



CHARLES D. BAKER
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KARYN E. POLITO
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JAY ASH
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ECONOMIC DEVELOPMENT

Commonwealth of Massachusetts
Division of Professional Licensure
BOARD OF REGISTRATION OF ALLIED MENTAL HEALTH
AND HUMAN SERVICES PROFESSIONS
1000 Washington Street • Boston • Massachusetts • 02118

JOHN C. CHAPMAN
UNDERSECRETARY OF
CONSUMER AFFAIRS AND
BUSINESS REGULATION

CHARLES BORSTEL
DIRECTOR, DIVISION OF
PROFESSIONAL LICENSURE

Frequently Asked Questions
Post-June 5, 2015 License Requirements for
Licensed Mental Health Counselors

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On June 5, 2015, the Board of Registration of Allied Mental Health and Human Services Professionals (Board) promulgated new regulations at 262 CMR 2.00 updating the eligibility criteria for licensure as a mental health counselor. Below are Frequently Asked Questions concerning the new regulations.

- 1. I have already been placed in a pre-master's practicum or internship. My site supervisor meets the definition of "Approved Supervisor" under the regulations effective prior to June 5, 2015 but does not meet the definition of "Approved Supervisor" under the new regulations. May I still qualify for licensure using this supervised experience?**

The regulations effective *prior* to June 5, 2015 required pre-master's practicum and internship site supervisors to be either a licensed mental health counselor (LMHC), a certified clinical mental health counselor (CCMHC), or a licensed mental health practitioner who meets various education and / or experience requirements. Additionally, the regulations required site supervisors to have *five years* of full time or the equivalent part time *post-graduate* clinical mental health counseling experience. Please note that experience is only one element of the licensure certification process and other factors, such as education or examinations, are considered when the Board certifies and individual for licensure.

The new regulations effective June 5, 2015 require pre-master's practicum and internship site supervisors to be either a Massachusetts LMHC or one of several types of licensed mental health practitioners. Additionally, the new regulations require site supervisors to have *three years* of full time or the equivalent part time *post-licensure* clinical mental health counseling experience. [262 CMR 2.02](#).

If you were placed in a pre-master's practicum or internship prior to June 5, 2015 and your site supervisor meets the previous definition of "Approved Supervisor" under the regulations effective prior to June 5, 2015, your experience will still qualify for licensure so long as you were *placed* in the experience prior to June 5, 2015.

- 2. I am currently accruing my pre-master's practicum or internship supervised experience. My site supervisor meets the definition of "Approved Supervisor" under the regulations effective prior to June 5, 2015 but does not meet the definition**



of “Approved Supervisor” under the new regulations. May I still qualify for licensure using this experience?

If, as of the date of this guidance, you are already accruing your pre-master’s practicum or internship supervised experience under a supervisor who meets the previous definition of “Approved Supervisor” under the regulations effective prior to June 5, 2015, your experience will still qualify as long as the experience began prior to June 5, 2015. Please note that experience is only one element of the licensure certification process and other factors, such as education or examinations, are considered when the Board certifies and individual for licensure.

3. I am a representative from an educational institution which previously contracted with an individual to serve in a teaching role responsible for the supervision of students in a practicum or internship (a campus supervisor). This person meets the definition of “Approved Supervisor” under the regulations effective prior to June 5, 2015 but does not meet the definition of “Approved Supervisor” under the new regulations. Will our students still qualify for licensure if practicum or internship supervision is under this individual?

The regulations effective prior to June 5, 2015 required campus supervisors to be a mental health practitioner who holds a teaching or supervisory position in a recognized educational institution which trains clinical mental health counselors and holds a graduate degree in mental health counseling or a related field.

The new regulations effective June 5, 2015 require campus supervisors, like site supervisors, to be either a Massachusetts LMHC or one of several types of licensed mental health practitioners. Also like site supervisors, the new regulations require campus supervisors to have *three years* of full-time or the equivalent part-time *post-licensure* clinical mental health counseling experience. [262 CMR 2.02](#).

If the educational institution contracted with the individual to serve as a campus supervisor prior to June 5, 2015 and the campus supervisor meets the previous definition of “Approved Supervisor,” students under this supervision will still qualify for licensure using this supervised experience so long as the educational institution contracted with the campus supervisor for this supervision prior to June 5, 2015. Provided, however, that once the duration of the contractual agreement between the educational institution and the individual regarding his or her role as campus supervisor expires, or three years from the effective date of the new regulations, whichever is later, supervision and the experience under the campus supervisor will no longer be accepted unless the campus supervisor otherwise meets the definition of “Approved Supervisor” under the regulations effective June 5, 2015. For purposes of tenured status individuals who were tenured prior to June 5, 2015 and who do not meet the new definition of “Approved Supervisor,” the Board will accept supervision that was provided by such individuals within three years from the effective date of the new regulations. Please note that experience is only one element of the licensure certification process and other factors, such as education or examinations, are considered when the Board certifies and individual for licensure.

The application forms will recognize and reflect this provision. It is recommended that the educational institutions provide letters of attestations to their students at the end of their pre-masters experience should such documentation be necessary when the students apply for licensure.

- 4. I am currently accruing post-master's supervised experience. My current supervisor and / or past supervisor(s) meet the definition of "Approved Supervisor" under the regulations effective prior to June 5, 2015 but do not meet the definition of "Approved Supervisor" under the new regulations. May I still qualify for licensure using this experience?**

If, as of the date of this guidance, you are currently obtaining post-master's supervised experience under a supervisor with whom you began supervision before June 5, 2015 and this supervisor meets the previous definition of "Approved Supervisor," your experience will still qualify for licensure as long as the supervision and experience began prior to June 5, 2015. This supervisor may continue to supervise you until the completion of your experience. Any supervisors with whom you begin to work on or after June 5, 2015 must meet the definition of "Approved Supervisor" under the regulations effective June 5, 2015.

The Board will accept supervision from any past supervisors from whom you received supervision before June 5, 2015 so long as the supervisors met the definition of "Approved Supervisor" under the regulations effective prior to June 5, 2015. Please note that experience is only one element of the licensure certification process and other factors, such as education or examinations, are considered when the Board certifies and individual for licensure.

- 5. I have completed experience forms from the Board's pre-June 5, 2015 application. May I still submit my experience information on these forms?**

If your experience forms were completed and dated by a supervisor prior to June 5, 2015, you may use the pre-June 5, 2015 application experience forms. If your supervision began after June 5, 2015 you will be required to document the supervision using the experience forms from the post-June 5, 2015 application.

- 6. In order to qualify for licensure, I understand that I need a minimum number of supervisory contact hours by an LMHC. I am working at an agency in Massachusetts. My supervisor at this agency is an LMHC in Rhode Island. May I use this supervision toward the minimum supervisory contact hour requirement for LMHC supervision?**

No. For purposes of accruing supervisory contact hours under LMHC supervision, [262 CMR 2.08](#) stipulates that such supervision must be provided by a Massachusetts LMHC or an equivalently licensed mental health counselor from another state or jurisdiction. However, consistent with the definition of "Approved Supervisor" under [262 CMR 2.02\(g\)](#), your supervisor must be licensed in the jurisdiction in which the supervision occurs.

- 7. I have a 48 credit degree and I graduated from my degree program prior to 1998. May I apply using the pre-July 1, 1998 licensure eligibility standards outlined in the regulations that were effective prior to June 5, 2015?**

No. All applications received on or after June 5, 2015 must meet the eligibility standards outlined in the new regulations effective June 5, 2015.

The new regulations no longer distinguish between applicants who graduated before and after July 1, 1998. All applicants must have at least 60 semester credit hours of graduate level courses in mental health counseling or a related field which includes a 48 semester credit master's degree. If you have a degree which is less than 48 credits, you must obtain either a master's degree with an advanced certificate, a second master's degree, or a doctoral degree.

For those who matriculate into a master's degree program on or after July 1, 2017 the applicant must have at least a 60 semester credit hour or 80 quarter credit hour master's degree in mental health counseling or a related field or a doctoral degree in mental health counseling or a related field.

All degrees and coursework must be from a regionally accredited institution.

8. Additional information regarding coursework requirements forms in the new application:

Please demonstrate completion of the required coursework fields on the required coursework form. Use the elective coursework form to demonstrate that the remaining credits from your master's degree, doctoral degree or advanced certificate program were from courses in Mental Health Counseling or a Related Field. You should use each class only once between the two forms (classes used for your required coursework will not be counted toward your electives requirement).