

ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

<p>1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected</p>	<p>2. Date August 10, 2020</p>
<p>3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) MPSW 11</p>	
<p>4. Subject Degrees from programs accredited by the Commission for Accreditation of Counseling (CACREP)</p>	
<p>5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input checked="" type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S</p>	<p>6. Chapter 20, Stats. Appropriations Affected 20.165 (1) (G)</p>
<p>7. Fiscal Effect of Implementing the Rule <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input checked="" type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input checked="" type="checkbox"/> Could Absorb Within Agency's Budget</p>	
<p>8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A)</p>	
<p>9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0</p>	
<p>10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>11. Policy Problem Addressed by the Rule Currently, any CACREP accredited program specialty area is considered sufficient to meet the education requirement for licensure as a professional counselor. The board would like to narrow automatic acceptance of CACREP accredited programs to only certain specialty areas that closely align with the board's education requirement under MPSW 14.</p>	
<p>12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. The rule draft was posted on the department's website for 14 days in order to solicit economic impact comments from businesses, associations representing business, local governmental units, and individuals that may be affected by the rule. No comments were received.</p>	
<p>13. Identify the Local Governmental Units that Participated in the Development of this EIA. None.</p>	
<p>14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) No impact.</p>	
<p>15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule The benefit of implementing the rule will be to ensure that individuals licensed in Wisconsin as professional counselors will have the necessary education to competently provide services to clients. The alternative would be to continue to automatically approve the education of graduates from some CACREP accredited specialty areas which may not adequately prepare graduates for practice as a professional counselor.</p>	
<p>16. Long Range Implications of Implementing the Rule The benefit of implementing the rule will be to ensure that individuals licensed in Wisconsin as professional counselors will have the necessary education to competently provide services to clients.</p>	
<p>17. Compare With Approaches Being Used by Federal Government</p>	

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None.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois:

For the purposes of licensure as a clinical professional counselor, Illinois law recognizes any CACREP or CORE approved program or any doctorate in psychology approved by the American Psychological Association and the Council for the National Registry of Health Service Providers as approved programs (Ill. Admin Code § 1375.145 (c)).

Applicants who do not have a degree from a program approved by one of the above entities must demonstrate that their educational background meets the following requirements (Ill. Admin Code § 1375.145 (a)):

a) The educational requirements are as follows:

1) Master's degrees shall be from a college, university or school that is a regionally accredited institution of higher education and recognized by the U.S. Department of Education;

2) The programs, wherever they may be administratively housed, must be clearly identified and labeled as offering counseling, rehabilitation counseling or psychology programs. Such a program must specify in institutional catalogues and brochures its intent to educate and train counselors;

3) The program is an organizational entity within the institution;

4) The program has an integrated, organized sequence of study;

5) The program must be at least 2 academic years in length and require an individual to graduate from a program with a minimum of 48 semester hours or 72 quarter hours with a minimum of one course ("course" is defined as 3 semester hours or equivalent) in each of the areas listed in this subsection (a)(5). The 13 areas are the same as those listed for the licensed professional counselor. "A minimum of one course" is defined to mean that the objectives and content of a course need to meet the requirements for one content area and cannot be used to meet the objectives and content requirements of another content area. (See Appendix A (Course Descriptions) for a definition of the subject content for each core area with examples of course titles that relate to each of the core content areas.) Students who started their educational program after January 1, 1999 and graduated before January 1, 2008 who make application for the Licensed Clinical Professional Counselor after January 1, 2008 must meet the hour requirements for each core areas established by their educational program at the time they started their graduate studies. In some cases, this may not be 3 semester hours or equivalent for each core area. All students, however, graduating after January 1, 2008 must meet the "3 semester hour or equivalent" requirement.

A) Human Growth and Development

B) Counseling Theory

C) Counseling Techniques

D) Group Dynamics, Processing and Counseling

E) Appraisal of Individuals

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- F) Research and Evaluation
 - G) Professional, Legal and Ethical Responsibilities Relating to Professional Counseling, Including Illinois Law
 - H) Social and Cultural Foundations
 - I) Lifestyle and Career Development
 - J) Practicum/Internship
 - K) Psychopathology and Maladaptive Behavior
 - L) Substance Abuse
 - M) Family Dynamics;
- 6) The program has faculty responsible for the program and has a sufficient number of full-time instructors to make certain that the educational obligations to the student are fulfilled. The faculty must have degrees in their areas of teaching from professional colleges and institutions;
- 7) The program has an identifiable body of students who are matriculated in that program for a degree;
- 8) The program has a one year residence. Residence requires interaction with faculty and other matriculated students. One year's residence is defined as 24 semester hours taken on a full-time or part-time basis at the institution accumulated within the time frame and course of study of the program.

Iowa:

Licensure as a mental health counselor in Iowa requires a degree from a CACREP accredited 60 credit (45 credits if the student graduated prior to June of 2012) master's or doctoral program with an emphasis in mental health counseling. Alternatively, an applicant may meet the educational requirement for licensure if their master's or doctorate program transcript demonstrates educational equivalency to CACREP accreditation in mental health counseling. The equivalency determination is made by the Center for Credentialing and Education (CCE) at the applicant's expense based on submission and review of the applicant's transcript (IA Admin Code § 645.31.6). The full list of considerations made by the CCE can be found in IA Admin Code § 645.31.6, and very closely mirror the requirements for CACREP accreditation.

Michigan:

Applicants for a counselor license must have degree from either a master's or doctorate program in counseling or student personnel matters that is approved by the board (Mich. Admin Code § R 338.1752 (2)). Programs that are accredited by CACREP are automatically considered to be acceptable to the board. If the graduate program is not CACREP accredited, the applicant's degree program must consist of a 600 hour supervised clinical internship and at least 48 semester or 75 quarter credit hours including all of the following counseling related topics:

1. Career development.
 2. Consulting.
 3. Counseling techniques.
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4. Counseling theories.
5. Counseling philosophy.
6. Group techniques.
7. Professional ethics.
8. Research methodology.
9. Multicultural counseling.
10. Testing procedures and assessment.
11. Practicum.

(Mich. Admin. Code § R 338.1752a).

Minnesota:

Minnesota law requires applicants to have either a master's or doctorate in counseling or a related field, including at least 700 hours of supervised counseling experience. The course shall involve a minimum of 48 semester or 75 quarter credit hours and include all of the following topics:

- (1) The helping relationship, including counseling theory and practice;
- (2) Human growth and development;
- (3) Lifestyle and career development;
- (4) Group dynamics, processes, counseling, and consulting;
- (5) Assessment and appraisal;
- (6) Social and cultural foundations, including multicultural issues;
- (7) Principles of etiology, treatment planning, and prevention of mental and emotional disorders and dysfunctional behavior;
- (8) Family counseling and therapy;
- (9) Research and evaluation; and
- (10) Professional counseling orientation and ethics.

(Minn. Stats. § 148B.53).

19. Contact Name

Jon Derenne, Administrative Rules Coordinator

20. Contact Phone Number

(608) 266-0955

This document can be made available in alternate formats to individuals with disabilities upon request.

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ATTACHMENT A

1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

2. Summary of the data sources used to measure the Rule's impact on Small Businesses

3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- Less Stringent Compliance or Reporting Requirements
- Less Stringent Schedules or Deadlines for Compliance or Reporting
- Consolidation or Simplification of Reporting Requirements
- Establishment of performance standards in lieu of Design or Operational Standards
- Exemption of Small Businesses from some or all requirements
- Other, describe:

4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

5. Describe the Rule's Enforcement Provisions

6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

- Yes No
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