



November 28, 2022,

Official Statement Regarding the Mental Health Professional Practice Act §58-60-3-305 and §58-60-4-405

The UMHCA, UAMFT, and NASW-UT Board of Directors as well as the Behavioral Health Workforce Workgroup have voted unanimously to not support a reduction in the number of supervised months from 24 to 18 months for Associate Clinical Mental Health Counselors (ACMHCs), Associate Marriage and Family Therapists (AMFTs), and Certified Social Workers (CSWs). While we understand the stated intent of the proposed reduction in the number of supervised months from 24 to 18, the negative impact to Utahns throughout the state may result in a greater problem. Utah has great pride in the culture of compassion shown to those that live here. A change such as this can result in less qualified mental health services resulting in a negative impact on that cultural belief. It is both our belief and empirical knowledge that the proposed reduction in the number of supervised months will not increase the number of qualified 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. Additionally, supervision is provided by the public providers that are currently in critical need of Mental Health Therapists.
2. The current 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 our experience as an agency administrators) 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.

We recognize and agree there is great importance in 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. A reduction will leave therapists less prepared to provide the necessary mental health support to the public. We request the UT legislature to not make any changes to the Mental Health Practice Act as stated above.

Thank you,

Anna Lieber, CMHC, NCC  
President UMHCA  
[president@uhmca.org](mailto:president@uhmca.org)

Justin McPheters, PhD, LMFT  
President UAMFT  
[justinmcpeters@gmail.com](mailto:justinmcpeters@gmail.com)

David Parker, BSW, Ed.D.  
President NASW-UT  
[drparkerd@gmail.com](mailto:drparkerd@gmail.com)

