

Attachment B

License Type	Total Records	Records with Colorado Address	STATUS WITH DORA:			Active			Active - Restricted			Active - With Conditions			Inactive			Expired			Revoked			Surrendered			Suspended			Voluntary Surrender		
			Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total			
LPC	10,970	9,432	7,139	212	2.97%	5	3	60.00%	68	68	100.00%	75	2	2.67%	2,001	97	4.85%	29	29	100.00%	18	16	88.89%	11	10	90.91%	83	83	100.00%			
Does not state			155	1	0.01%										16																	
HS Diploma or GED			1												1																	
Highest Education Indicated on DORA:															2																	
AA/AS			1												1																	
BA/BS			52												2																	
MA/MS			6,667	194	2.72%	5	3	60.00%	66	66	97.06%	71	2	2.67%	1,684	81	4.05%	29	29	100.00%	15	13	72.22%	9	8	72.73%	82	82	98.80%			
Doctorate			253	17	0.24%				2	2	2.94%	4			299	16	0.80%				3	3	100.00%	2	2	100.00%	1	1	100.00%			

NIC	20,433	19,372	STATUS WITH DORA:			Active			Active - Restricted			Active - With Conditions			Cancelled			Expired			Revoked			Surrendered			Suspended			Voluntary Surrender		
			Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total			
Does not state			2144	12	0.26%	1			19	19	42.22%	13			536	15	0.13%	4	4	22.22%												
HS Diploma or GED			102	7	0.15%				1	1	2.22%	43	2	0.06%	805	64	0.57%	1	2	11.11%	6	6	42.86%	2	2	20.00%	22	22	34.92%			
Certificate			3											7																		
Highest Education Indicated on DORA:															203	12	0.11%	5	5	27.78%	7											
AA/AS			46	3	0.06%				1	1	2.22%	15			203	12	0.11%															
BA/BS			583	19	0.41%	1			6	6	13.33%	86			2,208	58	0.51%	5	5	27.78%	7											
MA/MS			1,618	76	1.63%				17	17	37.78%	2,650	23	0.70%	6,841	172	1.52%	6	6	33.33%	7	7	50.00%	6	6	60.00%	27	27	42.86%			
Doctorate			158	8	0.17%				1	1	2.22%	463	5	0.15%	700	172	32.09%	2	2	11.11%	1	1	7.14%	1	1	10.00%	3	3	4.76%			

PSY	5,136	3,837	STATUS WITH DORA:			Active			Active - Restricted			Active - With Conditions			Inactive			Expired			Revoked			Surrendered			Suspended			Voluntary Surrender		
			Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total	Disciplinary Action	Percent of Disciplinary Actions	Total			
Does not state			36												45																	
Highest Education Indicated on DORA:															13																	
AA/AS			1												1																	
BA/BS			3												1																	
MA/MS			9												13																	
Doctorate			2704	149	5.41%	4	2	50.00%	30	30	100.00%	8	3	37.50%	947	46	4.86%	43	43	100.00%	24	24	100.00%	6	6	100.00%	22	22	100.00%			

**Consumer & Small Business Alliance
Kim M. Green, Founder
1304 Westmoreland Rd, Ste. A
Colorado Springs, CO 80933
719-231-5715**

RE: Oppose Amendments to HB20-1206

The Consumer & Small Business Alliance brings consumers and professionals together to work in a collaborative way to insure complete access, affordability to care and educational standards.

The CSBA opposes any amendments to HB20-1206 that would eliminate the Psychotherapy Registration or change their designation to coaches which would fall under the need for a registration and would put the registration in danger of not meeting the minimum standards of practice in order to exist.

Historically, Colorado is one of the healthiest states in the nation, yet we have a crisis surrounding the availability of affordable and efficacious mental health professionals. Our suicide rates amongst our teens are some of the highest in the nation. When someone is at risk of committing suicide and seeks help, assessment is not the most important thing to a teen or their parents, saving that child's life is. Having a counselor guide them through and talk them down is really what is at stake in this hearing today.

Will the legislators of Colorado eliminate needed help of practicing counselors that take calls on suicide hotlines, going out to meet the homeless in their encampments, going into prisons as peer counselors to help stop recidivism and show them a different path?

1. AGAINST THE STATE CONSTITUTION

a. State Constitution 6-2-102. Legislative declaration:

- i. "The general assembly declares that the purpose of this article is to safeguard the public against the creation or perpetuation of monopolies and to foster and encourage competition by prohibiting unfair and discriminatory practices by which fair and honest competition is destroyed or prevented. This article shall be liberally construed so that its beneficial purposes may be subserved."**

2. PUTS EVERYONE OUT OF BUSINESS

- a. Elimination of the Registered psychotherapists and requiring Licensing alone would make all other professionals illegal to practice in the state of Colorado. That is what Scope of Practice and Licensing laws are designed to do.**
- b. Eliminating the psychotherapy registration creates an unfair monopoly and puts all others out of business by creating a Scope of Practice that one would have to follow under the Licensed Professionals Practices Act who are promoting this. In order to practice, all counselors would have to follow educational requirements which are required under licensing laws. The Psychotherapy Registration keeps that monopoly at bay and allows for all to practice thereby upholding the state constitution.**

3. **CREATES AN UNFAIR MONOPOLY & IS AN ANTITRUST VIOLATION** ~ The opposition and the elimination of the Registered Psychotherapists create an unfair and illegal monopoly in Colorado based on the following criteria of an antitrust violation.
 - a. This amendment comes at the bequest of a stakeholder called the American Psychological Association. The APA is a membership driven organization- acting for the good of its membership, by disallowing all other education than in their practices act is thus: SOLE PRODUCER OF EDUCATION MATERIAL, CERTIFYING UNIVERSITY and COLLEGES, CONTROLLING PHILOSOPHY OF TREATMENT and PHILOSOPHY OF HOW THE PSYCHOLOGICAL DAMAGE IS CREATED. BEING the CREDENTIALING BODY determining WHO provides service, as their MEMBER. Setting Standards of such financial investment so to prohibit MARKET Supply and Demand of providers, to preclude other competing providers from another philosophy or education credentialing body, to determine service rates and to restrain service providers, maintaining a hourly rate of billing which for many populations in the State of Colorado excludes ALL SERVICES. (Exemplified by having to 'leave' the local market via Electronic communications, as psychological services in the remote areas of the State of Colorado cannot support the profession in that economically limited area of the State

4. **CHANGING REGISTERED PSYCHOTHERAPIST TO COACH MAKES REGISTRATION NULL & VOID**
 - a. In the upcoming proposed amendment that will be heard today, changing the term psychotherapy in the registration to "Coach" will not meet the requirements of the Administrative Procedure Act 24-24-104 in the Sunset Review Process, thereby making Registered Psychotherapists practice under an illegal designation. This could make The Registration for Psychotherapists null and void as it would be an illegal document.

5. **THE SUPREME COURT HAS UPHELD ANTITRUST VIOLATIONS AGAINST LICENSING ORGANIZATIONS**
 - a. In *Wilk vs. AMA*, the Supreme Court upheld that monopolies which created educational standards that went against another philosophy was illegal.

6. **LICENSING CREATES INCREASED PRICES ~ P.I.P. CREATED \$180.00 MASSAGE THERAPY SESSION**
 - a. Monopolies always create increased cost. The consumer loses. PIP was required in Colorado in the 90's and the cost of a massage skyrocketed up to \$180.00 per session for insurance pay and \$80.00 per session for private pay. Once PIP was removed prices came down to a practical level where people could once again afford a simple massage.

7. **MONOPOLIES RESTRICT CHOICE & PEOPLE SUFFER**
 - a. There are not enough licensed professionals to take care of the Colorado Population currently. Counselors under the Registered Psychotherapy board have historically met that need. People will no longer have quick access to a professional when they need it most. Elimination would create mass wait lists for care.

8. CONSUMERS WANT CHOICE BEYOND PSYCHOTHERAPY

- a. An alcoholic would prefer to speak with a recovering alcoholic who's been there and now practices as a counselor. A homeless person would rather speak with a counselor who meets them where they are at instead of going to a licensed psychotherapists office. A prisoner would rather speak to a reformed prison counselor who's walked in their shoes.

9. DIFFERENCES IN BELIEF.

- a. Many consumers do not believe in the practice of psychotherapy and choose Hypnotherapy or other modalities that Licensed Psychotherapists don't learn at Universities or in their training.

One consumer shared, "Freud was a cocaine addict. I'm an addict. Why would I follow anyone who learned his teachings?"

In conclusion, groups have historically fought over who was right and who was wrong. Licensing bodies have tried to create monopolies by stating their training, educational standards, philosophies, and ways of doing things was far superior to other beliefs. Legislators have believed this because the argument is compelling. This is a philosophical debate of who is right and who is wrong.

Ultimately, the consumer and public lose.

Please vote no on the amendments to change the psychotherapy registration in any way.

Sincerely,

Kim M. Green, Founder
Consumer & Small Business Alliance