



LOUISIANA

Licensed Professional Counselors Board of Examiners

May 22, 2025

Sent via Electronic Submission

To: Louisiana Department of Justice
Public Protection Division-
Occupational Licensing Review Program
olrp@ag.louisiana.gov

From: Licensed Professional Counselors Board of Examiners

To Whom It May Concern:

The Licensed Professional Counselors Board of Examiners has proposed amendments to LAC 46: LX.707. To facilitate the Department of Justice's review of the proposed rule, the Licensed Professional Counselors Board of Examiners provides answers to the following questions:

1. Describe any relevant factual background to the occupational regulation and the purpose of the occupational regulation.

Licensed Professional Counselors (LPCs) authorized to supervise provisional licensees would be required to watch a one-hour video with multiple-choice questions. The rule mandates that, every two years, before submitting a renewal application, LPC Board-Approved Supervisors must complete this supervisor training and submit a Certificate of Completion.

The video would cover essential topics related to board regulations, including any changes to regulatory requirements. Upon completion, the board office would issue a Certificate of Completion, which must be submitted with the renewal application via the online portal. The certificate would also be automatically available on the licensee's online portal.

2. Is the occupational regulation within the scope of the occupational licensing board's general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope.

In accordance with the Louisiana Administrative Procedures Act (R.S. 49:4950 et seq.) and through the authority of the Mental Health Counseling Licensing Act (R.S. 37:1101 et seq.).

3. Check all of the following that apply as reasons the occupational regulation is subject to review

- Other activity: Active state supervision to ensure compliance.

4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against?

The policy of the Louisiana Mental Health Counselor Practice Act, as stated in LA R.S. 37:1103, is that activities of such persons in the mental health counseling area should be regulated for the protection of the public health, safety, and welfare and to provide for the regulation of the practice of mental health counseling in the state of Louisiana.

5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why.

The Board is not aware of any less restrictive alternatives. Many states require a jurisprudence exam, along with a fee, as part of the regulatory requirements for becoming a board-approved supervisor. While the Louisiana Board does not require an exam for supervision privileges, it believes that providing additional information through the online portal and board website would strengthen supervision regulations.

As part of the renewal process, LPC Board-Approved Supervisors would be required to watch an informational video every two years. This video would educate supervisors on current regulatory requirements and highlight common public and provisional licensee complaints. Unlike other states, there would be no test or fee for obtaining the certificate of completion.

6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed.

The Fiscal and Economic Impact Statement (FEIS) was submitted and approved. The notice of intent was sent to the Louisiana Register along with the required Oversight Committees. The Notice of Intent was published in the March 2025 Louisiana Register with public comments being accepted until April 10, 2025. The Board did not receive any requests or public comments and therefore did not conduct a public hearing.

7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order?

No.

8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant.

Roy Salgado, Jr. (Active), Laura Fazio-Griffith (Active), Nakeisha Pierce (Active), Earnest Airhia (Active), Chastity Butler (Active), Abigail Hays (Active), Kristal Hebert (Active), Amanda Dossaji (Active), Foley Nash (Active), Mark Reynaud (Active), Kelly Austin (Active).

9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule?

No.

The Board did not receive any requests or public comments and therefore did not conduct a public hearing. Should you have any questions or need any additional information, please contact Jamie S. Doming or Raelene Lundin at (225) 295-8444 or via email to lpcboard@lpcboard.org.

Respectfully,



Raelene Lundin

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