



March 2, 2018

Susan Hammonds-White, EdD, LPC  
President

Tennessee Board of Licensed Professional Counselors, Licensed Marital and Family  
Therapists and Licensed Pastoral Therapists  
665 Mainstream Drive  
Nashville, TN 37243

Dear President Hammonds-White:

The American Association for Marriage and Family Therapy (AAMFT) thanks you for your service to the mental health field and the Tennessee Board of Licensed Professional Counselors, Licensed Marital and Family Therapists and Licensed Pastoral Therapists (Board). AAMFT represents the professional interests of over 62,000 Marital and Family Therapists (MFTs) in the United States, including MFTs in Tennessee. The Tennessee Association for Marriage and Family Therapy, the state organization for MFTs, is affiliated with AAMFT. AAMFT would like to voice our concerns of unqualified providers attempting to provide mental health services.

Marital and Family Therapy is a nationally and internationally recognized profession. MFTs are licensed to provide mental health services in all 50 states and the District of Columbia. Public and private health plans recognize MFTs as independent providers of mental health services. Marital and Family Therapy is one of the five federally recognized core mental health professions, and MFTs are recognized as eligible providers by the Department of Veterans Affairs. MFTs diagnose and treat mental health disorders and provide services to individuals and groups. Licensed MFTs must meet a rigorous standard in order to independently provide services. Qualifications for licensure in Tennessee including the completion of a Master's or Doctoral Degree in marital and family therapy or a related field, 2 years of post-graduate supervised clinical experience, and passing an examination. Due to the vulnerable needs of individuals and groups seeking mental health treatment, AAMFT believes a high standard for licensure is needed for all professions seeking to provide mental health services.

As you may know, the Tennessee General Assembly is considering several proposals related to the treatment of post-traumatic stress disorder for first responders. House Bill 1510 (HB 1510) and Senate Bill 1797 (SB 1797) would allow qualified mental health providers, including physicians; psychologists and psychological examiners; MFTs, professional counselors; clinical social workers; and psychiatric mental health nurse practitioners, to provide mental health treatment for first responders suffering from post-traumatic stress disorder. AAMFT supports allowing qualified mental health providers to provide treatment to first responders, and others seeking assistance. However, there

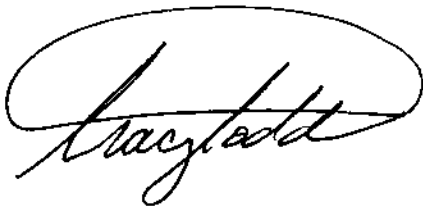
are attempts to include providers, such as occupational therapists, who are not qualified to treat mental health.

Occupational therapists are not recognized as mental health providers by the Department of Veterans Affairs and have not been included as one of the five federally recognized core mental health professions. In Tennessee, occupational therapists are not able to diagnose and treat mental health disorders. Unlike the high clinical standards that MFTs must meet, per Tenn. Comp. R. & Regs. 1150-02-.04, occupational therapists are not required to have mental health diagnosis courses or post-graduate supervised experience in treating mental health. Current occupational therapy education standards from the Accreditation Council for Occupational Therapy Education do not include courses on the use of the Diagnostic and Statistical Manual of Mental Disorder. The scope of practice in Tennessee for occupational therapists includes training in the use of prosthetics, and enhancing functional mobility through wheelchair management. While AAMFT believes occupational therapists play a role in the healthcare system, we do not believe that these skills qualify a person to provide mental health services.

As President of the Board, you know the harm that an unqualified or incompetent mental health provider may inflict upon unsuspecting members of the public. The board's obligation to protect the public includes protecting against providers who are acting outside of their scope of practice. First responders and our nation's veterans put the safety of our country and community ahead of their own. Tennessee's first responders should be protected from untrained mental health providers just as the Department of Veterans Affairs prohibits occupational therapists from providing services for which they are unqualified.

Thank you for your time and consideration. AAMFT respectfully requests the Board to consider these concerns. Please feel free to contact Laura Evans, AAMFT's State Government Affairs Manager, at [levans@aamft.org](mailto:levans@aamft.org) or via phone at 703-253-0453 if you need additional information or have any questions or concerns.

Sincerely,

A handwritten signature in black ink, enclosed in a large, thin oval. The signature is cursive and appears to read "Tracy Todd".

Tracy Todd, PhD  
Chief Executive Officer  
American Association for Marriage and Family Therapy