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Subject: Support for Supervision by Licensed Clinical Professional Counselors (LCPCs) for Licensed Professional Counselors (LPCs)

Dear Members of the Kansas Behavioral Sciences Regulatory Board,

The Kansas Counseling Association (KCA) is writing to express our support for the current policy and statutory requirements stipulating that supervision for Licensed Professional Counselors (LPCs) be provided exclusively by Licensed Clinical Professional Counselor (LCPC) supervisors. This ensures that supervision is grounded in counseling-specific principles, legal and ethical standards, and essential competencies. Such an approach provides the highest level of protection for the public by ensuring that counselors are properly supervised to practice within their professional scope. This is in alignment with the requirements of K.S.A. 65-5818 for LPCs working under a clinical training plan.

Rationale:

1. Professional Competency and Public Protection:

The counseling profession is unique in its emphasis on a developmental, wellness, and strength-based approach to mental health care. LPCs are trained in these specific models, and supervision by LCPC supervisors ensures that emerging professionals continue to develop these core competencies. Supervision by LCPC supervisors fosters consistency in practice and competency, which is critical to protecting the public by ensuring the delivery of high-quality, professional counseling services.

2. Regulatory and Ethical Compliance:

Supervision by LCPC supervisors reinforces a strong commitment to the legal, regulatory, and ethical standards unique to the counseling profession. LCPC supervisors are well-versed in Kansas's specific legal guidelines (e.g., K.S.A. 102-3-12a on

unprofessional conduct) and emphasize the importance of adhering to these standards and ethical standards of the profession. This profession-specific supervision ensures that LPCs are well-prepared to offer competent and ethical care that aligns with the legal and regulatory requirements of the state of Kansas. By maintaining LPC supervision within the profession, we ensure public safety through legal and ethical consistency and accountability.

The KCA is actively engaged in supporting this recommendation. We are dedicated to working to connect LPCs with qualified LCPC supervisors through our network. This includes identifying a comprehensive list of supervisors willing to provide supervision and facilitating introductions between LPCs and potential supervisors. We consistently advocate for the importance of these supervisory standards in various forums, including professional development events and policy discussions.

In conclusion, the KCA firmly supports the policy that LPCs should receive supervision exclusively from LCPC supervisors. This standard ensures public protection by fostering legal and ethical compliance, theoretical consistency, and professional accountability within the counseling profession. As advocates for the highest standards in mental health care, we believe that maintaining counseling-specific supervision is essential to ensuring the quality, integrity, and safety of services delivered to our communities.

We call on regulatory bodies in Kansas to uphold this standard to ensure the continued growth, integrity, and public trust in the counseling profession.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda', with a stylized flourish at the end.

Amanda Petrik-Gardner, LCPC
President
Kansas Counseling Association