
Sunrise Analysis of a Proposal to Regulate Professional Counselors

A Report to the
Governor
and the
Legislature of
the State of
Hawai'i

Report No. 92-23
November 1992



THE AUDITOR
STATE OF HAWAII

The Office of the Auditor

The missions of the Office of the Auditor are assigned by the Hawaii State Constitution (Article VII, Section 10). The primary mission is to conduct post audits of the transactions, accounts, programs, and performance of public agencies. A supplemental mission is to conduct such other investigations and prepare such additional reports as may be directed by the Legislature.

Under its assigned missions, the office conducts the following types of examinations:

1. *Financial audits* attest to the fairness of the financial statements of agencies. They examine the adequacy of the financial records and accounting and internal controls, and they determine the legality and propriety of expenditures.
2. *Management audits*, which are also referred to as *performance audits*, examine the effectiveness of programs or the efficiency of agencies or both. These audits are also called *program audits*, when they focus on whether programs are attaining the objectives and results expected of them, and *operations audits*, when they examine how well agencies are organized and managed and how efficiently they acquire and utilize resources.
3. *Sunset evaluations* evaluate new professional and occupational licensing programs to determine whether the programs should be terminated, continued, or modified. These evaluations are conducted in accordance with criteria established by statute.
4. *Sunrise analyses* are similar to sunset evaluations, but they apply to proposed rather than existing regulatory programs. Before a new professional and occupational licensing program can be enacted, the statutes require that the measure be analyzed by the Office of the Auditor as to its probable effects.
5. *Health insurance analyses* examine bills that propose to mandate certain health insurance benefits. Such bills cannot be enacted unless they are referred to the Office of the Auditor for an assessment of the social and financial impact of the proposed measure.
6. *Analyses of proposed special funds* and existing *trust and revolving funds* determine if proposals to establish these funds and existing funds meet legislative criteria.
7. *Procurement compliance audits* and other *procurement-related monitoring* assist the Legislature in overseeing government procurement practices.
8. *Fiscal accountability reports* analyze expenditures by the state Department of Education in various areas.
9. *Special studies* respond to requests from both houses of the Legislature. The studies usually address specific problems for which the Legislature is seeking solutions.

Hawaii's laws provide the Auditor with broad powers to examine all books, records, files, papers, and documents and all financial affairs of every agency. The Auditor also has the authority to summon persons to produce records and to question persons under oath. However, the Office of the Auditor exercises no control function, and its authority is limited to reviewing, evaluating, and reporting on its findings and recommendations to the Legislature and the Governor.



THE AUDITOR STATE OF HAWAII

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OVERVIEW

THE AUDITOR
STATE OF HAWAII

Sunrise Analysis of a Proposal to Regulate Professional Counselors

Summary

We analyzed whether professional counselors should be regulated as proposed in Senate Bill No. 3281 introduced during the 1992 legislative session. We conclude that the proposal should not be enacted.

Counselors help people with personal, social, educational, and career problems. They may specialize in areas such as vocational guidance, rehabilitation, mental health, substance abuse, marriage and family, and aging. They may work with individuals or groups.

Senate Bill No. 3281 proposes to regulate the practice of counseling by a seven-member professional counselor board in the Department of Commerce and Consumer Affairs. No one could lawfully practice as a counselor unless licensed by the board. To be licensed, applicants would have to have a master's degree in counseling, three years of post-master's experience, and pass a written examination.

This is our second sunrise analysis of proposals to regulate counselors. In our 1988 analysis of a different proposal, we concluded that the practice of professional counseling did not pose sufficient harm to warrant licensure. We found the proposed scope of practice was confusing and the requirements were restrictive.

We reach similar conclusions today. The Sunset Law says that occupations should be regulated only when necessary to protect the health, safety, and welfare of consumers. There is still insufficient evidence of harm by counselors to warrant regulation. Furthermore, the cost of regulation would be substantial, and not justified by the potential harm. The current proposal still does not define the practice of counseling with any precision and is too broad to be enforceable. Also, the bill has sweeping exemptions that leave only private practitioners subject to regulation, making regulation almost meaningless.

Furthermore, the bill is restrictive and flawed. It proposes education and experience requirements—a master's degree in counseling and 3,000 hours of practice for the professional counselor license—that are not necessary to protect the public. It inappropriately requires license applicants to declare their area of competence, intended counseling procedures, and theoretical orientation. It has restrictive requirements for supervision and for associate

counselor licenses. Finally, the bill contains questionable requirements on citizenship and residency, nomination of board members, previous criminal record, continuing education, and other matters.

Recommendations and Response

We recommend that Senate Bill No. 3281 not be enacted.

The Department of Commerce and Consumer Affairs supports our findings and conclusions. It comments that our report touched upon the same concerns it had.

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Submitted by

THE AUDITOR
STATE OF HAWAII

Report No. 92-23
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Foreword

The Sunset Law, or the Hawaii Regulatory Licensing Reform Act of 1977, contains a sunrise provision which requires that measures proposing to regulate professions or vocations be referred to the State Auditor for analysis prior to enactment. The Auditor is responsible for reporting the results of the analysis to the Legislature.

This report evaluates the regulation of professional counselors as proposed in Senate Bill No. 3281, introduced in the Regular Session of 1992. It presents our findings on whether the proposed regulation complies with policies in the Sunset Law and whether there is a reasonable need to regulate professional counselors to protect the health, safety, and welfare of the public. It concludes with our recommendation on whether the proposed regulation should be enacted.

We acknowledge the cooperation of the Department of Commerce and Consumer Affairs, other state officials, and organizations and individuals in the counseling profession whom we contacted during the course of our analysis.

Marion M. Higa
State Auditor

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Chapter 1

Introduction

The Sunset Law, or the Hawaii Regulatory Licensing Reform Act (Chapter 26H, Hawaii Revised Statutes), contains a sunrise provision which requires that measures proposing to regulate professions or vocations be referred to the State Auditor for analysis prior to enactment. The Auditor is to determine whether regulation is necessary to protect the health, safety, and welfare of consumers.

This report evaluates whether the regulation of professional counselors proposed in Senate Bill No. 3281, introduced in the Regular Session of 1992, complies with policies for occupational regulation in the Sunset Law.

Background on Professional Counseling

Counselors help people deal with personal, social, educational, and career problems. As society has become more complex, people increasingly have sought assistance from those in the “helping professions” such as counselors, psychologists, and social workers.

Professional counseling has its roots in vocational and educational guidance. Counselors specialize in these and such other areas as rehabilitation, mental health, substance abuse, marriage and family, and aging. Their work may include counseling individuals and groups, performing appraisals, making referrals, and doing consulting and research.

Information on the total number of professional counselors in Hawaii is sketchy. The State employs about 500 public school counselors, at least 80 vocational rehabilitation counselors, and a few in various agencies.¹ Practicing in the private sector are at least 60 vocational rehabilitation counselors, 200 substance abuse counselors, and 80 marriage, family, child, or individual counselors.² An unknown number of counselors work in public and private colleges and universities, private schools, social service and health organizations, charitable and religious institutions, independent practice, and the military.

Regulation in other states

Regulation of professional counselors began in the mid-1970s as they began competing with psychologists and social workers for jobs. Today 37 states regulate professional counselors, marriage and family counselors, or mental health counselors.³

State regulation ranges from licensing to voluntary certification to simple registration. Some states regulate the practice of counselors and others regulate the use of a particular title only. Education and examination requirements vary.⁴

Regulation in Hawaii

The State of Hawaii regulates public school counselors, vocational rehabilitation counselors, and substance abuse counselors. The Department of Education certifies public school counselors under the School Personnel Law, Chapter 297, HRS.⁵ The Department of Labor and Industrial Relations registers public and private vocational rehabilitation specialists (who serve as counselors) under the Workers' Compensation Law, Chapter 386, HRS,⁶ and the Department of Health certifies private substance abuse counselors under Chapter 321, HRS.⁷

Previous Sunrise Analysis

We had concluded in a previous sunrise analysis that regulation of counselors was not warranted. House Bill No. 3094 of the 1988 legislative session proposed to regulate anyone who practices professional counseling under the title "licensed professional counselor." Our sunrise analysis of that bill found that the practice of professional counseling did not pose sufficient harm to warrant licensure.⁸

We also found that the 1988 proposal was restrictive. It would have prevented otherwise qualified persons from practicing simply because they lacked sufficient formal education in counseling. The scope of practice was confusing and would have barred counselors from offering certain kinds of services. In addition, the proposed regulatory board would have been dominated by those with interest in professional counseling.

Current Proposal to Regulate Counselors

Senate Bill No. 3281 of 1992 would regulate both the practice of counseling and the use of certain titles. Unless licensed by the State, no one could lawfully engage in the practice of counseling or use the title "licensed professional counselor," "licensed counselor," or "licensed associate counselor." The bill exempts certain professionals who engage in counseling, school counselors, and others.

The bill would create a professional counselor board consisting of seven members to be located in the Department of Commerce and Consumer Affairs. Five members would be professional counselors and two would be public members. The board would be responsible for issuing licenses, adopting rules and a code of ethics, examining applicants, and

disciplining licensees. The board would also establish continuing education requirements and maintain a registry of licensed counselors and approved supervisors.

To be licensed as a professional counselor, applicants must have reached the age of majority, be a citizen of the United States or have declared this intent, be a legal resident of Hawaii, and have no record of moral turpitude (unless rehabilitation is shown). Also required would be a master's degree in counseling (including a practicum and internship) and three years of post-master's experience (including 3,000 hours of supervised experience). Applicants would have to declare their areas of competency (including theoretical orientation and preferred techniques) and pass a written examination.

During the first 12 months following its effective date, applicants could be licensed without examination. Applicants from states having equivalent or stricter requirements could be licensed by reciprocity. Counselors educated outside the United States must demonstrate that their education meets Hawaii's requirements.

The bill also provides for licensure as an associate counselor. These applicants must have a master's degree which is primarily counseling in content. They must also meet the requirements of age, citizenship, residency, moral character, and examination. Associate licenses would be in effect for a period up to three years. Associate counselors could practice only under the direct supervision of a board-approved supervisor.

The bill would make client-counselor communications privileged. In addition, counselors would have to disclose in writing to their clients their educational background, counseling philosophy, and other basic information about their practice.

Objectives of the Analysis

The objectives for this analysis were to:

1. Determine whether there is a reasonable need to regulate the occupation to protect the health, safety, and welfare of the public.
2. Make recommendations based on findings in these areas.

Scope and Methodology

To accomplish these objectives, we reviewed the literature on professional counselors and their regulation. We contacted certification programs for counselors in Hawaii and we reviewed complaints and other evidence of harm to consumers.

We obtained information from national and local associations of professional counselors and from accreditation and certification organizations. We interviewed representatives of professional associations and counselor education programs in Hawaii, and staff of the Department of Commerce and Consumer Affairs and of other state agencies.

Our work was performed from May 1992 through September 1992 in accordance with generally accepted government auditing standards.

Chapter 2

Findings and Recommendation

This chapter presents our findings and recommendation on the need to regulate professional counselors. We conclude that licensing is not necessary and that Senate Bill No. 3281 which proposes licensing is flawed.

Summary of Findings

1. The regulation of professional counselors is not warranted because there is little evidence that they harm consumers. The costs of regulation would be substantial.
2. Senate Bill No. 3281 does not clearly define what or whom it would regulate.
3. The bill is seriously flawed. It sets licensing requirements that are restrictive and includes provisions that are unclear or unconstitutional.

Regulation of Professional Counselors Is Not Warranted

The Sunset Law says that professions and vocations should be regulated only when necessary to protect the health, safety, and welfare of consumers. In assessing the need for regulation, evidence of abuses is to be given great weight and the cost of regulation to taxpayers must be considered. We found that there is little evidence of abuse by professional counselors and that the projected costs of regulation are substantial.

No documented evidence of harm

The Hawaii Association for Counseling and Development (HACD) proposed Senate Bill No. 3281 to regulate professional counselors. Neither the HACD nor other counselor associations in Hawaii had evidence of harm caused by counselors. The cases they mentioned were anecdotal at best.

The American Counseling Association (ACA) which is HACD's national parent organization, provided us with some data on complaints it received and complaints made to state counseling boards. The data showed that a number of counselors in other states have been charged with misrepresenting their qualifications, committing sexual improprieties with clients, substance abuse, and other violations. We

were not informed of the outcome of the complaints to state boards. Most of the complaints to ACA were not being pursued or were in process.

Proponents of regulation acknowledge their lack of solid evidence but say that the potential for harm warrants licensing as a preventive measure. They point to the vulnerability of many clients and their dependency on the counselors. Counselors could take advantage of these clients financially, sexually, or in other ways. Proponents are concerned with an anticipated influx of disreputable practitioners from other states. However, whether the influx will actually occur is speculative and is a dubious reason for regulation.

Few consumer complaints

During the past four years, consumers have made few complaints to the Office of Consumer Protection (OCP) and the Regulated Industries Complaints Office (RICO) of the Department of Commerce and Consumer Affairs.

Several consumers complained to both OCP and RICO about two counselors in joint practice, alleging emotional and sexual abuse, breach of confidentiality, unauthorized practice of psychology, and other abuses. OCP concluded that it had no jurisdiction. RICO closed the cases with an advisory letter.

Substantial cost of regulation

We do not believe the State should allocate scarce resources to regulate an occupation that poses so little harm. The Department of Commerce and Consumer Affairs estimates that regulating counselors would cost at least \$126,000 in the first fiscal year (for personnel and equipment) and \$94,000 in each subsequent fiscal year for personnel. The expense could rise as wages and other costs increase.¹

The department attributes these costs to the complexity of the proposed regulatory program. The program would have two categories of licensure, arrangements for supervision, examinations, and continuing education requirements among other duties. Based on its experience with similar regulatory programs, the department says its current staff could not handle the added workload.²

Scope of Regulation Is Unclear

A basic problem with regulating counselors is that it is not possible to define the practice with any precision. For regulation to be effective, the profession and its scope of practice must be delineated so that the State

can readily determine who falls under regulation of counseling and who does not. The definition of counseling in the bill, however, is too broad to be enforceable. The bill's attempt to identify who will be regulated by exempting many like practitioners makes regulation almost meaningless.

The bill defines the practice of counseling broadly as:

the rendering to individuals, couples, families, groups, organizations, corporations, institutions, government agencies, or the general public a service that integrates a wellness, pathology, and multicultural model of human behavior. This model applies a combination of mental health and human development principles and procedures to help clients achieve effective mental, emotional, physical, social, moral, educational, spiritual, or career development, and adjustment through the lifespan.

The bill also describes "counseling procedures" but the descriptions of these procedures do not clarify the definition of counseling. Instead, the definitions are circular. The bill lists counseling procedures as including but not limited to appraisal, consulting, counseling, referral, and research. It then describes the key procedure of "counseling" in much the same way as it defined the practice of counseling:

assisting a client through the counseling relationship, using a combination of mental health and human development principles, methods, and techniques, to achieve mental, emotional, physical, social, moral, educational, spiritual, or career development, and adjustment through the lifespan.

The bill also defines the "consulting" procedure as applying scientific principles and procedures in counseling and human development to assist in understanding and solving current or potential problems.

These definitions appear too general to be enforceable. The definitions could apply to practitioners in a wide variety of helping professions including psychologists, social workers, mental health workers, nurses, marriage and family therapists, psychotherapists, clergy, probation and parole officers, educational consultants, personal and organizational motivators, and development consultants, among others. These broad definitions reflect the overlap among the helping professions and the generic nature of the counseling process.

Sweeping exemptions

Some states approach the problem of overlapping occupations by expressly excluding certain professions from the regulation of counseling. Senate Bill No. 3281 takes this approach but makes so many exemptions that regulation seems almost meaningless. The bill exempts qualified members of other professions and other counselors.

Without explaining what the terms mean, the bill exempts “*qualified members of other professions* [emphasis added], such as physicians, psychologists, registered nurses, or social workers.” They may not, however, represent themselves by any title or practice described in the bill.

This provision appears to allow like professionals to practice but confuses the issue by saying they may not call themselves counselors or say that they are engaging in practices described in the bill. This may prevent them from saying, for example, that they help clients to achieve mental, emotional, or physical adjustment; or perform appraisals, consulting, counseling, referral, or research. These “counseling” procedures are common and the terms are used in many similar professions.

The bill also exempts all counselors employed by government agencies and by educational institutions, counseling student interns or trainees, counseling by nonresidents (up to 30 days per calendar year), and volunteer or professional counselors working for public and private nonprofit organizations or charities.

Few categories regulated

These sweeping exemptions leave only those in private practice subject to regulation under the bill. Limiting regulation to private practitioners would make regulation pointless because so many counselors could practice without meeting any standards. Furthermore, the nature and extent of private counseling practice in Hawaii is largely unknown. Proponents of licensing had no data on the number of counselors to be regulated and no complete listing of these practitioners.

Proposed Legislation Is Seriously Flawed

The bill contains a number of inconsistencies and errors. But among its more serious flaws are the restrictiveness of its licensing requirements and provisions that are unconstitutional, of questionable legality, or unclear.

Restrictive licensing requirements

The purpose of licensing is to ensure that applicants have minimum competencies to practice. Senate Bill No. 3281 contains licensing requirements that would unreasonably restrict entry into the profession. The problem areas include education and experience, statements of professional intent, supervision, and associate licenses.

Unwarranted education and experience requirements

Applicants for the professional counselor license would need a master's degree in counseling which includes a practicum and internship, and at least three years of post-master's experience in a professional setting. This experience would include at least 3,000 hours of professional practice of which 1,200 is in counseling and 3,000 hours in supervised experience under a board-approved supervisor.

We found no evidence that a counseling degree or the required experience are essential to minimal competency or that their absence would harm the public. The field of counseling is broad and changing and there is no single path to competency. There is no consensus about standards of education and experience. States that regulate counselors differ in their requirements. Generally they require a master's degree. Some require that the degree be in counseling, others do not. Experience requirements vary even more. They range from one to four years and differ in the required number of hours and types of experience.

These stringent requirements are in contrast to the much looser requirements that would be in effect for current practitioners. The bill has a grandfather clause that would allow applicants to meet less stringent requirements for the first 12 months of the licensing program. These applicants could qualify with a master's degree in a related professional field (instead of a counseling degree) and without previous supervised experience. The written examination would also be waived.

Inappropriate statement of intent

The bill requires applicants to state what kind of practice they intend to engage in. This requirement is not relevant to the basic purpose of licensing.

Applicants must submit a "statement of professional intent" that discloses the applicant's areas of professional competence, the intended use of the license, the client populations with whom the applicant will work, and the counseling procedures the applicant plans to utilize, including the applicant's theoretical orientation and preferred intervention strategies. An applicant would be required to validate the competencies declared and to agree to continue to declare competencies once licensed. Licensees would be required to update the statement when renewing their license.

Requiring these details of an applicant's intentions, professional beliefs, and practices is unprecedented. It is particularly questionable when the bill establishes no criteria on how the board should approve or disapprove these statements.

Restrictive supervision requirements

The bill requires applicants for licensure as a professional counselor to have 3,000 hours of experience under an “approved supervisor.” Associate counselors must also practice under an approved supervisor. The board would maintain a registry of approved supervisors.

The definition of approved supervisor could limit their number and thus limit opportunities for applicants to obtain the required hours of supervision. An approved supervisor is defined as:

any licensed professional counselor with five years counseling experience, including two years of supervised experience, who documents to the board the completion of a graduate level supervision course or equivalent that includes content and experience relevant to the supervision of counselors.

Allowing only licensed professional counselors to be approved supervisors disqualifies professionals in related fields, such as psychiatrists and psychologists who may be competent in counseling and who may even have supervised or currently be supervising counselors. Also, it is not clear what would qualify as a supervisor course or its equivalent. Currently, graduate programs in counseling offered by the University of Hawaii and Chaminade University of Honolulu do not offer courses in supervision.

Restrictive associate licensing

The bill would license “associate counselors” but the purpose of this license is unclear and the provision appears to be restrictive.

Applicants for an associate license must have a master’s degree “which is primarily counseling in content” and pass a written examination. Once licensed, associate counselors could practice for up to three years but only under the direct supervision of an approved supervisor under a plan approved by the board. Associate counselors would qualify for the professional counselor license when they meet the experience requirement and submit a statement of intent for a professional counselor license.

Associates who do not qualify for professional counselor licensure within three years may not have their licenses renewed.

The associate license appears to create an alternative pathway for those without a master’s degrees in counseling. But the requirement for those with other degrees to be licensed as associate counselors appears to be discriminatory in the absence of any evidence that completion of a graduate degree is essential for competent practice.

Other questionable provisions

The bill is flawed in many other respects. Many questionable provisions could have been avoided if the bill had followed the State's new Uniform Professional and Vocational Licensing Act, Chapter 436B, HRS. We list some of the more questionable provisions below.

- Requiring applicants to be residents of Hawaii and citizens (or of declared intent to be a citizen) of the United States appears to be unconstitutional.
- The proposal to allow only professional counselor associations to nominate counselor board members is unfairly restrictive.
- The provision regarding licensing applicants convicted of a felony or crime involving moral turpitude appears to be inconsistent with Section 831-3.1, HRS, which spells out when and how previous crimes can disqualify applicants.
- The type and number of examinations are not specified. Applicants for an associate counselor license and applicants for a counselor license must pass examinations of knowledge of the field of counseling. Whether there would be a single examination or two examinations is not stated. The bill also suggests that another examination would be required to validate the competencies declared in the statement of professional intent.
- Requiring licensees to complete continuing education requirements for renewal of a professional counselor's license as proposed is questionable. The effectiveness of mandatory continuing education in maintaining professional competence has not been demonstrated.
- In one place the bill provides for the chairperson of the board to make final decisions on license applications. Yet in other places the bill states that the board issues licenses.

Recommendation

We recommend that Senate Bill No. 3281 not be enacted.

Notes

Chapter 1

1. The figures are based on information provided by officials of the Personnel Management, Certification, and Development Branch of the Department of Education and of the Rehabilitation Branch of the Department of Labor and Industrial Relations.
2. The figures are based on information provided by officials of the Rehabilitation Branch of the Department of Labor and Industrial Relations and of the Alcohol and Drug Abuse Division of the Department of Health; and on listings in GTE Hawaiian Telephone's *The Everything Pages*, Oahu, March 1992-1993, pages 749-50.
3. Harriet L. Glosoff, American Association for Counseling and Development, "Education, Experience, and Examination Requirements of Credentialed Counselors as Dictated by State Statutes" (summary as of May 1992); Carol S. Vroman and John W. Bloom, "Summary of Counselor Credentialing Legislation," *Guidepost*, March 14, 1991.
4. Ibid.
5. Section 297-2, HRS.
6. Section 386-25, HRS.
7. Section 321-193, HRS.
8. Hawaii, Legislative Auditor, *Sunrise Analysis of a Proposal to Regulate Professional Counselors*, Report No. 88-17, Honolulu, November 1988.

Chapter 2

1. Letter to Marion M. Higa, State Auditor, from Robert A. Alm, Director, Department of Commerce and Consumer Affairs, July 29, 1992.
2. Ibid.

Response of the Affected Agency

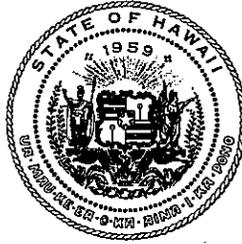
Comments on Agency Response

We transmitted a draft of this report to the Department of Commerce and Consumer Affairs on November 4, 1992. A copy of the transmittal letter to the department is included as Attachment 1. The response from the department is included as Attachment 2.

The department supports the findings and conclusions in our report. It comments that our analysis touched on the same areas of concern it had.

ATTACHMENT 1

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MARION M. HIGA
State Auditor
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November 4, 1992

C O P Y

The Honorable Robert A. Alm, Director
Department of Commerce and Consumer Affairs
1010 Richards Street
Honolulu, Hawaii 96813

Dear Mr. Alm:

Enclosed for your information are three copies, numbered 6 to 8 of our draft report, *Sunrise Analysis of a Proposal to Regulate Professional Counselors*. We ask that you telephone us by Friday, November 6, 1992, on whether you intend to comment on our recommendations. If you wish your comments to be included in the report, please submit them no later than Wednesday, November 18, 1992.

The Governor and presiding officers of the two houses of the Legislature have also been provided copies of this draft report.

Since this report is not in final form and changes may be made to it, access to the report should be restricted to those assisting you in preparing your response. Public release of the report will be made solely by our office and only after the report is published in its final form.

Sincerely,

A handwritten signature in cursive script, reading 'Marion M. Higa'.

Marion M. Higa
State Auditor

Enclosures

JOHN WAIHEE
GOVERNOR



ROBERT A. ALM
DIRECTOR

SUSAN DOYLE
DEPUTY DIRECTOR

STATE OF HAWAII
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November 16, 1992

RECEIVED

Nov 17 2 17 PM '92

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Ms. Marion H. Higa, State Auditor
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Dear Ms. Higa:

Thank you for providing the Department of Commerce and Consumer Affairs the opportunity to comment on the Sunrise Analysis of a Proposal to Regulate Professional Counselors.

The Department found the Auditor touched upon the same areas of concern which we had. We can support the summary of findings and conclusions in the report.

Very truly yours,

ROBERT A. ALM
Director

cc: Noe Noe Tom, Licensing Administrator

