Subject: Public Comment on Proposed Revision of Massachusetts 262 CMR 2.00

To: Board of Registration of Allied Board of Mental Health and Social Service Providers To the members of the Board,

My name is James Aronson and i am the Director of Counseling Field Placement at the Boston College, Lynch School of Education and Human Development, in the Master’s Program in Mental Healtyh Counseling. I am writing to provide my testimony on the proposed changes to 262 CMR 2.00, Requirements for Licensure as a Mental Health Counselor.

Overall, I write in support of the proposed changes and wish to express sincere appreciation for the dedicated work of the Board and many stakeholders in carrying out our shared mission to protect the public. I also write to request consideration of 1 additional revision, 1 proposal regarding the timeline for implementation, and 1question for which I seek clarification.

Additional proposed revision: In the Pre-2015 version of 262 CMR 2.00, Section 2.02 (f) provided a special approved supervisor status for non-licensed faculty, and other instructors with relevant graduate degrees, to teach the first-year Practicum Experience course, and provide clinical supervision for the formal on-campus practicum experience. Unfortunately, when the 2015 regulations were proposed and adopted, universities did not respond, and the special status for university supervisors was terminated. Some universities were no longer able to provide an on-campus practicum experience. The restoration of the special status, as proposed below, would allow universities to *feasibly* revitalize a high standard,

on-campus practicum training experience for students. We propose the addition to Section 202 of a subsection (7)(a)(b)(c):

**(7) For the specific purpose of the college supervision of students in a practicum or internship, an approved supervisor may be a mental health practitioner who:**

1. **holds a teaching or supervisory position in a recognized educational institution which trains clinical mental counselors; and**
2. **holds a graduate degree in mental health counseling or a related field, and**

**( c) be supervised by an approved supervisor as defined in (1)(2)(3)(4) ot (5) above.**

Proposed timeline for implementation of proposed revision: 2.02(1)(a) and (1)(b) are new requirements, and set a standard that is higher for LMHCs and LMFTs than has been, or will be applied, to supervisors from other disciplines. Thus, there must be a reasonable grace period for supervisors who meet the requirement in 2.02 (1)(a) to also meet the requirements in 2.02 (1)(b) and (1)(c). In the absence of a reasonable time frame, it will be difficult to arrange approved supervision for the entire cohort of graduate students entering field placement across the state. The standard grace period has been two years, and I propose that the two-year grace period be applied here.

Question: 2.05(1) clarifies the potential pathways to licensure for aspiring mental health counselors who have graduate degrees described in (a)-(e) by allowing them to acquire missing academic requirements. I believe that the most significant obstacle for people in this situation is the absence of a qualifying practicum and/or internship course (and associated field experience). I noticed that a Master's plus CAGS

combination is one possible pathway. Does this mean that Massachusetts programs can again offer CAGs certificate programs to provide a high standards academic and practical experience that leads clearly to license eligibility?

Thank you for providing the public with an opportunity to testify and share our support for the proposed revisions as well as changes that we believe serve the best interest of the public. In addition, I thank you for your efforts in drafting the welcome proposed revisions to 262 CMR 2.00.

Sincerely,



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