

August 13th, 2018

Meghan Bennett
Healthcare Quality and Safety Branch
Practitioner Licensing and Investigations Section
Department of Public Health
410 Capitol Avenue, MS#12HSR
P.O. Box 340308
Hartford, CT 06134
(860)509-7546
Meghan.bennett@ct.gov

Re: Scope of Practice Review Request for an Associate License for Marriage and Family Therapists

Dear Ms. Bennett:

On behalf of the Connecticut Association for Marriage and Family Therapy (CTAMFT), I would like to thank you for the opportunity to request a scope of practice committee review regarding an associate or provisional license for Marital and Family Therapists. CTAMFT represents approximately 700 active Marital and Family Therapist organization members and over 1,300 Connecticut Marital and Family Therapists. CTAMFT shares the Department's vision of healthy people in healthy Connecticut communities.

Currently, the profession of Marital and Family Therapy is recognized and licensed in all 50 states and the District of Columbia, as well as internationally. Licensed Marital and Family Therapists in Connecticut are regulated by the Department of Public Health under Conn. Gen. Stat. Title 20, Ch. 383a. Marital and Family Therapy is a distinct profession within the mental health field where practitioners diagnose and treat mental and emotional disorders using a systemic philosophy. The systemic philosophy is a perspective that includes assessment, diagnosis, consultation, and treatment of individual or relational concerns. This perspective applies to all living systems for a holistic view of an individual's difficulties. Licensed Marital and Family Therapists are trained in typical mental health treatment interventions. Requirements to practice independently include completion of an accredited marital and family therapy graduate degree program, completion of a supervised practicum, completion of a minimum of 1 year post graduate supervised clinical experience that includes at least 1,000 hours of direct client contact, and passage of the licensure examination.

Since 2009, CTAMFT has researched the public health benefit and economic impact of an associate category of Marital and Family Therapy licensure. Legislation that would create an associate or provisional license for Marital and Family Therapy has been introduced in the 2015, 2016, 2017, and 2018 legislative sessions. House Bill 6861 was introduced in the 2015 session, Senate Bill 68 was introduced in 2016 and House Bill 6698 was introduced in the 2016 session.

Associate or provisional licensure for Marital and Family Therapists does not represent an expansion of the profession's scope of practice, but rather it is a new category of licensure. As a new category of licensure for Marital and Family Therapy, a review by the Department of Public Health is triggered due to Public Act 11-209.

While an associate or provisional license would be a new licensing category for Marital and Family Therapists in Connecticut, it is not a new concept for other professions in Connecticut or nationwide. In 2010 legislation was signed into law that allowed the Department to issue a temporary permit to an applicant for licensure as a Master Social Worker. Associate or provisional licenses for Marital and Family Therapists are available in 28 states. The associate or provisional license would span the time frame during which an applicant for licensure as a Marital and Family Therapist has completed an accredited graduate degree program specializing in marital and family therapy, has not yet taken the licensure examination prescribed by Conn. Gen. Stat. § 20-195c (a) and is working to acquire the necessary work hours for licensure. This is very similar to the associate license for social workers in Connecticut.

An associate or provisional license would provide additional public health and safety benefits if implemented. The Department recognizes the need for licensure of mental health practitioners as these providers often work with vulnerable populations and individuals seeking assistance with mental health issues. Issuing an associate license to Marital and Family Therapists who have completed the educational requirements, passed the license exam and are working towards completing the required work hours for licensure, would allow for the regulation and discipline of individuals within this period of time. An associate or provisional license would provide identifiable ways for consumers to recognize practitioners who have completed the educational requirements of the field and are operating within its guidelines. If an associate license is not issued there may be increased risk of harm to the public.

Issuing associate or provisional licenses for Marital and Family Therapists would increase access to mental health services as there would be additional providers. This license type would indicate to the public that the license holder is a highly-qualified clinician who has graduated from an accredited marital and family therapy program and is under supervision from a Department approved supervisor. Some insurance companies may not reimburse for services provided by an unlicensed clinician under supervision. This reduces the number of providers the consumer can choose from.

Along with increasing access, an associate or provisional license would positively impact existing relationship within the healthcare delivery system. Currently, individuals who have completed the marital and family therapy educational requirements but are still completing the supervised clinical experience requirement are not able to transition into paid positions for which they are qualified due to the lack of an associate or provisional license. Individuals are unable to obtain a position in which they can accumulate the required hours of direct client contact. As a result, applicants are unable to become a licensed Marital and Family Therapists without

completing the required hours creating a conundrum for those seeking to become licensed professionals.

Creating an associate or provisional license would generate additional revenue for the Department that would offset and surpass any projected costs for implementing a new licensing category. Most jurisdictions that offer an associate or provisional license charge a fee for processing the associate or provisional application in addition to the fee for the full Marital and Family Therapist license. The Department would be able to collect fees for both licensing categories and reduce the workload of staff due to the majority of the paperwork being submitted during the associate licensing process. Once an associate licensee is ready to apply for full Marital and Family Therapy licensure, the evaluation of the required supervised clinical hours would be the only required paperwork.

State licensure for associates is rapidly becoming the standard in the mental health field, and, therefore, it is becoming something that public and private payers are expecting recent graduates to have obtained. The provisional license would not change scope of practice in any way except to clarify it, as all requirements for practice settings, training, supervision and the exam would remain as they currently exist. The license also would not allow any activities that are not already under the purview of marital and family therapists in their post graduate clinical supervised experienced. In fact, an associate or provisional license should tighten the scope of practice since licensees will be under the authority of a state agency rather than practicing unregulated.

The Connecticut Association for Marriage and Family Therapy appreciates your time and consideration on this issue. We stand ready to assist the Department as the review of marital and family therapy associate licensure is examined. If you need additional information related to marital and family therapy or associate licensure, please do not hesitate to contact me at advocacy@ctamft.org or via phone at 860-462-1345. The CTAMFT Chair can be contacted at chair@ctamft.org.

Sincerely,

Rebecca L. Ruitto, LMFT

Rebecca L. Ruitto, LMFT
CTAMFT Chair-Elect and Advocacy Committee Co-Chair