holds \$90,000 in student loan debt. Without my income, I am fearful about defaulting on those loans. I am terrified that I will be forced to move out of state to continue paying for an education that I bought under false pretenses.

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

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

Kindest Regards,

Justina Crow, MA, LPC, CAADC, NCC

## Eddie Sleeper

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**From:** Kristen Qualls <kristenqualls@gmail.com>  
**Sent:** Sunday, September 29, 2019 9:13 PM  
**To:** Eddie Sleeper  
**Subject:** TESTIMONY FOR HB 4325 Wednesday W/M Committee meeting.

Dear Rep. Warren:

I am respectfully writing to request you move quickly to support LPC legislative bill HB4325. I am a Licensed Professional Counselor practicing for 11 years to serve the Oakland County community. I have helped countless individuals and families (in the thousands by now). Some of my clients are even high risk. One sad story: an adult who was traumatized as a child by hospital care for suicide attempts and refusing to use the hospital to help as an adult now. This client WILL MOST LIKELY COMMIT SUICIDE almost immediately if you allow LARA to take away our rights to practice and I can no longer work together with him and the psychiatrist treating him for medicine. I have another client who is Dissociative Identity Disorder and is incredibly distressed about the happenings in legislation. This person's trauma is massive enough to split into multiple alters, this need not be another part of this person's traumatic journey! I have teachers who are underfunded, and under supported working to help their families and all their students who can barely function in their jobs. I have firefighters and paramedics who have lost limbs, digits, and relationships and need help in order to be able to do their jobs well and with focus. I have children whose parents are emotionally abusive but not to the point that CPS/DHS can intervene so they are stuck in their awful situations with only the counselor to help them make it to adulthood where they can finally get freedom. I have children being bullied online, at school, and desperate to make it through w/o experiencing traumas that would become long lasting. My schedule is full (40 hours of face to face client time per week) and I have a waiting list months long, and so do all my colleagues, LPCs, MSWs, PhDs. We do not have enough help to go around.

I am a mother of a young child just getting started in this world and a degree that would be obliterated significantly affecting my only way to support my family if you take away ability to practice. I am a wife, and own a small house in Troy, MI. I support my community, my neighbors, my family. And there are countless more like me all in the same situation. This is dire, and so important. We are not asking you to change our scope of practice. We have been trained adequately for the licensure LARA has granted us and counseling that we have been practicing for 30 years. We come from accredited schools that have had to prove our programs are competent and follow rigorous guidelines to train us. We are not incompetent in diagnosis and counseling techniques. Our training is comparable with others like us (MSWs, PhDs). We are educated about both and focus on WORKING WITH AND HELPING people directly! We want to help people, and we do not make a ton of money.

No person or profession stands to benefit from this act by LARA. AND PEOPLE WILL LITERALLY DIE! AND QUICKLY! I implore you to please consider the welfare of all the community, the life's work we have all dedicated to the community, the safety of our clients, the well being of ourselves. This is an injustice that can be resolved swiftly, safely, and with love and respect if you quickly SUPPORT HB4325 WITHOUT AMENDMENT.

I am personally going to be devastated by this change as well. My family relies on my income to survive and there are others in my position. I chose my profession in 2004 after graduating with a BA in Psychology from EMU. My entire life has been dedicated to understanding how to best counsel in a competent way. I have no other professional skills, and student loans I am STILL TRYING TO PAY back. I would not be able to afford to go back to school, take care of my son who is not yet in school, and work full-time in some other industry while affording my house and recreating my career.

I have heard rumoring that the American Psychological Association is lobbying against us. That they have hired lobbyists specifically to kill HB 4325. HOW IS THIS ETHICAL?? There is a known huge impact to the community. They are saying that they need to protect the public from our "sub-par skills." HOW IS THIS PROTECTING THE PUBLIC? They have been

after us for years and it is purely ego. I have worked for 4 clinics before I opened my own private practice after BCBS agreed to allow LPCs to take insurance w/o having to bill under someone else. I just made it to the 2 year mark. In my history with psychologists, the Dean at U/M was incredibly condescending when I was applying to grad school; my internship clinic owner would cancel my clients on me less than an hour before I had clients and I had to find another internship so I could complete it; TWO have stolen from me (\$30K plus) as they have defrauded insurance and clients; one went to prison for it; and all hurt numerous clients in the process. NOT ALL OF THEM ARE LIKE THIS obviously!

Another point is because LPCs were previously required to bill under a PhD to accept insurance, many psychology and counseling clinics are LOADED full of LPCs. It is hard for me to believe this won't hurt the psychologists as well. How are they going to deal with all the clients that can no longer be seen and afford to keep their doors open with that massive amount of revenue and opportunity overnight? This goes way beyond anything the psychologists are fighting against us seem to be considering, I think. Our schedules are all full! I don't know anyone in the area who does not have a waiting list at least a month or two long, and I have been doing this 11 years, and met so many clinicians along the way.

Critical thinking is necessary as you choose how to proceed with helping us with our very near future. I implore you to PLEASE allow us to continue working, making a living to support ourselves, supporting the entire community, and serving benevolently. I have yet to come across an LPC with shady ethics. They are highly ethical people working very hard (for much less money than the PhDs or even other industries). My hair stylist makes more in an hour cutting hair than I do with 7 years of school post high school, and numerous hours of supervision training, and two licenses in MI. AND I AM ONE OF THE FINANCIALLY SUCCESSFUL COUNSELORS WHO HAS MADE IT IN PRIVATE PRACTICE. It is really not acceptable but what is unconscionable is shutting us down.

I implore you to urgently pass HB 4325 without amendment. Thank you for your assistance and representation.

With Great Concern,

Kristen R. Qualls, MA, LPC, LMFT, NCC  
Licensed Professional Counselor  
Licensed Marriage and Family Therapist  
National Certified Counselor

Phone: 810-397-4861

Email: [kristenrqualls@gmail.com](mailto:kristenrqualls@gmail.com)



## Eddie Sleeper

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**From:** Lynnae Stankus <stankusl79@gmail.com>  
**Sent:** Sunday, September 29, 2019 9:25 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

Dear Mr. Sleeper,

I would like to submit this testimony for the Ways and Means Committee regarding HB 4325.

I strongly urge you to pass this bill with no changes or amendments as soon as possible.

My husband serves as an LPC and I know the tremendous impact he has on his clients. This bill would stop LARA's proposed changes that would devastate the mental health community. HB 4325 does not make changes for an LPC's scope of practice. It simply allows them to be doing what they have been doing for 30 years, which is serving those who need mental health care.

We have a mental health crisis in Michigan. Eliminating 10,000 jobs for people who serve this community is unwise, at a minimum. I urge you to pass this bill and save our mental health community from irreversible harm.

Thank you for your time.

Lynnae Stankus  
Portage, MI



## Eddie Sleeper

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**From:** Christina Arsenault <carsenault527@gmail.com>  
**Sent:** Sunday, September 29, 2019 9:30 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - Ways and Means Committee Written Testimony

Christina Arsenault MA, LLPC  
5565 Streefkerk Dr.  
Warren, MI 48092  
586-863-2444  
carsenault527@gmail.com

September 29, 2019

Dear Ways and Means Committee,

I currently work with 72 clients on my case load out of Westland and Monroe. I worked extremely hard attending graduate school at the University of Detroit Mercy studying full time for 3 years from 2013-2016 in the Masters of Community Counseling program. I studied hard, and my professors prepared us well. I had numerous classes that trained me to diagnose, assess, and treat clients - such as "Counseling Skills", "Testing and Evaluation", "Mental Health Diagnosis and Treatment" - and I also completed an on-site practicum as well as an external internship all prior to graduating. Stripping me of my license would be detrimental to not only me, but my clients. I work 50-60 hours per week, and I absolutely love what I do. My clients and I have built trust and rapport, and taking my license away would ultimately take me away from them.

Do you want to be a part of that negative impact on Michigan?

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

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

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

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

Practice Rules changes will put all LPCs immediately out of practice and will ensure that the citizens of Michigan will have less access to mental health care.

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

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

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

If the Board of Professional Licensing is not motivated by the ACA Code of Ethics violations as well as the financial and emotional crisis that would be experienced by thousands of LPCs, their clients, and their client's family members, has LARA considered the ramifications of LARA's proposed LPC Scope of Practice Rules change long term?

It is the job of state licensing boards to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will very unnecessarily and recklessly place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, LARA would find it very difficult to justify the proposed LPC Scope of Practice Rules change in legal disputes since LARA will immediately be responsible for inflicting counseling client neglect and abandonment. Additionally, LARA will be immediately responsible for more citizens of Michigan having less access to mental health care when there is already a crisis from a lack of mental healthcare services in the state of Michigan. Once again, a state licensing board would not be protecting the citizens of the state if this were to occur and it would be unlikely that this behavior would hold up well in legal disputes.

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

I hope that my letter will help inform you about the negative consequences of LARA's proposed LPC Scope of Practice Rules change. If you desire additional information from me, please contact me via phone at 586-863-2444 or email at [carsenault527@gmail.com](mailto:carsenault527@gmail.com)

Sincerely,  
Christina Arsenault MA, LLPC

## **Eddie Sleeper**

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**From:** Erin Medeiros <emedeiro@emich.edu>  
**Sent:** Sunday, September 29, 2019 9:42 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - Ways and Means Committee Written Testimony

To the members of the Ways and Means Committee,

I am writing to express my support of HB 4325 and to ask for you to vote to pass it out of committee immediately and without amendments. As a Counselor-in-Training at Eastern Michigan University and pursuing a career as a Licensed Professional Counselor (LPC), this bill is of vital importance to me. Not only will it affect my future, but more importantly it will affect the future of those Michigan citizens who seek and require mental health services.

HB 4325 clarifies and maintains the scope of practice that Licensed Professional Counselors have been practicing since 1988, specifically addressing the wording around diagnosis and treatment with counseling techniques. This does not change the eligibility of those who obtain licenses as professional counselors. Counselors-in-Training, such as myself, still receive education in diagnosis and treatment of mental and emotional disorders and meet the standards set by the Council for the Accreditation of Counseling and Related Educational Programs (CACREP). To receive our licenses in the state of Michigan, those granted a limited license still must receive 3000 hours of supervision after graduation, in addition to the 700 hours of supervisory experience that is required within the master's program.

I hope to convey that the education, training and supervision standards have not changed, but that this bill will update the statute, so that the scope of practice is clear and licensed professional counselors will maintain their ability to properly diagnosis and treat clients with mental disorders.

This is an urgent matter because Michigan's Department of Licensing and Regulatory Affairs (LARA) have proposed to change the existing rules surrounding a LPC's ability to practice counseling. Not only would this jeopardize the careers of all Michigan LPCs, but it would be devastating to hundreds of thousands of clients who rely on mental health care from LPCs. Counselors would not be able to diagnose or treat clients and clients will be the ones suffering these changes most intensely.

Michigan has over 1.4 million adults with mental illness and 67,000 youth suffering from a major depressive episode. According to American's Health Rankings, approximately 1,400 Michigan citizens commit suicide each year. In addition, the opioid crisis that is sweeping the nation is not excluding the citizens of Michigan. Licensed Professional Counselors are trained to combat these issues and are an essential part of every community. We need more mental health professionals, not less. With the passing of HB 4325 out of committee and sending it to the House, we will be one step closer to supporting the mental health and wellness of our communities.

Please vote in support of HB 4325 without amendments on Oct 2<sup>nd</sup>. Thank you for your time and consideration of this important matter.

Sincerely,  
Erin Medeiros  
4889 Birch Ln, Dexter MI 48130  
(703) 859-1612  
[emedeiro@emich.edu](mailto:emedeiro@emich.edu)

Erin E. Medeiros

MA Clinical Mental Health Counseling  
Counselor-in-training  
Eastern Michigan University  
[emedeiro@emich.edu](mailto:emedeiro@emich.edu)

## Eddie Sleeper

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**From:** Patricia <pathanaford@comcast.net>  
**Sent:** Sunday, September 29, 2019 9:48 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

Mr. Edward Sleeper

I am an LPC. I am writing in support of HB 4325 which supports LPCs providing mental health care counseling.

I am concerned that the Michigan Psychological Association is unduly influencing LARA and BCBS of Michigns to disenfranchise LPCs by removing their ability to provide mental health therapy, diagnose and bill BCBS of Michigan. Disinformation has been presented by the MPA that distorts our training and education making it appear as if we are undertrained. This is untrue.

LPC s receive education in diagnosing and psychological counseling techniques. Our curriculum is at least as good as that of MSWs and LLPs. We complete a 48 to 60 hour curriculum, a 600 hour practicum and a minimum of 3000 supervised hours prior to becoming an LPC. And, many of us have passed a rigorous National Counselor Exam. This is equivalent to both MSWs and LLPs.

LARA is to be an unbiased agency and yet the MPA has stated in their newsletter that they have made inroads with LARA in removing the right to practice therapy from LPCs. The MPA news letter also states that they are working with BCBS to no longer reimburse LPCs for mental health therapy. It appears as if the MPA fears competition from LPCs so has misrepresented our qualifications.

I would match my education, training and skills against any MSW or LLP, all 3 of us being masters level therapists. In fact, we have the support of our MSW peers to continue to practice as we have been for 30 years.

I am concerned about losing my practice, my livelihood and having my education rendered useless. I fear for my clients abruptly losing me as their therapist. All due to politics. There is no validity to the claims of the MPA. Why are they lobbying against us? Why is LARA listening? LPCs have been practicing for 30 years. We've been given licenses to practice. We paid our license fees. We have had zero complaints to LARA.

I am also concerned about a conflict of interest with the LARA director, Ms.Hawkes, as her husband is a BCBS lobbyist. This certainly seems a conflict of interest as BCBS would benefit by no longer having to reimburse 10,000 LPCs. I fear losing my career, my credentials and my income for no valid reason.

There are approximately 10,000 LPCs who will lose their jobs or businesses and therefore their livelihoods. Also, importantly, we will no longer be able to help the clients we trained to be able to help. LARA is not only trying to remove my ability to diagnose, but also limit my ability to use psychological counseling techniques, thereby rendering me unable to do therapy in any form.

There will be an even more severe shortage of mental health counselors in the State of Michigan if LARA succeeds and HB 4325 does not pass soon. Not only will we LPCs suffer, the residents of Michigan that need mental health care will also suffer. The Michigan legislature can help LPCs and state residents by passing HB

4325 without amendments expeditiously before LARA implements their severe and unwarranted limitations to the LPC scope of practice. It needs to continue as it has been for the last 30 years.

Patricia Hanaford  
MA LPC NCC

Sent from Xfinity Connect Application



## Eddie Sleeper

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**From:** D Dobbins <d.c.nelson2110@gmail.com>  
**Sent:** Sunday, September 29, 2019 9:49 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325

Hello,

I am reaching out to you regarding HB4325 and the proposed changes LARA is attempting to make on my counseling license and to my profession.

I am a licensed professional counselor and have been working in my field for over 7 years. I obtained my masters degree in counseling from Oakland University and my undergraduate degree in counseling psychology from Rochester College. My extensive education and training qualifies me to diagnose and treat those with mental illness the same as social workers and psychologists. While counseling is a relatively newer profession, we have been contributing to the field for the last 30 years and taking away our ability to diagnose and use counseling techniques would be detrimental for me, my fellow LPC'S and our clients.

I am currently employed by the State of Michigan in the department of corrections providing mental health services to individuals in the prison system. I also have a small practice to supervise limited licensed professional counselors who are working toward full licensure. I chose this career path for one reason: to help. I'm asking you to support HB4325 without ammendment in order for me to continue doing what I love. It is imperative this bill passes quickly allowing the Governor to review and sign before LARA's proposed changes take effect. I'm advocating for myself, my profession and my clients and am asking you to be an ally and support this bill.

Thank you for your time and attention to this deeply important matter.

Sincerely,  
Danyelle Dobbins MA, LPC



## Eddie Sleeper

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**From:** Larry Stankus <ra11ef@yahoo.com>  
**Sent:** Sunday, September 29, 2019 10:00 PM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB4325

Dear Mr. Sleeper,

I would like to submit this testimony for the Ways and Means Committee regarding HB4325.

My name is Lawrence Stankus and I am a Licensed Professional Counselor (LPC). I have been an LPC for the past six years. I am writing to say I strongly oppose LARA's rule changes concerning LPC's and I am in favor of HB4325 being passed. LPC's have been able to diagnose and treat for the past 30 years and it is necessary to change the artificial restrictions on diagnosis being proposed. We are not asking to increase our scope, but to maintain the scope we have had since 1988.

Each week I meet with between 25 - 30 individuals, ranging in age from 7 to 72, who are working through significant life issues and traumas. These individuals will be left without treatment if LARA's proposed changes go through and HB 4325 does not pass. I have met with individuals struggling with suicidal ideation, anxiety, depression, divorce, grief, abuse and neglect, who are looking to have someone they can talk to about their experiences. They are looking to talk with someone who they can trust and who will not judge them. They are looking for someone to sit with them through their darkest time and witness their story, and not tell them to just get over it. This is what LPC's do.

These individuals will be left to work through these issues on their own or have an excessive wait until they could get in with a psychologist or a social worker. Access to treatment already takes an extended period of time; critical time. Allowing LARA to make its proposed changes will drastically increase waiting times to access therapy.

The proposed restrictions will have devastating effects felt throughout our state. This is a very dangerous change. I am confident there are hundreds of people still alive today in our state because they were able to talk with their LPC. It is frightening to imagine what would happen if this treatment is no longer available. The removal of LPC's ability to practice will leave approximately 150,000 Michiganders without treatment. It will cause 10,000 LPC's to lose their careers. Careers they are passionate about.

I hope you move this bill out of committee without any changes or amendments as soon as possible to allow the house to vote on it.

Sincerely,

Lawrence Stankus, LPC



## Eddie Sleeper

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**From:** Patricia <pathanaford@comcast.net>  
**Sent:** Sunday, September 29, 2019 10:06 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325

Mr Sleeper

I have concerns about LARA being unbiased in their plan to strip LPCs of their right to practice mental health counseling. I see a conflict of interest as BCBS of Michigan would benefit by not having to reimburse LPCs. I have copied below an article detailing concerns about Governor Whitmer naming Ms. Hawkes to lead LARA.

LPCs are highly educated and have totally comparable education and training to MSWs and LLPs. There is no basis to strip us of our right to practice and utilize the education we paid for and received. LPCs have been practicing for 30 years in Michigan. Why this action at this time to strip us of our livelihoods? I see no logical fact based reason do I must conclude that it's a nefarious reason.

I beg the Michigan legislature to pass HB 4325 without amendments as soon as possible so as to negate the imminent actions of LARA to remove LPCs from practicing mental health therapy in Michigan or any where else. LARA is trying to take our hard earned educational benefits and resulting careers away from 10,000 highly educated and committed LPCs.

Whitmer choice raises questions about state's conflicts of interest laws

PAUL EGAN | DETROIT FREE PRESS

Updated 10:41 a.m. EST Jan. 8, 2019

Gov.-Elect Gretchen Whitmer looks ahead to taking office in 2019

Gov.-Elect Gretchen Whitmer speaks to the Free Press

MANDI WRIGHT, DETROIT FREE PRESS

LANSING — The official who Gov. Gretchen Whitmer named to head one of the largest and most far-reaching state government departments is married to an owner of one of Lansing's biggest lobbying firms — raising concerns about potential conflicts of interest related to industries such as marijuana, where both spouses have responsibilities or client interests.

Whitmer, a Democrat who took office Jan. 1, named Orlene Hawks director of the Department of Licensing and Regulatory Affairs (LARA) — a \$518-million agency with responsibilities ranging from oversight of Michigan's lucrative new marijuana industry to liquor licensing, regulation of utilities, and licensing of doctors, hospitals and physical therapy providers.

Michigan Gov. Rick Snyder with Orlene Hawks and Mike Hawks of Okemos at the 2011 North American International Auto Show Charity Preview Gala at ... Show more

ONEITA JACKSON, DETROIT FREE PRESS

Gretchen Whitmer before being sworn in as Michigan's 49th governor, takes part in the inaugural ceremonies at the Capitol in Lansing on Tuesday, Jan. ... Show more

CORY MORSE, THE GRAND RAPIDS PRESS VIA AP

Hawks, of Okemos, is married to Michael Hawks, an owner and principal of Government Consultant Services, Inc. (GCSI). The firm's clients include marijuana interests such as the Michigan Cannabis Development Association, CannArbor Inc., MedFarm of Michigan LLC, and PSI Labs, state records show.

GCSI also represents many other clients affected by the policies and rulings of LARA and its sub-agencies, such as the Liquor Control Commission, which handles liquor licensing, and the Public Service Commission, which regulates utilities. While state records don't show which GCSI accounts are specifically handled by Michael Hawks, those clients include the Michigan Beer and Wine Wholesalers Association, Consumers Energy Co., the Michigan Physical Therapy Association, and Blue Cross, Blue Shield of Michigan, to name a few.

It's not the first time in recent years that similar concerns have been raised. Marriages with lobbyists involving a former governor's chief of staff and a former state senator have also been questioned.

While not questioning the integrity of Hawks or her husband, a state government ethics expert said the potential conflicts raised by the situation underline a need for stronger financial disclosure and conflict-of-interest laws in Michigan. A state senator who has the power to hold hearings on Orlene Hawks' appointment said it raises questions about how she will handle conflicts with her husband's firm, if they arise.

"On its face, it is concerning," said Craig Mauger, executive director of the Michigan Campaign Finance Network and an expert on ethics and disclosure rules for state officials.

"LARA is a very important department that has its hands in a lot of different industries," and "lobbyists work with all types of industries to try to advance their interests," Mauger said.

"If you were someone who wants something from LARA, do you think you would be more likely to go to the lobbying firm that is connected to the director of LARA?"

More: Whitmer to talk Michigan issues at Free Press 'Breakfast Club' event

More: Whitmer bans use of private email accounts for state business Sen. Peter Lucido, R-Shelby Township, chairman of the Senate Advice and Consent Committee, which can hold confirmation hearings on Whitmer's cabinet selections but is not required to do so, said Monday that areas of potential conflict and how they would be handled would be examined if his committee convenes a hearing on Hawk's confirmation.

"These are things that you've got to look at," Lucido said.

"If there's an appearance of impropriety or a conflict of interest, then I think she has a duty to make it known."

Lucido said one of the issues he wants to explore is "how does a potential conflict get resolved in an administrative agency" such as LARA.

Orlene Hawks, who will be paid \$165,000 a year in her new role, formerly served as director of the Office of Children's Ombudsman, which deals with the state's child welfare system, and before that worked for the state health department. She holds a bachelor's degree from Michigan State University.

LARA Director Orlene Hawks

## MICHIGAN GOVERNOR'S OFFICE

"Throughout my entire career in state government, I have served the people of Michigan with the utmost honesty and integrity, and will continue to do so as LARA director," Hawks said in a statement emailed to the Free Press by an aide on Monday.

Hawks did not respond in detail to an emailed question about how specifically she would respond to a conflict with her husband's firm, but said: "I will rely on all civil service rules and protocols to ensure that the laws under my department's oversight are administered fairly, efficiently, consistently and transparently."

Michael Hawks has been voted among the top two lobbyists in the state by Capitol insiders, according to his biography on the website of Eastern Michigan University. Snyder appointed Hawks to the EMU board in 2011. Before joining GCSI around 1990, Hawks worked for Democratic leaders in the state House. Hawks, who did not return a phone message Monday, holds a bachelor's degree from EMU and a master's degree from MSU.

GCSI Principal Michael Hawks

## EASTERN MICHIGAN UNIVERSITY

Whitmer spokeswoman Tiffany Brown said the governor is confident Orlene Hawks and the other cabinet members she selected "will be ethically conscious, serve with integrity and are committed to putting Michigan residents first."

Brown said Whitmer's expectations of her cabinet are clear, pointing to an executive directive Whitmer signed Thursday that points to state law governing conflicts of interest, none of which would prohibit the LARA director from being married to a lobbyist with interests before LARA, and adds other directives, such as that officials "not engage in outside employment or activities conflicting with their official government duties."

Whitmer "has set a high bar and has full faith in her cabinet," Brown said.

Mauger said Michigan is one of only two states that doesn't require some form of personal financial disclosure for top state officials, and the situation with the Hawks demonstrates the need for laws requiring such disclosure.

"This one is kind of obvious, but there could be many more of these situations that we don't know about," he said.

Lucido noted that potential conflicts involving top state officials and lobbyists are not new in Lansing, citing the example of Dennis Muchmore, who was chief of staff to former Republican Gov. Rick Snyder while his spouse, Deb Muchmore, worked as a Lansing lobbyist. She had served as a spokeswoman for Nestle, the company that obtained a controversial state permit to increase its pumping of Michigan groundwater, obtained at a nominal fee, after Dennis Muchmore left Snyder's employ.

State Sen. Joe Hune, R-Fowlerville, who left the Senate at the end of 2018 because of term limits, is married to Lansing lobbyist Marcia Hune. That relationship became an issue in a federal lawsuit involving electric car manufacturer Tesla, because Joe Hune introduced legislative language that Tesla alleges banned the insurgent company's sales model in Michigan, while the firm Marcia Hune worked for counted the established Michigan auto dealers among its clients.

Chuck Perricone, a former Republican House speaker who has worked as a lobbyist in the cannabis industry since 2011, said it's valuable to raise questions and concerns about such relationships because the approval process for various types of marijuana licensing "is just so subjective."

"I appreciate the scrutiny," Perricone said. However, "in my personal experience over the years and in this space, Mike Hawks is a straight shooter and I have no reason to believe that the new director won't operate the same way."

Contact Paul Egan: 517-372-8660 or [pegan@freepress.com](mailto:pegan@freepress.com). Follow him on Twitter [@paulegan4](https://twitter.com/paulegan4).  
Originally Published 6:00 a.m. EST Jan. 8, 2019 aqa



## Eddie Sleeper

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**From:** Christian Daman <staffordtoj@att.net>  
**Sent:** Sunday, September 29, 2019 10:31 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - Ways and Means Committee Written Testimony

I am writing to express my concern with LARA's proposed rules changes for Licensed Professional Counselors (LPC) that have significant consequences on the counseling profession and the workforce in Michigan's public mental health system. Michigan's CMH system relies heavily on LPCs - as much as 25-30% of the workforce is made up of LPCs.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751. These are rules that have been recognized as part of the scope since they were first promulgated after the passage of the Licensed Professional Counselor statute in 1988. Instead the department insists these definitions should apply only to the educational preparation of counselors and not to counseling practice.

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

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

LARA is also pursuing the repeal of the rules identifying the requirements for providing counseling supervision (R338.1757), one of which is specific training in supervision. This training is a national standard for professional counseling.

Again, if this rule is rescinded, counselors who provide supervision without training would be practicing in violation of the ACA's Code of Ethics (F.2.a Supervisor Preparation). Furthermore, LPCs who received their supervision in Michigan may not be eligible for licensure in other states because their supervisor would not be qualified in the state to which the counselor is moving.

Timing is critical, LARA has scheduled a public hearing on the proposed rule changes for October 4. After this public hearing, the rules can be certified, I strongly encourage JCAR to not support these rules. In addition, I strongly encourage the legislature pass HB 4325 (sponsored by Rep. Miller), which would overturn these proposed changes. HB 4325 is on the House Health Policy committee agenda - please support this bill!

Thank you in advance for your consideration.

Sincerely,



## Eddie Sleeper

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**From:** Irene Soléa Antonellis <iantonellis@gmail.com>  
**Sent:** Sunday, September 29, 2019 10:43 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - LPC written testimony

Dear Committee Members:

My name is Irene Antonellis, and I am a Licensed Professional Counselor (LPC) in Ann Arbor, MI. I am writing to urge your support of Michigan House Bill 4325 without adjustment or amendment.

As you may know, LARA is proposing changes to limit the LPC's scope of practice as we have understood and applied it within the state of Michigan for the past thirty years. **This will take away our ability to diagnose mental health disorders and provide counseling, leaving 10,000 LPC's abruptly out of work and 200,000 patients suddenly without their psychotherapist.** Make no mistakes about it, LARA's changes will make obsolete the hard-earned LPC licenses they themselves have been granting for decades, and will be disastrous to the public health of our state.

As an LPC in private practice, I am deeply concerned about anything that will reduce the availability of high-quality psychotherapy for those who need it. Our state's shortage in mental health services is overwhelming from the perspective of my own practice as well as the many providers with whom I work (physicians, psychologists, social workers, etc.). Currently, many patients in need cannot find a psychotherapist with a wait time under 6 months, and many are turned away entirely due to inability to find a psychotherapist covered by their insurance. **We have a teen suicide epidemic, an opioid crisis, and rising rates of anxiety and depression. We cannot afford to decrease accessibility to services during this fragile time for our communities; we need MORE qualified providers, not less.**

### LPC TRAINING AND QUALIFICATIONS.

There has been gross misinformation spread regarding the LPC's training and qualifications. In fact, **LPCs are masters-level clinicians with training and qualifications on par with licensed master social workers (LMSWs).** As part of my graduate studies in mental health counseling, I took required courses of Psychopathology, Counseling Theories and Practice, and Assessment/Evaluation *precisely to diagnose mental health disorders and treat them using the appropriate psychotherapy techniques.* My pre-license work under clinical supervision included a required minimum of 700 hours of practicum/internship during my graduate studies and 3,360 hours of post-graduate clinical work under supervision. **Clearly stated, I completed more than 4,000 hours of supervised clinical experience BEFORE becoming eligible for my LPC license (which is similar to the requirement for LMSWs: 4,000 hours of post-graduate experience under supervision).** Additionally, I was required to pass the National Clinical Mental Health Counseling Exam (NCMHCE) prior to licensure. Like our LMSW colleagues and allies, we are trained and qualified to independently diagnose and practice psychotherapy, and have been doing so for the past 30 years, fully licensed and supported by LARA and the state of Michigan.

**MAINTAINING (NOT EXPANDING) LPC SCOPE OF PRACTICE.** House Bill 4325 will codify into statute -and therefore maintain- the LPC's current scope of practice. **LPCs independent work diagnosing mental health disorders and providing psychotherapy has been the national standard for decades with only a few exceptions** (currently TX and ME, I believe, where there is a Licensed Clinical Mental Health Counselor (LCMHC) and/or Licensed Clinical Professional Counselor (LCPC) licensure that MI-trained LPCs can receive with reciprocity in most cases). In fact, I was previously practicing within the state of Massachusetts, where I was able to supervise LCSWs, LMHCs/LPCs, and psychologists as the Clinical Director of residential treatment within the world-renown Trauma Center and Justice Resource Institute, Inc. I have more than twelve years experience diagnosing and treating mental health disorders, and many years training and supervising others to do the same.

LARA granted me the LPC license years ago after reviewing my clinical training (graduate transcripts, supervised clinical hours, and NCMHCE exam score) and my Professional Disclosure Statement, which outlined my qualifications and intent to clinically diagnose and independently practice psychotherapy. Telling me that I now cannot diagnose or provide counseling techniques as an LPC is like telling a licensed plumber that he can neither assess nor use pipes. It is a disrespect to my professional training, experience, resume, and abilities.

I am in full support of House Bill 4325 without adjustment or amendment. I support the codifying into statute (and therefore maintaining) the LPC scope of practice to explicitly include diagnosing and treating our patients with counseling/psychotherapy techniques. I also support the bill's added requirements for Continuing Education which will keep us evolving on par with other masters-level clinical professions. Finally, I support our protection of the livelihoods (and income tax generation) of the 10,000 LPCs in our state, and the protection of mental health services for the 200,000 Michigan residents who are in need of your/our support during a time of clinician shortage and growing inaccessibility to treatment.

Thank you for reading.

Sincerely,  
Irene Antonellis, MA, LPC, LMHC  
304 Wesley Ave  
Ann Arbor, MI 48103  
617-877-9425  
[lantonellis@gmail.com](mailto:lantonellis@gmail.com)

## Eddie Sleeper

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**From:** jenellekleib <jenellekleib@yahoo.com>  
**Sent:** Sunday, September 29, 2019 11:07 PM  
**To:** Eddie Sleeper  
**Subject:** HB4325- Ways and Means Committee written testimony

Dear Members of the Committee:

I am writing this letter to ask and strongly urge you to please support the passing of HB 4325, without amendments. As you may already know, there is a public hearing to be held by LARA on October 4, 2019, regarding proposed changes to the rules of Licensed Professional Counselor's scope of practice. There is obviously "a race against time" to get the bill passed, or the hearing that proposes the rules changes delayed. This would allow time for the bill to move through the proper channels in order to prevent a catastrophic shift from occurring, which would leave no contingency transition plan in place to address a major and chaotic disruption to what people have come to consider their current "normal".

I am a Licensed Professional Counselor who works at Mt. Pleasant Community Counseling Associates in Mount Pleasant, MI. Of our 13 therapists, 11 are LPCs. We serve literally hundreds of clients, and are among other licensed professional counselors in the area who do the same. We see upwards of 900 clients per month. I have been working as an LPC for over 10 years, and have extensive training in diagnosing and treating clients, not only from my graduate training program, but from continuing education conferences and courses. Over the years, I have had clients fully trust in my provided care and repeatedly tell me how thankful they are for my services. I have seen their measurable progress take place.

If LARA's proposed rules changes are accepted, and HB 4325 is not passed, this would be a huge detriment to so many people, on personal, professional, and systemic levels. For instance, countless people would have to find alternative services after having already established positive relationships and rapport with their current providers. For instance, 84% of my agency's current caseload- in just this one agency- would be forced to find alternative services in an area that is already low in numbers of providers, and high in length of waiting lists. And this is just Mount Pleasant. What about the rural parts of the state that are lacking even more in resources? This would place added stress and consequences on an already vulnerable population of people. The extremely long waiting lists that are already a current problem due to a shortage of providers would grow even longer. The already limited number of mental health professionals available would decrease significantly more; and, some people may therefore choose to go without services altogether which, of course, negatively affects not only the individual, but so many more on a systemic level. Additionally, the growing population of people in need of mental health services will be limited in their options for services. Moreover, countless people would be out of jobs, or at the very least, extremely limited on alternative career opportunities, including myself, many people would be in financial crisis due to lost job opportunities and current job duties, including myself, our economy would be negatively affected, and the list goes on and on.

Those who seem to be in favor of the rules change, specifically psychologists, claim that LPCs are not qualified to diagnose and provide psychotherapy techniques. However, if you take a look at the educational requirements of a psychologist, a social worker, and an LPC you will see that the educational and training requirements are comparable across the board. LPCs are qualified to do what we already have been doing, successfully, for over 30 years. Michigan doesn't need to be the state known for doing a huge disservice to its population in the area of mental health needs, it should be known for supporting the needs of every one of its residents, especially in the high-need area of mental health and well-being. That can be accomplished by maintaining the status quo, not expanding the scope of practice (as many are skittish about this bill doing but IT DOES NOT SEEK TO DO THAT), and solidifying what LPCs have already been doing for decades by passing HB 4325.

Again, I ask that you please oppose LARA's proposed changes and instead, support the passing of HB 4325, without amendments. HB 4325 does not intend to expand the scope of practice, but rather to clarify and stabilize what LPCs have already been successfully and ethically doing for decades. The extensive list of disadvantages should be evidence enough that the passing of LARA's proposed rules changes would be a detriment to the people of Michigan, and to our society as a whole.

Thank you for your time and consideration.

Sincerely,

Jenelle K. Leib, MA LPC  
Mt. Pleasant Community Counseling Associates  
500 S. Main St.  
Mt. Pleasant MI 48858  
Phone: (989) 773-0222

## Eddie Sleeper

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**From:** Ashley Hudson <ashhudson0927@gmail.com>  
**Sent:** Monday, September 30, 2019 12:13 AM  
**To:** Eddie Sleeper  
**Subject:** House Bill 4325

Dear Ways and Means Committee Member,

I write to you tonight, praying for your support of House Bill 4325 without amendment. I never imagined that after 11 years of professional experience the state could decide to disregard my education, clinical training and licensure. I never thought I could be forced to stop doing what I spent 6 years in school 3000 hours of supervised experience and successful completion of a National exam to do. I never believed I would have to begin thinking about a new career. But, here I am.

At a time in this country where suicide rates are increasing and opioid related deaths are overwhelmingly high, mental health should be a priority. Instead LARA is considering putting 10,000+ LPCs out of work and creating a serious gap in service for clients who desperately need support. It is an unethical abuse of power by an agency who for the past 30 years has given confirmation of training and diagnostic authority to the same people whose careers they now seek to destroy.

It is my prayer that you will support LPCs and approve House Bill 4325 without amendments. This Bill simply seeks to put into law, what LPCs have been doing for the past 30 years. Time is of the essence so I ask that you pass this Bill out of committee as soon as possible. Help us continue to serve the residents of this state with quality care and compassion.

Thank you for your consideration

,Ashley Hudson, MA, LPC





## Eddie Sleeper

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**From:** Larimore, Julie Louise <julie.larimore@rockets.utoledo.edu>  
**Sent:** Monday, September 30, 2019 12:40 AM  
**To:** Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Jason Wentworth (District 97); Rep. Rebekah Warren (District 55); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Kevin Hertel (District 18); Rep. Bronna Kahle (District 57); Eddie Sleeper  
**Subject:** URGENT HB 4325

Dear legislators, I am writing this email to ask that you please expedite HB 4325 to the next level of legislation due to the urgency of these matters that are about to affect the hardworking therapists in Michigan and the 150,00 thousand people who receive mental health services in your state.

I am currently a graduate student in the clinical mental health counseling field at the University of Toledo. Mental health is my passion. I currently intern at a local community mental health agency. Our agency is currently scheduling four months out for psychiatric evaluations do to a large number of client's in need of medication management and a lack of available psychiatrists to see these individuals. Our LPC's and LPCC's serve a vital role at our organization and provide client's with important care to coincide with pharmacological management. Therapy and medication management are both recommended to help a client successfully reach their goals. About 9,000 counselors are employed by the state of Michigan and those receiving mental health care total about 150,000. If HB 4325 is not expedited and passed this will have a huge impact on both the counselors and individuals receiving mental health care in your state. I am a pure example of why mental health services are so important. I have lived with a mental illness most of my life and with the help of some very amazing therapists who provided therapeutic techniques such as CBT, DBT, and EMDR I am currently in recovery and now am able to help others. Those receiving mental health services are only going to grow and Michigan needs therapists to be able to diagnose and bill insurance companies for therapy sessions.

Thank you for your time and considering expediting HB 4325.

Sincerely,

Julie Larimore



## Eddie Sleeper

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**From:** Jane Fetzer <janefetzer@yahoo.com>  
**Sent:** Monday, September 30, 2019 6:09 AM  
**To:** Eddie Sleeper  
**Subject:** Fwd: HB 4325 Ways and Means Committee written testimony

Sent from my iPhone

Begin forwarded message:

**From:** Jane Fetzer <janefetzer@yahoo.com>  
**Date:** September 29, 2019 at 5:58:34 PM EDT  
**To:** [ealeeper@house.mi.gov](mailto:ealeeper@house.mi.gov)  
**Subject:** HB 4325 Ways and Means Committee written testimony

I am an LPC and I have been practicing since 1997. I am asking that HB 4325 goes up for vote without amendments. I am not looking to change the scope of LPC practice just clarify and stabilize what LPCs have been doing for 30 years.

LPCs in Michigan number nearly 10,000 and serve 150,000 mental health clients. There is already a shortage of counselors in Michigan. It would be a detriment to society to not pass HB 4325 without amendments.

Thank you,

Jane Fetzer, MA, LPC

Sent from my iPhone



## Eddie Sleeper

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**From:** salena baker <healthymindmi@gmail.com>  
**Sent:** Monday, September 30, 2019 8:14 AM  
**To:** Eddie Sleeper  
**Subject:** Testimony for HB 4325

LPCs have now had to ban together because of accusations from the MPA- Michigan Psychological Association, who has been lobbying to remove an LPC's scope of practice. Please help us end bullying and turf war. The hundreds of thousands of clients who will be without mental health providers should be what we are focused on and not who's license is better. We are in the midst of a mental health crisis with an opioid epidemic. It is ironic that LPs would like to push LPC's out of practice, however they are not the ones in the trenches seeing the SPMI Medicaid population and working at CMH's, CPS and in the foster care systems with DHS. If they succeed then who is going to fill this gap?

Here the MPA executive director report

# Executive Director's Report

## Advocacy, PSYPACT and CE Program

LaVone Swanson  
Executive Director

Welcome to Summer. It's been a long time arriving, but CE Programing and a number of other Association items

### Advocacy Update

As expected, the Michigan Mental Health Counselors / by Rep. Aaron Miller to change the LPC scope of pract (HB 5776) introduced in the last legislative session th their specific training in diagnosis and treatment of me disorders. MPA Lobbyist Sandi Jones and Judith Kove met with Rep. Miller to discuss our concerns. He concerns.

In a recent newsletter by Michigan Psychological Association (3rd Quarter) there was a segment entitled, "Your Clinical Practice Impacted by Advocacy Work of the MPA Insurance Committee" on page

14, the author says "We have been talking with BCBSM regarding their reimbursing Licensed Professional Counselors for clinical services, which in our opinion is outside the scope of practice of LPCs. MPA's position has had some support from LARA. We intend to continue to persist on this issue." Link: [https://www.michiganpsychologicalassociation.org/docs/3rd\\_Qtr\\_Newsletter\\_corrected.pdf?fbclid=IwAR1Mn\\_pRK2uYm8b-AgWTATwZszqp32vXjrt4cl6XnKFqEQOmnxhHZQyepLo](https://www.michiganpsychologicalassociation.org/docs/3rd_Qtr_Newsletter_corrected.pdf?fbclid=IwAR1Mn_pRK2uYm8b-AgWTATwZszqp32vXjrt4cl6XnKFqEQOmnxhHZQyepLo)

Many of us who have attended major universities (WMU, CMU, UofM, etc) have had courses on how to diagnosis as well as counseling techniques. I have an official transcript to prove I have had courses in both diagnosing and counseling techniques. As well as a 900 hour practicum and a 3000 hour supervised internship.

This above article by the MPA brings to light the conflict of interest with the director of LARA as her husband is a representative of BCBS.

The MPA historically bullied LLP's too. SB273 initiated by MPA and BCBS was defeated in 2014 and SB641 also initiated by MPA was defeated in 2018.

This is not about helping the mentally ill. Psychologists can't meet the demand for the mentally ill alone if 10,000 LPCs are put out of work. MPA is presenting like they are acting on ethical responsibility to ensure Michiganders are receiving quality services but that doesn't mean they have to discredit other professions licenses. They are violating their mission because this is not in the best interest of the mentally ill or our state. Please take a stand and support HB 4325.

Salena Baker

106 S Stewart Ave

Fremont MI 49413

## Eddie Sleeper

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**From:** Faith Hale <hale.faihc@gmail.com>  
**Sent:** Monday, September 30, 2019 8:52 AM  
**To:** Eddie Sleeper  
**Subject:** HB4325 - Ways and Means Committee Written Testimony

Good morning,

I am one of the many LPC's that is worried about the changes that could come to pass if the LARA rules changes go through and HB 4325 is not passed.

I have personally listened to all of the hearings from the Michigan Psychological Association about their basis in why they want these changes passed. They make a compelling argument if you do not know the truth. However, that is exactly what it is: lies. His major point was that LPC's do not take ANY diagnosing classes. We do. We take many and they are very hard.

Please consider passing HB 4325 for the sake of our clients and our own lives. This does not change what we are already doing and it does not give us more ability than we are capable.

To put this a little more real to you, I am 4 months pregnant and am counting on this job and my license for the insurance and bills. Do you think I can find a job and get on insurance fast enough if I lose my job before baby comes?

Thank you for your time.

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Blessings,

*Faith C. Hale*





## Eddie Sleeper

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**From:** Martha De Boer <marti.deboerxx@gmail.com>  
**Sent:** Thursday, September 19, 2019 6:47 PM  
**To:** Eddie Sleeper  
**Subject:** HB 4325 Scope of practice for Michigan LPC's

As of this morning it is my understanding that the Health Committee has passed on HB 4325 to the House Ways and Means Committee of which you are a member. I would ask for your support of HB 4325.

This is a time critical matter. LARA is proposing rule changes that could eliminate MI LPC's from doing the jobs they were trained to do. They intend to enact this on 10/08 and it would go into effect by November. LARA is set to eliminate the LPC's ability to bill through Insurance and accept Medicaid affecting our most at risk populations. Ten thousand Licensed LPC's educated in the State of MI who are serving 100s of thousands of consumers will be out of business by November of this year. That would force 10,000 families to leave the state or face bankruptcy.

The passing of HB 4325 would disallow LARA from participating in further political turf wars and more clearly define the LPC's scope of practice. We need more Mental Health Professionals, not less.

As a Human Services professional I know the impact that will have.

One consumer with whom I worked cost the community over \$300,000. in jail, recovery programs, hospitals and housing programs over just a few years. In 10 years receiving services she was never given a diagnosis. She was frankly unpleasant. Anyone given a choice would simply find a reason to not give her treatment. Her children were not in her life due to the drugs. No one wanted to take on her case. CMH said that her primary issue was addiction so they wouldn't accept her. It was an LPC that finally stepped up and worked with her. She was given a diagnosis, the LPC stayed with her and within two years she is clean and seeing her daughter again. She has Disability which allows her to live with dignity.

I worked with a Foster care agency. We had a child that had been physically and sexually wounded. When talking with her about her visits in a conversational context, I asked her if she felt better with the counseling..she just said very quietly 'he hears what I say'..

The harm that will come of this proposal goes above and beyond 'one' person or even 10,000 LPC's going broke after graduating from MI Universities.

The fabric of our culture is being ripped apart and we have a few brave souls who are willing to step and meet people where they are and you want to divest them of their role. College graduates are beating it for other states and you wonder why.

Martha A. DeBoer  
300 Martin Luther King #104  
Lansing, mi 48913



## Eddie Sleeper

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**From:** Tracey Galgoci <tracey@tgtherapy.com>  
**Sent:** Sunday, September 22, 2019 2:19 PM  
**To:** Eddie Sleeper; Rep. Sheldon Neeley (District 34); Rep. Rebekah Warren (District 55); Rep. Bronna Kahle (District 57); Rep. Eric Leutheuser (District 58); Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Jason Wentworth (District 97); Rep. Roger Hauck (District 99); Rep. Wendell Byrd (District 3); Rep. Kevin Hertel (District 18)  
**Subject:** HB 4325 URGENT

Hello, my name is Tracey Galgoci and I am a Licensed Professional Counselor in Mt. Pleasant. I am also a former Michigan Board of Counseling member, who was appointed by Gov. Snyder. As you all know by now, HB 4325 has been referred to the House Ways and Means Committee. As a member of that committee I am urging you to put HB 4325 on your calendar this week and quickly pass it through your committee to the full House for a vote.

HB 4325 is a much needed update to the Counseling licensure law. It provides needed definition and clarification to our scope of practice. It does NOT expand our scope of practice beyond what we have been doing for the past 35 years. When the law was written in 1988, there was so much push back from the MPA, that the language in the statute had to be vague and scope of practice was not clarified. At that time, the bill writers were told that the clarifications and definitions could be put in the Rules of the law. LARA's current day interpretation is very different. They do not believe the Rules can define, describe or expand anything that isn't explicitly written into the Law. They have proposed changes to the JRAC and those changes could take effect as soon as November of this year. If they take effect without a new law in place, 10,000 mental health providers in Michigan will no longer be able to "diagnose or identify the problem". Ethically and legally we would no longer be able to treat people because we wouldn't be able to diagnose the problem and therefore couldn't create a treatment plan.

Diagnosis and assessment have always been a part of the rules of our law. LPCs are required to complete graduate courses in diagnosis, assessment, and evaluation. We are not asking for something we aren't qualified to do, and we aren't asking the legislature to expand the scope of what we do. We are asking the legislature to pass HB 4325 so that our scope of practice is defined, clarified and no longer open to interpretation or challenges. Please protect the livelihood of 10,000 LPCs in Michigan and ensure that hundreds of thousands of Michigan residents will not lose access to mental health care.

Getting HB 4325 out of your committee and to the full House for a vote, is an urgent priority if we are going to have any chance of getting the bill passed this year. Thank you for your timely attention to this issue.

If you have any questions or concerns regarding HB 4325, I would be happy to talk with you. You can reach me at 989-854-1968.

Tracey Galgoci, MA, LPC, NCC  
Tracey Galgoci Counseling, PLLC  
215 W. Broadway Street  
Mt. Pleasant MI 48858  
989-630-4335  
[tracey@tgtherapy.com](mailto:tracey@tgtherapy.com)



## Eddie Sleeper

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**From:** Emily Wezner <ewezner@newoakland.org>  
**Sent:** Tuesday, September 24, 2019 3:38 PM  
**Subject:** PLEASE SUPPORT HB 4325!

Good Afternoon,

I apologize if this is a duplicate email, but I'm working hard to make sure that all committee members have a clear understanding of HB 4325. My name is Emily Wezner, and I'm a Limited Licensed Professional Counselor in our great state of Michigan, born and raised. I'm a recent Oakland University alumnus (a CACREP accredited counseling Master's program,) and I'm one of the senior Partial Hospitalization Program therapists, and an Outpatient Therapist, at a fantastic organization called New Oakland Family Centers, and I treat consumers from Wayne County.

I consider LARA's proposals related to my scope of practice out of line considering we have been practicing psychotherapy and diagnostic techniques for thirty years. I completely understand that the language used in our rules and statutes are outdated, but I assure you-WE are up to date with Michigan's needs for mental health treatment. We undergo rigorous training not so different from other disciplines, so to make the stretch that since our language is outdated, our scope should change just seems absurd to me.

HB 4325 has made it's way to the ways and means committee which I'm sure you are well aware of. I'm hoping for a quick passage to the house and then to Senate floor. I'm imploring you to think of the 10,000 counselors who will be unable to practice, as we will not be reimbursed by insurances should these proposals pass. Even more importantly, please consider the hundreds of thousands of consumers we treat and how displaced they would be in an already over burdened mental health system. We are in the middle of an opioid and suicide crisis. Please pass HB 4325 when it reaches you. Please voice your opposition to these proposals LARA has felt pressured to impose. Please help Michigan to move FORWARD, not backward in mental health legislation.

Warmest Regards,

**Emily B. Wezner, MA, LLPC**  
Senior PHP Therapist/Outpatient Therapist  
734-225-2090 ext. 3718  
[ewezner@newoakland.org](mailto:ewezner@newoakland.org)  
[www.newoakland.org](http://www.newoakland.org)

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## Eddie Sleeper

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**From:** Erin Arwady <erin.arwady@gmail.com>  
**Sent:** Wednesday, September 25, 2019 10:06 AM  
**To:** Eddie Sleeper; Rep. Brandt Iden (District 61); Rep. Jim Lilly (District 89); Rep. Eric Leutheuser (District 58); Rep. Beth Griffin (District 66); Rep. Roger Hauck (District 99); Rep. Bronna Kahle (District 57); Rep. Jason Wentworth (District 97); Rep. Rebekah Warren (District 55); Rep. Wendell Byrd (District 3); Rep. Sheldon Neeley (District 34); Rep. Kevin Hertel (District 18)  
**Subject:** HB 4325  
**Attachments:** LARA LPC letter.docx

Dear Ways and Means committee:

I am a clinical LMSW individual therapist. I am deeply concerned and strongly oppose the potential rule changes that Licensing and Regulatory affairs is proposing. These changes would drastically and negatively impact 10,000 LPC's and thousands of clients in the state of Michigan. I am attaching a letter that in great details outlines why these rule changes are unethical, dangerous, and not feasible. Please review it and feel free to use any of the information as talking points. In addition, Lara's current proposal is an artificial restriction for a right that LPC's already have. Lara's suggestion for changing the scope in practice are arbitrary and capricious and upset 29 years of interpretive precedent.

I am requesting the following action:

1. Oppose these rule changes at the upcoming public hearing hearing on October 4th
2. Pass HB 4325, introduced by Representative Aaron Miller (R-Sturgis), which would negate the need for LARA's rule changes altogether.

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Erin Arwady, LMSW  
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BPL-BoardSupport@Michigan.gov

Public comment on Counseling – General Rules (ORR 2019-063 LR)

Erin Arwady, LMSW, MSW

Trestlewood Counseling Group

5104 Lovers Lane

Portage, MI 49002-1558

Phone 269 743-7360 ext. 2

Part-Time Instructor Western Michigan University School of Social Work

e-mail: erin.arwady.lmsw@gmail.com/erin.arwady@wmich.edu

9/18/19

Dear Michigan Board of Professional Licensing Policy Analyst:

As a licensed clinical social worker in the state of MI and a part-time instructor in the school of social work for Western Michigan University, I am extremely concerned about the potential rule changes that Licensing and Regulatory Affairs (LARA) is trying to make in reference to mental health providers with an LPC license. I strongly oppose these changes due to the significant negative consequences that threatens the livelihood of all LPCs and the mental health status of clients currently seeing counselors in the state of Michigan. As such, LARA's proposed changes are not only a cause for serious concern to LPCs but also current counseling clients and the general public.

Despite the unanimous objections of the Board of Counseling Rules Committee, LARA is recommending the repeal of virtually all the rules that define an LPC's scope of practice under R338.1751 via counseling –General Rules (ORR 2019-063 LR). These are rules that have been recognized as part of the LPC scope of practice after the passage of our LPC statute in 1988. LARA negligently insists these definitions should apply only to the educational preparation of counselors and not to counseling practice. Included in LARA's repeal is the practice of "counseling techniques" and the related ability to "diagnose and identify the problem." Without these and numerous other definitions, the LPC scope of practice is severely limited. Restricting LPC's scope of practice in this way will most certainly reduce the availability of mental health counseling services in Michigan and at a time when there is a growing demand for these services.

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

who see between them 50+ clients in the Kalamazoo/Portage area on weekly, bi-weekly or monthly basis. If these changes were to take place, these clients would be left without care and it is simply not feasible to refer them elsewhere due to the lack of non-LPC service providers in the area. These changes are both morally and ethically wrong according to the NASW code of ethics standards 1.01 commitment to clients. Clearly, LARA cannot be committed to clients and their well-being if these proposed changes go through and there is no reasonable way to refer clients elsewhere.

Further, LARA's proposed changes in the LPC scope of practice would put LPCs in violation of ACA's Code of Ethics standard E.5.a. Proper Diagnosis, which requires the proper diagnosis of a client's mental disorder before treatment. Furthermore, third-party payors will immediately stop paying for the counseling services provided by LPCs because the billing process REQUIRES a diagnosis for a counseling services third party claim to be paid. This means that when LARA's proposed Scope of Practice Rules change goes into effect, thousands of people across the state of Michigan will immediately be stripped of current counseling services. This will immediately place all LPCs in the state of Michigan in violation of the American Counseling Association's (ACA) Code of Ethics standard A.12. Abandonment and Client Neglect, which states that "Counselors do not abandon or neglect clients in counseling." If LPCs cannot bill third party payers because they can no longer diagnose clients, clients will not be able to pay for counseling services in full out of their own pocket, which will result in client abandonment and neglect by LPCs as was legally caused by LARA's LPC Scope of Practice Rules change.

In addition, these changes will greatly affect other mental health providers (including LMSW's such as myself) in the area as they would have to attempt to absorb the client caseloads of current LPC. As noted above, if 54% of Michigan counties are being recognized as having a shortage of mental health services, how can LARA justify cutting the scope of practice of nearly 10,000 LPC in the state and leaving thousands of clients without services. Therefore, these proposed changes not only violate the LPC code of ethics but also the NASW code of ethics 1.01 – commitment to clients as a social worker's responsibility is to promote the well-being of clients.

If the Board of Professional Licensing is not motivated by the ACA Code of Ethics violations as well as the financial and emotional crisis that would be experienced by thousands of LPCs, their clients, and their client's family members, has LARA considered the ramifications of LARA's proposed LPC Scope of Practice Rules change long term? Just a few points to consider might be:

1. A class-action lawsuit of all LPCs and Limited License LPCs (LLPC) in the state of Michigan seeking compensation for lost wages, job loss, educational costs required for licensure as an LPC or LLPC, re-training to a new profession and job loss during retraining, mental anguish, and other damages.
2. A class-action lawsuit of all counselor education students currently obtaining training to become an LPC in the state of Michigan seeking compensation for educational costs required

for licensure as an LPC, re-training to a new profession and job loss during retraining, mental anguish, and other damages.

3. A class-action lawsuit of all counselor educators in the state of Michigan seeking compensation for lost wages, job loss, moving expenses to find work in another state, mental anguish, and other damages.

4. Lawsuits filed by the clients and client family members of LPCs and LLPCs in the state of Michigan seeking compensation for mental anguish, abandonment, neglect, and other damages.

These four concerns are significant because the job of state licensing boards is to protect the citizens of the state. LARA's proposed Scope of Practice Rules change via Counseling – General Rules (ORR 2019-063 LR) will very unnecessarily and recklessly place thousands of citizens in Michigan who are currently in counseling treatment to immediately lose needed counseling services and experience abandonment and neglect. Since HB 4325 is currently in process in the legislature and appropriately addresses the updates needed to the LPC license, LARA would find it very difficult to justify the proposed LPC Scope of Practice Rules change in legal disputes since LARA will immediately be responsible for inflicting counseling client neglect and abandonment. Additionally, LARA will be immediately responsible for more citizens of Michigan having less access to mental health care when there is already a crisis from a lack of mental healthcare services in the state of Michigan.

I am requesting the following action: OPPOSE these rule changes at the forthcoming public hearing on October 4<sup>th</sup> and Pass HB 4325, introduced by Rep. Aaron Miller (R-Sturgis), which would negate the need for LARA's changes altogether. If you have any questions or would like to discuss further the points raised above, please do not hesitate to contact me.

Sincerely,

Erin Arwady, LMSW

