



ACADEMIC AFFAIRS

December 11, 2013

1807
University of Maryland,
Baltimore

The Honorable Barbara A. Mikulski
United States Senator
901 S. Bond Street, Suite 310
Baltimore, MD 21231

The Honorable Ben L. Cardin
United States Senator
100 S. Charles Street, Suite 1710
Baltimore, MD 21201

1856
University of Maryland,
College Park

The Honorable Elijah E. Cummings
United States House of Representatives
1010 Park Avenue, Suite 105
Baltimore, MD 21201

The Honorable C.A. Dutch Ruppersberger
United States House of Representatives
375 West Padonia Road, Suite 200
Timonium, MD 21093

1865
Bowie State University

1866
Towson University

1886
University of Maryland
Eastern Shore

1898
Frostburg State
University

1900
Coppin State University

1925
Salisbury University

1925
University of Baltimore

1925
University of Maryland
Center for Environmental
Science

1947
University of Maryland
University College

1966
University of Maryland,
Baltimore County

The Honorable Steny H. Hoyer
United States House of Representatives
6500 Cherrywood Lane, Suite 310
Greenbelt, MD 20770

The Honorable Donna F. Edwards
United States House of Representatives
5001 Silver Hill Road, Suite 106
Suitland, MD 20746

The Honorable John K. Delaney
United States House of Representatives
6 West Washington Street, Suite 210
Hagerstown, MD 21740

Dear Congressional Members:

The Department of Defense (DoD) is expected to implement new federal restrictions on the practice of professional counselors (Interim Final Rule, 76-FR 80741-80744). If implemented, this rule will negatively affect universities within the University System of Maryland. We strongly believe that the restrictions imposed by this rule are arbitrary and unnecessary and should not be implemented as currently written. We respectfully bring to your attention this rule's negative impact on Maryland's higher education institutions and ask for your assistance in conveying by December 20, 2013 to the Department of Defense and the Office of Management and Budget (OMB) the need to suspend this rule's implementation until further review.

Several University System of Maryland (USM) deans, along with the Licensed Clinical Professional Counselors of Maryland (LCPCM), brought to our attention that the

interim rule would place new restrictions on independent counselors who qualify to provide mental health services in TRICARE – a major component of the Military Health System that combines the health care resources at military hospitals and clinics with networks of civilian health care professionals.

Beginning January 1, 2015, DoD will allow **only** graduates of colleges and university programs accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) to participate in the TRICARE program. CACREP endorses programs that confer master's degrees in "counseling" or "counselor education," but not in psychology. The majority of programs that train professional counselors in Maryland are psychology programs and therefore ineligible for CACREP. Other programs that may be CACREP-eligible would face astronomical costs to hire additional faculty and fundamentally re-engineer courses and curricula to gain approval. As a result, no graduate program in Maryland is CACREP-accredited in mental health counseling. Beginning in January 2015, all graduates from the seven USM psychology programs that train license-eligible counselors will be permanently barred from providing services in the TRICARE program; all of Maryland's graduates will be permanently excluded.

The psychology profession has developed accreditation standards for master's-level programs that are equally rigorous to CACREP. Deliberations over the relative merits are ongoing and best left for the educational community. However, when the DoD selects a single accrediting standard that excludes well-qualified, state-licensed mental health practitioners who have earned master's degrees from an accredited university (and passed a national examination for clinical counseling), we are obligated to issue a challenge and to bring this matter to your attention. In the past, TRICARE has recognized a breadth of expertise in the specialty areas of counseling and the proposed interim rule is a sharp departure.

The interim rule implies that psychology programs lack the quality, rigor and accountability necessary to prepare professional counselors. Moreover, the proposed rule implies that graduates of USM psychology programs would be unprepared to address the behavioral health needs of warfighters and their families. These implications are wholly without merit and will negatively impact enrollment in our programs as prospective students realize that even with a master's degree, passage of a national qualifying exam, and state licensure, they are disqualified from serving tens of thousands of TRICARE beneficiaries in Maryland.

A coalition of veterans, university educators, USM leadership and students, professional counselors, and staff from the American Counseling Association met with Dr. John Davison, of the Department of Defense, on November 15, 2013 to press for more inclusive standards in the TRICARE regulations. The impact of this meeting and the final rule's language remains unknown at this time.

Specifically, we ask for your support in amending the Interim Final Rule with the following bracketed deletions and highlighted substitute language:

"A master's or higher level degree [in counseling from a program in mental health counseling or clinical mental health counseling that is accredited by

Council for Accreditation of Counseling and Related Educational Programs (CACREP)] FROM A REGIONALLY ACCREDITED INSTITUTION IN EITHER PSYCHOLOGY OR MENTAL HEALTH COUNSELING , OR AN EQUIVALENT TITLE; a state license [in mental health counseling at the “clinical” or] AT the higher or highest level available in states that have tiered licensing schemes FOR PROFESSIONAL COUNSELORS; the passage of the National Clinical Mental Health Counseling examination (NCMHCE); and a well-defined scope of practice for practitioners.”

80742 Federal Register / Vol. 76, No. 248 / Tuesday, December 27, 2011 / Rules and Regulations

Maryland is home to over 29,000 active duty military personnel. The institutions that represent the USM have had a solid track record in understanding the intricacies of military culture and community and are willing to work with DoD for additional specialized training. Active duty or veteran, these members of the military family are our neighbors, our students, and in some cases, our faculty. We want to ensure that military men and woman not only have access and opportunity to USM academic programs and military-specific services, but also to quality care and support provided by USM graduates.

As provosts of USM institutions, we thank you for being a champion for Maryland’s students and the University System of Maryland. We are grateful for your continued efforts in support of our institutions and urge your strong leadership on this issue.

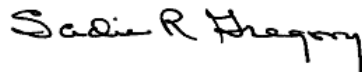
Sincerely,

USM Provosts



BOWIE STATE UNIVERSITY

Dr. Weldon Jackson
Provost and Vice President for Academic Affairs



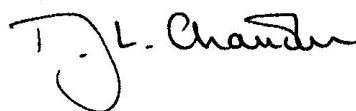
COPPIN STATE UNIVERSITY

Dr. Sadie Gregory
Provost and Vice President for Academic Affairs



FROSTBURG STATE UNIVERSITY

Dr. William P. Childs
Interim Provost and Vice President for Academic Affairs



TOWSON UNIVERSITY

Dr. Timothy J.L. Chandler
Provost and Vice President for Academic Affairs



UNIVERSITY OF BALTIMORE

Dr. Joseph S. Wood
Provost and Senior Vice President for Academic
Affairs



UNIVERSITY OF MARYLAND, BALTIMORE

Dr. Bruce Jarrell, MD, FACS
Chief Academic and Research Officer and Senior
Vice President



UNIVERSITY OF MARYLAND UNIVERSITY COLLEGE

Dr. Marie A. Cini
Provost and Senior Vice President for Academic
Affairs