

RULEMAKING DOCKET NO. 24-1501-2601
RECORD OF PUBLIC COMMENTS

Pursuant to Idaho Code section 67-5225(2)(b), the Division of Occupational and Professional Licenses (DOPL) provides the following record of public comments received for Rulemaking Docket No. 24-1501-2601, involving changes to the Rules of the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists (IDAPA 24.15.01).

Through this rulemaking, the Division seeks to reduce a regulatory burden on marriage and family therapists by decreasing the direct supervisory hour requirements for marriage and family therapists.

Procedural Overview:

The Proposed Rule notice for this docket was published in the [August 5, 2026](#) Administrative Bulletin, in accordance with Idaho Code section 67-5225(2)(a). This notice contained details on how to submit public comments and participate in the public hearing set for August 13, 2026.

The 21-Day Public Comment Period began on August 5, 2026, and concluded on August 26, 2026.

August 13, 2026, Public Hearing:

The public hearing was attended by the following person(s):

- **Veritas Advisors:** Liz Hatter

There were no public comments received during the August 13, 2026, public hearing.

Next Steps:

The Board of Professional Counselors and Marriage and Family Therapists voted to adopt Pending Rules at their August 14, 2026, Board meeting, through a special motion that authorized the Board chair to proceed with moving the rules to pending if no substantive comments were received during the remainder of the public comment period.

Materials pertaining to the rulemaking, including any available preliminary rule drafts, can be found on the DOPL website via the following link: <https://dopl.idaho.gov/rulemaking/>

For assistance on technical questions concerning this rulemaking, please contact **Ryan Bernard, Legislative & Regulatory Affairs Chief**, at (775) 870-7926.

RULEMAKING DOCKET NO. 24-1501-2601
DIVISION RESPONSE TO PUBLIC COMMENTS

The table below presents the Division's response to each public comment submitted for this rulemaking docket. The corresponding public comments appear on the following page(s) of this document.

Date	Submitted By	Response
5/29/2026*	Pete Serra	These comments were communicated to the Board, and were deemed to be outside the scope of what the current rulemaking set out to accomplish.
6/3/2026*	Denise Winkel	These comments of support were communicated to the Board.
8/8/2026	Gretchen Scott	These comments were communicated to the Board, and it determined that reducing the financial barriers incurred from graduate programs is outside of the Board's scope.
8/14/2026	Maren Bennett	These comments were communicated to the Board, and the requests for additional training or to increase Continuing Education requirements for supervisees was deemed to be outside of the scope of this rulemaking.
8/23/2026	Brian Jones	These comments were communicated to the Board, and the request to address the shortage of Marriage and Family Therapists by increasing pay was deemed to be outside of the Board's scope.

** Comment received outside of the 21-Day Public Comment Period (August 5 – August 26, 2026)*



Proposed MFT changes

From Pete Serra [REDACTED]
Date Fri 5/29/2026 2:14 PM
To Ryan J. Bernard <ryan.bernard@dopl.idaho.gov>

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Hi Ryan,

I received an email announcing the possibility for changes to Marriage and Family Therapist licensure requirements. It looks like you are the person who receives written comment on the matter, so I just wanted to offer my quick thoughts. As an LPC working on completing my hours to obtain Clinical licensure, my immediate request would simply be, if there were to be a reduction in direct supervision hours for MFTs (currently 3000 hours), could there also be a reduction in hours for individuals seeking their "C" which also has a 3000-hour requirement?

I'm sure there is much more to it than that, but since I had a chance to offer written comment, there it is!

Thank you,

Pete Serra, LPC

Development Counselor - Nampa, ID

Dept. of Development Counseling Services

The Church of Jesus Christ of Latter-Day Saints

Mobile: [REDACTED] | Office: [REDACTED]



LMFT changes

From Denise Winkel [REDACTED]
Date Wed 6/3/2026 11:14 AM
To Ryan J. Bernard <ryan.bernard@dopl.idaho.gov>

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Hi, Ryan!

Sorry I am late to the party. What became of the vote to lower the hours to become an LMFT?

I have been working on getting my LMFT for a while. I have 46 more hours of supervision and less than 60 couple clinical hours left to be completed. I may have all of these complete before the changes are in place.

I am in favor of less supervision and clinical hours needed to become an LMFT.

Thank you for your time,

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Denise Winkel, LCPC-8331224
2021-2023 ICA Conference Chairman
[REDACTED]



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Opposition to Proposed Reductions in LMFTA Supervision Requirements - 2027 Legislative Session

From Gretchen Scott [REDACTED]
 Date Sat 8/8/2026 8:42 PM
 To Ryan J. Bernard <ryan.bernard@dopl.idaho.gov>
 Cc Gretchen Scott [REDACTED]

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Dear Ryan Bernard, Legislative & Regulatory Affairs Chief

I am writing as a Washington State Licensed Marriage and Family Therapist (LMFT) in the Spokane area, and also hold an Idaho State Telehealth License, to express my strong opposition to any proposals that reduce clinical supervision hours or oversight for Marriage and Family Therapy Associates (LMFTAs).

In addition to running a private practice, I employ Associate therapists and have served as a site supervisor for Whitworth University's MFT program. I am currently completing my credentialing to become an AAMFT Approved Supervisor (which requires a rigorous 30 hour course and 18 months of Supervision of Supervision). My daily work with emerging clinicians reinforces what experience has taught me: clinical supervision is the primary safeguard for public safety in mental health care.

Therapy is a complex discipline operating at the intersection of clinical science, ethics, and law. Associates frequently navigate intricate legal dilemmas, high-risk client presentations, complex business practices, and nuanced ethical gray areas. Reducing required supervision hours short-changes clinicians of essential mentoring and exposes vulnerable populations to heightened risk.

Even with six years of clinical experience, I regularly consult with my own mentor on complex cases, such as a recent high-acuity situation involving a client experiencing a first-psychotic break episode. Professional growth is continuous, but foundational competence requires structured, rigorous oversight. Lowering these standards will inevitably leave newer clinicians under-prepared to handle high-stakes situations including crisis intervention, severe grief, and active suicidality.

Our regulatory framework exists to protect clients when they are at their most vulnerable. Decreasing supervision requirements weakens the quality of care in Idaho state at a time when complex mental health needs are at an all-time high. I urge you to preserve current supervision standards to maintain the safety, integrity, and clinical excellence of Idaho's mental health workforce.

The need for more mental health providers can be addressed by reducing financial barriers for health and mental health graduate programs. Mental and behavioral health fields are female-dominated, and women face more barriers to furthering their education, despite being 61% of the demographic pursuing post-bachelor's education. This is where intervention is needed, not in lessening the training, competencies, and oversight of our learning therapists.

Thank you for your time, leadership, and dedication to protecting public health in Idaho state.



Respectfully,

Gretchen Scott, MA, LMFT

WA/MFT Lic: LF61353982 // ID/MFT Lic: 8071668

AAMFT Clinical Supervisor Fellow

Owner & Clinical Supervisor, Confident Expectations Counseling Services

Spokane, WA

Gretchen E. Scott, MA, LMFT



Written Comment Regarding Idaho Administrative Procedure Act, Chapter 52, Title 67, Idaho Code

From Maren Berrett [REDACTED]
Date Fri 8/14/2026 3:16 PM
To Ryan J. Bernard <ryan.bernard@dopl.idaho.gov>

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To the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists,

I am writing to submit a comment on the proposed amendment to the postgraduate supervised experience requirements, specifically the provision requiring that all 100 hours of supervision be provided by a licensed marriage and family therapist (LMFT).

I am a Licensed Associate Marriage and Family Therapist (LAMFT) and work with both individuals and couples in my current practice. My concern is that license type alone does not reliably indicate whether a supervisor has the relevant expertise in conjoint, couples, or family work. It is possible for a supervisee to accumulate hours under an LMFT-licensed supervisor without gaining substantive experience with the populations and modalities this rule seems intended to ensure competency in. Conversely, some supervisors without an LMFT license have extensive, well-documented training and experience working with couples and families.

I'd ask the Board to consider what specific outcome this change is meant to achieve. If the goal is to ensure supervisees are equipped to work with couples and families, I'd suggest an alternative that ties the requirement to demonstrated competency rather than license type alone — for example, requiring that supervisors document a minimum amount of training or clinical experience specific to conjoint/family work, regardless of which license they hold. As an alternative or complement, the Board could require supervisees to complete a set number of CEUs focused on couples and family systems as part of licensure.

Thank you for considering this feedback.

Sincerely,

Maren Berrett, LAMFT

License number: 9 461177

From: Brian Jones [REDACTED]
Sent: Sunday, August 23, 2026 4:16 PM
To: DOPL OL-Licensing <OL-Licensing@dopl.idaho.gov>
Subject: Notice of Public Hearing for Proposed Rules

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Hello,

If I understand these rule changes correctly, it seems as though they are actually lowering the amount of supervision hours need obtain a license. Am I correct? If so, I am totally against this decision.

By doing so you are lowering the professional standard set years ago. I understand there is a shortage of qualified professionals, but the only way to increase interest is to advocate for increased pay, not to lower the professional bar.

A very big mistake IMO.

Sincerely,

Brian Jones MA LPC -4852