



**Tennessee Association
for Marriage and Family Therapy**

A Division of the American Association for Marriage and Family Therapy

March 5, 2018

Members of the Board
c/o Susan Hammonds-White, EdD, LPC
Tennessee Board of Licensed Professional Counselors, Licensed Marital and Family Therapists and
Licensed Pastoral Therapists
665 Mainstream Drive
Nashville, TN 37243

Members of the Board:

This letter has been approved by the Board of The Tennessee Association for Marriage and Family Therapy. Our state association expresses its opposition to the addition of occupational therapists as mental health service providers for the treatment of trauma on HB1510/SB1797, The Tennessee Public Safety Behavioral Health Act.

The primary focus of training and practice of occupational therapists is not psychotherapy. The regulations that govern their profession in Tennessee do not include the higher level and comprehensive required coursework, clinical training, supervision, licensure evaluation, and continuing education of other mental health service providers in order to diagnose and treat mental illness and trauma.

In its 2018 report *Evaluation of the Department of Veterans Affairs Mental Health Services*, occupational therapists are not listed as full-time equivalent mental health providers alongside psychiatrists, psychologists, social workers, nurses, peer specialists, professional counselors, and marriage and family therapists. Occupational therapists are also not recognized by the U.S Department of Health and Human Services and the Health Resources and Services Administration as one of the five core mental health professions.

Occupational therapists must clearly represent their scope of practice to the public, in order that consumers do not believe they are licensed mental health professionals. Additionally, the ethical dilemma of practicing in dual roles emerges when a practitioner attempts to alternate between or simultaneously offer services otherwise separate.

We must uphold the highest standards of care for all consumers of mental health services in our state. Tennessee firefighters should be protected from this profession's attempt to expand its scope of practice through the very bill which is fully intended to raise those standards.

Respectfully,

Robbie Robinson Hutchens, MMFT, LMFT
Legislative Chairperson
Tennessee Association for Marriage and Family Therapy