

WA State Dept. of Health
c/o Sherry Thomas
P.O. Box 47850
Olympia, WA 98504-7850

January 31, 2014

Re: Proposed Rule Making: Fee increases.

Good afternoon,

In response to agency proposed rule making change to WAC 246-810-990, Counselors fees and renewal cycle, the **Washington Professional Counselors Association** (association) submits the following comments and recommendations to the **Washington State Department of Health** (department), on behalf of Certified Counselors, Certified Advisers, and Agency Affiliated Counselors.

The department proposes a lump-sum fee increase – based primarily on the following.

1. Fully fund core credentialing, discipline, and regulatory activities.
2. Cost projections, based on current number of credential holders.

The department has taken proactive steps in addressing a budget deficit by combining the Certified Counselor and Certified Adviser credentials into a single budget.

The department proposes to increase fees as follows:

The following nonrefundable fees will be charged for certified counselor:

Application and certification	((110.00)) <u>160.00</u>
Examination or reexamination	85.00
Renewal	((90.00)) <u>140.00</u>
Late renewal penalty	50.00
Expired credential reissuance	((50.00)) <u>100.00</u>
Duplicate credential	15.00
Certification of credential	15.00

The following nonrefundable fees will be charged for certified adviser:

Application and certification	((80.00)) <u>130.00</u>
Examination or reexamination	85.00
Renewal	((65.00)) <u>115.00</u>
Late renewal penalty	50.00
Expired credential reissuance	((50.00)) <u>100.00</u>
Duplicate credential	15.00
Certification of credential	15.00

The following nonrefundable fees will be charged for registered agency affiliated counselor:

Application and registration	((50.00)) <u>60.00</u>
Renewal	((40.00)) <u>50.00</u>
Late renewal penalty	40.00
Expired registration reissuance	((40.00)) <u>50.00</u>
Duplicate registration	15.00
Certification of registration	15.00

The Washington Professional Counselors Association respectfully submits the following recommendation, on behalf of Certified Counselors, Certified Advisers, and Agency Affiliated Counselors.

1. A phased approach to fee increases.
 - a) As stated in the December 2011 'Report on Counselor Credentialing', "A phased approach over several years was needed to implement eight new professions...", and suggest that a similar approach is true for increasing credentialing fees over a period of time, in order to best support both the on-going and increasing costs to credential holders.
 - b) Support fee affordability to the credential holders, as these professions are not billing insurance companies and are paid directly by clients as an out-of-pocket expense.
 - c) Increase the number of credential holders by partnering with the department, as recommended in items two (2) and three (3) below.
 - d) Reduce the need for a fee reduction consideration in the near future, as a result of the recommendations in items two (2) and three (3) below.

2. Partner with the department on their recommendation in the December 2011 '*Report on Counselor Credentialing*', which suggests that the department "...will work with community colleges to increase numbers of applicants for the certified adviser credential."
 - a) In addition to the departments recommendation, the association will work with State Universities to increase the number of applications for the certified counselor credential through awareness and education.

- b) The association would like to partner with the department to outline a plan, in an effort to support their initial recommendation to the legislature.
 - c) The Certified Counselor and Certified Adviser credentials remain widely unknown to the community colleges and universities in Washington State, which has led to a much lower number of credential holders than anticipated.
 - d) We believe strongly that these partnership opportunities will greatly increase the number of applicants for both the Certified Counselor and Certified Adviser credentials.
3. Partner with the department on their recommendation from the December 2011 '*Report on Counselor Credentialing*', which states that they "...will work with community colleges to learn why so few of their graduates apply for the certified adviser credential, and encourage more graduates to apply for this credential."
- a) It is believed that this matter will begin to resolve itself, based on the partnership between the association and the department, once the community colleges and universities become aware and familiar with the new credentialing opportunities for both current students and alumni.

We look forward to participating in the collaborative discussion on Tuesday, February 4, 2014, in Tumwater, WA.

Respectfully,
Tim

Tim Livingston

President

WA Professional Counselors Assoc. (WAPROCA)

Seattle, WA

(206) 289-0874

tim@waproca.org