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Hearing Date: May 20, 2024

Today's Date: May 21, 2024

Agency: CDP Board

Rule Number(s): 4758-5-07, 08, 09, 10; 4758-6-07, 08, 09, 10; 4758-8-04

If no comments at the hearing, please check the box. ✓

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

**In-Person Comments: NONE**

Individual(s)/Organization(s)	Rule	Comments

**Written Comments:**

Individual(s)/Organization(s)	Rule	Comments
Evan Abood, OCPSA	4758-6-08, 09	Concern that the rule would remove the ability of the OCPSA to do Community Based process work
Nick Violet, RA	4758-5-07, 08, 09	Did not want the RA time period to change; Concern that he already had hours that exceeded the content area for P6
Jennifer Benson, OCPC	4758-5-07, 08, 09, 10	Clarification if work experience hours under the RA can be considered for the OCPSA if the RA is expired. Clarification if ethics and cultural humility hours are part of P6. Clarification on what is a board approved CE entity and if new definitions for the OCPC education areas will be provided.
Erin Glossop/Amanda Sines, Government Advantage Group, representing School Counselors Assn.	4758-6-07, 08	Requested a Zoom mtg to provide clarification on why school counselors were added to RA approved supervisors but not professional counselors.
Cindy Woodford, Family Resource Center	4758-5-8, 10; 4758-6-0	Concern that not enough OCPC to maintain coalition programming, concern that not enough movement to higher certification without a degree; language of supervision of staff and volunteers could be problematic as may only have one or the other ; question regarding higher certifications requiring

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		specific degree types. Concern on supervision requirements for pieces of the OCPS scope of practice requirements and suggested a time period to meet the requirements and concern that it could take four years to move through RA to higher certification .
Zachary Thomas, OCPS	4758-5-9,10, 4758-6-09	Comments if any degree is acceptable for the OCPS/OCPC . Also commented on the requirement language of supervising staff <u>and</u> volunteers and concern of the supervision rule for planning and evaluation work and managing prevention programs to be supervised by the OCPC or CHES.
Michael Lewis, LPCC-S, Ohio Counseling Assn, President Elect	4758-5-08	Wanted LPC and LPCC to be able to apply directly for the OCPSA certification
Jamie Belcher, OCPC, CHES	4758-5-08, 4758-6	Supportive of SW or CHES can apply directly for the OCPSA. Supportive of rule changes and asked that if someone is providing supervision to prevention certificate holders that they have some prevention education/training and knowledge of prevention science.
Tom Mann, Manager, State Government Relations ATA Action	4758-8-04	Wanted the rule to incorporate “asynchronous modalities” into the definition of telehealth.

## **Consolidated Summary of Comments Received**

*Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).*

4758-5-07- One comment wanting the time period of holding the RA certificate to remain.

4758-5-08- One comment wanting to allow more hours in ethics and cultural humility than in the rule for the total of the 45-hour requirement in the different prevention education content areas. Another just wanted clarification that yes, the actual required remainder of hours in P6 could be nine hours if the max number of hours in ethics or cultural humility were obtained. Clarification that work experience under the RA would meet the requirements even if RA was expired while applicant submitted application, and that was permissible in the rule as written. There was a request to allow LPC and LPCCs to also be able to apply directly for the OCPSA as SW and CHES were added, but the LPC/LPCC do not have prevention in their scope of practice as SW and CHES do, and the LPC/LPCC training and education as noted in the comments provided are in clinical counseling. Prevention strategies and activities do not include counseling or clinical services thus not included to apply directly for the OCPSA.

4758-5-09- Similar comment wanting to allow more hours in ethics and cultural humility than in the rule for the total -hour requirement in the different prevention education content areas to obtain the OCPS. Concern that current social workers or counselors providing supervision under current scope would take four years to move to higher certification but requirement for the OCPS is only 2000 hours ( approx. one year) of work experience and there is no length of time requirement to stay as an RA or OCPSA, so someone could move to the OCPS quickly if they desired. Also, a concern regarding community and coalition work whereas most coalition programming could be maintained under the OCPS with the

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expanded scope or practice proposed, or even the OCPSA/RA under supervision.

4758-5-10 – Comments wanting to know if new education definitions will be provided to match the education content areas, and they will be published. Language in D(2) of supervising staff "and" volunteers may be problematic as many agencies only employ one or the other, which this change was made.

4758-6 – Some comments that interpreted that the rules were providing more restrictions to the supervision of the OCPS which in fact the scope of practice for the OCPS was expanded to do more prevention activities without supervision. Engagement in more advanced community level planning should be supervised by those with demonstrated competency due to its necessary knowledge of prevention science by exam and certification, thus supervision requirements under the scope of practice rule of 4758-6 are reflective of that demonstrated competency.

Some of the comments regarding moving up to higher certification seem to have a misinterpretation that the OCPC is the certification that needs to be strived for, when in fact some people may not need the OCPC unless they desire to consult independently. The OCPC is available for there for those who desire that achievement and recognition of their years of experience in administering or supervising prevention services, and to *independently* conduct planning and evaluation at the community level or *independently* manage prevention programming. Most coalition work and prevention programming can be done within the OCPS scope of practice. Other comments regarding removing barriers to the OCPS or OCPC by removing the degree requirement, aligning with other certifications , or not allowing certain licenses without prevention demonstrated competency would require ORC changes.

4758-8-04 One comment desiring the incorporation of “asynchronous modalities” into the definition of telehealth .The Board follows the state statutes in ORC regarding defining telehealth in Ohio. OAC 4758-8-04 is an ethics professional conduct rule.

### **Incorporated Comments into Rule(s)**

*Indicate how comments received during the hearing process were incorporated into the rule(s). If no comments were incorporated, explain why not.*

<b>Comment Received</b>	<b>Rule</b>	<b>How Incorporated</b>
Language in D(2) of supervising staff "and" volunteers may be problematic as many agencies only employ one or the other.	4758-5-10	Changed to read as supervision of staff <b>or</b> volunteers