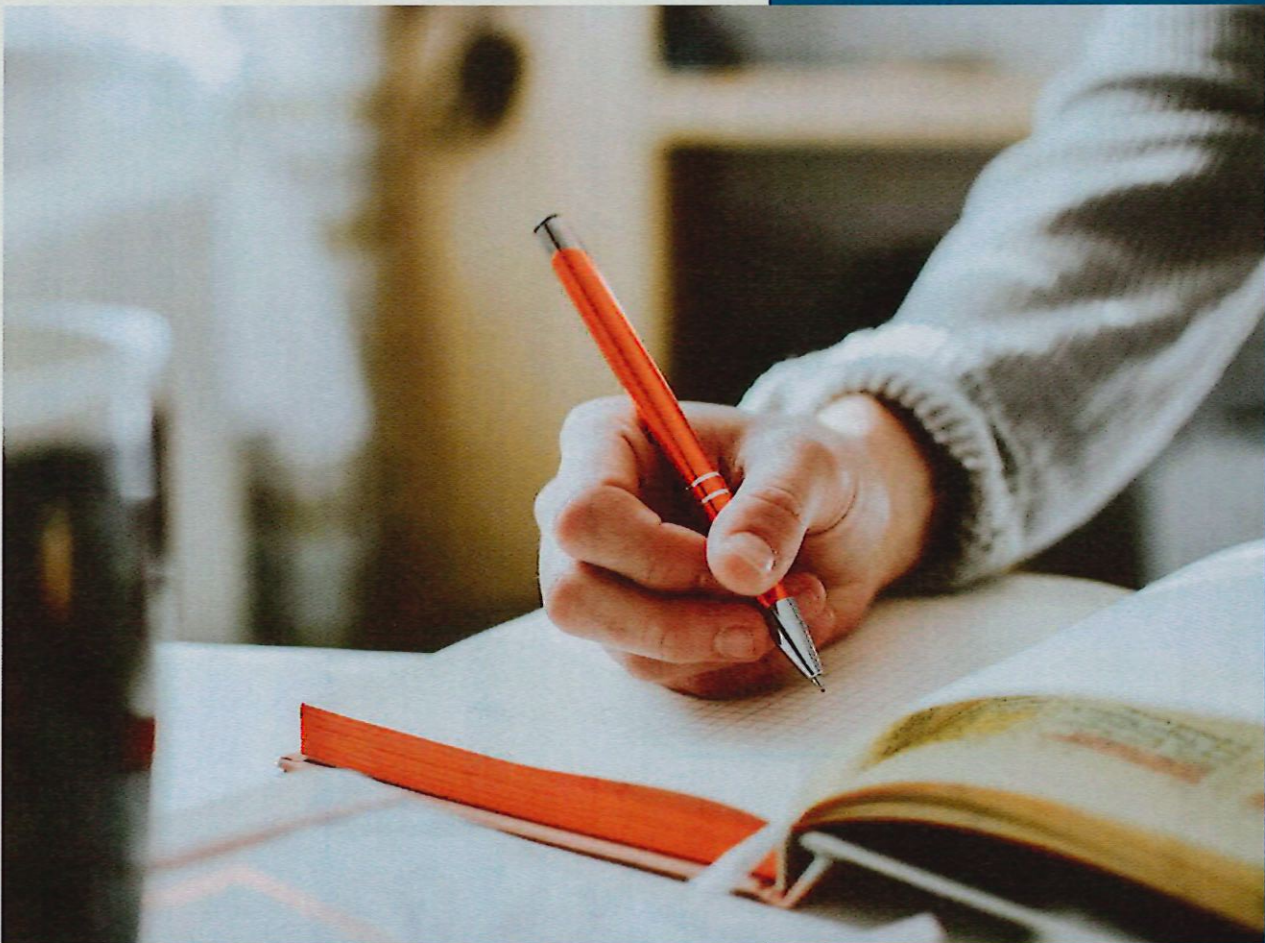




PROFESSIONAL EDUCATOR
LICENSING AND STANDARDS BOARD

Pre-Hearing Comments

R-4703



Proposed Amendments to the Rules Governing
School Counseling Programs and Licensure

COMMENT PERIODS

Dual Notice:
June 2, 2025 -
July 8, 2025

Request for Comments:
September 20, 2024 -
December 6, 2024

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Rollin, Steven (He/Him/His) (PELSB)

From: Erica Hinson <Erica.Hinson@epicstaffinggroup.com>
Sent: Monday, June 2, 2025 3:36 PM
To: MN_PELSB Rules
Subject: FW: R4703 Rulemaking Update - Dual Notice

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Hi there,

Will you please update me with the outcome of the hearing or if there is a cancellation of the hearing?

Thank you,

From: Minnesota Professional Educator Licensing and Standards Board <pelsb@public.govdelivery.com>
Sent: Monday, June 2, 2025 12:41 PM
To: Theresa McKay <Theresa.McKay@epicstaffinggroup.com>
Subject: R4703 Rulemaking Update - Dual Notice

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R-4703 Rulemaking Update

On June 2, 2025, PELSB published a notice in the *State Register* announcing its intent to adopt changes to the rules relating to school counseling programs and licensure (Minnesota Rules 8705.0100, 8705.1010, and 8710.6400 ([Professional Educator Licensing and Standards Board - MN Rules](#))). The notice, referred to as

Rollin, Steven (He/Him/His) (PELSB)

From: Michele Milan <michelemlan215@gmail.com>
Sent: Monday, June 2, 2025 12:28 PM
To: MN_PELSB Rules
Subject: regarding school counseling

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Hello PELSB,

I like that you are being more flexible. I have a bachelor's in Psychology (1989) and was able to do counseling with various non-profits at the time. Now I have a Master's in Education, with a 7-12 SS license, I have been teaching for 25 years.

I would like to be a school counselor but at 59 years old, I didn't want to pay 50k+ dollars for a 2nd Master's in order to be qualified (it's required to take 60 more credits).

For all the differentiation and personalization, I have done in my job, it was crushing, that with all my experience, I had to do the same thing as a 23 year old, who may not have taught a class or worked with the students, yet they would be able to be qualified to do school counseling.

I encourage you to think of people like me who have been teaching and could laterally move to a different position (keeping experienced people in schools), with a reasonable amount of classes or even taking a test.

Two things I would encourage thinking about:

1. School counselors should know how to do a class (for example, in social emotional learning, how to enroll in Naviance (or other college planning software) or how the brain learns, etc and it should be an expectation. Afterall, they are in a school, and should understand both student and teacher perspectives.

2. There should be a way that experience counts for something. Otherwise, it feels like higher education is a money-making gate keeper. Possibly a test (Counseling related) , or criteria that is flexible, like has Master's in education and can take 12 credits to brush up counseling skills. I liked that North Dakota University had online classes for certificates with people who already had a Master's. CACREP keeps it so that 60 credits are required. So I support the decision to not have this requirement.

I appreciate the work that you have put into this and I'm glad it's moving to be flexible.

Thanks,
Michele Milan

Rollin, Steven (He/Him/His) (PELSB)

From: Mitchell, Thomas M <thomas.mitchell.2@mnsu.edu>
Sent: Friday, December 6, 2024 1:44 PM
To: MN_PELSB Rules
Subject: Public Comment: RD4703

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Mr. Rollin,

Greetings! I recently joined the school counseling program faculty at MSU Mankato. Prior to arriving at MSU, I served for two decades in various Virginia school counseling positions—at the school level and the leadership level. My background includes creating and revising policies at the school district level. I appreciate this opportunity to offer feedback on the proposed rule changes relating to school counseling programs and licensure. In short, these changes seem well-conceived to me. However, I would like to offer more specific feedback regarding each item and one suggested change:

1. Require school counseling programs in Minnesota to hold accreditation from CACREP rather than require these programs to obtain state approval through PELSB by meeting state-specific standards.

Although this update makes sense and aligns PELSB regulatory language with (CACREP) school counseling program best practices, I suggest including language that allows PELSB the flexibility to approve non-CACREP programs under certain circumstances by special request. If CACREP institutes unexpected program requirements or fails to adapt quickly to changing market conditions, including 'special request' or 'exception' language will allow PELSB the flexibility to continue approving school counselor candidates for licensure from programs in Minnesota without going through the full legislative process to update this language.

2. Upon approval, allow providers to create a school counseling program tailored to candidates who already hold a master's degree, which would allow these candidates to be recommended for licensure as a school counselor without obtaining an additional master's degree

This seems like a good suggestion. I look forward to brainstorming and developing pathways to licensure for candidates who already hold a master's degree in counseling or a related specialty area.

3. Expand the scope of the school counselor license to allow school counselors to also serve pre-kindergarteners

We are already expected to teach content that addresses the needs of pre-kindergarteners in our programs. This seems like a straightforward change that reduces school counselor and school district liability. Thanks for this.

4. Create a number of pathways by which a licensed school counselor, who holds a restricted license, would be able to expand the scope of their license to the full scope.

Again, this seems like a straightforward update that provides flexibility for individuals with unique credentials. I don't believe many professionals will access the opportunity, but it makes sense to have it.

Thanks for the work you're doing. I look forward to collaborating--

Tom Mitchell, PhD | Assistant Professor
Department of Counseling and Student Personnel
Minnesota State University, Mankato
507.389.5658

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Rollin, Steven (He/Him/His) (PELSB)

From: Arneson, Jennifer <jarneson.naswmn@socialworkers.org>
Sent: Friday, December 6, 2024 7:06 AM
To: MN_PELSB Rules
Subject: Comments Relating to School Counseling Programs and Licensure
Attachments: MSSWA Feedback on School Counselor Changes.pdf

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Attached you will find comments from the MN Coalition of Licensed Social Workers on *Possible Permanent Rules Relating to School Counseling Programs and Licensure, Minnesota Rules, 8705.0100, 8705.0400, 8705.1010 and 8710.6400; Revisor's ID Number RD4703; Docket Number 21-9021-37950.*

Thank you.

Sincerely,

Jenny Arneson, MSW, LGSW (she/her)

Legislative Consultant

MN Coalition of Licensed Social Workers:

[National Association of Social Workers, MN Chapter](#)

[MN School Social Workers Association](#)

[MN Society for Clinical Social Work](#)

[MN Hmong Social Workers' Coalition](#)

[MN Association of Black Social Workers](#)

[MN Nursing Home Social Workers Association](#)

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Comments on Proposed Rules Relating to School Counseling Programs and Licensure

The Coalition of Licensed Social Workers is comprised of multiple professional social work organizations including:

- Minnesota School Social Workers Association
- National Association of Social Workers, MN Chapter
- Minnesota Society for Clinical Social Work
- Minnesota Nursing Home Social Workers Association
- Minnesota Association of Black Social Workers
- Minnesota Hmong Social Workers' Coalition

We offer the following comments on [the proposed rules relating to school counseling programs and licensure](#):

Proposal 1: To prepare individuals for licensure as a school counselor under part 8710.6400, a school counseling program based in Minnesota must hold accreditation from the Council for the Accreditation of Counseling and Related Educational Programs (CACREP).

Social Work Comments: Social work programs are regulated by the Council of Social Work Education; we are supportive of this shift for school counselors.

Proposal 2: A school counseling program may seek approval to recommend candidates for licensure who have completed a portion or subset of the program that is accredited by CACREP. The program must: (1) obtain approval of its model before recommending candidates for licensure; (2) must have a documented enrollment policy that includes an enrollment requirement that a candidate hold a master's degree in counseling or a related area; (3) have a documented process for evaluating the candidate's prior experiences . . . ; (4) ensure the candidate completes at least 600 total clinical experience hours, including a minimum of 240 hours of direct service with students. The program may evaluate a candidate's prior experiences to determine whether to waive up to 150 of the clinical experience hours. The program may not waive direct service hours.

Social Work Comments: We urge definition of "related area," as master programs vary considerably by degree. Allowing candidates to be recommended for licensure as a school counselor without obtaining an additional master's degree should be clearly defined and reserved for those completing very similar coursework. For example, social work master programs only offer advanced standing to candidates with a bachelor's in social work.

Proposal 3: A school counselor is authorized to provide to ~~kindergarten~~ prekindergarten through grade 12 students school counseling services that focus on the promotion of ~~preventive and educational strategies to enhance the cognitive, emotional, and behavioral development; effective decision-making skills; and resiliency capabilities of students~~ the academic, career, and

personal and social development of all students through data-informed school counseling programs.

Social Work Comments: Social workers seek to understand how accredited counseling programs will be adjusting their curriculum to ensure that the expanded scope of practice to prekindergarten is accompanied by expanded speciality training.

It is best practice to ensure that practitioners have access to specialist training. For example, per the Council on Social Work Education, a “master’s program in social work prepares students for specialized practice” ([EPAS, pg 18, 2022](#)). This may include deeper training in child development, play therapy, or diagnostic tools for early childhood. Furthermore, advanced social work degree programs guarantee foundational social work knowledge in the person-in-environment and systems theory along with human development through psychology and biology courses.

We note and appreciate that these proposed rule changes are more narrow in scope than the proposals in [HF4512](#). We believe that mental health practice ought to be cross-referenced with [MN Chapter 245j](#).

Proposal 4: Licensing restrictions and expansions.

Social Work Comments: No comments.

Rollin, Steven (He/Him/His) (PELSB)

From: cacrep <cacrep@cacrep.org>
Sent: Tuesday, December 3, 2024 1:29 PM
To: MN_PELSB Rules
Subject: CACREP's Comments on Minn. R. 8705.0100
Attachments: Minnesota Letter.pdf

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Please find attached a comment letter.

Jenny Gunderman

Chief Operating Officer

Council for Accreditation of Counseling and Related Educational Programs (CACREP)

500 Montgomery Street, Suite 350, Alexandria, VA 22314

P: 703.535.5990 | W: www.cacrep.org



CACREP is a recognized accrediting agency by the Council for Higher Education Accreditation (CHEA) and holds full membership status with the Association of Specialized and Professional Accreditors (ASPA) and the International Network of Quality Assurance Agencies in Higher Education (INQAAHE).

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Council for Accreditation of Counseling and Related Educational Programs

500 Montgomery Street, Suite 350 • Alexandria, VA 22314 • (703) 535-5990 • www.cacrep.org

December 3, 2024

Re: Proposed Changes to Minn. R. 8705.0100, .0400, .1010, .6400

To Steven Rollin
Professional Educator Licensing and Standards Board

Dear Mr. Rollin,

The Council for Accreditation of Counseling and Related Educational Programs (CACREP) is reaching out to offer our comment on the proposed amendments to Minn. R. 8705.0100, .0400, .1010, and .6400.

CACREP is the leading national accrediting body for Professional Counselor preparation programs. We accredit programs in the specialized practice areas of Addiction Counseling, Career Counseling, Mental Health Counseling, Clinical Rehabilitation Counseling, College Counseling and Student Affairs, Marriage, Couple and Family Counseling, Rehabilitation Counseling, and School Counseling. Additionally, CACREP accredits doctoral programs in Counselor Education and Supervision for the preparation of counselor educators and advanced practitioners.

First, CACREP **supports** the amendment in 8705.0400, subpart 1, which would require Minnesota school counseling programs to obtain accreditation from CACREP rather than through PELSB's state-specific standards. CACREP accredits over 983 master's and doctoral degree programs in Counseling nationwide, including 27 programs across 10 universities in Minnesota. It is widely recognized as the gold standard in counseling program accreditation and has a significant presence in the state. Requiring school counseling programs to be accredited by CACREP rather than meeting state-specific standards accomplishes two key objectives: (1) it aligns Minnesota's standards with those accepted across the country, and (2) it ensures that Minnesota counseling students receive a top-tier education grounded in a well-researched curriculum tailored to the counseling profession.

Furthermore, in terms of Subpart 2(A), we want to clarify that to be a CACREP-accredited graduate, a student must complete the full required CACREP curriculum (core foundational curriculum and the specialty area curriculum) to become a school counselor. Completing a portion or subset does not mean a student has graduated from a CACREP-accredited program. Ensuring counselors have a full education is integral to protecting Counselors' professional identity.

Next, CACREP additionally **opposes** the wording of 8705.0400 Subpart 2.A.2, which would allow individuals with a master's degree in "related area" to counseling to become school counselors.

CACREP believes this wording is too vague and could create pathways for individuals with degrees in broadly defined disciplines to qualify as school counselors without the proper credentials and training. This could mislead students and potentially prove dangerous, as such "school counselors" may be authorized to offer care they are not adequately trained to provide. However, CACREP acknowledges the intent behind the proposed rule and recognizes the shortage of counselors in certain regions of the country. Therefore, we propose the following revised language utilizing CACREP's Standards for further defining a "related area" to counseling.

8705.0400 Subpart 2(A)(2) could read:

"The program must have a documented enrollment policy that includes an enrollment requirement that a candidate hold a master's degree in counseling or a related area. A related area is defined as a 'Profession closely related to counseling or the school context . . . must be commensurate with the clinical preparation and experience of professional counselors.'"

CACREP believes that this minor adjustment to the language addresses the intent of the proposed rule while avoiding the shortcomings outlined above. Furthermore, if adopted as written, 8705.0400 subpart 1 and 8705.0400 subpart 2.A.2 would directly conflict, as CACREP's requirements do not permit individuals from unspecified "related areas" to qualify as school counselors. The language we are proposing resolves this contradiction as well.

Next, CACREP **supports** 8710.6400 subpart 1 which would allow school counselors to serve pre-kindergarteners. Many states already allow this, and CACREP believes it serves to benefit a broader range of school-age children by providing them with educational and mental health support they need to succeed, delivered by professionally trained school counselors.

Lastly, CACREP **supports** the proposed changes to 8710.6400 subpart 7 which establishes formal pathways for licensed school counselors to expand the scope of their license to the full scope. We believe that providing strict but accessible ways for school counselors to expand the scope of their license through on-the-job learning would be beneficial for Minnesota.

CACREP believes these comments support the needs of both students and school counselors.

For any further questions, please contact CACREP's CEO Sylvia Fernandez at sfernandez@cacrep.org.

Sincerely,

M. Sylvia Fernandez, Ph.D.

M. Sylvia Fernandez
President & CEO

Rollin, Steven (He/Him/His) (PELSB)

From: Marguerite Ohrtman <mohrtman@umn.edu>
Sent: Tuesday, December 3, 2024 9:22 AM
To: MN_PELSB Rules
Subject: Response to Proposed School Counseling Rule Changes
Attachments: Response to PELSB R-4703 Proposed Rules Relating to School Counseling Programs and Licensure.pdf

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Dear Mr. Rollin and the PELSB Rule Committee:

As training directors for the School Counseling programs across Minnesota, we wanted to express our concerns to the proposed rule changes. We have outlined our concerns below for the new changes on the attached document.

Thank you for this opportunity to ask questions and provide feedback. Hope you have a great week,
Marguerite Ohrtman and MN School Counseling Training Directors

--

Dr. Marguerite Ohrtman

Program Coordinator

Director of School Counseling and Director of the Clinical Training Program, University of Minnesota

Past President of the Minnesota School Counselor Association

Approved Clinical Supervisor

National Certified Counselor

Licensed Professional Clinical Counselor, Minnesota

Licensed School Counselor, Minnesota

Education Science Building, Rm 168

mohrtman@umn.edu

Pronouns: She/Her/Hers

Dear Mr. Rollin and the PELSB Rule Committee:

As training directors for the School Counseling programs across Minnesota, we wanted to express our concerns to the proposed rule changes. We have outlined our concerns below for the new changes.

1. Upon approval, allow providers to create a school counseling program tailored to candidates who already hold a master's degree, which would enable these candidates to be recommended for licensure as a school counselor without obtaining an additional master's degree;
 - a. While it is valuable to have such a pathway for related helping professionals to obtain a school counseling license in Minnesota to recruit, retain, and graduate excellent school counselors, there is a need for clarity on what types of master's degrees would be accepted into such a pathway by clarifying what is an acceptable "related helping profession" degree to allow candidates into such a program. (suggested by Bill from SCSU as we have an approved certificate program for related professions but agree that clarity is needed on this as well as alignment with the other counselor ed programs in Minnesota to ensure CACREP requirements and high standards are met by all school counseling candidates.)
 - b. We need state-level alignment and consensus on how programs would ensure that school counseling licensure track individuals meet requirements. We discussed how at the very least school counseling licensure candidates should have to demonstrate their coursework meets all the core CACREP areas, including practicum and internship hour requirements.
 - c. The majority of programs in MN do not offer non-degree seeking courses currently, although SCSU and Winona State have programs to provide such an option for related helping professionals. Candidates may also choose to go out of state or to online programs. If a student does go to an out of state or online program, how would this be managed and overseen by PELSB?
2. Expand the scope of the school counselor license to allow school counselors to also serve pre-kindergarteners;
 - a. There is a need for more specifics on what level this would be considered
 - i. Would school counselors in training be required to have an internship or practicum that includes the pre-K grade level?

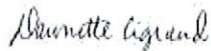
1. If so, there is a concern about how to find placements as elementary counselors are so scarce in MN, especially in rural parts of the state.
- b. Will school social worker licenses also be covering PreK?
- c. Will the state grandfather school counselors who are currently K-12 licensed?
 - i. How will licensure renewal be affected? Will school counselors be required to take CEUs specific to the pre-K level?
 - ii. How will school counselors who have completed programs out of state be licensed if they do not have Pre-K training or experience?
3. Create multiple pathways by which a licensed school counselor, who holds a restricted license, would be able to expand the scope of their license to the full scope.
 - a. There is a need for more information about what pathways are expected.
 - b. Who would be approving these courses at PELSB?

We look forward to PELSB responses to our above questions and are hoping to have more conversations about these proposed changes.

Thank you for your time,

Marguerite Ohrtman
Program Coordinator and Director of School Counseling, University of Minnesota

Carolyn Berger
Teaching Associate Professor, University of Minnesota



Dawnette Cigrand, PhD
Professor and Chair, Counselor Education, Winona State University



Bill Lepkowski, PhD,
Professor and Program Director of the School Counseling Program
St. Cloud State University

Rollin, Steven (He/Him/His) (PELSB)

From: Akgul, Taryn M <taryn.akgul@mnstate.edu>
Sent: Tuesday, November 26, 2024 12:29 PM
To: MN_PELSB Rules
Subject: Proposed Changes to Minn. R. 8705.011,.0400, .1010, .6400
Attachments: Response to MN Changes.docx

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Please see the attached letter.

November 26, 2024

Re: Proposed Changes to Minn. R. 8705.0100, .0400, .1010, .6400

Dear Steven Rollin,

As a Professional Counselor, Counselor Educator, and member of Chi Sigma Iota (CSI), I am reaching out to offer my comments on the proposed amendments to Minn. R. 8705.0100, .0400, .1010, and .6400.

CSI is an international honor society dedicated to promoting excellence in the Counseling Profession. Our mission is to promote scholarship, research, professionalism, leadership, and excellence within our profession. We currently have 170,000 members, and we are one of the largest single-member organizations of Professional Counselors in the world.

First, I **support** the amendment in 8705.0400, Subpart 1, which would require Minnesota school counseling programs to obtain accreditation from the Council for Accreditation of Counseling and Related Educational Programs (CACREP) rather than through PELSB's state-specific standards. CACREP accredits over 983 master's and doctoral degree programs in Counseling nationwide, including 27 programs across 10 universities in Minnesota. It is widely recognized as the gold standard in counseling program accreditation and has a significant presence in the state. Requiring school counseling programs to be accredited by CACREP rather than meeting state-specific standards accomplishes two key objectives: (1) it aligns Minnesota's standards with those accepted across the country, and (2) it ensures that Minnesota counseling students receive a top-tier education grounded in a well-researched curriculum tailored to the counseling profession.

Furthermore, in terms of Subpart 2(A), we want to clarify that to be a CACREP-accredited graduate, a student must complete the full required CACREP curriculum to become a school counselor. Completing a portion or subset does not mean a student has graduated from a CACREP-accredited program. Ensuring counselors have a full education is integral to protecting Counselor's professional identity.

Next, I additionally **oppose** 8705.0400 Subpart 2.A.2, which would allow individuals with a master's degree in "related area" to counseling to become school counselors. It should be only a master's in counseling to become a school counselor.

Additionally, I **support** 8710.6400 Subpart 1 which would allow school counselors to serve pre-kindergarteners. Many states already allow this, and CACREP believes it serves to benefit a broader range of school-age children by providing them with educational and mental health support they need to succeed, delivered by professionally trained school counselors.

Lastly, I **support** the proposed changes to 8710.6400 Subpart 7 which establishes formal pathways for licensed school counselors to expand the scope of their license to the full scope. We believe that providing strict but accessible ways for school counselors to expand the scope of their license through on-the-job learning would be beneficial for Minnesota.

As a CSI member, I believe these comments support the needs of both students and school counselors.

Sincerely,

Taryn Akgul, Ed.D., LPC, LAC
Assistant Professor/Program Coordinator
Minnesota State University Moorhead
College of Education & Human Services
Counseling Program
Lommen Hall 113
1104 Seventh Avenue South
Moorhead, Minnesota 56563
tell:218-477-2694
taryn.akgul@mnstate.edu

Rollin, Steven (He/Him/His) (PELSB)

From: Ryg, Matt [MN] <Matt.Ryg@edmn.org>
Sent: Monday, November 25, 2024 11:20 AM
To: Rollin, Steven (He/Him/His) (PELSB)
Subject: Some counseling rules questions

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Hello, Steve!

Happy Monday, my friend. I hope you've got fun plans with family this week.

Regretfully, it doesn't look like we're going to be able to get on a call with the educators I've been in dialogue with about the proposed rule changes. Below you'll find some of their questions/comments.

Upon approval, allow providers to create a school counseling program tailored to candidates who already hold a master's degree, which would allow these candidates to be recommended for licensure as a school counselor without obtaining an additional master's degree;

1. Some state guidelines around this change are needed so that universities are aligned with what they are accepting in terms of master's degrees and what coursework would be required. Minimally, the state needs to specify alignment with CACREP areas/curriculum and practicum/internship hour requirements.
2. The majority of school counseling programs in Minnesota do not offer non-degree seeking courses currently, so candidates may choose to go out of state or to online programs. How would this be managed?

Expand the scope of the school counselor license to allow school counselors to also serve pre-kindergarteners;

1. CACREP standards do include PreK (for school counselors-in-training) but would practicing, licensed school counselors need to demonstrate their curriculum covered Pre-K for licensure renewal?
2. Are currently licensed school counselors grandfathered in even if their curriculum didn't cover pre-K?
3. Would internships/practicums need to also cover pre-K? Currently PELSB requires that school counselors-in-training have placements in elementary, middle and high school but not all elementary schools include pre-K (in fact many do not). Counselor educators are concerned that pre-K internship or practicum placements would be required and this would be problematic as it is hard enough to find elementary school counselors. (This also brings up the question whether the placement requirements at all three levels would be eliminated if CACREP is replacing all other licensure requirements).
4. Will school social worker licenses also be covering PreK?

Create a number of pathways by which a licensed school counselor, who holds a restricted license, would be able to expand the scope of their license to the full scope.

1. This seems vague and needs expanding- what would these pathways look like?
2. Who would be approving these pathways at PELSB and would this also be done through universities?

Do you have thoughts on how we might get some of these addressed? Please forgive my ignorance of the processes involved here.

Warmly,

Matt Ryg

--

Matthew Alan Ryg, PhD, MAPL
Political Organizer, Education Minnesota
matt.ryg@edmn.org

41 Sherburne Avenue, St. Paul 55103

(office) 651-767-1270; 800-377-7783

(cell) 651-245-6142

pronouns: he/him/his



Rollin, Steven (He/Him/His) (PELSB)

From: Schwen, Lauren <SchwenL@District112.org>
Sent: Wednesday, October 23, 2024 2:27 PM
To: MN_PELSB Rules
Subject: R-4073 Rule Change Comments - Schwen

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To whom it may concern:

I am writing to comment on the R-4703 proposed rule changes relating to school counselors and licensure. First of all, thank you for your thoughtfulness and consideration in making counseling services more readily available to students through expanding the criteria for licensure as a school counselor. Currently, I am practicing as a Tier II School Counselor as a non-public school counselor in the Eastern Carver County School District. I previously earned my Master's Degree in Counseling from a CACREP accredited institution.

As someone who would directly be impacted by this rule change, I would be in full support of this rule change. Under the current rule, I am aware that I will need to complete my Master's Degree in School Counseling over the next six years to continue practicing as a school counselor in Minnesota. While I currently love my job and am passionate about serving students in the schools, the financial and time cost of pursuing another degree certainly impacts the way I view my long term plans. With providing an alternative path towards licensure, you would increase the likelihood that qualified mental health professionals would be able to pursue a long term career in school counseling to better serve students.

In addition, as I have begun researching the possibility of completing my graduate degree in school counseling, there is a strong likelihood that I would need to repeat courses that I have already taken in addition to doing an internship when I have already been doing that job for several years. Many programs have a limit of classes that they allow to transfer over, which would necessitate possibly having to repeat several courses. While I do believe repetition is a positive thing in solidifying learning, there seems to be a more time and cost effective approach through continuing education or related training. As someone currently practicing as a school counselor with a M.A. in Clinical Mental Health Counseling, I have found that my education and internship in a private practice setting has prepared me well for the job I am currently doing. My previous education and experience has given me the foundation of building rapport with the intention of offering support and facilitating change, leading groups, setting goals, and working within systems. Certainly, as with any new job, there are plenty of things to learn and grow, but through supervision and mentorship from other professionals, additional training opportunities, and on-the-job training, I do not feel like there are extensive gaps in knowledge or skills that I will not be able to learn as I grow in my job.

Thank you for considering a more accessible pathway to school counselor licensure for professionals passionate about delivering high quality care and support to our students. As we all know, there is so

much need in today's young people for supportive adults to come alongside them and care for them, empower them, and support them in the settings where they spend large amounts of time. I am excited about the opportunity to continue to serve students in my career and put my full support behind efforts to make it possible for qualified candidates to be licensed. Please feel free to contact me with further questions or clarifications.

Sincerely,

Lauren Schwen

laurenschwen@gmail.com | 612-213-7451

Rollin, Steven (He/Him/His) (PELSB)

From: Schwen, Lauren <SchwenL@District112.org>
Sent: Tuesday, October 22, 2024 1:24 PM
To: MN_PELSB Rules
Subject: R-4073 Rule Change Comments - Schwen

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Sincerely,

Lauren Schwen

laurenschwen@gmail.com | 612-213-7451

Rollin, Steven (He/Him/His) (PELSB)

From: Kristan Pfarr <kkparr@gmail.com>
Sent: Tuesday, October 15, 2024 8:56 AM
To: MN_PELSB Rules
Subject: Possible changes to school counselor licensure

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I am writing in response to the R-4703 Proposed Rules Relating to School Counseling Programs and Licensure. I am entering my thirty fifth year as a school counselor. My path to become a school counselor was extremely extensive, because I did not have a teaching degree in 1988 when I started my program. It took me four years of full time requirements to earn my masters degree in K-12 counseling. Since then, the requirements have been consolidated greatly, but still effective.

I am concerned that the current proposal will not adequately prepare individuals for a career in the school counseling profession. This job has always required a master's degree in school counseling, for the reason that the profession is not meant to be entered lightly or ill prepared. This proposal will put individuals in situations they are not trained for in an ever demanding mental health field. I feel that this is a disservice to our most vulnerable students, to have those who are not properly trained address these SEL concerns. This is NOT an area we want to misguide students and families.

I am also concerned about adding Pre-K students to current caseloads. I feel quite confident that most schools will simply add this new age level to their current elementary counselors load, and not hire a new counselor to cover the additional students. As an elementary school counselor, I find my most time consuming students are in kindergarten through grade 2. These students are still being identified, monitored, and have interventions in place to help identify their academic and SEL needs. Adding pre-school to an elementary counselor's role, would no doubt add greatly to their job duties. I am also concerned on what training would be provided for me and others to work with this new age group, of which I have no experience or knowledge. It would be very irresponsible for the state to add this group of students to our caseloads without proper training.

I think our time would be best spent addressing why individuals are either leaving education as a profession, or not pursuing it altogether. Watering down requirements and adding more to educators duties and responsibilities is not the answer. I love my students, co-workers and families. I am beyond disappointed in MDE, the union and MN politics.

Kristan Pfarr

Rollin, Steven (He/Him/His) (PELSB)

From: Wright, Tricia <twright@tcu2905.us>
Sent: Friday, October 18, 2024 6:21 PM
To: MN_PELSB Rules
Subject: Request for Comments for School Counseling Rule Change

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Steven,

I hope this message finds you well. I am writing to provide feedback on the proposed changes to the school counseling licensing procedure. While I am supportive of the shift to CACREP accreditation as a standard for school counselors, I have concerns regarding certain aspects of the proposal.

First, I believe that the move to require CACREP-accredited training is a positive step in ensuring high standards for school counselors in Minnesota. However, I have questions about the proposed "alternate" path for individuals who have already earned a master's degree. Allowing this exception seems to contradict the very essence of adopting the CACREP standard. If the goal is to uphold CACREP's rigorous educational framework, creating a separate pathway for non-CACREP graduates might undermine the consistency and quality the rule aims to establish.

Additionally, the inclusion of Pre-K in school counseling responsibilities raises concerns. While expanding services to younger students is important, this new requirement would place a significant burden on current counselors who may not have been trained in early childhood development. Serving Pre-K students effectively would require specialized knowledge and skills, and this would demand considerable time and resources. It seems this additional responsibility could overwhelm counselors who are already managing heavy caseloads without having been adequately prepared for Pre-K counseling.

Thank you for considering my input. I believe that with some adjustments, these changes could be highly beneficial for the field and for students across Minnesota. Please feel free to reach out if there are further opportunities for discussion or clarification.

Tricia Wright MS, LPSC
she/her ([What is this?](#))
School Counselor K-6
Lonsdale Elementary
Tri-City United Public Schools ISD 2905

ALL MEANS ALL



1000 Idaho St. SW
Lonsdale, MN 55046

Phone: (507) 364-3002
Fax: (507) 744-3902
Email: twright@tcu2905.us
Website: www.TCU2905.us

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Rollin, Steven (He/Him/His) (PELSB)

From: Travis Gjerner <tgjerner@flaschools.org>
Sent: Thursday, October 10, 2024 1:32 PM
To: MN_PELSB Rules
Subject: School Counseling Licensure

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Thank you for requesting input regarding school counseling licensure and some changes that might be coming. I do have some opinions that I would like to share that may or may not be part of the information you are seeking.

I received my Masters Degree from the University of Wisconsin-Stout, and have been a licensed school counselor in the state of Minnesota since 1998. I've noticed a variety of differences between my colleagues from Wisconsin and how school counselors are utilized in the state of Minnesota. Since 1987, Wisconsin has required a licensed SCHOOL COUNSELOR in every K-12 public school building. Minnesota does not have such a law and schools have a variety of people in "Counseling" positions. My district (Forest Lake) for one, has school social workers (which might only have a 4 year bachelor's degree) in our elementary counseling positions. In addition, our high school is void of school counselors and instead has "deans of students" which have little to no training in mental health support and generally fill that role as a stepping stone on their way to an admin position. Furthermore, elementary counselors in elementary schools are probably an exception instead of a rule in the state of Minnesota.

As we look at redefining the scope of school counselors in the state of Minnesota, I think it is also important to not diminish the credentials of licensed school counselors. Just like I would not be properly trained to be a speech therapist, deans and social workers might not have the same preparation as to what licensed school counselors are trained in and to lump them all together under the label of "counselors" feels disingenuous.

I also agree to expand the scope of school K-12 counselors to Pre-K and yes to (CACREP) accreditation.

Thank you for allowing me to provide my thoughts!

--

Travis Gjerner
School Counselor Scandia Elementary
[Counselor Webpage](#)

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Crisis Services- MN Department of Human Services (Text MN to 741741)
Crisis Connection (612-379-6363)
Canvas Health Mobile Crisis - Washington County (651-777-5222)
Canvas Health Mobile Crisis - Anoka County (763-755-3801)
[Canvas Health Mobile Crisis - Chisago County \(1-800-523-3333\)](#)

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