



**Scott Walker, Governor**  
**Dave Ross, Secretary**

December 10, 2013

SENATOR LEAH VUKMIR, CHAIR  
COMMITTEE ON HEALTH & HUMAN SERVICES  
ROOM 131 SOUTH  
STATE CAPITOL  
MADISON WI 53707

REPRESENTATIVE STEPHEN NASS, CHAIR  
COMMITTEE ON COLLEGES & UNIVERSITIES  
ROOM 12 WEST  
STATE CAPITOL  
MADISON WI 53708

RE: Germane modification to Clearinghouse Rule 13-009

Dear Senator Vukmir and Representative Nass:

The Marriage & Family Therapy, Professional Counseling, and Social Work Examining Board would like to make germane modifications to proposed rules Clearinghouse Rule 13-009. Clearinghouse Rule 13-009 was submitted to the legislature on April 23, 2013 and recalled on July 2, 2013.

A meeting was held on July 22, 2013 with Representative Nass to discuss concerns his Committee raised regarding the increase of the educational requirement in a degree equivalent to professional counseling from 42 credits to 48 credits. During the meeting, it was discussed that Wisconsin license holders and graduates of Wisconsin schools would be at a disadvantage in portability to 29 other states which already require 60 credits, including our neighboring state of Iowa. There is also movement in Minnesota and Illinois to increase their requirements to 60 credits.

The Professional Counselor Section sought input from various college and university stakeholders on October 11 and 21, 2013 regarding an increase to 60 credits. Based upon that input, the Board is making a germane modification to the rule to increase the educational requirements for a degree equivalent to professional counseling from 48 credits in the recalled proposed rule to 60 credits in the resubmitted rule. The changes from the previously submitted rule are found in Section 2 MPSW 14.01(2)(intro) and (e) through (g).

In addition, there is a germane modification to the effective date of this rule from September 1, 2016 to September 1, 2018 to account for the increased time in promulgating the rule and to allow time for the schools to make the necessary adjustments in course offerings and curricula as well as providing notice to students pursuing their master's degrees.

Attached to the Legislative Report is a letter from Charles Lindsey, Chair of the Professional Counselor Section on behalf of the Marriage & Family Therapy, Professional Counseling, and Social Work Examining Board addressing concerns regarding reciprocity raised during the December 2, 2013 meeting with Representative Nass. The letter indicates the Board will address reciprocity in the revision of MPSW 11, 12, and 14 so that experienced counselors from other states whose educational requirements are lower than 60 credits will not face unnecessary boundaries in obtaining a Wisconsin license.

Cordially,

Sharon Henes  
Administrative Rules Coordinator