



January 26, 2023

RE: H.B. 166 State Licensing Requirements for Clinical Mental Health Counselors

The Utah Mental Health Counselors Association oppose the passing of proposed legislation in Utah, H.B. 166 which would amend the current Mental Health Professional Practice Act for Clinical Social Workers, Marriage and Family Therapists, and Clinical Mental Health Counselors.

As it pertains to Clinical Mental Health Counselors, H.B. 166 would reduce the number of hours of supervision from 100 hours to 75 hours. This same legislation deletes any mention of the minimum amount of time required for full licensure which is currently 2 years.

In the table (Attachment A) is listed the state-by-state requirements for licensure as clinical mental health counselors to obtain full licensure. This is based on data available from each state in 2022.

**Supervision Hours.** An analysis of the information regarding the requirement for supervision hours needed for a graduate degree mental health counselor to be received from an approved supervisor is noted as Supervision Hours.

- 30 states require 100 hours
- 12 states require more than 100 hours
- 1 state requires 80 hours

In total, 42 states require 100 or more hours of clinical supervision.

**Minimum Time.** An analysis of the information regarding the required time for a graduate degree mental health counselor to complete before obtaining full licensure is noted in years.

- 27 states require 2 years
- 6 states require 3 years
- 3 states require 4 years
- 1 state requires 1.5 years and 1 state requires 1 year

To recap, 36 states require 2 or more years.



In the 2022 legislature, the Utah cut back on the total number of hours required for full licensure from 4000 hours to 3000 hours based on the most common number of hours that 28 other states require.

By the same logic, we should have the most common number of hours of supervision of 100 hours (30 states with 12 other states requiring more than 100 hours). And the most common minimum time requirements for full licensure of 2 years (27 states with 2 years and another 9 states with 3 or 4 years).

It is important to note that the Counseling Compact Commission will likely use these same minimum standards of at least 100 supervision hours and at least two years to be supervised.

Clinically supervised practice is the primary means for newly graduated mental health therapists learn to effectively treat mental health disorders. Effective treatment is accomplished as they confer weekly with their supervisor. State law currently requires at least 100 hours of direct supervisory consultation (100 hours of consultation equates to a minimum of one hour of supervision a week over the course of 100 weeks or two years).

A decrease in supervised practice would reduce clinical effectiveness of ACMHCs (as well as other associate licensed mental health therapists) and increase the potential harm to individuals receiving mental health care. During supervised practice, ACMHCs must confer with their qualified supervisor, review ethical dilemmas, and have their work with clients monitored to ensure effective treatment outcomes. Curtailing clinical supervision cuts short the opportunity to develop competently skilled and ethically proficient mental health therapists more fully.

Anna Lieber, MS, LCMHC  
President, Utah Mental Health Counselors Association  
[president@umhca.org](mailto:president@umhca.org)

Gray Otis, Ph.D., LCMHC  
UMHCA Legislative Affairs  
[gray\\_otis@yahoo.com](mailto:gray_otis@yahoo.com)



### Attachment A

State	Top Tier Title	Educational Requirements		Experiential Requirements				Exams
		Accreditation	Credit Hours	Supervision Hours	Direct Hours	Minimum Time	Total Hours	
AL	LPC	CACREP/CORE	60 in 2024	NS	2,250	NS	3,000	NCE
AK	LPC	regional or national	60	100	1,000	2 yrs	3,000	NCE or NCMHCE
AZ	LPC	CACREP/CORE	60	100	1,600	2 yrs	3,200	NCE or NCMHCE or CRCE
AR	LPC	CACREP/CORE	60	100	1,500	3 yrs	3,000	NCE + Oral
CA	LPCC	NS	60	NS	1,700	NS	3,000	NCMHCE + CA Exam
CO	LPC	CACREP	60	100	NS	2 yrs	2,000	NCE + CO Exam
CT	LPC	regional	60	100	NS	NS	3,000	NCE or NCMHCE
DC	LPC	accredited	60	200	NS	2 yrs	3,500	NCE or NCMHCE or CRCE
DE	LPCMHC	NCC certification	60 for compact	100	1,500	2 yrs	3,200	NCE or NCMHCE
FL	LMHC	CACREP	60	100	1,500	2 yrs	NS	NCMHCE
GA	LPC	CHEA recognition	60 for compact	120	NS	4 yrs	3,000	NCE
HI	LMHC	accredited	48	100	NS	2 yrs	3,000	NCE
ID	LCPC	accredited	60	80	2,400	2 yrs	3,400	NCE + NCMHCE
IL	LCPC	CACREP/CORE	48	NS	1,920	2 yrs	3,360	NCE + NCMHCE
IN	LMHC	CACREP/CORE	60	100	NS	21-48 mos	3,000	NCE + NCMHCE
IA	LMHC	CACREP	60	200	1,500	2 yrs	3,000	NCE or NCMHCE or CRCE
KS	LCPC	KS board approved	60	100	1,500	NS	4,000	NCE + NCMHCE
KY	LPCC	CACREP	60	100	1,600	NS	4,000	NCE or NCMHCE
LA	LPC	regional	60	100	1,900	2 yrs	3,000	NCE or NCMHCE
ME	LCPC	CACREP	60	117	2,500	4 yrs	5,000	NCE + NCMHCE
MD	LCPC	accredited	60	100	1,500	3 yrs	3,000	NCE + MD Exam
MA	LMHC	regional or CCMHC	60	130	960	2 yrs	3,360	NCMHCE
MI	LPC	CACREP	60 in 2023	100	NS	2 yrs	3,000	NCE or CRCE
MN	LPCC	CACREP	48 current – proposed compact	100	3,800	1 yr	6,000	NCE + NCMHCE
MS	LPC	regional or national	60	100	1,167	2 yrs	3,500	NCE or NCMHCE
MO	LPC	CACREP/CORE	48 current – proposed compact	1 hr/week	1,200	2 yrs	3,000	NCE
MT	LCPC	accredited	60	1:20	1,000	NS	3,000	NCE
NE	LPC	CACREP	60	NS	1,500	NS	3,000	NCE or NCMHCE
NV	LCPC	CACREP	48	100	1,500	2 yrs	3,000	NCMHCE
NH	LCMHC	CACREP	60	100	3,000	2 yrs	3,000	NCMHCE + essay exam
NJ	LCMHC	regional	60	100	NS	2 yrs	3,000	NCE



NM	LPCC	accredited	48	100	3,000	2 yrs	NS	NCE + NCMHCE
NY	LMHC	NS	60	NS	1,500	NS	3,000	NCMHCE w/o ESL
NC	LPC	CACREP	60	100	2,000	1.5 yrs	3,000	NCE or NCMHCE or CRCE
ND	LPCC	accredited	60	200	NS	4 yrs	3,000	NCE + NCMHCE + video
OH	LPCC	CACREP	60	NS	1,500	2 yrs	3,000	NCE + NCMHCE + OH exam
OK	LPC	regional	60	112.5	1,050	3 yrs	3,000	NCE + OK exam
OR	LPC	CACREP/CORE	60	150	2,400	3 yrs	NS	NCE/NCMHCE/CRCE + OR exam
PA	LPC	NS	60	2:40	NS	3 yrs	3,600	NCE or CRCE
PR	LPC	Puerto Rico Council	45	NS	NS	NS	500	NCE
RI	LCMHC	New England Assn	60	100	NS	2 yrs	2,000	NCMHCE
SC	LPC	regional	60	100	1,500	2 yrs	NS	NCE or NCMHCE
SD	LPC-MH	CACREP	60	150	1,800	2 yrs	4,000	NCE + NCMHCE
TN	LPC/MHSP	CACREP	60	150	1,500	2 yrs	3,000	NCE + NCMHCE + TN exam
TX	LPC	accredited	60	NS	1,500	NS	3,000	NCE + TX exam
UT	LCMHC	CACREP	60	100	NS	2 yrs	3,000	NCE + NCMHCE
VT	LCMHC	CACREP	60	100	2,000	2 yrs	3,000	NCE + NCMHCE + VT exam
VA	LPC	CACREP/CORE	60	200	2,000	NS	3,400	NCMHCE
WA	LMHC	regional or CCMHC	NS	100	1,200	3 yrs	3,000	NCE or NCMHCE
WV	LPC	CACREP/CORE	60	1:20	1,500	2 yrs	3,000	NCE or NCMHCE or CRCE
WI	LPC	regional	60	100	1,000	2 yrs	3,000	NCE or CRCE + WI exam
WY	LPC	CACREP/CORE	60	100	1,200	NS	3,000	NCE or NCMHCE or CRCE