

Deborah L. Drew, Ed.D.

Regarding Proposed Rule Chapter 115- The Credentialing of Education Personnel (075 School Counselor) page

February 23, 2026

Senator Rafferty, Chair Murphy, and member of the Education and Cultural Affairs Committee:

I am a school counselor and counselor educator in Maine. I have assisted and consulted with the Maine Department of Education with reviews for certification for 075 School Counselor frequently over the last twenty years. I am writing today to urge you not to approve the changes to Ch 115 Certification Law until more work can be done to clarify and correct certain sections. In particular I am concerned with Part II 075 School Counselor certification. While many attempts have been made to add to and clarify the requirements, the process and language is confusing and has resulted recently in some people receiving 075 School Counselor certification with no training at all in school counseling, just a masters degree in something.

I appreciate and support the following changes:

- The desire to address workforce shortage by making it simpler to become certified in Maine and the intent that “equivalent certification” helps to ease the process for someone certified in another state to be certified in Maine
- Wording recognizing that program curriculum must align with CACREP accreditation standards, though that is not the same as being CACREP accredited.
- Efforts in Alternative Pathway II to define key areas of school counseling coursework: Foundations, Contextual Dimensions, and Practice of School Counseling
- Preserving a minimum of 24 credits required for conditional certification rather than lowering it
- Recognition of the need for conditionally certified school counselors to have more extensive supervision and mentoring

I am deeply concerned about the following:

- “Equivalent certification” is not clearly defined. State standards for School Counselor certification vary widely. How will a certification from another state be deemed “equivalent” to Maine’s certification which has been historically rigorous and aligned with all of the CACREP curriculum expectations.
- “CACREP aligned” is not the same as CACREP accredited. Alignment with coursework can only be determined through rigorous, informed review of each course on the transcript.

- The words Foundations, Contextual Dimensions, and Practice of School Counseling come from the School Counseling specialty section of CACREP standards only and do not recognize that these are designed to be in addition to all the rest of the CACREP core curriculum standards. Specifically, these would refer to the classes commonly known as The Role of the School Counselor, School Counseling Programs, and Practicum and internship in School Counseling. The rest of the courses include all courses found in CACREP 2024, Section 3, Foundational Counseling Curriculum:
 - Professional Counseling Orientation and Ethical Practice
 - Social and Cultural Identities and Experiences
 - Lifespan Development
 - Career Development
 - Counseling Practice and Relationship (skills and theory)
 - Group Counseling and Group Work
 - Assessment and Diagnostic Processes
 - Research and Program Evaluation
- 24 credits for conditional certification reflects only 40% of the required curriculum and does not include important supervised practicum and internship experiences, leaving the conditionally certified person with a very limited scope of practice
- Clinical Mental Health Counselors (Maine LCPCs), who take the same coursework as school counselors except for the school counseling specific courses, cannot practice at all until they are conditionally licensed and which occurs AFTER completion of the graduate program and requires post graduate 3000 hours under very close prescribed and approved clinical supervision prescribed by the licensing statutes. School Counselors carry very similar liability and expectations in their work.
- Simpler certification pathways for school counselors do not provide for adequate training, supervision, and support. The job of the School Counselor involves very critical work, sometimes even life and death decision-making, as in the case of suicidal ideation and intent. Training and supervision are essential.
- School Counselor training requires a minimum of a master's degree. No bachelors degree or doctoral degree specifically trains school counselors.

I recommend the following:

075 School Counselor

Pathway 1: Graduation with a master's degree from a CACREP accredited, Maine approved school counseling program or an equivalent 60 credit CACREP accredited program from another state or certification in another state with equivalent training requirements.

Pathway 2: Master's degree in Clinical Mental Health Counseling or closely related field from a CACREP accredited program and additional coursework and school counseling internship that meets the requirements for School Counselor training: Foundations, Contextual Dimensions, and Practice of School Counseling.

Conditional certification: A minimum of 24 credits of Counseling coursework equivalent to that of a School Counselor CACREP accredited 60 credit programs. As soon as possible, I recommend raising this requirement to 60% of the required 60 credits or 36 credits. Conditionally certified school counselors must be enrolled in a program to complete requirements and receive ongoing, face to face supervision of at least one hour per week throughout their conditional status.

I appreciate your consideration of my concerns and am glad to offer my assistance if desired. I can be reached at drewdeborah1@gmail.com or 207-944-9048.