



Frequently Asked Questions regarding participation of licensed professional counselors in the Veterans Affairs (VA) health care system

Are licensed professional counselors officially recognized as mental health providers within the VA health care system?

Yes. Public Law 109-461, which was enacted December 22, 2006, explicitly recognized both “licensed professional mental health counselors” and “marriage and family therapists” as mental health providers within the agency. On September 28, 2010, the Department of Veterans Affairs (VA) released a set of qualification standards for licensed professional mental health counselor (LPMHC) positions, as well as for marriage and family therapist positions. Prior to the adoption of the new standards, counselors were typically eligible only for “rehabilitation counseling therapist” positions, at a maximum General Service (GS) level of 11. At this level, counselors were not allowed to work in supervisory positions.

Where can I find a copy of the new standards?

The new standards are posted on the VA’s website at www1.va.gov/vapubs/viewPublication.asp?Pub_ID=507&FType=2.

What are the eligibility requirements for LPMHC positions within the VA?

1. Be a U.S. Citizen.
2. Have a master’s degree in counseling. The standards state that applicants must:
“Hold a master’s degree in mental health counseling, or a related field, from a program accredited by the Council on Accreditation of Counseling and Related Educational Programs (CACREP). Examples of related mental health counseling fields include, but are not limited to, Addiction Counseling; Community Counseling; Gerontology Counseling; Marital, Couple, and Family Counseling; and Marriage and Family Therapy. A doctoral degree in mental health counseling may not be substituted for the master’s degree in mental health counseling.”
3. Be licensed, or working toward licensure. The standards state that:
“Persons hired or reassigned to LPMHC positions...must hold a full, current, and unrestricted license to independently practice mental health counseling, which includes diagnosis and treatment....“Non-licensed LPMHCs who otherwise meet the eligibility requirements may be given a temporary appointment as a graduate LPMHC.... The appointing official may waive the requirement of licensure for a period not to exceed 2 years for a LPMHC that provides care under the supervision of a licensed LPMHC at or above the full performance level. This exception only applies at the entry level (GS-9). For grade levels at or above the full performance level, the candidate must be licensed.”

How did the CACREP accreditation requirement get included in the standards?

The CACREP accreditation requirement was included in the standards by the Department of Veterans Affairs, without any input or recommendation from ACA or other counseling organizations. Instead, the VA convened a panel of subject matter experts, who spent a year researching the counseling profession, industry practice in the use of licensed counselors, and potential use of counseling positions within the VA. Just as it did with the development of standards for other professions, the subject matter expert panel charged with developing the LPMHC standard did its work behind closed doors.

After the standards were released in September of 2010, ACA joined the National Board for Certified Counselors and the American Mental Health Counselors Association in writing to the VA to request the adoption of grandparenting provisions, so that counselors without CACREP accredited degrees could become eligible for LPMHC positions. The VA wrote back to our organizations stating that they adopted the CACREP requirement in order to be consistent with their recognition of other

professionals; graduation from a program that has national (not just regional) accreditation status is a requirement for all of the other mental health professions recognized by the VA. The VA's letter indicated that they have no plans to revise the current qualification standard.

Can local VA offices make exceptions to the requirements in hiring counselors?

No, they cannot.

Can the standards be changed?

Perhaps. Our highest priority for the time being, however, is gaining the hiring of counselors who meet the new standards. Most mental health therapist positions being advertised by the VA appear to be restricted only to clinical social workers, or to marriage and family therapists. ACA has heard from dozens and dozens of counselors who have been told that they are ineligible for therapist positions because they don't have a social work degree or a marriage and family therapist degree. Routine searches on the www.usajobs.gov website turn up few, if any, LPMHC positions.

We need to get local VA offices and facilities to recognize the counseling profession and begin hiring counselors, and we are working with the national VA office to help make this happen. Nevertheless, the most important goal, for both our organization and the Department of Veterans Affairs, is to provide the best service possible for veterans, in terms of both quality of care and access to care. In trying to accomplish this, we believe that as many highly qualified professional mental health counselors as possible should be eligible for mental health provider positions within the VA, perhaps through the use of grandparenting provisions for established, experienced counselors.

What job titles and GS (general schedule) levels will be used for counselor positions?

The positions established by the VA include:

- GS-9 Licensed Professional Mental Health Counselor (Entry Level – for individuals with a graduate degree in counseling but who have not yet become licensed)
- GS-11 Licensed Professional Mental Health Counselor
- GS-12 Licensed Professional Mental Health Counselor Program Coordinator
- GS-12 Licensed Professional Mental Health Counselor Supervisor
- GS-13 Licensed Professional Mental Health Counselor Program Manager
- GS-14 LPMHC Program Manager Leadership Assignments

The GS levels established for these positions parallel those currently used for social workers. The counselor positions are established within the GS-101 "social science" series.

What job responsibilities are included in the new standards?

The GS-11 level LPMHC job qualification standard requires candidates to demonstrate knowledge, skills, and abilities in basic mental health practice areas, including:

- "Ability to make professional evaluations, decisions, and recommendation for treatment planning and implementation.
- "Ability to provide complex crisis intervention and stabilization to patients who are in psychological distress."
- "Ability to fully utilize the current DSM in making diagnoses and formulation of treatment goals and application of appropriate clinical intervention using professional counseling practice."

For positions at the GS-12 level, as an LPMHC Supervisor, the occupational standard states that:

"LPMHCs administratively supervise their licensed staff and/or graduates and may provide treatment to patients. They direct the development and implementation of services and treatment to patients through the administrative supervision, mentoring, and oversight of assigned clinical staff. Their experience must demonstrate practice skills in a specialty area or in administration demonstrating progressively more professional competency and judgment."

My local VA clinic says they haven't heard anything about the law, and that they can't hire counselors until they get more direction from the VA central office.

Counselors have been told by local VA facilities that they can't recognize them until they get further guidance from the VA central office in Washington DC. We asked VA central office staff if this was true, and were told that it is incorrect; VA facilities can use the new Licensed Professional Mental Health Counselor (LPMHC) position standards immediately.

How can I search for “Licensed Professional Mental Health Counselor” jobs with the VA?

Go to www.usajobs.gov and type in “mental health counselor” in the search box. You can also search by geographic location. Jobs that include the provision of mental health treatment will be listed, although many if not most of these may be listed as open only to social workers or marriage and family therapists. Job postings will include a reference to educational requirements.

What should I do if the position recognizes other professionals, but not counselors?

If you meet the LPMHC standards listed above, and the position appears to encompass counseling work but is not listed as open to counselors, we suggest you take the following three steps:

1. Contact the person or office listed as the contact for the position, and ask if you are eligible to apply for the position, despite the fact that licensure as a counselor or completion of a degree in counseling is referenced as a qualification for the position.
2. Contact your Representative and/or Senators’ offices to ask them to explore why the VA is choosing not to recognize licensed professional mental health counselors, and share the position contact information with them. Congress approved recognition of mental health counselors more than four years ago, and veterans need better access to high quality mental health services. If a VA facility in their district or state is deciding that counselors aren’t eligible for counseling positions, they should be concerned and should take action to correct this. You can identify your congressional offices using ACA’s internet action center at <https://www.votervoice.net/COUNSELING/Home>.
3. Let us know what you hear from either the local VA contact for the position or your Congressional offices. We need information about what counselors are experiencing in their communities in order to document issues regarding counselor recognition to VA headquarters staff. Send an email to Art Terrazas with ACA at aterrazas@counseling.org.

Will the new standards be available for use in the military or in other federal agencies?

Yes. VA staff have been in contact with the Office of Personnel Management (OPM) regarding the standards. Ultimately, OPM will establish new occupational titles for licensed professional mental health counselors based on, if not identical to, the occupational standards adopted by the VA. Once the job classifications and occupational series have been approved by OPM, other government agencies and branches of the military will be able to hire “licensed professional mental health counselors.”

For more information, Office of Government Affairs, 703-823-9800 x242