

Substance Use Disorder (SUD) Administrative Rules FAQs for Counseling Services

On June 26, 2023, the Michigan Department of Licensing and Regulatory Affairs (LARA), Bureau of Community and Health Systems Substance Use Disorders (SUD) Service Program [Administrative Rules](#) went into effect. The new rules include important changes pertaining to counseling services. This Frequently Asked Questions (FAQs) resource addresses some of the most common questions about the new counseling service rules.

Staff Development and Training

1. The STAFF DEVELOPMENT AND TRAINING rules list eight different trainings for licensed facilities to provide, at a minimum. Are all staff required to complete these trainings?

All staff who interact with, treat, and/or monitor SUD service recipients must receive the in-service education program trainings at least once every three years. At a minimum, the in-service education program must include: (1) first aid and cardiopulmonary resuscitation (CPR); (2) identifying the signs and symptoms of a medical emergency; (3) the potential medical risks associated with withdrawal from substances and combinations of substance and appropriate acute interventions; (4) medication administration monitoring; (5) emergency response protocols, including medical, psychiatric, and safety emergencies; (6) signs and symptoms of intoxication and withdrawal, including seizures; (7) vital sign measurement and interpretation; (8) naloxone administration.

Differentiating Counselor Roles and Procedures by Certification Type

2. What is the difference between a development plan, LIMITED CERTIFIED COUNSELOR, and a fully certified counselor?

| Certification Type | Description |
|-----------------------------|--|
| Development Plan | <p>A development plan is a time-limited agreement between an employee and their employer. It is not a certification. It is designed for employees who do not yet hold a specialty certification from the Michigan Certification Board for Addiction Professionals (MCBAP). The development plan is a bridge to obtain either the limited certification or the full certification, both of which require the candidate to pass the International Certification & Reciprocity Consortium (IC&RC) exam.</p> <p>The development plan requires the individual to work diligently to ensure that they obtain the appropriate work experience, additional education and supervision while adhering to the MCBAP code of ethics. The development plan is time-limited and not renewable. If a candidate does not complete the full certification requirements before the expiration of the development plan, this could place them in job jeopardy. If the development plan expires, the individual may continue to prepare for MCBAP full certification on their own. MCBAP does not require a development plan to obtain a full credential.</p> <p>To obtain a development plan, one needs to provide an official job description, proof of appropriate supervision, verification of 51% work/residency in the State of Michigan and agree to abide by the MCBAP code of ethics. Proof of 6 hours of ethics is also required and is broken down as follows: 3 hours ethics, 2 hours boundaries, and 1 hour confidentiality. The development plan is specific to the place of employment sponsoring the plan. It does not automatically transfer to other employers. Upon meeting the criteria, a development plan is conferred by MCBAP.</p> |
| Limited Certified Counselor | <p>A LIMITED CERTIFIED COUNSELOR is a time-limited agreement between an employee and their employer. It is designed for employees who do not yet hold a specialty certification from MCBAP but have achieved many of the milestones toward certification. The limited certification is a bridge to obtain the full certification.</p> <p>The limited certification requires the individual to work diligently to ensure that they obtain the appropriate work experience, additional education and supervision while adhering to the MCBAP code of ethics. The limited certification is time-limited and not renewable. A candidate not completing the full certification requirements before the expiration could place their employment in jeopardy. If the limited certification expires, the individual may continue to prepare for MCBAP full certification on their own. MCBAP does not require a development plan to obtain a full credential.</p> |
| Fully Certified Counselor | <p>A full MCBAP certification means that the individual has met all necessary requirements and has been conferred a credential by MCBAP.</p> |

3. What do we do with counselors who are currently billing under a development plan, but they do not qualify as a LIMITED CERTIFIED COUNSELOR?

Billing for a service is an indication that an individual is offering a service. Under licensing regulations, only a state-licensed or MCBAP certified counselor should be offering these covered services. The Bureau of Community and Health Systems does not get involved in billing issues, but would investigate anyone offering counseling services that is not state licensed or MCBAP certified in a licensed setting. The Bureau of Community and Health Systems would also look for evidence that the individual is not directly and independently offering that service without appropriate review and oversight by a state licensed or MCBAP certified person.

4. How do we employ counselors during the first two years of their development plan before they qualify for the credential?

Decisions regarding the employment of counselors completing a development plan can be made by the facility providing the counseling services.

Limited Certified Counselors

5. What is the difference between a limited LICENSED counselor and a limited CERTIFIED counselor?

A limited LICENSED counselor is a professional counselor working toward full licensure who has received a master's or doctoral degree in counseling from a qualified program, or a degree that has been determined to be substantially equivalent to a counseling degree from a qualified program. Limited LICENSED counselors must also obtain 3,000 hours of post-degree work experience under the supervision of a fully licensed counseling professional.

A limited CERTIFIED counselor is an individual who does not yet hold the specialty certification from Michigan Certification Board for Addiction Professionals (MCBAP) but is employed by or volunteers to work at a licensed program providing SUD services. These counselors have completed a minimum set of state-approved requirements and can practice only under the supervision of a fully licensed or certified counseling professional.

6. I have LIMITED CERTIFIED COUNSELORS working at my facility. Why must LIMITED CERTIFIED COUNSELORS now be restricted to 32 recipients?

LARA identified an appropriate maximum number of patients that LIMITED CERTIFIED COUNSELORS can be responsible for. LIMITED CERTIFIED COUNSELORS could not contribute to the recipient-to-counselor ratios in the previous administrative rules. These new rules permit LIMITED CERTIFIED COUNSELORS to be responsible for no more than 32 recipients of outpatient counseling and/or methadone program services and no more than 10 recipients of residential and/or residential withdrawal management program services.

7. How can my facility access a list of available LIMITED CERTIFIED COUNSELORS?

The [MCBAP website](#) has a tool at the top of the page titled, "[FIND A PROFESSIONAL](#)." After clicking on the button, you will be redirected to a page that lists the certificants' name, county, credential acronym, credential ID, credential issue date, and credential expiration date.

Branch Office Staffing

8. Does the limit on the hours of operation for BRANCH OFFICES providing outpatient services pertain to all SUD program staff or only the counselors?

BRANCH OFFICES can only be open and operate for 20 hours per week. This limitation is for all services and all operations.

9. If a licensed outpatient parent office has two BRANCH OFFICES, do the counselor-to-recipient ratios have to be met at all sites?

The parent office needs the proper licensed counselor(s) to meet the counselor-to-recipient ratio. Additional staff will need to be hired if the BRANCH adds more recipients to ensure that the ratios are still met. However, if counselor-to-recipient ratios are met, any eligible staff can split time between the parent office and the branch office(s). Outpatient SUD programs are not required to have full-time employees.

Counseling Contacts Decision Tree

10. Who should I contact when I have questions about my application, billing, or contributing to my facility's counselor-to-recipient ratio?

