# Information Summary

# **Report on Counselor Credentialing**

Abolishing registered counselor credential and implementing new professional counseling credentials

December 2011



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# **Contents**

Page	Contents
1	Executive Summary
3	Introduction
5	Implementation of the New Counselor Credentials and Standards
7	New Counselor Professions - Credentialing Data
11	New Counselor Professions - Complaint and Disciplinary Data
15	Next Steps and Recommendations
15	Appendix A
19	Appendix B

# **Executive Summary**

In 2008, Second Substitute House Bill 2674 (2SHB 2674) created eight new counseling professions on July 1, 2009, and abolished the registered counselor credential on July 1, 2010.

The bill requires the Department of Health (department) to provide information about abolishing the registered counselor credential and implementing the new counselor professions. This report is a summary that includes the number of new credentials issued, disciplinary actions, requirements for obtaining a credential, and costs of implementing the bill.

Abolishing the registered counselor credential and implementing the new professions was a multiphase, multi-year project. We transitioned thousands of credential holders to new professions. Many rules, licensing materials, and procedures were created. To maintain continuity of client care and minimize impact on the community mental health programs, we hired and trained additional staff so the transition to new professions would be timely and efficient.

Over two years, we handled thousands of calls and messages with registered counselors, new applicants, service providers, and employers. We found that many registered counselors applied for a replacement credential late in the transition period. More than half of the new credentials were issued three months before the registered counselor credential ended. We made sure to manage resources to be ready for a last minute surge in applications.

When the house bill went into effect, there were 15,950 registered counselors. About 10,000 registered counselors applied for, and received, another counseling credential allowing them to continue practicing. About 6,000 registered counselors did not obtain a replacement credential and are no longer eligible to practice.

We are tracking complaint and disciplinary data on the new professions, but there is not yet sufficient data to identify trends. We also tracked staffing and other costs to implement the legislation. Final reports show that the transition was completed within available resources.

From our review of the transition process, we identified areas for continued improvement. We plan to take these steps:

- We will work with community colleges to increase numbers of applicants for the certified adviser credential.
- We will appoint an advisory committee to review current counselor rules and identify changes that may be needed. The committee will also help develop added examination questions.
- We will continue to compile and analyze complaint and disciplinary data for trends, and make changes to improve patient safety and the practice of counseling.

## Introduction

The Washington State Legislature enacted Second Substitute House Bill 2674 in 2008. The bill created eight new counseling professions on July 1, 2009, and abolished the registered counselor credential on July 1, 2010.

Section 23 of the bill requires the department to report to the legislature and the governor by December 15, 2011, on:

- The number of registered counselors who become certified counselors or certified advisers.
- The number, status, type, and outcome of disciplinary actions involving certified counselors and certified advisers beginning June 12, 2008 (the effective date of the bill).
- Status of education equivalency, examination, supervisory, consultation, and continuing education requirements established by this act.
- Report on cost savings or expenditures to implement the bill.
- Make recommendations regarding future reports or evaluations.

This report contains information requested by the legislature. The report also includes data and analysis related to abolishing the registered counselor credential, and the transition to the new counseling professions.

In 2006, several concerns were raised about the registered counselor credential. Required education and training for the registered counselor credential was minimal. There was a public perception that a registered counselor had more education and training than was actually required. There was also a high rate of disciplinary actions taken against individuals holding this credential. Based on these concerns, Governor Chris Gregoire directed the department to review the registered counselor profession to determine the level of regulation needed to ensure patient and public safety. A task force report recommended eliminating the registered counselor credential, and creating new credentials with higher standards.

House Bills 1494 and 1993, introduced during the 2007 legislative session, included many of the task force recommendations. Neither bill passed. However, a proviso in 2007-09 operating budget directed the department to convene a second work group to develop added recommendations to regulate registered counselors. The 2007 report included comprehensive recommendations for creating new credentials for private practice, in-training, and agency affiliated counselors. The report also recommended scopes of practice, disclosure statements to be provided to clients, and continuing education standards.

The eight new counseling credentials are:

# **Certified Counselor (CC)**

This credential is for counselors in private practice who have a bachelor's degree in a counseling-related field and have passed an examination. Providers with this credential must have a supervisory or consultation arrangement with a qualified license holder.

# Certified Adviser (CA)

This credential is for counselors in private practice who have a two-year college degree in a counseling-related field and have passed an examination. Providers with this credential must have a supervisory arrangement with a qualified license holder.

#### **Agency Affiliated Counselor (AAC)**

This credential is for counselors employed by an agency or facility which is operated, licensed or certified to provide counseling services in the state. The original language has since been expanded by the legislature to include Washington counties and federally recognized Indian tribes as agencies.

# **Chemical Dependency Professional Trainee (CDPT)**

This credential is for individuals enrolled in college and gaining the education and experience to qualify for a Chemical Dependency Professional credential.

#### **Licensed Mental Health Counselor Associate (LMHCA)**

This credential is for individuals with at least a master's degree in mental health counseling who are gaining supervised experience to qualify as a licensed mental health counselor.

#### **Licensed Marriage and Family Therapist Associate (LMFTA)**

This credential is for individuals with at least a master's degree in marriage and family therapy who are gaining supervised experience to qualify as a licensed marriage and family therapist.

#### **Licensed Social Work Associate Advanced (LSWAA)**

This credential is for individuals with at least a master's degree in social work who are gaining supervised experience to qualify as a licensed advanced social worker.

## **Licensed Social Work Associate Independent Clinical (LSWAIC)**

This credential is for individuals with at least a master's degree in social work who are gaining supervised experience to qualify as a licensed independent clinical social worker.

# **Implementation of New Counselor Standards and Credentials**

A phased approach over several years was needed to implement eight new professions and abolish the registered counselor credential.

During the first phase, mid-2008 to mid-2009, we were developing and adopting rules, procedures, examinations, and license applications. We updated to information technology systems for new professions, and communicated changes to credential holders and potential applicants. During the next phase, mid-2009 to mid-2010, we hired staff, reviewed and processed applications, and communicated with interested parties.

The implementation cost was \$1,871,000. The department received \$1,549,000 from the legislature. We used another \$322,000 of existing counselor profession funds to implement new counselor standards and credentials.

Key elements and strategies included:

#### Rules and Standards Development

Rules were created for the new professions following numerous statewide meetings and significant stakeholder feedback. Profession qualifications and practice standards were established for education, examination, supervisory, consultation, and continuing education requirements. Appendix A includes a complete listing of rules that were developed and adopted.

#### Credential Application Development and Application Processing

Application materials and instructions were developed and made available to applicants online. Because of the importance of transitioning registered counselors to new professions to ensure continuity of patient care, we assigned additional staff to process applications and conduct criminal background checks. As a result, thousands of applications were completed within the expected timeframes.

#### Examination Development

Written examinations for certified counselor and certified adviser credentials were created. To improve access for applicants to take the examination, we contracted with a national firm to provide the exam at hundreds of test centers throughout North America. Appendix B lists statistics on applicant performance to date, with summary of the study materials and applicant guide.

# Communication with Credential Holders and Applicants

Throughout implementation, we communicated with current and potential counselors about coming changes and opportunities to participate in the process. During the project, for example, we sent about 40 notifications and updates to credential holders and other interested parties subscribed to our listserv. In 2009 and 2010, we sent postcards were sent to more than 20,000 current and former registered counselors, alerting them to changes and the need to obtain a new credential. Our call center, credentialing, and program staff responded to thousands of calls and e-mail messages.

## Project and Resource Management

This was our first experience transitioning thousands of credential holders to new health care professions. To prepare for it, we created project management and contingency plans for each phase. In the next section of the report we show that many registered counselors delayed applying for a replacement credential until very late in the transition period. As a result, more than half of new credentials were processed and issued three months before the registered counselor credential was abolished. We managed resources to process the surge in applications and to issue credentials by the deadline.

# **New Counselor Professions – Credentialing Data**

In this section we list data about new and existing counselor credentials, and abolishing the registered counselor credential. This includes:

- The number of credentials that were issued for the new counselor professions.
- When providers applied for new credentials.
- The number of counselor profession credentials that were issued to individuals who have not previously held a counseling credential.
- The number of registered counselors that obtained one of the new counseling credentials.
- The number of registered counselors that obtained a counseling credential other than one of the new counseling credentials.
- The number of registered counselors that did not obtain a new credential, and are no longer eligible to practice.

Table 1 presents the number of credentials issued for each of the new professions from the date of inception on July 1, 2009.

Table 1
Credentials Issued for New Counselor Professions
July 1, 2009 through June 30, 2011

New Counselor Profession	Number of Credentials Issued	Percentage of all Counselor Credentials
Certified Counselor	731	7%
Certified Adviser	10	0%
Agency Affiliated Counselor	6,062	57%
Chemical Dependency Professional Trainee	1,431	13%
Licensed Mental Health Counselor Associate	1,212	11%
Licensed Marriage and Family Therapist Associate	294	3%
Licensed Social Work Associate Advanced	174	2%
Licensed Social Work Associate Independent Clinical	751	7%
Total	10,665	100%

- More than half (57 percent) of the credentials issued in the new counseling professions were for agency affiliated counselor.
- Credentials issued in the trainee and associate categories represented more than a third (36 percent) of the credentials issued.
- The percentage of certified counselor credentials issued was low (7 percent) compared to other credential types.
- Very few only 10 certified adviser credentials were issued.

Table 2 presents the number of credentials issued for the new professions each month and the average time each credential was held by providers to date.

Table 2 Credentials Issued for New Counselor Professions July 1, 2009, through June 30, 2011

	Number of Credentials Issued									
Month	Certified Counselor	Counselor Certified Adviser	Agency Affiliated Counselor	Chemical Dependency Professional Trainee	Health Counselor Associate	Marriage and Family Therapist Associate	Social Worker Associate Advanced	Social Worker Associate Independent Clinical	Total By Month	
July2009	0	0	0	11	1	2	1	6	21	
August	0	0	114	37	14	7	4	14	190	
September	0	0	135	41	17	10	1	25	229	
October	0	0	128	23	23	6	4	20	204	
November	0	0	126	33	30	7	5	27	228	
December	0	0	198	79	53	17	6	45	398	
January2010	0	0	216	59	42	21	9	31	378	
February	0	0	256	67	42	12	1	34	412	
March	20	0	364	106	44	6	5	30	575	
April	31	0	607	159	87	30	17	78	1,009	
Мау	61	0	662	190	144	22	23	111	1,213	
June	192	0	2,412	264	381	83	41	180	3,553	
July	103	0	346	74	83	14	9	23	652	
August	89	1	204	48	23	12	11	31	419	
September	82	0	82	31	51	8	9	24	287	
October	68	2	72	18	78	1	11	7	257	
November	29	3	90	65	34	5	5	6	237	
December	10	3	32	29	18	7	1	7	107	
January2011	9	1	3	18	23	7	2	4	67	
February	9	0	4	26	1	1	1	9	51	
March	12	0	2	28	12	6	3	13	76	
April	4	0	3	23	6	7	3	6	52	
May	2	0	4	1	3	2	1	9	22	
June	10	0	2	1	2	1	1	11	28	
Total By Profession	731	10	6,062	1,431	1,212	294	174	751	10,665	
Average Time In Months Each New Counselor Credential Has Been Held To Date	11.3 Months	5.6 Months	14.4 Months	14 Months	13.5 Months	14 Months	13.3 Months	14.2 Months	14 Months	

- Although the eight new counselor profession credentials became available in July 2009, most applicants waited until 2010 to obtain a new credential.
- Over half of all of the credentials issued for the new counselor professions were issued during the months of April, May, and June 2010.
- On average, providers have held their new counselor profession credential for only 14 months.

Table 3 presents a breakdown of the number of credentials issued in the new professions to former registered counselors and individuals who had not previously held a counseling credential.

Table 3
Credentials Issued to Former Registered Counselors
And Individuals with No Prior Counseling Credential
July 1, 2009 through June 30, 2011

New Counselor Profession	Total Former Reg Number Counse		•		o Prior Counseling Credential	
	Issued	Number	Percent	Number	Percent	
Certified Counselor	731	648	89%	83	11%	
Certified Adviser	10	5	50%	5	50%	
Agency Affiliated Counselor	6,062	4,633	76%	1,429	24%	
Chemical Dependency Professional Trainee	1,431	1,024	72%	407	28%	
Licensed Mental Health Counselor Associate	1,212	1,162	96%	50	4%	
Licensed Marriage and Family Therapist Associate	294	252	86%	42	14%	
Licensed Social Work Associate Advanced	174	137	79%	37	21%	
Licensed Social Work Associate Independent Clinical	751	648	89%	83	11%	
Total	10,665	8,678	81%	1,987	19%	

- Out of all credentials issued in the new professions, 81 percent were to individuals who had held the registered counselor credential; 19 percent were issued to individuals who had not held a counseling credential.
- Of the certified counselor credentials issued, 89 percent were to individuals who had held the registered counselor credential.
- Three-quarters (75 percent) f the credentials issued in the trainee and associate categories were to individuals who had held the registered counselor credential.

An analysis we conducted for the 2007 work group found that many counselors with advanced counseling degrees and significant experience chose to be credentialed as registered counselors, instead of a mental health counselors, which have higher education and experience requirements.

Many of these providers decided to obtain the master's level credential for which they were qualified, now that the registered counselor credential no longer exists.

Table 4 shows, as of June 30, 2011, the number of former registered counselors who obtained an existing master's level counseling credential instead of one of the new credentials. We have not included data for the psychologist profession because very few of these providers chose to practice under the registered counselor credential.

Table 4
Credentials Issued to Former Registered Counselors
For Existing Counselor Professions
July 1, 2009-June 30, 2011

Counselor Profession	Credentials Issued to Former Registered Counselors
Licensed Mental Health Counselor	796
Licensed Marriage and Family Therapist	181
Licensed Social Worker - Advanced	31
Licensed Social Worker - Independent Clinical	406
Total	1,414

Table 5 presents the number of registered counselors, as of June 30, 2011, who obtained one of the new credentials or one of the previously established credentials, and the number who did not obtain any credential.

Table 5
Registered Counselors Who Obtained
And Did Not Obtain Replacement Counseling Credential
As of June 30, 2011

Registered counselors on July 1, 2009	15,950	
Registered counselors who obtained a credential in one of the new counselor professions (from Table 2)	8,678	54%
Registered counselors who obtained a credential in a previously established counselor profession (from Table 3)	1,414	9%
Registered counselors who did not obtain any credential	5,858	37%

# **New Counselor Professions – Complaint and Disciplinary Data**

Tables 6 though 12 show the number, nature, and status of all cases opened in each of the eight new professions from July 1, 2009, through June 30, 2011.

Table 6
Certified Adviser

			Case Status	
Case Nature	Cases Opened	Cases Closed	Cases Under Review	Actions Taken
Unlicensed Practice (Never had a License)	1	1	0	0
Total Cases	1	1	0	0

Table 7
Agency Affiliated Counselor

	Cases	Case Status				
Case Nature	Opened	Cases Closed	Cases Under Review	Actions Taken		
Criminal Conviction on Application	32	3	8	21		
Standard of Care/Services	38	26	10	2		
Violation of Laws or Rules	28	18	6	4		
Unlicensed Practice (Never had a License)	7	3	4	0		
Sexual Misconduct	11	3	8	0		
Substance Abuse	8	1	7	0		
Action in Another State/Jurisdiction	3	1	0	2		
Documentation	3	2	1	0		
Practice Without a Valid License (Expired, Suspended, Revoked)	2	0	2	0		
Theft	5	2	3	0		
Practice Beyond Scope	6	4	2	0		
Fraud	3	3	0	0		
Criminal Conviction	3	2	1	0		
Single Complaint Process	1	1	0	0		
Failure to Meet Licensure Application Requirements	3	1	2	0		
Misrepresentation	1	1	0	0		
Mandatory Reporting	2	1	1	0		
Failure to Comply	1	0	1	0		
Medication Errors	1	1	0	0		
Total Cases	158	73	56	29		

Table 8
Chemical Dependency Professional Trainee

Case Nature	Cases	Case Status				
	Opened	Cases Closed	Cases Under Review	Actions Taken		
Criminal Conviction on Application	150	7	27	116		
Standard of Care/Services	18	7	10	1		
Violation of Laws or Rules	29	18	3	8		
Unlicensed Practice (Never had a License)	3	2	1	0		
Adverse Action Report	18	0	2	16		
Sexual Misconduct	1	0	0	1		
Substance Abuse	7	2	4	1		
Action in Another State/Jurisdiction	8	0	1	7		
Documentation	2	2	0	0		
Theft	4	2	0	2		
Practice Beyond Scope	1	1	0	0		
Fraud	3	2	0	1		
Criminal Conviction	1	1	0	0		
Failure to Meet Licensure Application Requirements	1	1	0	0		
Misrepresentation	4	1	3	0		
Prohibition in Another State	3	0	0	3		
Failure to Comply	1	0	1	0		
Abuse	1	0	1	0		
Cite/Fine	1	0	1	0		
Total Cases	256	46	54	156		

Table 9
Licensed Mental Health Counselor Associate

	Cases	Case Status				
Case Nature	Opened	Cases Closed	Cases Under Review	Actions Taken		
Criminal Conviction on Application	2	2	0	0		
Standard of Care/Services	10	4	6	0		
Violation of Laws or Rules	10	5	4	1		
Unlicensed Practice (Never had a License)	4	2	2	0		
Adverse Action Report	2	1	0	1		
Sexual Misconduct	4	2	2	0		
Substance Abuse	1	1	0	0		
Documentation	3	2	0	1		
Practice Without a Valid License (Expired, Suspended, Revoked)	5	3	2	0		
Fraud	1	1	0	0		
Criminal Conviction	2	1	0	1		
Single Complaint Process	1	1	0	0		
Failure to Meet Licensure Application Requirements	1	0	0	1		
Misrepresentation	1	1	0	0		
Mandatory Reporting	1	1	0	0		
Prohibition in Another State	1	0	0	1		
Educational Program Denial	1	0	0	1		
Total Cases	50	27	16	7		

Table 10 Licensed Marriage and Family Therapist Associate

	Cases	Case Status				
Case Nature	Opened	Cases Closed	Cases Under Review	Actions Taken		
Standard of Care/Services	2	0	2	0		
Violation of Laws or Rules	2	1	1	0		
Adverse Action Report	0	0	0	0		
Sexual Misconduct	1	1	0	0		
Single Complaint Process	1	1	0	0		
Total Cases	6	3	3	0		

Table 11
Licensed Social Work Associate Advanced

		Case Status				
Case Nature	Cases Opened	Cases Closed	Cases Under Review	Actions Taken		
Standard of Care/Services	1	1	0	0		
Unlicensed Practice (Never had a License)	1	1	0	0		
Practice Without a Valid License (Expired, Suspended, Revoked)	1	1	0	0		
Abuse	1	1	0	0		
Mental Health, Physical Health, Investigative Exams, Request for Declaratory Order	1	1	0	0		
Total Cases	5	5	0	0		

Table 12
Licensed Social Work Associate Independent Clinical

Case Nature	Cases Opened	Case Status		
		Cases Closed	Cases Under Review	Actions Taken
Criminal Conviction on Application	2	2	0	0
Standard of Care/Services	8	7	1	0
Violation of Laws or Rules	5	5	0	0
Action in Another State/Jurisdiction	1	0	0	1

Practice Without a Valid License (Expired, Suspended, Revoked)	1	1	0	0
Theft	1	1	0	0
Single Complaint Process	3	3	0	0
Mandatory Reporting	2	2	0	0
Total Cases	23	21	1	1

# **Next Steps and Recommendations**

After reviewing the transition process, we have identified areas for continued improvement. One of these is addressing the unexpectedly low number of applications for the certified adviser credential. We also need more established disciplinary data, a rule review to add clarification, and creating a larger pool of exam questions for the certified counselor and adviser credentials. Our next steps:

- 1. We will work with community colleges to learn why so few of their graduates apply for the certified adviser credential, and encourage more graduates to apply for this credential.
- 2. We will continue to compile and analyze disciplinary activity. As trends become clear, we will develop new strategies to improve patient safety.
- 3. We will develop more detailed practice standards to help the new professions. Legislation directs appointing an advisory committee for the professions of certified counselor, certified advisor, and hypnotherapist. Once the rulemaking moratorium ends, we will appoint a committee to begin rules review and revision activities.
- 4. We will work with the advisory committee to create additional questions for the certified counselor and adviser credentials.

# **APPENDIX A – Summary of Rules Adopted to Implement the New Counselor Professions**

# WAC Chapter 246-810 Counselor Rules Adopted

#### • 246-810-010

Defined agency, agency affiliated counselor, certified adviser, certified counselor, client, consultation, counseling, counselor, private practice counseling, psychotherapy, and supervision.

#### • 246-810-012

Defined the application process for agency affiliated counselor, certified counselor, certified adviser.

#### • 246-810-015

Defined agency affiliated counselor scope of practice and credentialing requirements.

#### • 246-810-016

Identified agencies, facilities, or counties that can employ agency affiliated counselors.

#### • 246-810-017

Defined the process to become a recognized agency or facility.

#### • 246-810-018

Required that agency affiliated counselors report an employment change.

#### • 246-810-0201

Defined the practice scope and limits of certified counselors.

## • 246-810-021

Defined the practice scope and limits for certified advisers.

#### • 246-810-0221

Defined the qualifications to become a certified counselor.

#### • 246-810-023

Defined the qualifications to become a certified adviser.

#### • 246-810-024

Defined the counseling-related degrees that meet the requirements for certified counselor and certified adviser.

#### • 246-810-025

Defined the supervision and consultation requirements for certified counselors and supervision requirements for certified advisers.

#### • 246-810-026

Defined the qualifications to be a certified counselor supervisor, certified adviser supervisor, or a certified counselor consultant.

#### • 246-810-027

Defined the continuing education for a certified counselor or certified adviser.

#### • 246-810-029

Identified acceptable continuing education courses for certified counselor and certified adviser.

#### • 246-810-0293

Identified the institutions of higher learning, or local, state, national, or international organizations that qualify to provide continuing education for certified counselors and certified advisers.

#### • 246-810-0297

Defined the required certified counselor or certified adviser continuing education documentation.

#### • 246-810-031

Defined the disclosure statement to be provided to clients by certified counselors and certified advisers.

#### • 246-810-035

Defined counselor record requirements.

#### • 246-810-049

Defined sexual misconduct regulations.

# • 246-810-060

Defined mandatory reporting requirements.

#### • 246-810-089

Defined transitional dates impacting all registered counselor credentials.

## WAC Chapter 246-811 Chemical Dependency Professionals Trainee Rules Adopted

#### • 246-811-035

Defined the procedure for certification of chemical dependency professional trainees.

#### • 246-811-048

Defined the trainee supervision requirements.

#### • 246-811-049

Defined the requirements to become a trainee supervisor.

• 246-811-090 and 100 Defined the trainee client disclosure requirements.

# WAC Chapter 246-809 Mental Health Counselor Associate, Marriage and Family Therapy Associate, and Social Worker Associate Rules Adopted

246-809-010, 110, 210, 310
 Defined associate, independent social work, mental health counseling, marriage and family therapy.

• 246-809-035

Defined associate recordkeeping and retention requirements.

• 246-809-040, 140, 240, 340

Defined requirements for reporting suspected abuse or neglect of a child or vulnerable adult.

• 246-809-060

Defined mandatory reporting requirements.

• 246-809-110, 120, 210, 220, 310, 320

Defined approved associate education programs, approved supervisor, equally qualified licensed mental health practitioner, continuing education requirements, and group supervision.

• 246-809-121, 221, 321 Defined program equivalency requirements.

• 246-809-130, 230, 330

Defined supervised postgraduate experience requirements.

• 246-809-134, 234, 334

Defined approved supervisor requirements.

• 246-809-140, 240, 340

Defined examination requirements.

• 246-809-700 and 710

Defined client disclosure requirements.

#### APPENDIX B -

# Overview of the Examination Required for Certified Counselors and Certified Advisers

# **Performance Of Applicants On The Examination To Date**

• Number of applicants taking the examination: 764

• Number of applicants passing the examination on first administration: 617 (80.7%)

• Number of applicants passing on subsequent administrations: 120 (15.7%)

• Number of applicant who have not successful passed to date: 27 (3.5%)

# **Subjects / Sources Materials Covered On The Examination**

- <u>Diagnostic and Statistical Manual of Mental Disorders</u> (DSM), Fourth Edition, American Psychiatric Association, Chapter on Global Assessment of Functioning
- Washington State Laws and Rules:

RCW 18.19	Counselors
RCW 18.130	Uniform Disciplinary Act
RCW 70.02	Health Care Information Act
RCW 26.44	Abuse of Children
RCW 71.05	Mental Illness Act
RCW 74.34	Abuse of Vulnerable Adults
WAC 246-810	Counselor Rules
WAC 246-15	Whistleblower Complaints
WAC 246-16	Standards of Professional Conduct
WAC 246-12	Administrative Procedures and Requirements for
	Credentialed Health Care Providers
RCW 71.34	Age of Consent Regulations

- National Institutes of Mental Health Publications on Disorders and Populations
- Suicide Fact Sheets, American Association of Suicidology
- Violence Against Women: Information for Health Care Providers