

Eva Beeker, Phd. LPCC-S  
2/11/2025

To: Senate Workforce Development Committee

Subject: Testimony in Opposition to Bill SB 2357

Dear Chair Wobbema and Members of the Workforce Development Committee

I am writing to express my opposition to SB 2357. As a Licensed Professional Clinical Counselor and Supervisor, licensed and practicing in the state of North Dakota since 2018, this bill impacts my profession directly.

My opposition to a consolidated licensing board is rooted in a deep respect and appreciation for the unique differences and complexities of each mental health profession—including their distinct ethical codes, specialized education, and training requirements.

There are several reasons I strongly oppose merging our licensing boards into a single composite entity:

### **1. Public Protection and Professional Standards**

Licensing boards exist primarily to protect the public by upholding the ethical and practice standards of each profession. Each mental health discipline has specific guidelines for identifying, disciplining, and addressing unfit professionals. A composite board may lack the specialized expertise necessary to thoroughly investigate ethical violations and malpractice claims. Without this depth of knowledge, disciplinary actions may become overly generalized and fail to reflect best practices within each profession, leaving clients vulnerable to inadequate protection. Additionally, merging boards could lead to a dilution of professional standards, as licensing requirements vary significantly based on ethical codes and best practices. Competency is defined differently for each field, and this must be respected to maintain public safety.

### **2. Efficiency and Professional Oversight**

Each profession has distinct training requirements, ethical standards, and best practices. A composite board may inadvertently slow down licensing and disciplinary processes rather than improve efficiency. With fewer board members possessing specialized knowledge in each discipline, applications and complaints would be reviewed by individuals with limited expertise, creating bottlenecks in decision-making. Furthermore, professionals representing their specialties would likely spend more time educating their fellow board members on the nuances of their field rather than directly addressing concerns, further delaying processes.

### **3. Power Imbalances and Conflicts of Interest**

A composite board also raises concerns about conflicts of interest and potential imbalances of power. Larger or more politically influential professions may dominate decision-making, leading to regulations that do not align with the best practices of smaller disciplines. This

could result in policies that disproportionately benefit the most represented groups rather than ensuring fair and equitable oversight for all professions.

I urge you to oppose bill SB 2357 so that the mental health licensing boards retain their independence and integrity as separate entities to serve in protecting the public. Thank you for your time and consideration. Please feel free to contact me at [eva.beeker@und.edu](mailto:eva.beeker@und.edu) if you have any questions.

Sincerely,

*Eva M Beeker*

Eva Beeker, Ph.d., LPCC-S  
(Grand Forks)