

VOLUME 45, ISSUE 22
ISSUE DATE: NOVEMBER 18, 2013
RULE ADOPTIONS

**LAW AND PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF MARRIAGE AND FAMILY THERAPY EXAMINERS**

Adopted Amendment: N.J.A.C. 13:34-4.3

Experiential Requirements for Licensure

Proposed: October 15, 2012, at 44 N.J.R. 2352(a).

Adopted: February 14, 2013, by the State Board of Marriage and Family Therapy Examiners, Ben K. Beitin, Ph.D., Chair.

Filed: October 15, 2013, as R.2013 d.134, **without change**.

Authority: N.J.S.A. 45:8B-13 and 18.

Effective Date: November 18, 2013.

Expiration Date: September 10, 2016.

Summary of Public Comments and Agency Responses:

The official comment period ended December 14, 2012. The Board received comments from the following 73 individuals:

1. Silvia Marques Costeria, American Association for Marriage and Family Therapy (AAMFT)
2. Lavern Depeine, Marriage and Family Therapy (MFT) Student, AAMFT
3. Lorraine Barry, Licensed Marriage and Family Therapist (LMFT), AAMFT Clinical
4. Misbha Qureshi, AAMFT Student Member
5. Joanna Carr
6. Cindy Iarussi, AAMFT
7. Lisa Donley
8. Laura Lefelar-Barch, AAMFT
9. Joel Goldstein, American Association for the Advancement of Science (AAAS), American Association for Cancer Research (AACR)
10. Allison Lansky, University Medical Center of Princeton at Plainsboro

11. Melissa Berlingieri Hurley, LMFT
12. Xuhua Shang, Family Service Bureau
13. Jennifer Sumerlin, AAMFT Student Member
14. Naomi Steinhauser, AAMFT
15. Jean Bailey, AAMFT
16. Rosemarie Manes, LMFT
17. Michelle Leyman, MFT student
18. Bonnie Weiss, LMFT
19. Arti Kakkar
20. Ashley Winslow
21. Christin Bucciero, AAMFT
22. Mary Sillup, New Jersey AAMFT
23. Richard Horn, AAMFT, American Family Therapy Academy (AFTA), National Association of Social Workers (NASW)
24. Marisa O'Keefe-Giuliani, AAMFT
25. Jan Chapman, AAMFT, NJMFT
26. Carole Goldstein, MFT student
27. Nancy Hodges, NASW, Approved Supervisor AAMFT
28. Nancy Denis, AAMFT
29. Deanna Brace, MFT student
30. Banti Jean, AAMFT, American Psychological Association (APA)
31. Doreen Randolph, Holy Family University
32. Karishma Jain
33. Caitlyn Burns, MFT student
34. Benjamin Leibowitz, New Jersey LMFT, AAMFT, NJMFT
35. Agnes Raczynski

36. Mary McLaughlin, Family Care Connections, LLC
37. Megan Coral, AAMFT
38. Ray Blume
39. Beth Tunis, MFT
40. Rebecca Gillespie, AAMFT student member
41. Michael Fingerman
42. Maria Zacharatos, The Alzheimer's Association
43. Atsuko Seto
44. Tracey Ryan, Center for Assessment and Treatment
45. Michelle Weinberg, NJAMFT
46. Bruce Betner, AAMFT
47. Karen Sherman
48. Paula Ochs, Family Service League, Chrysalis Clinical Supervision
49. Gerldine Kerr, Director, Warren County Center for the Family
50. Charleen Alderfer, AAMFT, Approved Supervisor, The College of New Jersey (TCNJ)
51. Maria Antonelli, MFT member, SNJAMFT
52. Marion Cavallaro, American Counseling Association, New Jersey Counseling Association, Association for Counselor Educators and Supervisors
53. Gerald Washko, AAMFT
54. Nicholas Watts, AAMFT Clinical Member
55. Karen Vedus, NJAMFT
56. Meira Itzkowitz, AAMFT
57. Laura Wechsler, Diplomate in Clinical Social Work (DCSW), NASW, AAMFT Supervisor
58. Patricia Borusiewicz, New Jersey Counseling Association (NJCA) - Student
59. Vincent Lamont, American Counseling Association
60. Edward Igle, AAMFT

61. Nancy Kline Gold, Family Therapy and Consultation Services, United Family Services
62. Barbara Andrew, AAMFT, NASW
63. Andrew Hoffman, AAMFT
64. Ronnamarie Palladino, LMFT
65. Kelly Foters, NJAMFT, AAMFT, American Association of Sexuality Educators, Counselors and Therapists (AASECT), NJCA
66. Tarcila Sutterley, NJAMFT
67. Kenneth Young
68. Alison Quispe, NJAMFT, AAMFT
69. Pamela Whiteman
70. Narda Ludena, NJAAMFT
71. Tabrina Hargrove, AAMFT
72. Sabrina Magliulo, AAMFT
73. Debra L. Wentz, Ph.D., Chief Executive Officer, New Jersey Association of Mental Health and Addiction Agencies (NJAMHAA)

1. COMMENT: The vast majority of the commenters support the amendments to N.J.A.C. 13:34-4.3.

RESPONSE: The Board thanks the commenters for their support.

2. COMMENT: One commenter suggests that applicants who worked as pastoral counselors for several years and who hold masters degrees should be allowed to obtain a license by completing half as many supervised hours as other applicants. The commenter also suggests that such applicants should be permitted to take the licensing examination and then complete supervised hours.

RESPONSE: The Board believes that all applicants for licensure need to complete the same number of supervised hours in order to ensure that they receive the interaction with experienced marriage and family therapists necessary to provide marriage and family therapy services in a safe and effective manner. The Board points out that hours of counseling provided as pastoral counselors may count towards the required hours of marriage and family therapy client contact. N.J.S.A. 45:8B-18 requires applicants to complete experiential requirements before taking the licensing examination and the Board will not amend N.J.A.C. 13:34-4.3 to permit pastoral counselors to take the licensing examination before completion of experiential requirements.

3. COMMENT: One commenter contends that many agencies are able to offer only one hour of supervision per week and that this means that individuals have to work more than three years on a temporary permit in order to satisfy supervised hour requirements.

[page=2434] RESPONSE: The Board recognized that it is sometimes difficult for applicants to complete more than one hour of face-to-face supervision per week. The Board points out that, as proposed and adopted, N.J.A.C. 13:34-4.3 was drafted so that one hour a week of supervision will satisfy experiential requirements, and, therefore, can be completed in two years.

4. COMMENT: A commenter asks if the terminal year in a program will still count as one of the three years of marriage and family therapy experience.

RESPONSE: N.J.A.C. 13:34-4.3(c), which has not been amended, recognizes that the one year of experience may be obtained during a master's degree program.

5. COMMENT: A commenter asks if a supervisor may supervise more than six individuals.

RESPONSE: N.J.A.C. 13:34-5.3, which has not been amended, prohibits supervisors from supervising more than six individuals.

6. COMMENT: One commenter opposes the amendments to N.J.A.C. 13:34-4.3. The commenter contends that four hours of supervision per week provides the necessary clinical knowledge of marriage and family therapy to practice in a safe and effective manner. The four hours of supervision per week standard protects both consumers and therapists.

RESPONSE: The Board amended N.J.A.C. 13:34-4.3 so that the Board's experiential requirements were consistent with other State mental health professional licensing boards. The Board believes that the new experiential requirements provide the minimum supervision necessary for an applicant to provide marriage and family therapy services in a safe and effective manner. The Board points out that, if a supervisor deems it necessary to provide more supervision in order to adequately prepare an applicant, he or she is free to do so.

Federal Standards Statement

A Federal standards analysis is not required because the adopted amendments are governed by N.J.S.A. 45:8B-13 et seq., and are not subject to any Federal requirements or standards.

Full text of the adoption follows:

13:34-4.3 Experiential requirements for licensure

(a) The following words and terms as used in this section and N.J.A.C. 13:34-5, shall have the following meanings, unless the context clearly indicates otherwise.

...

"Group supervision" means the ongoing process of supervising between two and six interns and/or permit holders at one time in a group setting by a qualified supervisor.

...

(b) An applicant for licensure as a marriage and family therapist shall submit to the Board documentation, on a form provided by the Board, establishing that the applicant has completed a minimum of two calendar years of supervised marriage and family therapy experience and one calendar year of counseling experience, which may be in marriage and family therapy, as set forth below:

1. Supervised marriage and family therapy experience for each calendar year shall consist of:

i. A minimum of 50 hours of face-to-face supervision, at the rate of one hour per week, of which not more than 25 hours may be in group supervision;

ii. A maximum of 1,150 hours of actual marriage and family therapy client contact; and

iii. A maximum of 300 hours of other work-related activities, such as preparing and maintaining client records as described in N.J.A.C. 13:34-8, report writing, maintaining appointment schedules, communicating with other professionals, preparing for supervision, preparing and maintaining financial records in accordance with N.J.A.C. 13:34-5.4 and 6.1, and any other activities the qualified supervisor deems appropriate; and

2. For the two calendar years of supervised marriage and family therapy experience and the one calendar year of counseling experience, no more than 30 hours of experience shall be earned in any one week, and no more than 125 hours of experience shall be earned in any one month.

(c)-(d) (No change.)