June 29, 2015

Jaime Hoyle, J.D.
Acting Executive Director
Department of Health Professions
9960 Mayland Drive, Suite 300
Richmond, VA 23233

Re: Changes to Virginia Licensing Requirements

Dear Mr. Hoyle:

The National Association of Service Providers in Private Rehabilitation (NASPPR) is submitting comment regarding proposed changes for licensure requirements for Licensed Professional Counselors in the state of Virginia. NASPPR is a Division of the National Rehabilitation Association (NRA) and represents vocational rehabilitation professionals from a diverse practice spectrum including rehabilitation counselors, rehabilitation nurses, placement specialists, physical therapists, occupational therapists, vocational evaluators, job developers, employers, speech pathologists, insurance adjusters, administrators, managers, supervisors, educators, attorneys, physicians and students.

NASPPR works to improve the quality of the entire rehabilitation process from the medical phase to the job placement phase. As such, NASPPR firmly believes in the importance of upholding high educational, clinical and professional standards for practitioners who are charged with providing person-centered services to individuals who may present with diverse needs across the full counseling spectrum. Credentialing serves a critical role in ensuring that counseling services are being provided by competent, qualified and ethical counseling professionals for the citizens of Virginia. NASPPR believes that these competent, qualified and ethical counseling professionals are appropriately produced from educational programs accredited by both the Council on Rehabilitation Education (CORE) and the Council on Accreditation of Counseling and Related Educational Programs (CACREP). Further, NASPPR believes that the diversity of counselor training (rehabilitation, mental health, addictions, etc.) represented by both CORE and CACREP graduate programs best parallels the diverse and complex counseling needs of communities. Both accrediting bodies are recognized by the Council for Higher Education Accreditation (CHEA), as supporting counselor education standards. Therefore, NASPPR believes that master’s level graduates from both CORE and
CACREP accredited programs should receive full consideration for meeting licensure requirements for Licensed Professional Counselors in the great state of Virginia.

NASPPR does not support the proposed licensure eligibility changes which “require graduation from a clinically-focused counselor preparation program accredited by CACREP or an approved affiliate of CACREP”. Despite the attempt to create recognition of an “affiliate”, the current language explicitly naming CACREP as the required benchmark for educational preparation disenfranchises those counselor candidates coming from CORE accredited programs, and therefore has the potential to further restrict the professional practice of highly qualified professional rehabilitation counselors who are trained and ready to provide much needed services to citizens of Virginia.

NASPPR continues to monitor trends of state licensure boards as well as policies which might marginalize graduates of non-CACREP programs, and result in restricting access, quality, or specialization of needed services to individuals. For example, the use of CACREP exclusive language in the Veterans Administration and in Tri-Care puts the well-being of our veterans at risk, particularly those who are returning from service with significant and life-altering disabilities such as Traumatic Brain Injury. For these individuals and others who experience disability, it is imperative that their counselors have specific training and professional expertise on the impact of living, working, and thriving as a person with a disability. These are training elements found in CORE accredited education programs, not CACREP Clinical Mental Health educational standards. Furthermore, graduates of CORE accredited programs have specific expertise related to vocational counseling. As has clearly been established, employment is a significant life domain that often supports wellness, stability, and mental health for individuals and families. Such expertise is uniquely offered by graduates of CORE accredited programs. To amend licensure language as currently proposed would put many Virginians at risk of not having access to the expert counseling and vocational services they deserve, and threatens the professional practice and careers of highly qualified counselors who hold unique professional counseling skill sets.

The NASPPR Board requests that these concerns and suggestions be carefully considered, and that the proposed licensure regulations be amended to include graduates from CORE accredited programs. This is extremely important to ensure that the diverse needs of Virginians are being met by highly qualified and credentialed professional counselors.

Respectfully Submitted,

Elizabeth Skyles, MS, CRC, LPC
NASPPR President

Joseph E. Keferl, Rh.D., CRC
NASPPR Legislative Representative