

STATEMENT OF CONSIDERATION RELATING TO

201 KAR 32:030
201 KAR 32:035
201 KAR 32:060

Kentucky Board of Licensure of Marriage and Family Therapists

(Amended After Comments)

201 KAR 32:030
201 KAR 32:060

(Not Amended After Comments)

201 KAR 32:035

I. The public hearing on 201 KAR 32:030, 201 KAR 32:035, and 201 KAR 32:060 scheduled for March 23, 2021, at the Department of Professional Licensing was canceled; but, written comments were received during the public comment period.

II. The following people submitted written comments:

<u>Name and Title</u>	<u>Agency/Organization</u>
Kathy Adams, Director of Public Policy	Children's Alliance

III. The following people from the Kentucky Board of Licensure of Marriage and Family Therapists responded to the written comments:

<u>Name and Title</u>
Shawn Oak, Chair

IV. Summary of Comments and Responses

(1) Subject Matter: References to consecutive calendar years.

(a) Comment: For clarity and consistency with Section 9 of 201 KAR 32:030, the references to "two years" or "two (2) years" in the Application for Continuing Education Sponsor form and in 201 KAR 32:060 Sections 3(3) and 3(3)(a)2.p.(iii) should be changed to "two (2) consecutive calendar years".

(b) Response: The Board agrees and will amend the regulations and material incorporated by reference accordingly.

(2) Subject Matter: Reference to "all mental health professionals".

(a) Comment: The reference to "all mental health professionals" in 201 KAR 32:060 Section 1(5), regarding training about domestic violence, elder abuse, neglect, and

exploitation, should be changed because the Board does not have purview over all mental health professionals.

(b) Response: The Board agrees and will amend the regulation by changing “all mental health professionals” to “each licensee and associate”.

(3) Subject Matter: Continuing Education Providers.

(a) Comment: The term “providing Kentucky” in 201 KAR 32:060 Section 3(3)(a)2.c., regarding the sample continuing education course to be submitted by continuing education providers with the application, should be corrected.

(b) Response: The Board agrees and will amend the regulation by changing “providing Kentucky.” to “provided”.

(4) Subject Matter: Continuing Education Providers.

(a) Comment: To clarify 201 KAR Section 32:060 3(3)(b) regarding the submission of annual reports of education programs, the paragraph should be changed to specify that the reports shall be submitted to the Board.

(b) Response: The Board agrees and will amend the regulation accordingly.

(5) Subject Matter: Application for Continuing Education Sponsor form

(a) Comment: The word “certificated” should be changed to “certificate” in item “c.” of the Sponsor Status Eligibility Requirements section of the Application for Continuing Education Sponsor form

(b) Response: The Board agrees and will amend the regulation accordingly.

(6) Subject Matter: Temporary Supervision

(a) Comment: Ms. Adams asks the Board to clarify whether an associate receiving supervision under 201 KAR 32:035 Section 8 can count those hours toward the 200 hours of supervision and whether an associate needs to get raw data during that time.

(b) Response: An associate receiving supervision under 201 KAR 32:035 Section 8 is receiving supervision from a board-approved supervisor and thus those hours count toward the 200 hours of supervision. The Board appreciates the comment, but there is no need to further amend the regulation.

(7) Subject Matter: Continuing Education Providers

(a) Comment: 201 KAR 32:060 Section 3(3)(a)2.k., and the Application for Continuing Education Sponsor form, refer to continuing education providers providing information as to whether or not they maintain policies concerning program fees, refunds, and cancelations; if the provision of such policies is not optional then the regulation should be amended accordingly.

(b) Response: The proposed amendment to this regulation, as filed, would require the continuing education provider to provide a statement of whether the provider maintains policies concerning program fee, refunds, and cancelations. The proposed amendment does not seek to require continuing education providers to maintain such policies. The Board appreciates the comment, but will not seek to amend this language.

V. Summary of Statement of Consideration and Action Taken by Promulgating Administrative Body

The public hearing on these administrative regulations was canceled; however, written comments were received. The Board of Licensure of Marriage and Family Therapists responded to the comments and amends the administrative regulations as follows:

201 KAR 32:030

Page 5
Section 10(1)(f)
Line 14

After "Sponsor", insert "**May**";
Delete "January".

201 KAR 32:060

Page 2
Section 1(5)
Line 7

After "certification," insert "**each licensee and associate**";
Delete "all mental health professionals".

Page 4
Section 3(3)
Line 12

Before "year", insert "**consecutive calendar**".

Page 4
Section 3(3)(a)2.c.
Line 22

After "courses", insert "**provided**";
Delete " **providing Kentucky**".

Page 6
Section 3(3)(a)2.p.(iii)
Line 14

After "two", insert "**(2) consecutive calendar**".

Page 6
Section 3(3)(b)
Line 19

After "submit", insert "**to the board**".

Page 10
Section 8(1)(a)
Line 13

After "Sponsor", insert "**May**";
Delete "January".

Application for Continuing Education Sponsor

Page 1
Opening paragraph
Fourth Line

After "two", insert "**(2) consecutive**".

Page 1
Last paragraph
Third Line

After "two", insert "**(2) consecutive**".

Page 2
Sponsor Status Eligibility Requirements, part "c."
Sixth Line

After "Official", insert "**certificate**";
Delete "certificated"

Page 5
First paragraph
Second Line

After "two", insert "**(2) consecutive**".

Page 5
Edition date
Last line

After "Sponsor", insert "**May**";
Delete "January".