

# MENTAL HEALTH PROFESSIONAL LICENSING STUDY

Office of Professional Regulation

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[https://sos.vermont.gov/opr/regulatory/  
regulatory-review/mental-health-  
licensing-study/](https://sos.vermont.gov/opr/regulatory/regulatory-review/mental-health-licensing-study/)



# AGENDA

- Welcome
- Present and Discuss Subgroup Meeting Work
- Next Steps
  - Identifying Resources, Research, and Learning Opportunities
- Continued Steps
  - New and Refined Issues and Questions Throughout

**Update:** New email communications coming soon

We're here!  
11/20/23



Questions and  
Goals and  
Scope

Research,  
Resources, and  
Learning

Recommendations

Report

# BARRIERS TO ENTRY

- Examinations (need for accommodations and alternatives)
- Pathways to licensure (need to simplify and expand, particularly for those out-of-state)
- "Threshold" qualifications and post-degree supplementation
- Confusing qualifications (e.g., "psychotherapy" and social work; direct vs. indirect supervision)
- Lack of qualified supervisors
- Cost and payment structure for supervision
- Licensing requirements inconsistent with those of surrounding states
- Access and barriers to obtaining required education (financial, time, location, etc.)
- No license for disciplines (e.g., art therapy, music therapy, school counseling)
- The Roster, its role, timing requirements, and impact of both (e.g., public protection, ability to obtain license, counting of supervision hours, reciprocity)

- Lack of guidance on how to pursue licensure (e.g., website problems, inaccessible language and resources)
- Specificity of the current requirements (e.g., 1:30 ratio of supervision to supervised practice)
- Continuing education requirements across all professions (equity, cost, time, need, consistency, etc.)
- Multiple boards and regulatory requirements for professions with similar but different practices
- Disconnect between licensing and reimbursement (time after licensure to credentialing, roster timeline, etc.)
- Clarity of process for obtaining VT license based on license in another state
- Clarity of process for obtaining a telehealth license or a compact license
- No regulation of supervisors
- No way to confirm supervision is compliant until finished

## BARRIERS SUBGROUP QUESTIONS

- How can we be more equitable in mental health professional licensing?
  - Continuing education, access to education, cost and access to relevant supervision
- How can the laws be improved for professionals-in-training?
  - The Roster
  - Affordability, access, non-monetary costs
  - Exams, supervision hours, coursework
  - Guidance, clarity
- How do we improve the post-degree supervised practice and supervision requirements?
  - Address equity, cost, oversight, etc.
  - Maintain availability
- How do we work with partners to ensure coordination with other practice needs (e.g., reimbursement)?
- How do we address barriers to licensure for other disciplines and out-of-state professionals?

# BARRIERS TO ENTRY

- Additional

- Resources

# SUPERVISION

- Barriers to supervision
- Workforce development
- Accommodations
- Cross-profession supervision requirements
- Supervisor qualifications
- Supervision contracts (accountability and transparency)
- Private practice v. agency settings
- Supervision hourly rules criteria
- Direct v. indirect service criteria
- Consistency with surrounding states

- Definition of supervised practice hours (what counts?)
- Documentation of supervised hours (e.g., supervisor reports)
- Communication with applicant during supervised practice
- Clarity of requirements and guidance
- Ethical requirements (e.g., payment structures, multiple relationships)
- Number of supervisees
- Regulating the supervisor

# SUPERVISION

- HOW CAN WE BALANCE ACCESS TO SUPERVISION WITH DIFFERENT INTERESTS OF SUPERVISORS AND SUPERVISEES?
- HOW CAN REGULATIONS MAKE SUPERVISION MORE ACCESSIBLE? HOW CAN REGULATIONS REDUCE BARRIERS TO SUPERVISION?
- *Oversight of supervised practice*
  - How can OPR streamline supervision requirements across all mental health professions?
  - What does quality supervision mean? How can additional oversight improve supervision?
  - How can the supervised practice regulations be revised to improve access while still protecting the public?
  - What are the risks we are concerned about with poor quality supervision?
  - Is it possible to create more flexibility in supervision pathways to licensure?
- *Oversight of supervisor-supervisee relationship*
  - Should providing supervision require training or additional CE?
  - Should providing supervision be a revocable privilege, e.g., in the event of misconduct?
  - Should OPR standardize supervision contracts?
  - What is considered fair and equitable in supervision arrangements/contract terms?
  - Should OPR actively track supervision hours/relationships?
  - What are the concerns around supervision business models?
  - Are there employment complications for professionals-in-training as independent contractors?



# SUPERVISION

- Additional

- Resources

# STREAMLINING LICENSE REGULATIONS

- Education requirements that reflect current access and cost realities
- Integration of out-of-state requirements into VT licensing
- Balancing administration and clarity of licensing requirements with need for multiple pathways to licensure
- Inclusion of discipline licenses (e.g., art therapy, music therapy, school counseling)
- Telehealth and compact integration

- Supervision requirements and regulation
- CE requirements; multiple license types; equity; barriers
- Roster – role, public protection, impact
- Coordination with other entities that impact practice (e.g., insurers)
- Applicant communication and awareness of application status (and problems)

## STREAMLINING SUBGROUP QUESTIONS

- How can we balance the need for multiple pathways to licensure with the needs for public protection, clarity, and the ability to administer the rules?
- How can we ensure the requirements for licensure protect the public while minimizing the barriers to obtaining licensure (e.g., cost of education, access to supervision, etc.)?
- How can OPR better coordinate with other entities that impact professional practice?
- How can regulations incorporate mental health disciplines (e.g., art and music therapy, school counselors, forensic psychologist evaluations)
- How can we streamline post-licensure requirements to ensure equity and access?
- How can use of the roster better serve professionals-in-training as well as public protection?
- How can we improve out-of-state endorsement pathways for professionals/trainees?
- How would a single mental health board function for multiple mental health professions?

# STREAMLINING

- Additional

- Resources:
  - 3rd-Party certification bodies
  - Other states

## NEXT STEPS: RESEARCH & RESOURCES

- What resources would be helpful to answer these subgroup questions?
- What stakeholder groups should be considered and how can we include their participation?
- What can Vermont learn from other states' regulatory programs?
- What other research would you like OPR to conduct?
- What other research and resources does this group have available?

## NEXT MEETING DATES

**Full Group Meeting – Dec. 18**

**Subcommittees: 2-4pm**

- Barriers to Entry – Nov. 28
- Supervision – Dec. 5
- Streamlining and Barriers – Dec. 12

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