

**WEST VIRGINIA**  
**SECRETARY OF STATE**  
**KEN HECHLER**  
**ADMINISTRATIVE LAW DIVISION**

Form #3

Do Not Mark in this Box

RECEIVED  
98 JUL 31 PM 4:10  
OFFICE OF THE SECRETARY OF STATE

**NOTICE OF AGENCY APPROVAL OF A PROPOSED RULE  
AND  
FILING WITH THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE**

AGENCY: Board of Examiners in Counseling TITLE NUMBER: 27

CITE AUTHORITY 30-31-5(a)(2)

AMENDMENT TO AN EXISTING RULE: YES  NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 1

TITLE OF RULE BEING AMENDED: Licensing Rule

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: \_\_\_\_\_

TITLE OF RULE BEING PROPOSED: \_\_\_\_\_

THE ABOVE PROPOSED LEGISLATIVE RULE HAVING GONE TO A PUBLIC HEARING OR A PUBLIC COMMENT PERIOD IS HEREBY APPROVED BY THE PROMULGATING AGENCY FOR FILING WITH THE SECRETARY OF STATE AND THE LEGISLATIVE RULE MAKING REVIEW COMMITTEE FOR THEIR REVIEW.



Authorized Signature

Chair, W.B.E.C.

\$13.70

DATE: 7/31/98

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: Dr. William Mullett

LEGISLATIVE RULE TITLE: 27

1. Authorizing statute(s) citation 30-31-5(a)(2)

2. a. Date filed in State Register with Notice of Hearing

6/30/98

b. What other notice, including advertising, did you give of the hearing?

Sent a postcard to All  
Licensed Professional Counselors  
Chairs of WVU, Marshall, WVCA + LPCA

c. Date of Hearing(s) Comment period

July 1, 1998 - July 31, 1998

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached  No comments received

e. Date you filed in State Register the agency approved proposed Legislative Rule following public hearing: (be exact)

f. Name and phone number(s) of agency person(s) to contact for additional information:

Dr. William Mullett 348-7786

Jean Ann Johnson 746-2512

3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided. 6/30/98

Comment period July 1, 1998 - July 31, 1998

fee changes

b. Date of hearing: July 1, 1998 - July 31, 1998

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

7/31/98

d. Attach findings and determinations and reasons:

Attached

## **Summary of Proposed Rule Changes**

**The proposed rule changes address the need to increase the application fee for a counselor license and the renewal fee for licensed professional counselors. These proposed increases will enable the Board to meet the mission and mandates of the code governing the practice of counseling and to meet the expectations of the Performance Evaluation and Research Division report of June, 1995 regarding the Board of Examiners in Counseling.**

## Statement of Circumstances

The Board of Examiners in Counseling is requesting permission to increase fees based on financial need. Regarding our current financial status and current fee structure, we will be extremely limited in staffing our office and providing services to the LPC's and the public after July 30, 1998.

Our need can be substantiated. As of July, 1998, we have a balance less than \$4056.00. Our Program Specialist will be able to work less than five hours a week through June, 1999 and jeopardize our ability to pay other bills. The minimum funds needed on a monthly basis (phone, risk management, copies, postage, and 4 board meeting) is approximately \$1650.00.

The renewal dollars we collect make up the majority of our funds to operate. Our next renewal period is June, 1999. The attached chart demonstrates how our renewal and application fees are below the norm and will not allow us to operate the Board in a professional manner. (Fee Comparison chart)

The Board of Counseling has made a substantial move towards saving money. We have entered into a cooperative agreement with the Marshall University Graduate College. Services provided by the college: 100 sq.ft. office space, utilities, cleaning service, maintenance service, 2 special file cabinets, computer, computer technical services, use of copier (we pay 6 cents a copy), phone service (we pay for phone calls and local service), use of fax, mail service, internet access, rooms for Board meetings, printing service available at reduced prices and easy access for the public and our LPC's. If the Board of Counseling had to pay for all the above services, we would have been out of funds long ago.

Our current application fee is \$50.00 and the current renewal fee is \$25.00 for a two year cycle. We are requesting that the fee for applications be raised to \$120.00 and the renewal fee be raised to \$75.00 for a two year cycle.

You will find attached a copy of what the Board projects its operating expenses to be over a 24 month period. As you can see, based on the current fee structure, the Board can not be a service to the citizens of West Virginia and perform professional services for the Licensed Professional Counselors in West Virginia.

## Fee Comparison of WV and Surrounding States

State	Application Fee	2 year Renewal Fee
West Virginia	<b>\$50.00</b>	<b>\$25.00</b>
Virginia	<b>\$100.00</b>	<b>\$75.00</b>
Illinois	<b>\$150.00/\$200.00</b>	<b>\$120.00</b>
Maryland	<b>\$75.00</b>	<b>\$150.00</b>
Ohio	<b>\$60.00/\$75.00</b>	<b>\$60.00</b>

## Operating Expenses

All of these numbers are for 24 months

Program Specialist	30 hr. x 14.00 x 24 months	43680.00
Phone	800 Service = \$150.00 a month, Long Distance service and Bell Atlantic	6000.00
Risk Management		2000.00
Board Meetings	See attached sheets	15590.00
Legal Expenses	AG attending 12 board meetings and performing any legal work necessary - averages \$480.00 a meeting.	5760.00
Office Supplies	Copy paper, stationary, envelopes, lg. mailing envelopes, printing of newsletters (500.00 x 4), coping of forms & Board meeting info (.07 a page), computer supplies and general office supplies.	5000.00
Postage		5000.00
Association Dues		600.00
Temporary Help	Extra help to expedite processing renewals and other "heavy" times. \$7.00 hr. x 640 hr. (16 weeks)	4480.00
Hearing Costs	Unknown at this time \$5000 - \$7000 each hearing	
<b><u>Total operating expenses for 24 month period</u></b>		<b>88110.00</b>

**APPENDIX B**

**FISCAL NOTE FOR PROPOSED RULES**

Rule Title: Title 27 Legislative Rule

Type of Rule:  Legislative  Interpretive  Procedural

Agency Board of Examiners in Counseling

Address 100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600

**1. Effect of Proposed Rule**

	ANNUAL FISCAL YEAR				
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
<u>ESTIMATED TOTAL COST</u>	\$	\$	\$	\$	\$
PERSONAL SERVICES	N/A				
CURRENT EXPENSE	N/A				
REPAIRS & ALTERNATIONS	N/A				
EQUIPMENT	N/A				
OTHER	N/A				

**2. Explanation of above estimates:**

NOT APPLICABLE

**3. Objectives of these rules:**

NOT APPLICABLE

Rule Title: Title 27 Legislative Rule

4. Explanation of Overall Economic Impact of Proposed Rule.

A. Economic Impact on State Government.

N/A

B. Economic Impact on Political Subdivisions; Specific Industries; Specific groups of Citizens.

N/A

C. Economic Impact on Citizens/Public at Large.

N/A

Date:

6-30-98

Signature of Agency Head or Authorized Representative

William E. Zuley

## **Summary of Proposed Rule Changes**

**The proposed rule changes address the need to increase the application fee for a counselor license and the renewal fee for licensed professional counselors. These proposed increases will enable the Board to meet the mission and mandates of the code governing the practice of counseling and to meet the expectations of the Performance Evaluation and Research Division report of June, 1995 regarding the Board of Examiners in Counseling.**

**APPENDIX B**

**FISCAL NOTE FOR PROPOSED RULES**

**Rule Title:** Title 27 Legislative Rule

**Type of Rule:**  **Legislative**     **Interpretive**     **Procedural**

**Agency**                    Board of Examiners in Counseling

**Address**                    100 Angus E. Peyton Drive

South Charleston, WV 25303-1600

**1. Effect of Proposed Rule**

	ANNUAL FISCAL YEAR				
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
<u>ESTIMATED TOTAL COST</u>	\$	\$	\$	\$	\$
PERSONAL SERVICES	N/A				
CURRENT EXPENSE	N/A				
REPAIRS & ALTERNATIONS	N/A				
EQUIPMENT	N/A				
OTHER	N/A				

**2. Explanation of above estimates:**

NOT APPLICABLE

**3. Objectives of these rules:**

NOT APPLICABLE

Rule Title: Title 27 Legislative Rule

4. Explanation of Overall Economic Impact of Proposed Rule.

A. Economic Impact on State Government.

N/A

B. Economic Impact on Political Subdivisions; Specific Industries; Specific groups of Citizens.

N/A

C. Economic Impact on Citizens/Public at Large.

N/A

Date: 6-30-98

Signature of Agency Head or Authorized Representative

William E. Zuley

TITLE 27  
LEGISLATIVE RULE  
BOARD OF EXAMINERS IN COUNSELING

SERIES 1  
LICENSING RULE

**§27-1-1. General.**

1.1. **Scope.** -- This legislative rule establishes standards for professional counselors to follow in applying, qualifying, maintaining, and renewing required licensure.

1.2. **Authority.** -- W. Va. Code §30-31-5(a)(2).

1.3. **Filing Date.** -- August 1, 1997.

1.4. **Effective Date.** -- July 1, 1998.

**§27-1-2. Definitions.**

2.1. The following definitions apply to all rules promulgated by the Board of Examiners in Counseling, unless the word or term is explicitly defined or used in a different manner.

2.2. The terms "Applicant," "Board," "Counseling," "Counselor," and "Mental health counseling procedures" shall have the same meanings as are set forth for each under W. Va. Code §30-31-2.

2.3 "Application" means a written application providing all required information on forms prescribed by the Board and filed with the Board secretary.

2.4. "Counseling experience" means the applicant's primary professional responsibility that was in direct provision of counseling services or supervision of a counseling program.

2.4.1. If during a twelve-month period, the applicant is engaged in practice for fewer than 1200 clock hours, the Board will grant credit for a fraction of a year's experience represented by the number of hours actually practiced.

2.4.2.1. The Board will not credit an applicant with more than one year of experience in any twelve-month period.

**§27-1-3. Application Materials.**

3.1. The applicant shall submit the following before the Board will consider the applicant for licensure.

3.1.1. A completed application form;

3.1.2. A notarized affidavit;

3.1.3. A non-refundable application fee by check or money order;

3.1.4. Official transcripts sent directly from college or university.

3.1.5. Three (3) completed professional recommendation forms from individuals licensed as professional counselors, clinical psychologists, clinical social workers, or psychiatrists.

3.1.6. Three (3) personal reference letters to satisfy the Board that the applicant is of good moral character and merits the public trust. The letters' authors must not be persons completing the recommendation forms.

3.1.7. A verification of supervision form. This form may serve as one of the professional recommendations.

3.1.8. Verification of a successful score on a certification examination in counseling approved by the Board. The applicant shall have obtained the successful score within five (5) years prior to the submission of the application.

**§27-1-4. Classification of Applicants.**

4.1. An applicant for licensure in counseling in West Virginia shall file the application materials required under section 1 of this rule and meet the requirements set forth in this W. Va. Code §30-31-7 and this rule.

4.2. An applicant for licensure currently certified or licensed in another jurisdiction, where it is adjudged by the Board that the applicant was certified or licensed by equivalent procedures with comparable examination standards, shall file proper application. The national certification examination may be waived. It is the applicant's responsibility to provide the documentation necessary for the Board to make an appropriate decision on reciprocity.

**§27-1-5. Qualifications of Applicants.**

5.1. Education: The education requirements for the licensure of applicants are set forth in W. Va. Code §30-31-7. To meet those requirements, an applicant shall have one of the following degrees:

5.1.1. A master's or doctoral degree in counseling from an institution with program accrediting by the Council on Accreditation of Counseling and Related Educational Programs (CACREP), the National Council on Accreditation for Teacher Education (NCATE), the North Central Association of Colleges and Schools (NCACS), the Southern Association of Colleges and Schools (SACS), or a comparable accrediting body. Acceptable graduate degrees include a specialization in community agency counseling, mental health counseling, pastoral counseling, rehabilitation counseling, and school counseling. Similar degrees that include the word "counseling" and include the core of coursework representative of professional counseling programs at the time of its completion may be accepted.

5.1.2.(a) A master's or doctoral degree in a field closely related to counseling from an institution with a program accrediting by the Council on Accreditation of Counseling and Related Educational Programs (CACREP), the National Council on Accreditation for Teacher Education (NCATE), the North Central Association of Colleges and Schools (NCACS), the Southern Association of Colleges and Schools (SACS), or a comparable accrediting body. The graduate degree shall include graduate core coursework, either as part of the degree or after the award of the degree, in each of the following areas or their equivalent, as determined by the Board:

1. Counseling theories: includes a study of basic theories and principles of counseling and philosophic basis of the helping relationship;
2. Counseling techniques: includes individual counseling practices, methods, facilitative skills, and the application of these skills;

3. Human growth and development: includes the nature and needs of individuals at all developmental levels, following psychological, sociological and physiological approaches. Also includes human behavior (normal and abnormal), personality theory, learning theory, dynamics of stress, and medical/functional implications of disability;

4. Social and cultural foundations: includes studies of social change, ethnic groups, subcultures, mores, urban and rural societies, population patterns, use of leisure time, work, and differing life patterns;

5. Individual appraisal: includes individual differences, methods of data-gathering and interpretation, individual and group testing, and case study;

6. Professional responsibilities: includes goals and objectives of professional counseling organizations, codes of ethics, legal considerations, standards of preparation, certification and licensing, advocacy, confidentiality, and the role identity of counselors;

7. Supervised practicum: includes the provision of counseling to bona fide clients and groups seeking services from counselors under the direction of a graduate faculty member who is a licensed professional counselor or related mental health professional, and must include critiquing of counseling either observed or recorded on audio or video tape and;

8. Supervised internship: includes actual on-the-job experience in professional counseling under the tutelage of an on-site supervisor who is a licensed professional counselor or related mental health professional.

5.1.2(b). In addition, an applicant in addition to 5.1.2(a) with a master's or doctoral degree in a field closely related to counseling must present at least one graduate course or equivalent, as determined by the Board, in five of the following eight areas:

1. Addictions counseling;

2. Crisis intervention;

3. Group dynamics, processes, counseling, and consulting: includes theories, practices, methods, dynamics, facilitative skills, and supervised practice;

4. Life-style and career development: includes vocational-choice theory, relationship between career choice and life-style, occupational and educational information, career decision-making processes, career development exploration, and placement techniques;

5. Marriage, couples, and/or family counseling/therapy;

6. Research and evaluation: includes statistics, research design, research proposals, and evaluation.

7. Principles of etiology, diagnosis, treatment planning, and prevention of mental and emotional disorders and dysfunctional behavior; or

8. Community resources and rehabilitation services: includes development and implementation of community resource references and materials for client referral.

5.1.3. The applicant shall demonstrate that his or her coursework meets the educational requirements contained in this rule. If a course title does not clearly indicate the content area of courses named in this Rule, the applicant must also provide the college catalog description of the course and the name of the instructor of the course.

5.1.4. The applicant shall complete the educational requirements contained in this Rule prior to applying for licensure.

5.1.5. The applicant shall verify his graduate record by authorizing the college or university to forward an official transcript directly to the Board office.

5.2. Supervised professional experience: The applicant is required to have two years of supervised professional experience in counseling after earning the master's degree in counseling or equivalent as determined by the Board; or have earned a doctoral degree in counseling, or equivalent as determined by the Board, and have at least one year of supervised professional experience in counseling after earning the doctoral degree.

5.2.1. The applicant shall remain under professional supervision satisfactory to the Board, and may not be called a licensed professional counselor, solicit clients, bill for services, or in any way be represented as a licensed professional counselor, until the applicant is duly licensed by the Board.

5.2.2. The professional supervisor shall determine the applicant's activities and the amount of supervision required. A minimum of one hour of individual supervision is required for every 20 hours of practice.

5.2.3. The applicant shall provide the Board with verification of completion of supervised professional experience in the manner determined by the Board.

5.2.4. The professional supervisor may provide post-graduate degree supervision for prospective applicants in the field of professional counseling provided he or she is licensed for a period of two years as a professional counselor, clinical psychologist, clinical social worker, or psychiatrist.

5.2.5. For the purposes of this section, beginning July 1, 2001, professional supervisor means any Licensed Professional Counselor, or other qualified supervisor as determined by the Board, who has five years counseling experience and documents to the Board that he or she has completed training in counseling supervision that included content and experiences relevant to the supervision of counselors. The supervisor shall provide the Board a statement detailing the person's supervision, philosophy, orientation, and experience.

5.3 Standardized certification examination in counseling: The applicant shall provide the Board with verification that he or she has attained a successful score on a certification examination in counseling approved by the Board. The Successful score must be attained within five (5) years prior to the submission of the application.

**§27-1-6. Issuance of License.**

6.1. Each license issued by the Board shall contain the licensee's name, license number, and date of issuance.

6.2. Official licenses shall be signed by the Chairperson and Secretary of the Board, and be affixed with the official seal of the Board.

6.3. All licenses issued by the Board remain the property of the Board and must be surrendered on demand.

6.4. Once all requirements for licensure have been determined, the Board shall mail notification of the license to the last known address.

6.5. The Board shall replace a license that is lost, damaged, or is in need of revision upon written request from the licensee and payment of the license replacement fee.

6.6 Counselors concede that denial or revocation of licensure in another state, or from another board in West Virginia, or from another credential or jurisdiction, shall also make them liable for denial or revocation of licensure by this Board.

**§27-1-7. Fees.**

7.1. The following fee structure hereby is established by the Board:

Application processing	\$120.00	<del>—\$50.00</del>
Renewal	75.00	<del>25.00</del>
Reciprocity application processing		50.00
Examination score endorsement		20.00
Name change		5.00
Endorsement to another jurisdiction		20.00
Duplicate wall hanging		10.00
Copies per page		.75

7.2. Examination fee shall be the current rate of the national exam cost and an appropriate fee to proctor and process the examination.

**§27-1-8. Licensure.**

8.1. A license authorizing the holder to engage in the practice of counseling shall be issued by the Board to each successful applicant for licensure as a licensed professional counselor.

**§27-1-9. Professional Disclosure.**

9.1. Licensees shall display a professional disclosure statement at the place where they perform services and make a copy of the statement available to clients upon request.

9.2. The information to be included on the professional disclosure statement is as follows:

9.2.1. The name, title, business address, and business phone number of the licensee performing the service.

9.2.2. The formal professional education of the licensee, including academic degrees, the institutions awarding those degrees and the dates they were received.

A. "Formal professional education" means the licensee's academic training related to counseling which meets the educational requirements for licensure as a counselor.

B. Academic degrees that do not meet the requirements for licensure are not formal professional education as defined in this Rule and shall not be listed.

9.2.3. The licensee's areas of competence in counseling and the services provided, based on training and experience, from the following list, as is appropriate: career counseling, consultation, diagnosis and treatment of mental and emotional disorders, employee assistance counseling, family counseling, human resources counseling, marriage counseling, mental health counseling, rehabilitation counseling, supervision, and vocational counseling.

9.3. The following legal and ethical principles apply to the licensee in providing the disclosure statement:

9.3.1. The provision of the professional disclosure statement is the sole responsibility of the licensee. The licensee shall submit a copy of the professional disclosure statement to the Board upon request.

9.3.2. The purpose of professional disclosure is to provide sufficient information to aid the consumer public in making informed judgments and choices on matters that concern it.

9.3.3. Areas of competence and provided services listed on the professional disclosure statement shall not exceed those professional qualifications possessed.

9.4. In listing areas of competence and services provided on the professional disclosure statement, the licensee shall adhere to the scope of practice of professional counseling and delivery of services as defined in W. Va. Code §30-31-2, and as stated in Section 11 of this Rule.

**§27-1-10. Confidentiality/Disclosure.**

The Disclosure of information and exceptions shall have the same meaning and intent as are set forth for each under W. Va. Code §30-31-13.

**§27-1-11. Code of Ethics.**

11.1. The Board adopts the following additional standards of professional and ethical behavior for licensed professional counselors to be included with the Code of Ethics:

11.1.1. The licensed professional counselor shall maintain high standards of personal conduct in the capacity or identity as a counselor. The private conduct of the counselor is a personal matter to the same degree as any other person's, except when that conduct compromises the fulfillment of the counselor's professional responsibility.

11.1.2. The licensed professional counselor shall not practice, condone, facilitate, or collaborate with any form of discrimination, and shall act to prevent and eliminate discrimination, against any person or group.

11.1.3. The licensed professional counselor shall not engage in any action that violates or diminishes the civil or legal rights of clients.

11.1.4. The licensed professional counselor shall under no circumstances be involved with the sexual exploitation of clients.

11.1.5. The licensed professional counselor shall not claim, either directly or by implication, professional qualifications that differ from his or her actual qualifications. This includes use of a degree or title which is not relevant to his or her professional training or which is issued by an institution which is not an accredited educational institution.

11.1.6. The licensed professional counselor shall not practice outside the areas of competence and services provided that are listed on his or her professional disclosure statement.

11.1.7. The licensed professional counselor shall not engage in activities resulting in personal gain based upon information accessible solely as a result of the confidential relationship, regardless of the absence of harm or detriment to the client; and

11.1.8. The licensed professional counselor shall not condone, facilitate, or collaborate in unethical practices, and is obligated to report such practices to the West Virginia Board of Examiners in Counseling.

**§27-1-12. Examination Failure.**

12.1. Any applicant who fails the licensure examination may be examined as follows retake to examination:

12.1.1. The applicant must notify the Board no less than sixty (60) days prior to the scheduled examination that he or she intends to retake the exam.

12.1.2. An applicant may sit for an approved examination within an eighteen (18) month period of the date of the first failed examination without filing a new application and without presenting evidence of additional education or experience.

12.2. An applicant who fails the initial examination and fails two (2) subsequent examinations is disqualified from retaking the examination until satisfactory documentation of additional education and experience has been received and approved by the Board.

**§27-1-13. Expired License.**

13.1. Persons whose licenses have expired and who continue to hold themselves out as counselors, or who engage in counseling without a license is in violation of W. Va. Code §30-31-6.

**§27-1-14. Renewal of License.**

14.1. Any license issued by the Board expires during the month of July two years from the effective date of issuance or renewal. The provisions of W. Va. Code §30-31-8, apply to all applications for renewal of licenses.

14.2. An applicant for renewal shall file the required licensure renewal forms in the manner prescribed by the Board and shall pay the renewal fee set forth in subsection 7.1 of this rule.

14.3. The renewal applicant shall demonstrate in the manner prescribed by the Board that the applicant has met the continuing professional education requirements set forth in Section 15 of this rule. The applicant shall have acquired the continuing education required for renewal during the time his or her license was in effect.

14.4. The Board shall renew any license that has been expired for two years or less upon application by the former licensee, documentation that the continuing education requirement set forth in Section 15 of this rule have been met, and payment of the renewal fee. A person whose license has been expired for more than two years shall reapply for licensure and shall take the appropriate licensure examination.

**§27-1-15. Continuing Professional Education.**

15.1. The goals of the Board's continuing professional education requirements are to: Enable the licensee to maintain and/or expand professional expertise, become more aware of new professional developments; and to provide responsible and quality service to clients and community.

15.2. Licensee shall obtain forty (40) continuing education clock hours (CECH) of approved continuing professional education within the two year renewal period in the program areas of counselor training listed in Section 5 of this Rule.

15.2.1. A "clock hour" (CECH) is one (1) hour spent in a program meeting the requirements set forth by this section by the Board and offered by an appropriate provider. Clock hours exclude refreshment breaks, receptions, and other social gatherings, and meals that do not include an acceptable program.

15.2.2. The Board shall grant fifteen (15) continuing education clock hours (CECH) for one academic semester hour. Ten (10) continuing education clock hours (CECH) will be granted for one academic quarter hour.

15.2.3. The Board shall grant ten (10) continuing education clock hours (CECH) for a journal article directly related to the counseling profession published during the renewal period in a refereed professional journal related to the counseling profession.

15.2.4. The Board shall grant thirty (30) continuing education clock hours (CECH) for a book that is published during the renewal period and is directly related to the counseling profession.

15.2.5. The Board will grant ten (10) continuing education clock hours (CECH) to a presenter of an approved graduate college course related to the counseling profession. No more than twenty (20) continuing education clock hours (CECH) shall be accepted during the two year renewal period.

15.2.6. The Board shall grant one-half (1/2) the total number of continuing education clock hours (CECH) to a presenter of an approved continuing education program related to the counseling professional for Licensed Professional Counselors.

15.2.7 The Board shall not grant more than fifteen (15) continuing education clock hours (CECH) for continuing education presented by the employing agency personnel who meet the presenter qualifications. The continuing education programs shall be directly related to the counseling profession for Licensed Professional Counselors.

15.3. The Board shall grant approval for academic courses offered in accredited educational institutions by counseling degree programs.

15.4. The Board shall grant approval for programs sponsored by departments of accredited educational institutions; national, regional, state or local human service professional organizations or associations; and public or private human service agencies or organizations.

15.4.1. Programs shall be presented by competent individuals as documented by appropriate academic training, professional licensure or certification, or professionally recognized experience. Presenters should have identifiable involvement in human services.

15.4.2. Continuing education programs shall meet the professional needs of the intended clients.

15.4.3. Continuing education programs shall have a minimum duration of one clock hour.

15.4.4. Continuing education programs shall be disseminated via appropriate instructional methods, such as lecture, group discussion, or film.

15.4.5. Continuing education programs shall be offered in a place which is accessible to persons who are handicapped.

15.4.6 Continuing education programs shall provide participant certificates of completion which contain the following information:

- a. The title and date(s) of the continuing education program;
- b. The name of the sponsoring agency or organization;
- c. The name of the participant and the number of clock hours of continuing professional education earned; and
- d. The signatures of the instructor and the official representative of the sponsoring organization.

15.5. Each licensee shall provide the Board with evidence that the continuing professional education requirement for renewal has been satisfied.

15.5.1. Courses taken for credit at accredited educational institutions shall be verified by transcripts. Completion of non-credit and audited courses shall be verified by certificates of completion or by signed statements from the instructor.

15.5.2. All other continuing professional education shall be documented by copies of certificates of completion furnished by the provider. The certificates shall contain the information required by subdivision 15.4.6. of this Rule. In addition, the licensee shall record his or her license number in an appropriate place on the certificate of completion.

15.5.3. Copies of publications for continuing professional education credit shall be furnished to the Board. In the case of journal articles, a copy of the journal editorial review board page must be included to document that the journal is refereed.

**§27-1-16. Relations with the Public and Other Professions.**

16.1. Licensees shall neither misrepresent nor accept the misrepresentation by other persons of the efficacy of their professional services.

16.2. Licensees shall not, under normal circumstances, offer professional services to clients receiving services from another professional except with the knowledge of the other professional.

16.3. Licensees shall not distribute advertisements, announcements, or information which is false, inaccurate, misleading, partial, out of context, or deceptive.

16.4. Licensees shall clearly state their licensure status by the use of title "LPC" or "Licensed Professional Counselor" in all advertisements or announcements.

16.5. Licensees shall display their original current license certificate in a prominent place in the primary location of their practice.

16.6. Licensees shall distinguish between public statements made as a private citizen and those made as a representative of the profession, and be aware that any statement they make may be interpreted as being representative of their profession.

16.7. Licensees who offer educational programs shall give clear statements regarding the purpose of the programs and shall refrain from participating in testing or counseling activities within the context of the educational situation without prior notification of intent.

16.8. Licensees shall not give or accept a commission, rebate, or other form of remuneration for referral of clients for professional services.

**§27-1-17. Notice of Board Meetings.**

17.1. All regularly scheduled meetings of the Board shall be published in the STATE REGISTER at least five (5) days prior to the date of the meeting.

17.2. In the event of an emergency requiring immediate official action, the Board shall file notice with the Secretary of State's office prior to the meeting, stating the time, place, and purpose of the meeting and the facts and circumstances of the emergency.

**Comments directed to the Board of Examiners regarding the proposed licensure fee rule changes are as follows:**

**The Board received 7 positive comments from LPC's regarding the proposed fee changes. Furthermore, the West Virginia Counseling Association Board of Directors voted to support the WVBECE efforts to increase the fees. The comments included statements citing the need for increased services, the proposed rates being comparable to other licensing fees in WV and other states, and the fact that this is the first fee increase since the inception of the licensing board.**

**Support for small increases in fees were received from 10 LPC's suggesting that a smaller step in fees be considered. These LPC's recognized a need for increased revenues to appropriately conduct board business on behalf of the citizens of this state.**

**Negative comments were received from 23 LPC's and others, who cited the need for further information before being able to support a fee increase, references to small and part-time practices, not needing the license to practice as a school counselor, expenses associated with meeting continuing education requirements, and not currently practicing or being unemployed. Suggestions were received for different rates for LPC's in different settings, such as private vs. public, non-profit settings.**

**The Board responses to these comments are as follows:**

**The Board will continue to communicate with LPC's the need to increase fees based on current revenues and disbursements of funds. Also, as a result of the 1995 Office of Legislative Auditor, Performance Evaluation & Research Division findings of ineffective and inappropriate operating practices, the Board will further emphasize the financial condition of the Board and the subsequent inability to respond to the public and LPC's in a complete and timely manner. The PERD mandates require permanent staffing, accessible office, timely responses to public inquiries, consumer awareness, and improved license processing, among others.**

**The Board will further communicate with the LPC's that expressed concern on the fee change and determine if additional information will result in their reconsidering their position. These concerns will be continued to be studied by the Board for possible changes in the rules in the future.**



Marshall University Graduate College  
100 Angus E. Peyton Drive  
South Charleston, West Virginia 25303-1600  
(304) 746-1925 • FAX (304) 746-1942

*School of Education & Professional Development  
Counseling Program*

July 29, 1998

West Virginia Board of Examiners in Counseling  
%Marshall University Graduate College  
Ms. Jean Ann Johnson, Director  
100 Angus E. Peyton Drive  
South Charleston, WV 25303

Dear Ms. Johnson:

The purpose of this letter is to express my considerable support for the proposed rule change by the Board of Examiners in Counseling which will allow for increased fees in renewal and application processes. I have been a Licensed Professional Counselor (LPC) in the State of West Virginia for over ten years, and have witnessed the growth and development of the field of counseling for 19 years as an LPC, certified school counselor and counselor educator. I cannot do justice to the role to which the West Virginia Board of Examiners in Counseling has played in 'professionalizing' the perception and services counselors provide to the citizens of this great State. West Virginia was one of the first states to license counselors. Many states have utilized our legislation and procedures in their own licensing endeavors. Initially, many services provided by the 'Board' were volunteer and part-time in nature. Compiling credentials, organizing files, and issuing licenses were but a sampling of these services. Although the 'Board' did an admirable job during the early years, the pace intensified and the forms of services provided became more complex. As verified by legislative evaluations (audits), the Board needed to take steps to provide services in a 'more timely and professional fashion'. In the past two years, several positive 'steps' have been taken to upgrade services. A part-time director and an association with Marshall University Graduate College (for office space) are but a few examples of the steps. In order to continue this positive process, additional revenue is required. The cost of our professional license is the lowest in the country. Attorneys, physicians, accountants, social workers, and psychologists pay amounts at least double the LPC fee. If the 'Board' is expected to provide professional services, it will need an adequate budget. I strongly urge the legislature to approve the proposed rule change.

The need for professional counseling services are crucial in our complex and stressful society. The citizens of the State of West Virginia are entitled to the highest quality professional counseling services we can provide. A licensing board with adequate resources is imperative in meeting these goals. If I can provide any additional information, please contact me at 1-800-642-9842, ext. 1953.

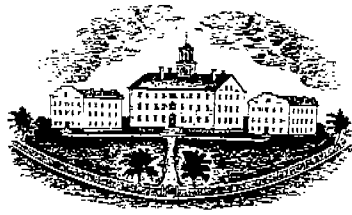
Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Rubenstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert L. Rubenstein, Ed.D., LPC #634  
Associate Professor of Counseling

Counseling and  
Higher Education

College of Education  
McCracken Hall 201  
Athens OH 45701-2979  
740-593-4440 phone  
740-593-0799 fax  
740-593-0477 fax



OHIO UNIVERSITY

July 17, 1998

West Virginia Board of Examiners in Counseling  
c/o Ms. Jean Ann Johnson  
100 Angus E. Peyton Drive  
South Charleston, WV 25303

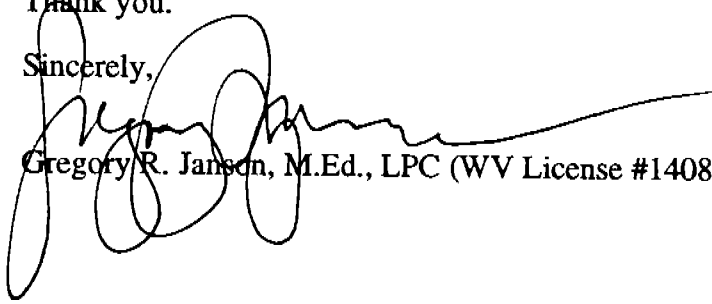
Dear Members of the Board,

I am writing in support of current recommendations to increase fees associated with LPC licensure in West Virginia and using the increased revenue to broaden the services offered by the Board. At a minimum, I believe there is a need for and many benefits to having a full time person on duty during regular business hours at the Board, as well as expanding other areas of service as identified by the Board.

Raising fees is seldom a popular action, but I believe this to be a necessary obligation, a part of our growth and maturity as a profession in West Virginia. I urge you to take whatever legislative actions are necessary to make this possible. Please feel free to call on me if you have questions.

Thank you.

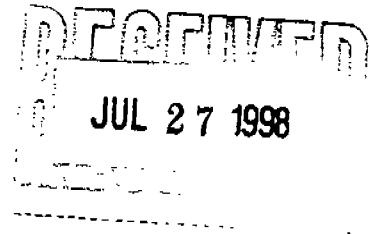
Sincerely,

  
Gregory R. Janson, M.Ed., LPC (WV License #1408)



Marshall University Graduate College  
100 Angus E. Peyton Drive  
South Charleston, West Virginia 25303-1600  
(304) 746-1925 • FAX (304) 746-1942

School of Education & Professional Development  
Counseling Program



July 24, 1998

West Virginia Board of Examiners in Counseling  
MUGC  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600

To Whom It May Concern:

This letter is written in support of the need to increase maintenance and application fees for the West Virginia Board of Examiners in Counseling. I have had many opportunities to first-hand observe Board operations over the years since we at the College are co-located with the Board and I see the need for a full-time person. Part of the increased fees would help pay that person's salary. I have watched the current full-time person take what had been an organized effort on the part of Board members to help licensees and others and improve upon that immeasurably. Her compassion for people, diligence, hard work, and intelligence were there when needed to deal with all of the very important licensing issues. Please feel free to contact me for any additional information at 1-800-642-9842 or (304) 746-1929. You may also write to me by using the letterhead address.

Sincerely,

Robert R. Smith, Ed.D.  
Professor

RRS/ma

# EVE FIROR, LPC

---

PO BOX 572 FRANKLIN WV 26807

304-358-2506

WVBEC  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600  
July 27, 1998

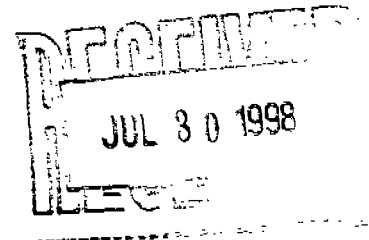
Dear WVBEC,

I am writing to support the increase of application fee to \$120 and renewal to \$75. This is in line with the fee I pay for renewal of my CAC. In the past I have been frustrated by the lack of timely response I have had from the board. It has improved somewhat in the last two years. If money from increased fees is used to pay for office coverage this problem should be resolved. Professional organizations in WV are coming in line with those in other states and I am happy to pay for this improvement.

Sincerely,

*Eve Firor, MA, LPC*

Eve Firor, MA, LPC



*Wendy Zolla, M.A.*

*P.O. Box 58, Baker, WV 26801*

*(304) 897-6028*

July 17, 1998

William E. Mullett  
WV Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

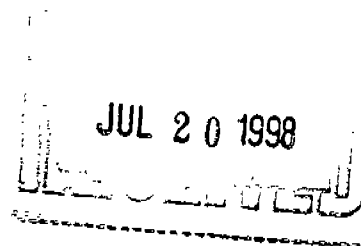
Dear Mr. Mullett:

As a West Virginia Licensed Professional Counselor, I would like to extend my full support for your proposed increases in application and renewal fees.


Sincerely,



Wendy M. Zolla, M.A., L.P.C.#947, NCC



*Licensed Professional Counselor*



*Jo Weisbrod, L.P.C., A.D.T.R.*

*Licensed Professional Counselor  
Dance/Movement Therapist*

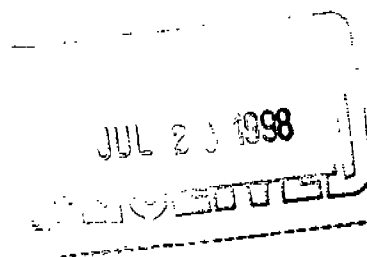
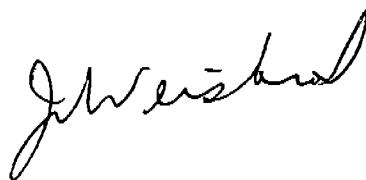
July 14, 1998

West Virginia Board of Examiners in Counseling  
100 Angus E Peyton Dr.  
South Charleston, WV  
25303-1600

Dear Sirs,

I am writing in response to the card I received about proposed rules changes regarding application and renewal fees. I completely support the recommended raises from \$50 to \$120 for the application and \$25 to \$75 for the renewal fees. They are certainly in keeping with fees from other professional organizations.

Sincerely,



*Route 5, Box 41 Lewisburg, West Virginia 24901 (304) 647-3311*

## Rubenstein, Bob

---

**From:** M. Jean Miller [jmiller@ruralnet.org]  
**Sent:** Saturday, July 25, 1998 2:10 PM  
**To:** bjdavis@access.k12.wv.us; ckyle@access.k12.wv.us; lj Kirk@access.k12.wv.us; mfawcett@access.k12.wv.us; mkreinik@access.k12.wv.us; mkureta@access.k12.wv.us; mrumer@access.k12.wv.us; paltman@access.k12.wv.us; sstankus@access.k12.wv.us; tperry@access.k12.wv.us; cbradley@access.mountain.net; evel@access.mountain.net; japoley@access.mountain.net; pjface@access.mountain.net; trauma@access.mountain.net; zasloff@access.mountain.net; pmcclung@alpha.wvup.wvnet.edu; annushkah@aol.com; barbjudy@aol.com; bell@aol.com; ccoll4444@aol.com; cwaitd@aol.com; drgoldman@aol.com; egadsjoy36@aol.com; guygage@aol.com; jmiller481@aol.com; lgds@aol.com; Parsons70@aol.com; pickettj@aol.com; pturner855@aol.com; raclifford@aol.com; raw2549@aol.com; rbaker1018@aol.com; TeeJane@aol.com; wendy9855@aol.com; willmull@aol.com; eliason@avalon.imagix.net; dsperoni@bscvax.wvnet.edu; linda.cooper@camcare.com; avocet@citynet.net; beckys@citynet.net; mitch@citynet.net; smithf@citynet.net; firstnaz@cwv.net; mike@cyberplanet.net; donohoes@earthlink.net; sycamore@eohio.net; sell@hardynet.com; wzolla@hardynet.com; carins@hgo.net; paineczarnik@inetone.net; rowrey@inetone.net; sunshine@inetone.net; susanb@inetone.net; davidb@intrepid.net; riverrat@intrepid.net; greendoor@iolinc.net; jdb@iolinc.net; gshade@ix.netcom.com; mmmarsh@ix.netcom.com; werthree@ix.netcom.com; pflavitt@juno.com; suemont@labyrinth.net; jimg@mail.wvdrs.wvnet.edu; fsa00149@mail.wvnet.edu; sca00275@mail.wvnet.edu; u1b04045@mail.wvnet.edu; barkerl@marshall.edu; kburnham@marshall.edu; BRUBENSTEIN@mugc.edu; BSMITH@mugc.edu; hhagerman@mugc.edu; tmccoy@nccvax.wvnet.edu; dcunningham@neumedia.net; laureleehager@prodigy.com; hlawrencejones@prodigy.net; lifectr@ruralnet.org; smarkle@ruralnet.org; jadams@shepherd.wvnet.edu; regdm@somvax.osteowvnet.edu; tedw@southern.wvnet.edu; fjk@speed1.net; re2h@virginia.edu; jeanne@wju.edu; dstrouse@wvu.edu; dwoodrum@wvu.edu; eglisea@wvu.edu; mkostka@wvu.edu; scrist@wvu.edu; slambert@wvu.edu; kuba\_s@wwc.edu; guyanddeb@xwv.net  
**Subject:** Proposed Licensure Rule Changes

### WVCA Online Members:

The WVCA Board of Directors, is on record, supporting the proposed licensure rule changes which increase the application fee and renewal fee to \$120 for application and \$75 for renewal. This is not out of line with other states.

The Board of Examiners, like other entities, businesses, etc., is affected by inflation. In addition, the legal fees spent in addressing ethics charges, etc. are increasing. Much of the revenue is currently being exhausted through the efforts involved in investigating and followup of ethics charges. This simply means there are those taking the profession of counseling seriously and are bringing charges against those who are allegedly violating codes of ethics. If you are not familiar with the codes of ethics, I suggest you access our web site.

A memo from Jean Ann Johnson, Program Specialist for the Board of Examiners in Counseling, states:

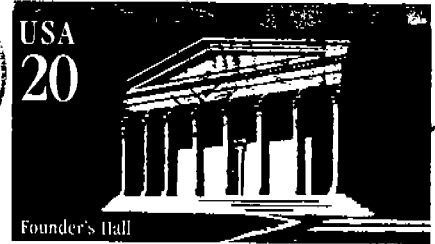
"Please be advised that the Board of Examiners in Counseling has proposed a rule change regarding application and renewal fees.....Please remember these fees have not changed since 1987.....Currently the program specialist in working one or two days a week. The office needs to be staffed at least thirty hours a week to offer the public, our licensed professional counselors and the applicants efficient, timely service."

Johnson also apologized for the long message at her office, but stated "that's a little of what people have to look forward to if the fees are not changed."

The purpose of counselor licensure is to ensure to the public that the counseling services they are receiving in the private sector is, indeed, delivered by those meeting specific standards. To evaluate applications takes time. To evaluate renewals take time. To process ethical complaint applications takes much time and money. To provide timely response to your inquiries and that of the public takes time and money. This operation cannot be operated efficiently without appropriate funding. To pretend otherwise is a farce and a disservice to the public we serve.

You are requested to write letters of support to the WV Board of Examiners in Counseling, which will compile the letters. The comment period ends July 31, 1998, at 4:30 p.m. You were notified earlier by postcard. Please send your letters of support to the WVBE, 100 Angus E. Peyton Drive, South Charleston, WV 25303-1600.

M. Jean Miller, LPC, NCC  
West Virginia Counseling Association, Inc.  
jmiller@wvcounseling.org  
Web Site: <http://www.wvcounseling.org>



Girard College Philadelphia, PA 1848-1998

Linda Louise Maier  
P.O. Box 56  
Buffalo, WV 25033

*I agree to  
the fee*

01397USPS 60c.eco



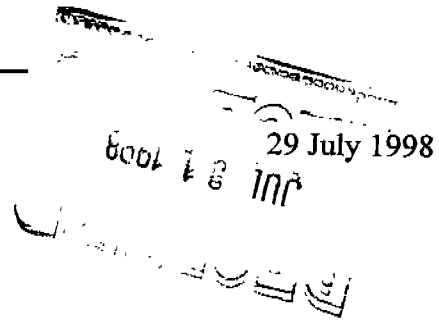
*Lovereads  
Linda Maier Ph*



# SHAWNEE HILLS

ACCREDITED BY THE JOINT COMMISSION

Barboursville School  
1535 Martha Road • P.O. Box 490  
Barboursville, WV 25504  
(304) 736-0915 • FAX (304) 736-0918



WV Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
Charleston, WV 25303-1600

To whom it may concern:

I would like to express my extreme displeasure over the proposed increase in renewal fees. I can certainly understand the need for an increase, but feel that tripling the current fee is outrageous. A reasonable increase would be \$10 - \$15 per renewal. The increase in the application fee is a good idea. I feel that it should be utilized in conjunction with a more stringent application process to insure that all licensed counselors have adequate education and experience.

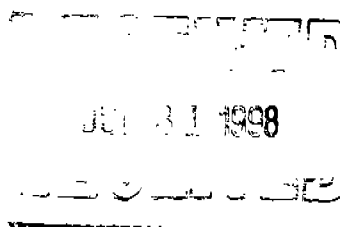
Thank you for your interest in my comments. If you have any questions please feel free to contact me at the above phone number.

Patty Deeds, M.A., NCC, LPC, LSW  
Patty Deeds, M.A., NCC, LPC, LSW  
Therapist



1021 Cleveland Avenue  
Charleston, WV 25302

July 29, 1998



Mr. William E. Mullett  
WV Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Mr. Mullett:

I strongly disagree with the sharp increase in fees. A 140 percent increase in the application fees and a 200 percent increase in the renewal fees are not real world increases. I would not disagree with a slight increase as I am aware the cost of doing any kind of business is going up.

I just do not feel these levels of increases are justified by what is happening to salaries in the field. Counselors in private practice tend to receive higher salaries than those in public positions, and I believe you need to consider all your licensees.

If you are going to raise the renewal fee to such an extent, then what further service are you going to provide? National certification providers send you magazines, newsletters, etc. Quarterly newsletters would be nice providing information like updates on legal/ethical issues and training opportunities. I guess I would like to see a more tangible benefit for a 200 percent increase.

Sincerely,

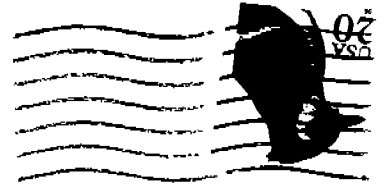
Karen White, LPC, CSW  
Lic. # 163

**SHOSHONE FALLS**

**Idaho**

During good water years, these falls that are higher than Niagara will thunder 210 ft. over a rocky ledge on the Snake River.

Photo by James Black



Dear Mr Mullett

I am writing in reference to the proposed changes in fees. I strongly believe that the increases are excessive. At the least the increases need to be gradual, over a two or three year period. Thank you!

JESSE MORAN  
PO Box 241

POST CARD

WV Bd of Examiners  
in Counseling  
100 Angus E. Peyton Dr  
South Charleston WV  
25303-1600

2US ID 77  
ID-712  
John Hinde Curteich Inc.  
Printed in Ireland

SPACE RESERVED FOR U.S. POSTAL SERVICE

Perry ME  
04667

**Magic Eye 3-D Optical Illusion Cards:** Hold this postcard right up to your nose and very very slowly pull it away from your face. Look through the image without focusing on it. Try not to blink, and a hidden image will magically appear!



Suggest a more realistic \$90 application fee and an increased renewal fee of \$50. Thanks for your consideration.  
Professionally,  
Dyson A. Dettinger  
WV LPC #654

© 1994 N.E. Thing Enterprises

WV Bd. of Examiners/Counselor  
100 Angus E. Peyton Drive  
South Charleston, WV  
25303-1600

Andrews and McMeel, Kansas City, MO 64112

Hidden Image: Hammerhead shark

Dear WV Bd of  
Examiners in Counseling:

7/13/92

Re: Proposed rule change  
re-application/renewal fees:

The \$50 to \$120 increase proposal for application and the \$25 to \$75 ~~increase~~ increase for renewal is unreasonable in my opinion. The increases should be kept to 25% or less. The proposed increases are more than 100% and 300% respectively.

The proposed increase of the Board would hurt me financially. I make in the mid \$20k range as a therapist, + my agency hasn't given raises in over 5 years (VAKey)!

Thanks for your time + attention.  
OVER. →

ROUTE #1, BOX 421  
GRAFTON, WV 26354  
JULY 28, 1998

WV BOARD OF EXAMINERS IN COUNSELING  
100 AUGUS E. PEYTON DRIVE  
SOUTH CHARLESTON, WV 25303-1600

DEAR MEMBERS OF THE BOARD OF EXAMINERS:

I VALUE HAVING A VALID WV LICENSE AND THE ABILITY TO USE THIS LICENSE AS A PROFESSIONAL COUNSELOR SHOULD I WISH TO DO SO. I AM WRITING TO QUESTION YOUR DECISION TO RAISE THE INITIAL APPLICATION FEE (FROM \$50 TO \$120) AND THE RENEWAL FEE (FROM \$25 TO \$75) IN YOUR PROPOSED RULE CHANGES TO THE STATE LEGISLATURE. WHY THE PROPOSED CHANGES? THE NUMBER OF LICENSED PROFESSIONAL COUNSELORS AT THE PRESENT TIME MUST BE LOW IN COMPARISON TO LARGER STATES AND THE NUMBER OF FUTURE COUNSELORS WHO MAY APPLY FOR LICENSURE WOULD SURELY BE A LOW NUMBER ALSO. IF THE REASONING BEHIND THESE FEE INCREASES IS TO GENERATE MORE INCOME FOR THE STATE, I DON'T THINK THAT WILL HAPPEN!

ANOTHER REASON FOR MY CORRESPONDENCE WITH YOU IS THE PROPOSED RATE INCREASES PRESENT (TO ME) AN UNFAIR DISCRIMINATION PRACTICE AGAINST A SMALL GROUP OF PROFESSIONALS IN WEST VIRGINIA. WHY ARE YOU CHOOSING TO REGULATE THE LICENSED PROFESSIONAL COUNSELORS SO CAREFULLY WHEN THERE ARE OTHER LARGER COMPANIES WHO COULD AFFORD TO PAY AN INCREASED TAX AND ARE BETTER ABLE TO DO SO BECAUSE OF THEIR LARGE SIZE? SINCE THERE ARE A RELATIVELY SMALL NUMBER OF LICENSED PROFESSIONAL COUNSELORS IN WEST VIRGINIA, WHY IS SOMEONE TARGETING THIS SMALL GROUP AS A WAY TO RAISE EXTRA MONEY?

I HAVE BEEN A LICENSED PROFESSIONAL COUNSELOR SINCE AUGUST 25, 1987 AND I VALUE MY LICENSE AS A SIGN OF PRESTIGE AND A SYMBOL OF MY ACADEMIC ACCOMPLISHMENT. I HAVE WORKED AS A SCHOOL GUIDANCE COUNSELOR FOR THE PAST 19 YEARS. ALTHOUGH HAVING A PROFESSIONAL LICENSE IS NOT A REQUIREMENT FOR MY JOB, I FEEL SECURE THAT I COULD PERFORM PART-TIME PRIVATE COUNSELING OR I COULD BE A FULL-TIME PRIVATE COUNSELOR. I RESENT BEING PUT IN A SITUATION THAT AS A PROFESSIONAL I FEEL I HAVE TO FIGHT FOR THE STATUS THAT BELONGS TO MY PROFESSION AND TO ALL OF MY COLLEAGUES.

ARE LICENSED PROFESSIONAL COUNSELORS BEING TARGETED AS THE RESULT OF A STATE BUDGET CRUNCH? ARE SOME OF THE LEGISLATORS HOPING TO GAIN FAVOR WITH THEIR CONSTITUENTS WITH THIS ACTION? I WILL EXPECT A PROMPT REPLY FROM THE BOARD OF EXAMINERS CONCERNING THE REASONS FOR THESE PROPOSED RULE CHANGES.

SINCERELY,

*Sue A. Shroyer*

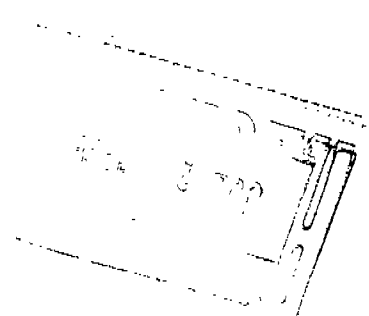
SUE A. SHROYER

JUL 30 1998

RECEIVED  
JUL 30 1998

July 20, 1998

WV Bd of Examiners  
100 August E. Peyton Dr.  
So. Charleston, Wv 25305



Dear Examiners:

I assume this increase in fees is to provide more and adequate operating funds for the Board. I farther assume that the current scale of fees is no longer sufficient to meet the demands of this licentiate profession.

The application fee of \$120 for an application in counseling seems reasonable. I, however, believe the increase from \$25 to \$75 for renewal fees seem a little steep.

Of course, I am speaking from a position of not being engaged in private or agency type counseling. If I were younger and not so near public school retirement, I probably would not renew this license, (LPC).

I suspect those public school counselors who are in their 20's, 30's and possibly 40's may not renew if this increase is approved. I don't know what percentage this represents for the total licentiate; it may not be that significant, anyway.

I know for myself that I now pay NBCC, LPC, WVCA, WVSCA, AFT, WVVA, and what ever else I have forgotten dues. This amounts up; \$25, \$50, \$75, etc. over a one, two, or five year period of time. Along the way, for example, I made a decision to drop my membership from the National Counseling Association a few years ago. It was the most expensive, and I felt I received less benefit from this organization; thus, I am no longer a member.

Perhaps this may not be the reasoning of younger public school counselors. I guess they can voice their opinions and comments the same way I have; that is, if they take the time. Come to think of it, I don't know very many school counselors under the age of 40.

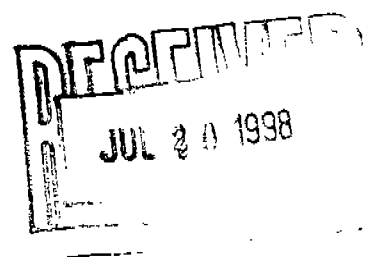
Thanks for the opportunity to offer comments, and keep up the good work in keeping everything organized and operating efficiently.

Sincerely,  
*Gary P. Adkins*  
Gary P. Adkins

#121

Rhonda A. Sarcone, M.Ed., L.P.C.  
1529 Clark Road  
Charleston, WV 25314-2336  
(304) 342-7552

West Virginia Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600



July 11, 1998

Dear Board:

I am writing to protest the proposed rate increases for both application and renewal. Counseling is an underpaid profession compared to other professional fields such as lawyer or accountant. There are relatively few job openings unlike nurse or doctor. Furthermore L.P.C.'s have to compete for the few jobs available with other licensed professionals such as social workers and psychologists who often are also able to command higher salaries and more job security than we are.

The rate increases would be an extreme hardship on me as I am unemployed after having taken a few years off for childrearing. It is already hard for me to afford the continuing education training I must take each year to maintain my license. This training can easily cost \$350 per year. If my rate to renew my license goes up from \$25 to \$75 per year, it is going to be very hard indeed to manage.

I expect that the new application increase (from \$50 to \$120) would be an unwarranted hardship on applicants most of whom are people in transition. Most are probably students newly graduated from their Master's program. They are already burdened by job seeking expenses and unemployment.

The state should appropriate monies to support the Board. If they are going to have a law requiring licensure, the taxpayers should be willing to support it. It is the public, more than the L.P.C. professionals, who benefit from having an L.P.C. law. Therefore the public should pay to maintain the office. If the legislature does not fund the office, I suggest that office expenses be reduced in order to avoid raising the rates as proposed.

I object strongly to raising the rates 200%.

Very truly yours,

Rhonda Andrews Sarcone, M.Ed., L.P.C.

File: Word Files/LCP Rate Increase

JUL 20 1998

111 Reservation Avenue  
Beckley, WV 25801  
July 13, 1998

WV Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600

Dear WVBE:

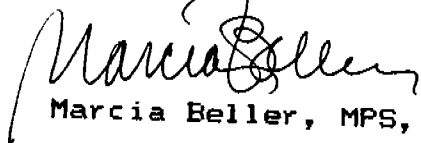
Please thoughtfully consider the following two comments on the proposed rule changes regarding application and renewal fees to the state legislature.

1) There should be a provision in the new fee structure for reduced fees for counselors who are unemployed, employed only part time, employed by nonprofit organizations, or are otherwise experiencing economic hardship. This status could be proven by the LPC to the Board with copies of paystubs, 501 (c) 3 forms for the organization they work for, tax returns, or other documents which indicate income or lack thereof. This reduced fee option probably need not be available to new applicants, since this is a one-time expense. This reduced fee option probably need not be available to counselors who have their fees paid by the agency they work for.

2) There should be full financial accounting and disclosure by the Board to the professionals who are being required to pay these fees.

Thank you for your attention to this matter and for giving me the opportunity to comment.

Sincerely,

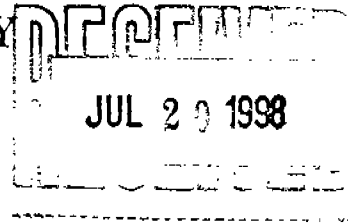


Marcia Beller, MPS, ATR-BC, LPC, NCC



WHEELING JESUIT UNIVERSITY

Office of Wellness  
and Drug Education



July 13, 1998

West Virginia Board of Examiners in Counseling  
100 August E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Board of Examiners:

I was surprised to find a postcard in my mail yesterday notifying me that the WV Board of Examiners in Counseling has proposed to the legislature that renewal fees be increased from \$25.00 to \$75.00. This is quite a shock to me. I am concerned about this increase and the manner in which the proposal was communicated to me.

Increasing the renewal rate to \$75.00 actually triples the fee from the present amount of \$25.00. Most people would agree that tripling any fee is certainly a large increase. I would like to know exactly *why* this increase is necessary and to the amount of \$75.00!

I am also concerned about receiving this information on a post card through third class mail. Most consumers would be very concerned, and rightfully so, if their utility companies notified them of a rate increase by a postcard. This notification process does not speak well to the professionalism expected in the counseling profession.

As a West Virginia counselor, licensed through the WV Board of Examiners, I feel that this process should be handled differently. I am aware that postage costs to communicate rate increases to all counselors in West Virginia are expensive. Given the important nature of this information, I believe that a first class letter-highlighting the rationale behind the rate increase would have been much more professional.

I am very interested to know the specific reasoning behind the proposed rate increase. Please send your written comments to me at the address listed on this letterhead.

Sincerely,

Daniel Caron, LPC  
Director of Wellness and Drug Education

Mary Jo Roman  
1240 Hillcrest Road  
Fairmont, WV 26554

RECEIVED  
JUL 20 1998

July 15, 1998

WV Board of Examiners in Counseling  
100 August E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Mr. Mullett:

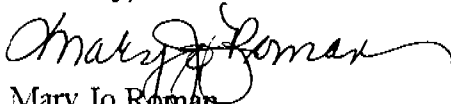
Thank you for your memo informing me of the proposed change in the renewal fees for Licensed Professional Counselors and for giving us the opportunity to respond to the proposal.

I am concerned with this proposal because I do not feel that we are getting anything for the additional \$50.00. All of the workshops that we attend are at an expense incurred by us with not reimbursement from our local school districts who have their own financial woes. I have not minded keeping my license current for the \$25.00 fee every other year. However, to add an additional \$50.00 will make me reconsider licensure. I do not need a license to continue my work as a Guidance Counselor. At this point in time, I am not employed by an outside agency where a license would be necessary to practice. I feel that many of us who are licensed and who are in the school system share my comments. If the Board is willing to provide workshops and/or a newsletter to keep us abreast of the latest counseling techniques and counseling trends, perhaps, I could justify spending the additional \$50.00.

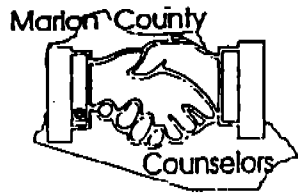
Perhaps, those of us who have been licensed, since its inception, could be grandfathered in to pay the \$25.00 fee. Those counselors who request licensure in 1998/99 could pay the increased fees of \$120.00 for application and \$75.00 for renewal.

Thank you for taking the time to read my comments.

Sincerely,



Mary Jo Roman  
Guidance Counselor  
Fairmont Senior High School



Serving the Youth of Marion County for Over Fifty Years

July 14, 1998

WV Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

To Whom It May Concern:

I would like to comment on the proposed rule changes regarding licensure application. It is my very strong feeling that if you feel it is necessary to make this proposal to the state legislature to raise fees that you consider "grandfathering" those of us who have been supporters of licensed professional counselors since its inception. If you feel the need to ~~raise fees~~, please consider beginning with those who are making new applications and keep renewal applications at \$25.

I would be interested to know for what this money is used and if the increase is a necessity at this time.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Ann Hickman".

Elizabeth Ann Hickman  
License #97

RECEIVED

JUL 21 1998

July 14, 1998

JUL 20 1998

West Virginia Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600

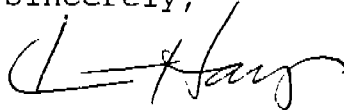
RE: Proposed increase in fees

I consider the proposed fee increase of \$70 more for application fee and \$50 more for renewal fee to be excessive based on past performance by the Board.

I have been licensed since December 1993. I would have been licensed sooner had the Board been meeting monthly. Based on my five year experience with the Board I would rate the early service as "minimal to none". Since hiring a part time staff person the service has improved to "fair". The Board has not shown an effective history of representing counselors with third party payers -- organization of the counselors has been ineffective in this regard. This has resulted in counselors having to become licensed as Social Workers if they want to have a political voice. (And many of us counselors are not, and do not want to be social workers!)

I realize the organization cannot operate without funds, but the well meaning volunteers on the Board have been too short on "results" to merit the increase that is being proposed to the legislature. I have no confidence that more money will increase the service or political effectiveness of this Board. I wish to go on record as being opposed to the increase.

Sincerely,



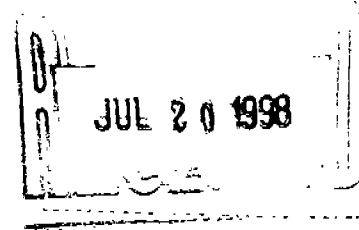
Catherine Hayes, MA, LPC, LSW  
289 Roxalana Hills Drive  
Dunbar, WV 25064

WVLPC #1028

PS. It doesn't help to promote confidence when you send out postcards which give a return address of 100 AUGUS E. Peyton Dr.

July 15, 1998

WV Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303-1600



Dear Mr. Mullett:

I am writing in response to the postcard I received from you regarding changes in fees for counseling licensure and renewal. I guess the obvious question is why, and why such a big increase? What is the need that warrants such a sizable increase in these fees?

I guess I would like to have known before now from the Board what the need was or what the reason was. You say that a change is being proposed but you don't say why.

I would support an increase that is necessary for the operation of the Board. I think that the Board does an excellent job. I have always received prompt assistance with anything I have needed and I really appreciate that. When I moved several years ago from Ohio back to West Virginia, where I had not been licensed previously, the Board members I spoke to were very helpful and facilitated the process without a problem. This was very important to me.

I would hate to see the licensure rates increase so much if it is not necessary. Salaries in West Virginia are considerably less than in other states where fees are comparable to the increases you are talking about. I think this should be considered when the legislature is reviewing this. I took a \$7,000 salary cut plus significant reductions in benefits (much better medical and dental coverage, a better annuity program, etc) to move back to my home state in the same field. I think the lower salaries of counselors in the state should factor into the costs of licensure and license renewal.

Again, it is difficult to respond to the limited information I have received in this postcard announcement from you. I would have less trouble supporting the fee changes if I knew why they were being recommended by the Board. The increase to three times what we have been paying will certainly affect me. I would appreciate having more information.

Sincerely,

*Cindy Wanamaker*  
Cindy Wanamaker, MA, LPC  
Director of Student Development  
Alderson-Broadus College



# EastRidge Health Systems

235 S. Water Street • Martinsburg, WV 25401 • 304-263-8954

July 14, 1998

WV Board of Examiners  
In Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

JUL 20 1998  
LIBRARY

Dear Board of Examiners:

This brief note is in response to a recent notice regarding the increase of application and renewal fees.

Although I can appreciate the need to perhaps increase your fees, I am concerned about the amount of the increase. Unless the Board can demonstrate an increase of 42 percent and 33 percent in their processing expenses, the fee should be raised less than proposed. A doubling of the fees would seem more appropriate initially. However, many of the LPC's I know work in rural, non-profit organizations, on a less than adequate salary. Any increase could create a hardship for some, and thus the State could stand to loose some very qualified professionals. So unless the Board can justify the need for such an increase, the request should be re-evaluated.

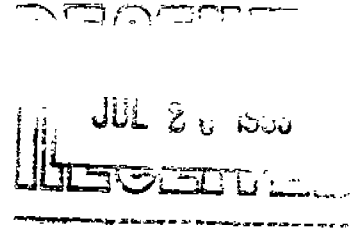
Sincerely,

Ralph Palmer, LPC #1163

Jefferson County Office: 114 W. Liberty Street • Charles Town, WV 25414 • 304-725-7565

Morgan County Office: 404 S. Green Street • Berkeley Springs, WV 25411 • 304-258-2889

MRS. MATHEW F. MOORE  
ROUTE 9, BOX 210  
PARKERSBURG, WEST VIRGINIA 26101



July 16, 1998

West Virginia Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

Sir:

I have received the post card advising me that the WV Board of Examiners has proposed rule changes regarding application and renewal fees to the state legislature, and four questions immediately came to mind.

- 1- What did the original fees cover?
- 2- Does the WV Board of Examiners have a budget?
- 3- How much of the each fee does the state receive?
- 4- Doesn't the Board consider an increase of 140% for new licenses and a 200% for renewal a bit inflationary?

Obviously, I am not in favor of an increase in either fee at this time and will be discussing my concerns with the legislators from this area.

Sincerely,

A handwritten signature in cursive script that reads 'Kathryn Sue Moore'.

Kathryn Sue Moore  
WV #358

P. O. Box 303  
Shepherdstown, WV 25443  
July 17, 1998

WEST VIRGINIA BOARD OF EXAMINERS IN COUNSELING  
100 AUGUST E. PEYTON DRIVE  
SOUTH CHARLESTON, WV 25303-1600

West Virginia Board of Examiners in Counseling  
100 August E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Board Members:

While I understand that the costs of doing the business of the Board must rise as does everything else, it seems to me that a 300% increase in renewal fees is excessive.

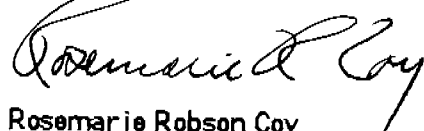
I struggle to maintain a small private practice, and this threefold increase is significant for me. I could tolerate, say, a 40% increase (\$10) this year, and perhaps that could be gradually increased over the next several years. Has the board simply been negligent in its oversight of fiscal needs? Otherwise, how can it justify such an extreme measure?

I am also dismayed that I received no explanation of the reason for the increase. You ask for input, but without knowledge of the motives that precipitated this move, we can hardly be expected to be receptive.

To a well-established practice which earns \$50-100,000.00 yearly (or more), this increase will be hardly noticed, but to those of us struggling alone to make expenses, another \$50.00 per year is painful.

Please reconsider your position.

Yours sincerely,



Rosemarie Robson Coy  
License 1079

7/17/98

West Virginia Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
south Charleston, WV 25303-1600

Re: Proposed fee increase

I do not believe the proposed increase should be approved.

Sincerely,

A handwritten signature in cursive script that reads "Allyson Sammons MA". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Allyson Sammons, MA  
Therapist

UNRECORDED

July 21, 1998

West Virginia Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303

To Whom It May Concern:

I would like to comment on the proposed increase in the application and renewal fees the West Virginia Board of Examiners in Counseling is requesting. Although I do not object in an increase in fees, I think that the proposed fee increases are too high. I think that a more reasonable increase in the application fee would be \$75 to \$100. A more reasonable renewal fee would be \$50.

Thank you for inviting my comments.

Sincerely,

*Robin Ford McNeer*

Robin Ford McNeer, MA, LPC  
HC 77, Box 85B  
Hinton, WV 25951

RECEIVED  
JUL 27 1998

# Olen J. Dodd

P.O. Box 301  
Beckley, WV 25802-0301

Licensed Professional Counselor  
Certified Rehabilitation Counselor

---

---

July 17, 1998

Mr. William E. Mullett  
WV Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

Re: Proposed fee increases

Dear Mr. Mullett:

I received your postcard indicating the Board's proposed rule changes to the state legislature increasing the application fee from \$50 to \$120, and renewal fees from \$25 to \$75. While I agree a fee increase may be in order as I do not recall any increases in the past 10 years, I do not feel the amount of increases are warranted for the renewals. A 200% increase appears exorbitant. A renewal fee of \$50 would be more appropriate. Doubling the initial application fee from \$50 to \$100 would not be unreasonable considering the processes involved in an original application for licensure.

Thank you for the opportunity to present my comments.

Sincerely,



Olen J. Dodd, M.A.  
Licensed Professional Counselor  
Certified Rehabilitation Counselor

RECEIVED

JUL 30 1998

**Larry A. Bell  
6 Wayside Lane  
Bridgeport, WV  
26330**

**July 13, 1998**

**Dear Mr. Mullett,**

***I believe that the renewal fee increase is too high. I think it would be much more reasonable to increase the renewal fee to \$50.00. That would double the current fee. I think that a tripling of the renewal fee is unreasonable.***

**Thank you.**

**Sincerely,**

*Larry A. Bell*  
**Larry A. Bell, L.P.C.**





**KLINE & KLINE ASSOCIATES**

WILLIAM T. KLINE, C.I.C.  
CERTIFIED INSURANCE COUNSELOR  
(304) 257-4244 Fax (304) 257-2567

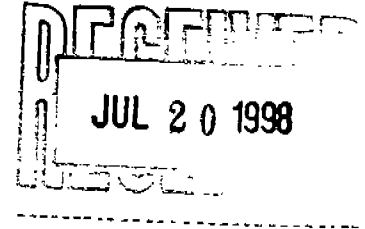
MARLENE FRANCHINI KLINE, B.C.D.  
AMERICAN BOARD CERTIFIED CLINICAL DIPLOMATE  
(304)-257-2584

TO: William Mullett  
WV Board of Examiners in Counseling

RE: Licensing Fees

FROM: Marlene Franchini Kline, BCD *M.F. Kline*  
American Board Certified Clinical Diplomate, #021410  
WV Licensed Professional Counselor, #472  
WV Independent Social Worker, #DP00453588  
American Council of Hypnotist Examiners, #HT693485

DATE: July 15, 1998



Suggested rate increase is excessive, please consider a fair gradual increase. Many practitioners are required to obtain and meet continuing expensive requirements in education annually and licensing annually for multiple certifications.

MFK/eb

**Cindy G. Burdette  
Licensed Professional Counselor  
National Certified Counselor  
1105 New York Avenue  
Martinsburg, WV 25401**

**July 15, 1998**

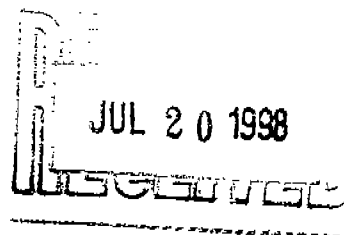
**Dear Mr. Mullett,**

**This letter is in response to the proposed rule changes regarding application and renewal fees to the state legislature. I am a part time self employed counselor and would find the increased fee to be burdensome to my small business. I do realize our current renewal fee is much less than that of other similar professionals. If the Board felt it was necessary to raise the renewal fee, I would propose an increase from \$25 to \$50. This would be much more managable to part time small businesses like myself. Thank you for your consideration of my comments.**

**Sincerely,**

*Cindy G. Burdette*

**Cindy G. Burdette**



*Annette Jennings*  
*213 Rollingwood Drive*  
*Beckley, West Virginia 25801-2335*

---

July 27, 1998

William E. Mullett, Ph. D.  
WV Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Dr. Mullett,

I am writing to request that the West Virginia Board of Examiners not increase the application or renewal fees. Most counselors are not employed by agencies which will cover these costs. Furthermore, I personally do not feel that the Board provides an abundance of services for licensees to warrant this increase.

Your attention in that matter is appreciated.

Sincerely,

*Annette Jennings*

Annette Jennings, M.A.

JUL 30 1998

UNREGISTERED

JUL 30 1998

Mr. Mullet and Board of Examiners:

While I understand the need to raise application and renewal fees, tripling (or nearly tripling) the amount of money due is certainly excessive. I can't imagine that such a substantial raise is necessary or warranted, nor can I recall such a "jump" in any other facet of our lives (food, taxes, gasoline, etc). My income has certainly not tripled, nor do I expect my licensed status to triple my income. An increase in fees of this magnitude would be too much of a hardship — and is not very encouraging to potential counselors.

JUL 30 1998

Mary E. Burkhardt  
MA, rec, LPC  
PO 1622  
Martinsburg, WV 25402

7-25-98

West Virginia Board of Examiners  
100 August E. Peyton Drive  
South Charleston, WV 25303-1600

July 28, 1998

Dear Sir or Madam:

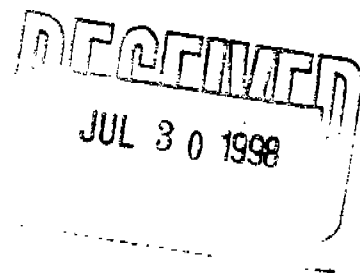
This response is sent in protest to the proposed application and renewal fee increases for licensure. As a professional counselor working in the field, I am strongly opposed to the proposed, and might I add outrageous, fee increase.

Thank you for your time and consideration in this matter. I sincerely hope that the opinion of the professionals working in the field will be counted.

Sincerely,

*Cynthia A. McManus M.A. NCC LPC LSW*

Cynthia A. McManus M.A. NCC L.P.C. LSW  
Adolescent Therapist





WEST VIRGINIA DEPARTMENT OF EDUCATION AND THE ARTS  
**DIVISION OF REHABILITATION SERVICES**

JAMES S. JEFFERS, DIRECTOR

July 24, 1998

West Virginia Board of Examiners in Counseling  
100 Augus E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Mr. Mullett:

I find it extremely difficult to justify raising of the renewal fee for the position of a Licensed Professional Counselor. Until this past year, I have seen very little from the West Virginia Board of Examiners in Counseling other than mismanagement of funds and lost checks. I would rather see some effort put into the Board establishing some credibility among its members and working on steps to augment communication at all levels of the organization before jumping into a substantial price increase.

Thanks for hearing me out on this matter.

Sincerely,

Terry Hawkins, LPC  
Client Service Specialist

TH/mae

RECEIVED

JUL 27 1998

CENTRAL UNION BUILDING • 40 14TH STREET • WHEELING, WEST VIRGINIA 26003  
TELEPHONE: (304) 238-1092 • FAX: (304) 238-1096



WEST VIRGINIA DEPARTMENT OF EDUCATION AND THE ARTS  
**DIVISION OF REHABILITATION SERVICES**

JAMES S. JEFFERS, DIRECTOR

July 24, 1998

Mr. William E. Mullett  
West Virginia Board of Examiners in Counseling  
100 August E. Peyton Drive  
South Charleston, WV 25303-1600

Dear Mr. Mullett:

I feel the proposed increase in the LPC renewal fee of 200% is very excessive. I understand this has not changed since its inception and I know operational expenses are rising. I would accept an increase of 100% to \$50.00.

Hopefully, I will not have to reapply and thus that proposed increase will not affect me. However, I feel that proposed increase is excessive.

Per the available time allowed by employers to attend professional training and the cost of seminars it is difficult and expensive to maintain the license and this additional renewal cost would be an additional burden.

Fees should be changed more gradually than the proposed increases.

Thank you very much for your consideration of these comments.

Sincerely appreciative,

*William M. Lindley II, MS, LPC*  
William M. Lindley II, MS, LPC

RECEIVED  
JUL 27 1998

P.O. BOX 869 • 124 SOUTH HIGH STREET • MORGANTOWN, WEST VIRGINIA 26505-0869  
TELEPHONE: (304) 285-3155 • FAX: (304) 285-3158

655 ½ West Main Street  
Clarksburg, West Virginia 26301

July 13, 1998

William E. Mullett  
WV Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
S. Charleston, WV 25303-1600

Dear Mr. Mullett:

This is to advise that I am opposed to increased renewal fees for licensed counselors in West Virginia from \$25.00 to \$75.00.

The \$25.00 is a high charge for what counselors are being provided by the Board of Examiners in Counseling.

There has been no salary increase as the result of being a licensed counselor in West Virginia.

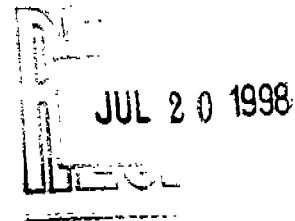
Most practicing counselors are ethical and try to provide maximum quality services to clients.

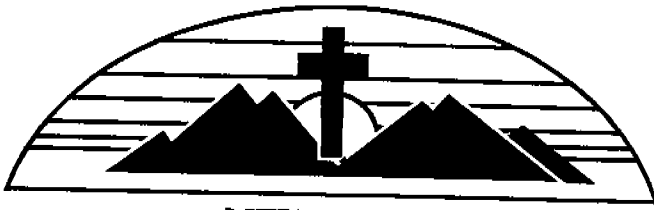
Sincerely yours,



John G. Riley  
Senior Rehabilitation Counselor

JGR:mbh





NEW HOPE  
Christian Counseling Center

David Humpherys, M.D.  
Christian Psychiatrist  
Bobby Miller, M.D.  
Christian Psychiatrist  
C. Stephen Edwards, M.D.  
Christian Psychiatrist

To Whom It May Concern,

I am opposed to the increase in renewal fees. I feel that it is necessary to consider the other demands placed on counselors to keep their license updated and to continue practicing, for example, the cost of continuing education credits and the cost of annual malpractice insurance, etc...

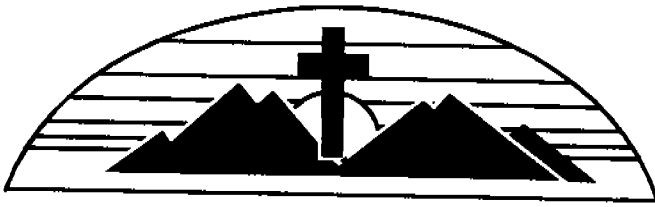
I know that the Board of Examiners works for the best interest of the counselors, but I do disagree with the change in fees. If a change must occur, I feel that it needs to be one of gradual increase, and all counselors need to be made aware of the utilization of these fees.

Sincerely,

Wendy K. Manns, MA, LPC  
Wendy Manns, MA, LPC #1358

RECEIVED  
JUL 27 1998

1225 Sixth Avenue  
Huntington, WV 25701  
(304) 526-9189



**NEW HOPE**  
**Christian Counseling Center**

*David Humphreys, M.D.*  
Christian Psychiatrist  
*Bobby Miller, M.D.*  
Christian Psychiatrist  
*C. Stephen Edwards, M.D.*  
Christian Psychiatrist

To Whom It May Concern,

I am opposed to the increase in renewal fees. I feel that it is necessary to consider the other demands placed on counselors to keep their license updated and to continue practicing, for example, the cost of continuing education credits and the cost of annual malpractice insurance, etc...

I know that the Board of Examiners works for the best interest of the counselors, but I do disagree with the change in fees. If a change must occur, I feel that it needs to be one of gradual increase, and all counselors need to be made aware of the utilization of these fees.

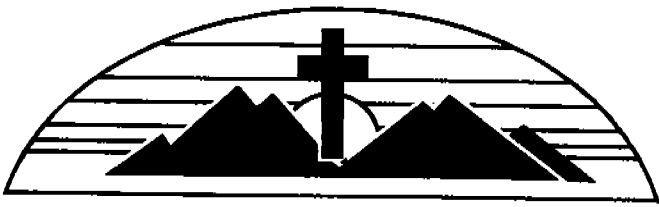
Sincerely,

*Melissa Martin MA, LPC*

Melissa Martin, MA, LPC

RECEIVED  
JUL 27 1992

5130 MacCorkle Avenue S.W.  
Charleston, WV 25304  
(304) 926-8600



**NEW HOPE**  
**Christian Counseling Center**

*David Humphreys, M.D.*  
*Christian Psychiatrist*  
*Bobby Miller, M.D.*  
*Christian Psychiatrist*  
*C. Stephen Edwards, M.D.*  
*Christian Psychiatrist*

To Whom It May Concern,

I am opposed to the increase in renewal fees. I feel that it is necessary to consider the other demands placed on counselors to keep their license updated and to continue practicing, for example, the cost of continuing education credits and the cost of annual malpractice insurance, etc...

I know that the Board of Examiners works for the best interest of the counselors, but I do disagree with the change in fees. If a change must occur, I feel that it needs to be one of gradual increase, and all counselors need to be made aware of the utilization of these fees.

Sincerely,

*Angie Juniper, MA, LPC*  
Angie Juniper, MA, LPC

JUL 20 1998

5130 MacCorkle Avenue S.W.  
Charleston, WV 25304  
(304) 926-8600

July 22, 1998

William E. Mullett  
West Virginia Board of Examiners in Counseling  
100 Angus E. Peyton Drive  
South Charleston, WV 25303 - 1600

Dear Mr. Mullett:

I received in the mail a post card indicating the Board of Examiners' proposal to change the rules regarding application and renewal fees to the State Legislature.

First, I want to make it clear that I am opposed to these increases and these are the reasons:

1. To date, I am not aware that we have received any information as to what the current application and renewal fees are used for and how the money is distributed and utilized.
2. Before I would be in favor of these increases, I would like to see a complete accounting of budgetary expenditures of the West Virginia Board of Examiners in Counseling over the past several years to clarify in my mind what the purpose and function of the Board actually is.
3. Before I would ever be supportive of any increase in renewal fees, I would like to also receive from the Board of Examiners a more detailed and explicit description of the renewal process. Specifically, we should know in advance what curricula would be appropriate for renewing our license rather than taking part in courses and then waiting to see if someone approves.
4. Finally, I would be in favor of, or expect to have, some input as a Rehab. professional in the voting process for new Board members. Also, I would favor the election of at least one representative from the ranks of Rehabilitation Counselors across this state to the Board of Examiners.

In my opinion, the whole process from day one has been confusing, subjective, and lacking in purpose and detail. Once these things become clearly explained and documented, I would feel more able to offer or withdraw support for an increase in renewal fees.

Thank you for the opportunity to respond and I certainly hope to hear back from you.

Sincerely,

Jeffrey W. Myers  
Counselor, LPC  
Rt. 2 Box 241-A  
CALDWELL, WV  
24925

