



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

## MICHIGAN BOARD OF COUNSELING DECEMBER 13, 2019 MEETING

### APPROVED MINUTES

In accordance with the Open Meetings Act, 1976 PA 267, as amended, the Michigan Board of Counseling met on December 13, 2019, at 611 West Ottawa Street, Upper Level Conference Room 4, Lansing, Michigan 48933.

#### CALL TO ORDER

Robyn Emde, Ph.D., L.P.C., Chairperson, called the meeting to order at 10:08 a.m.

#### ROLL CALL

**Members Present:** Robyn Emde, Ph.D., L.P.C., Chairperson  
Harold Love, M.A., L.P.C., Vice-Chairperson  
Mary Billman, Public Member  
Katie Bozek, Ph.D., L.M.F.T.  
Stephen Craig, Ph.D., L.P.C.  
Charles Hughes, L.P.C, N.C.C  
Walter Harper, Public Member  
Gerald Papazian, C.A.A.D.C., L.P.C.

**Members Absent:** Janet Glaes, Ph.D., L.P.C  
Harold Koviak, Public Member  
Jana Simmons, Public Member

**Staff Present:** Kimmy Catlin, Board Support, Boards and Committees Section  
Weston MacIntosh, Senior Policy Analyst, Boards and Committees Section  
Bridget Smith, Assistant Attorney General,

#### APPROVAL OF AGENDA

MOTION by Bozek, seconded by Love, to approve the agenda as presented.

A voice vote followed.

MOTION PREVAILED







James Blundo, L.P.C., Executive Director of MMHCA, introduced himself to the Board and gave a position statement about the rules. (See addendum #1).

## **ANNOUNCEMENTS**

The next regularly scheduled meeting will be held on January 17, 2020, 10:00 a.m. at 611 West Ottawa Street, Upper Level Conference Room 4, Lansing, Michigan 48933.

## **ADJOURNMENT**

MOTION by Love, seconded by Bozek, to adjourn the meeting at 10:34 a.m.

A voice vote followed.

MOTION PREVAILED

Minutes approved by the Board on January 17, 2020.

Prepared By:

Kimmy Catlin, Board Support  
Bureau of Professional Licensing

December 13, 2019



# Michigan Mental Health Counselors Association

---

Michigan Mental Health Counselors Association  
P.O. Box 80036 · Rochester, Michigan 48308  
[www.mmhca.org](http://www.mmhca.org)

December 12, 2019

## MMHCA POSITION STATEMENT ON RULES

### REMOTE OR DISTANCE SUPERVISION

#### MMHCA's POSITION

MMHCA is concerned about the ambiguity created by removing the words "immediate" and "physical" prior to "presence of the supervisor" in Rule 338.1774 (1) (b) (i) and (l). We encourage the Board to be more specific to avoid confusion about what this requirement means.

MMHCA supports allowing half of the required hours of supervision in the presence supervisor to be remote under certain circumstances. First, the Board needs to clearly define what qualifies as remote or tele-supervision. Second, MMHCA only supports allowing any remote supervision if the following requirements are also added:

LLPCs who acquire their supervised experience in Michigan must be supervised by a Michigan licensed LPC supervisor who is practicing in Michigan and who conducts the supervision consistent with Michigan law.

LLPCs who acquire their supervised experience in another state must be supervised by an LPC who meets all the requirements to be a supervisor in Michigan and who conducts the supervision consistent with Michigan law.

#### RATIONALE

There are now national organizations which create platforms to provide tele-supervision. In reviewing one such organization, it was discovered that most of those individuals purporting to meet requirements to supervise in Michigan listed credentials which are not valid in Michigan. Michigan Board of Counseling Administrative Rules require the potential supervisor to provide a statement in writing "that addresses the licensee's supervising qualifications, including how the licensee complies with the requirements in sub rules (1) and (2) of R 338.1757." On the platform reviewed, none of the biographical statements provided by those

purporting to qualify to be supervisors in Michigan met this requirement. We need to protect the public by ensuring the quality of the supervision provided to Michigan LLPCs as well as to ensure that when LLPCs apply for licensure, their supervision meets Michigan requirements.

A similar concern has proven true with supervisor training itself. For some time, there have been concerns about individuals who are not licensed in Michigan coming here to do supervisor training. One such individual claims to present requirements of Michigan law, but has taught potential supervisors' incorrect information (such as diagnosis is not in the practice of counseling or that there are restrictions on testing practice that in fact do not exist). As you can imagine, this information has been damaging to the profession as well as to the public. We do not want to create another such situation with supervision itself.

The above situations have caused MMHCA to be concerned about allowing all the supervision that an LLPC practicing in Michigan receives to be remote. It is important that a supervisor meet all Michigan requirements to supervise as well as to be acquainted with Michigan licensing law and other Michigan laws to appropriately supervise and advise a supervisee for licensure in Michigan. We want to ensure that allowing current technology to make obtaining supervision easier for Michigan LLPC's does not negatively impact the quality and integrity of that supervision. We believe that MMHCA's proposed language ensures exactly that.

#### EXPERIENCE FOR SUPERVISION

##### MMHCA's POSITION

MMHCA supports the current requirement of three years of post-degree experience in the practice of counseling to supervise LLPCs. We oppose changing this requirement to say that this experience must be as a fully licensed LPC, because to do so is not consistent with national standards for the profession.

We would also support changing this requirement to five years of post-degree experience in the practice of counseling to reflect current ACS requirements. We do not support requiring that any part of this experience be as a fully licensed LPC. We also support saying that anyone with the ACS credential meets requirements to supervise in Michigan.

To require that any part of this experience be as a fully licensed LPC would make our requirements inconsistent with national standards and would negatively impact portability. It would create confusion and inconsistency within our rules themselves because not everyone holding the ACS credential, which is the national standard, would meet our requirements in Michigan.

##### RATIONALE

We do not support creating requirements for supervisor training that exceed national standards. A supervisor who meets national standards (ACS) should be eligible to supervise in Michigan. If the Board requires three years of experience as a fully licensed counselor, it is possible that someone meeting national standards would not meet Michigan standards. We

have not become aware of any issues with inappropriate supervision based on the current standards which simply require three years of practice in counseling, so there might not be a demonstrated need to change the standard. However, if the Board feels that they need to change this requirement, MMHCA strongly recommends that they adapt the current standards for ACS which require five years of practice in counseling. (The ACS standards also have a requirement concerning the number of hours of practice that must met during the five years, which the Board could include or not.) For portability reasons, MMHCA strongly recommends that the Board not adopt standards which exceed ACS requirements. We believe that it would be highly inappropriate for a supervisor meeting the highest standards for our profession to be ineligible to supervise in Michigan.

Sincerely,

A handwritten signature in cursive script that reads "James Blundo".

James Blundo, MA, LPC  
MMHCA Executive Director  
248-930-0644  
[www.mmhca.org](http://www.mmhca.org)  
[jamesblundo@att.net](mailto:jamesblundo@att.net)