

November 8, 2022

RE: Mental Health Professional Practice Act §58-60-3-305 and §58-60-4-405

The UMHCA Board of Directors as well as the Behavioral Health Workforce Workgroup voted unanimously to not support a reduction in the number of supervised months from 24 months to 18 months for Licensed Associate Clinical Mental Health Counselors (ACMHCs), Licensed Associate Marriage and Family Therapists (AMFTs), and Certified Social Workers (CSWs). Decreasing the number of supervised months will not increase the number of mental health therapists.

Rationale:

1. Mental Health Therapists under supervision are available to the public in Utah. ACMHCs, CSWs, and AMFTs are licensed to see a full range of patients while under supervision. Associate licensed mental health therapists still assess, diagnose, and treat the spectrum of mental disorders. Therefore, the actual number of practicing mental health therapists would not be increased. Also, supervision is provided by the public providers that are currently in critical need of professionals.

2. The provisions of the Mental Health Practice Act require the following:

- a. Completion of 3000 hours under the supervision of a qualified supervisor (the law was amended in 2021 by H.B. 366 to reduce the number of hours from 4000 to 3000 hours and this was signed into law)
- b. A minimum of two years of practice
- c. 100 hours of supervision (usually 1 hour per week for 100 weeks)
- d. Successfully passing national certification tests.

3. DOPL has publicly stipulated and is urging an amendment of the Mental Health Practice Act to reduce the number of months of supervision by six months at a critical time of professional development for these mental health therapists as they gain experience under supervision. This action may cause harm to the public by having less qualified independently licensed therapists providing mental health treatment.

4. Additionally, during the 24 months of supervision, ACMHCs, AMFTs, and CSWs are employees of agencies that are in critical need of mental health therapists. It is probable (and my experience as an agency administrator) that a reduction in months will decrease the qualified workforce in our most vulnerable community and nonprofit agencies as therapists leave agencies six months earlier to establish private practices.

UMHCA recognizes the importance of increasing the mental health therapists in the workforce. However, this will not be achieved through an amendment to the Mental Health Practice Act that reduces the number of supervised months. We urge the UT legislature to not make any changes to the Mental Health Practice Act as stated above.

Sincerely,

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