



Petition for Waiver

With this petition, this writer requests consideration for a waiver of Rule MPH 306.01(c):

"(c) The applicant shall have completed at least a one-year practicum or internship supervised by an American Association of Marriage and Family Therapy (AAMFT) approved supervisor prior to the completion of the master's degree. This experience shall total a minimum of 300 hours of face-to-face client contact hours with individuals, couples, and families for the purpose of assessment, diagnosis, and treatment. At least half of these client contact hours shall have been completed with couples and families" (emphasis added).

This petition serves to request relief from the requirement italicized above of 150 relational hours to be adjusted to 100 hours, per this writer's university requirements, as seen on page 20 of the attached Colorado Christian University Master of Arts Clinical Mental Health Counseling Marriage & Family Therapy Emphasis Professional Practice Manual.

This writer requests this relief on the basis of, per MHP 213.01(b):

(1) Whether adherence to the rule would cause the petitioner hardship:

This writer was previously scheduled to graduate from the above-mentioned program in December 2024; however, this writer extended internship by an additional semester, delaying graduation to April 2025. This was due to not having enough relational hours to reasonably expect acquiring the needed 150 hours by then, allowing additional time to complete the remainder. This came at financial cost due to having to pay for an additional semester of class. Furthermore, this delayed this writer's ability to start working as a pre-licensed clinician while still remaining a student, causing financial hardship. To extend internship experience into the summer by adding an additional semester would increase this financial burden, both by incurring additional educational cost as well as delaying the start time for working as a pre-licensed clinician.

(2) Whether the requested waiver is necessary because of any neglect or misfeasance on the part of the petitioner;

This writer maintains that the shortage of relational hours is not due to any neglect or misfeasance on this writer's part. This writer began professional practice with the Center for Life Management in Derry, NH in August 2023, starting with practicum, in the Children's Department. With limited opportunity for family or couples therapy due to the latter not being offered by this department, as well as clinicians not in the habit of referring for family therapy due to there not having been someone in the department able to offer that service for quite some time, this writer was limited to incorporating parents into some individual sessions with adolescents and children.

This writer was up front with supervision from the beginning regarding the need for relational hours, and the two worked collaboratively to try to make opportunity for them. It was not until around Summer 2024 that family therapy referrals began to come in, over which this writer had no control; unable to refer one's own individual clients, it was dependent upon supervisors to inform their clinicians, and clinicians their clients, of the availability of this service. From that time, family therapy referrals have been steadily coming, and this writer has provided family therapy services for several cases. However, these hours are still limited for a number of reasons: a., some families who are referred do not follow through with the service; b., some families begin family therapy and choose to discontinue shortly thereafter; c., some families attend for a brief period and transition out of the service due to having met their goals; d., many families prefer to schedule on a less frequent schedule, such as biweekly instead of weekly, due to their children being in individual services and not wanting to overwhelm their calendars.

(3) Whether waiver of this rule would injure third persons;

This writer maintains that to grant this waiver of the rule requiring 150 relational hours would not injure third persons for the following reasons. First, this writer has had substantial experience thus far in professional practice working with children, adolescents, and their families, whether through family therapy sessions specifically, or through incorporating parents in individual sessions. Additionally, this writer has met all other requirements for total indirect and direct hours, providing ample experience with individual, systemic, and group counseling, as well as training, documentation, and supervision. It is this writer's opinion that to allow completing 100 relational hours instead of 150, given the over 350 hours each of direct and indirect hours would not pose a risk to clients, especially given that supervision will continue to be provided to ensure competent client care.

And (4) Other good cause for waiving the rule:

To waive this rule would allow this writer to graduate next month, not only preventing further delay of graduation, but also allowing sooner employment. This writer intends to stay with the Center for Life Management for and beyond prelicensure, providing opportunity to continue to serve the mental health needs of children, adolescents, and their families in southern New Hampshire. Additionally, eliminating further delays in graduation/employment means obtaining licensure sooner. That will also enable this writer to sooner give back to the mental health community in other ways, such as by becoming a supervisor and educator to mentor and equip other future mental health professionals.

Thank you for your consideration.

Signed: Jamasa Dayle

Date: 03/06/2025