

Todd F. Lewis
Counselor Educator and Counselor
6631 56th Ave. S.
Fargo, ND 58104

February 12, 2025

Subject: Testimony Regarding Senate Bill

Dear Senate Workforce Development Committee,

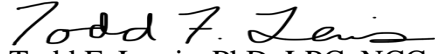
I am writing to express my strong opposition for Senate Bill 2357, which proposes a mental health licensing composite board including psychologists, counselors, social workers, substance abuse counselors, and marriage and family therapists. I oppose this bill because it will significantly impact each profession's integrity and require a large financial burden for the state and licensees.

Each profession is distinctly different including educational background, ethical codes, licensure requirements, roles of service, and licensure examination. By merging these five separate professions together in one composite board it will decrease the efficacy and integrity of each profession because each profession will have marginal representation of their licensure process, state statutes, navigating complaints, and advocating for their profession's needs. In addition, with multiple mental health professions moving towards licensure portability (compacts) a composite board could negatively impact the ability to adopt and maintain compact regulations. For example, counseling has already signed the counseling compact into legislation and is in the process of navigating implementation (e.g., jurisprudence examination, converting licensee records to electronic format, vetting compact compliant database). Decisions made for a composite board might compromise the progression of the counseling compact, as system needs may compete and create noncompliance between the different professions in the proposed composite board.

Furthermore, a composite board will drastically increase the time it takes to get licensed in North Dakota. Currently, it takes an average of 30 days or less for counselors (e.g., LAPC, LPC, LPCC) who meet requirements to obtain licensure. Whereas with a composite board, Minnesota for example, takes 4-6 months to obtain licensure. Lastly, implementing a composite board will create a large burden financially on the state and licensees (e.g., increasing licensure costs) due to changes in state statutes to accommodate composite board, vetting databases to meet the individual needs of each profession, and funding staff support for a larger composite board (e.g., attorney, executive assistants).

I urge you to OPPOSE this bill. I appreciate your consideration and representation of the counseling profession and counselors of North Dakota.

Cordially,

A handwritten signature in black ink that reads "Todd F. Lewis". The signature is written in a cursive style with a long horizontal flourish at the end.

Todd F. Lewis, PhD, LPC, NCC

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