



CONNECTICUT ASSOCIATION FOR  
Marriage & Family Therapy

February 21st, 2023

The Honorable Liz Linehan Co-Chair  
The Honorable Ceci Maher, Co-Chair  
The Honorable Anne Dauphinais, Ranking Member  
The Honorable Lisa Seminara, Ranking Member  
Committee on Children  
Connecticut General Assembly  
State Capitol Building, Room 011  
Hartford, CT 06106

RE: SB 02: An Act Concerning The Mental, Physical, and Emotional Wellness of Children

Chairwoman Linehan, Chairwoman Maher, Vice Chairwoman Keitt, Vice Chairwoman Kushner, Ranking Members Dauphinais and Seminara, and members of the Committee on Children:

My name is Rebecca Ruitto, a Licensed Marriage and Family Therapist, and Chair of the Connecticut Association of Marriage and Family Therapy (CTAMFT). I am a resident of Colchester and own a private mental health practice in West Hartford. I am writing on behalf of CTAMFT in support of SB 02 **with requested changes to ensure parity amongst mental health professions.**

CTAMFT currently represents over 2,000 Marriage and Family Therapists (MFTs) throughout Connecticut. Marriage and Family Therapists are employed in various clinical settings throughout the state, serving diverse mental health needs via: private outpatient treatment; community based and outreach programs; in-home services; school-based services; and agency inpatient and outpatient care, among others.

Connecticut has continued to see an increase in mental health needs across children and adolescents. Diagnoses on an upwards trend include anxiety, depression, post-traumatic stress disorder, adjustment disorders, and substance use disorders. This trend has increased the need for support in the form of outpatient, school-based, and higher level of care options (in-home, intensive outpatient treatment, partial hospitalization, inpatient); as well as ongoing escalated needs involving additional systems (DCF, police, and court services).

We are pleased to see the attention the Committee has taken to care for the entire wellbeing of our Connecticut children, particularly relating to the focus on mental health care. Included in SB 02 are several areas in which CTAMFT is in support. Specifically, CTAMFT supports:

**Sec. 10** - Medicaid reimbursement of suicide assessments and mental health evaluations.

**Sec. 11** - The establishment of an Office of Behavioral Health Advocate. CTAMFT has continued to hear of several ongoing disparities of mental health care insurance coverage. Administrative burdens erected by private insurance companies place a significant burden on our profession. These barriers include: ever changing claim submission procedures; lengthy waits for service reimbursement; frequent audits; claw-backs of previous payments and erroneous claim denials. These issues are driving mental health providers to remove themselves from provider networks. Those providers that choose to stay in-network are bogged down by time consuming and cumbersome paperwork and phone calls that could otherwise be used servicing Connecticut residents in need of mental health treatment. The establishment of an Office of Behavioral Health Advocate is necessary to rectify the ongoing barriers to providing care to those seeking to utilize insurance benefits.

**Sec. 15** - The establishment of a task force, with the inclusion of an MFT as well as all other mental health professional license types to ensure the most comprehensive approach to assessing children's needs.

Additionally, CTAMFT would like to take the time to encourage the Committee to be inclusive of all qualifying mental health professionals. Connecticut has six (6) licensed mental health professions: Marriage and Family Therapists, Nurse Practitioners, Professional Counselors, Psychologists, Psychiatrists and Social Workers. Inclusion of all license types in statutes and legislative efforts is the most effective way to meet the ever growing mental health needs of our state. We again urge the Committee for inclusion of all licenses, including MFTs, in ongoing legislative language, and specifically in **Sec. 4** - The inclusion of all mental health professions, including MFTs, in the definition of "Qualified Personnel".

Lastly, CTAMFT would respectfully **request the following changes to Sections 1, 13, and 14;** which focus on the barriers mental health providers in Connecticut are facing related to licensure.

**Sec. 1** - CTAMFT supports the addition of more staff for the DPH licensing unit to help process licenses; however, requests that staff be added for MFT licensure processing as well. MFTs are facing a significant delay in processing of the associate level license of Marriage and Family Therapists by DPH, waiting in excess of 3-6 months to obtain their associate level license. The delay in processing has created gaps in which graduates are not legally allowed to work nor can they maintain internships with potential employers. And unlike our Social work colleagues,

MFTs are not granted a temporary permit, making these delays all that much more detrimental to MFTs entering the workforce as well as creating a disruption of care for the clients they serve.

**Sec. 13 & 14** - CTAMFT has repeatedly brought up the disparity between MFT licensure fees and our comparative colleagues (Social Workers and Professional Counselors). This continues to remain a barrier for MFTs entering and remaining in the MFT profession. Marriage and Family Therapists, despite having the same level of education and qualifications as our Social Worker and Professional Counselor colleagues, and despite our comparative share in meeting the mental health needs of Connecticut children, are currently the only mental health profession with a significantly higher licensure renewal rate.

The chart below demonstrates the alarming differences in the fee structures across these comparative mental health professions. MFTs are currently paying 40% more to renew their licenses than Social Workers and Professional Counselors. CTAMFT has heard from our members for years about the financial burden this has placed on them, with no legislative results to create parity in fee structures.

Fee Category	Marriage and Family Therapist	Professional Counselor	Social Workers
<b>Associate License- Initial</b>	\$125	\$220	\$220
<b>Difference in cost</b>	MFT associate license initial application is 55% less expensive than other professions	55% more expensive than MFTs, same cost as Social Workers	55% more expensive than MFTs, same cost as professional Counselors
<b>Associate License Renewal</b>	\$220	\$195	\$195
<b>Difference in costs</b>	MFT associate license renewal is 12% higher than other MH professional licenses	12% lower than MFTs and same as social workers	12% lower than MFTs and same as social workers
<b>Full Licensure- Initial</b>	\$315	\$315	\$315
<b>Difference in costs</b>	No difference	No difference	No difference
<b>Full Licensure- Renewal</b>	\$320	\$195	\$195

<b>Difference in costs</b>	MFT's renewal cost is 64% more than other professions EACH renewal period (every yr)	64% less than MFTs, same as Social Workers	64% less than MFTs, same as Professional Counselors
<b>Full Licensure-Reinstatement</b>	\$315	\$315	\$315
<b>Difference in costs</b>	No difference	No difference	No difference

Currently, both Social Workers and Professional Counselors pay a renewal rate of \$195 for all license renewals. The renewal rate for LMFTs each year is \$320; 64% higher than our comparative colleagues. If this legislation moves forward, Social Workers would renew their license once every 2 years for a two-year total of \$195. MFTs in the same 2 year time frame, would be required to pay \$640 to keep their license, 228% higher than our comparative colleagues. Additionally, this legislation would make it 60% more expensive for MFTs to obtain even their initial licensure (\$315 compared to \$200).

CTAMFT recognizes and appreciates the efforts to adjust the associate license renewal cap for MFTs in Section 14; but request the Committee create parity amongst these licensures; as it has already been done between Social Workers and Professional Counselors. **We ask that the changes to Social Worker licensure fees in Sections 13 & 14 be applied across the board, and including Marriage and Family Therapists and Marriage and Family Therapist Associates.**

Continued lack of parity creates a divide amongst mental health professions as well as a risk of MFTs leaving the field, thus increasing the need for providers in our state already in desperate need as we shift out of the pandemic. The ability to remain licensed and in practice should be achievable by all mental health professionals, not reserved for a single license.

CTAMFT urges you to support SB 02 with these crucial licensing changes. Thank you for your time and consideration of this important matter. Please do not hesitate to reach out to me if I can be of further assistance at [chair@ctamft.org](mailto:chair@ctamft.org).

Sincerely,

*Rebecca Ruitto, LMFT*

Rebecca Ruitto, LMFT  
CTAMFT Chair