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OPLC-FINANCE

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Clear Reflection Counseling Associates

Office of Professional Licensure and Certification
Board of Mental Health
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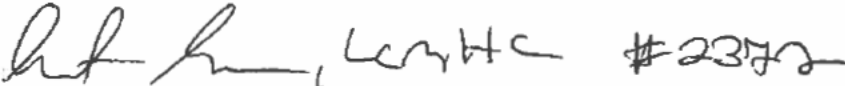
RE: Waiver request of adopted rule Mhp 305.03 (I)

I supervised the following clinicians whose supervision agreement approved 10/20/2023: Emily Moore, MA, Scott Schilling, MA and Avalon Zymin, MA. I also supervised Tori Cronin, MA from 12/4/2023 to 5/9/2024.

Please consider waiving adopted rule Mhp 305.03 (I) which reads “ (I) If the supervised professional experience was in a private practice, then the supervisee shall have a W-2 relationship with the site. A 1099 independent contractor relationship with the site shall not meet this requirement.

This rule was adopted and implemented after the above named clinician's supervisory agreements were in place. The rule specified the difference between a 1099 private practice and a W-2 practice. Upon the rule's implementation, our practice changed to a W-2 establishment. Since there was no clarification in the laws and rules differentiating between 1099 and W-2 supervision, the agreements were completed under the assumption that Clear Reflections was an agency and not an independent private practice.

Thank you for the consideration,

 #2372

Catharine Sauer, LCMHC, lic. # 2372