



January 1, 2013

Dr. Amy Milsom  
Chair, Standards Revision Committee  
Council for Accreditation of Counseling and Related Education Programs  
1001 North Fairfax St, Suite 510  
Alexandria, VA 22314

Dear Dr. Milsom,

On behalf of the American Counseling Association's Governing Council and ACA's 52,000 members, I would like to thank you and the entire CACREP Standards Revision Committee for the thorough process that you have established for the promulgation of the 2016 CACREP standards. Your efforts to solicit comments are greatly appreciated and ACA would like to use this opportunity to provide feedback to CACREP about the first draft.

ACA applauds the overarching theme of "clarify, simplify, unify" for the 2016 CACREP Standards. The draft makes the standards cleaner with general entry-level standards returning to the core curriculum section. Overall, the refined guidelines are a vast improvement in clarity, while providing balance of program flexibility with CACREP requirement specificity.

**ACA fully supports the proposed requirement that each entry-level program, including career counseling, school counseling, and student affairs and college counseling, be comprised of 60 credit hours by July 2020.** This new standard will raise the bar and strengthen the academic preparedness of professional counselors. It will also unify the profession and move us one step closer to licensure reciprocity. By setting one set of academic standards at the national level, policy makers at the state level will have a marker for which to build consistency in credentialing requirements for all professional counselors. In addition, requiring the same number of credits for all CACREP programs will reduce confusion among both the public and legislators as to whether professional counselors who have graduated from some program areas (those with 60-credit programs) are better trained and more highly qualified than professional counselors who have graduated from other program areas (those that require 48 credits).

In keeping with the CACREP theme of unification personified by the move to a standard number of credits for all entry-level programs, ACA would like to propose that CACREP **sunset the student affairs program area and thus focus solely on college counseling in the arena of higher education.** Student affairs is the only CACREP program area that is outside the traditional realm of professional counseling. Student affairs professionals do not see themselves as counselors and do not want counseling positions. They want to pursue administrative positions such as Dean of Student Affairs, Vice-President for Student Development, and Director of Housing. So while students in student affairs programs certainly see the value of learning basic helping skills, they do not want to have the advanced counseling and assessment skills of a professional counselor. Ending the student affairs program area will result in all CACREP

program areas fall squarely within the profession of counseling, signaling to potential students, the public, and legislators that CACREP focuses only on counseling programs, thus reducing confusion, promoting professional identity, and advancing the unification of the counseling profession.

The American Counseling Association was dismayed to see that the first draft of the 2016 CACREP standards removes the requirement for faculty to identify with the counseling profession specifically through memberships in ACA and/or ACA divisions. Section I.X has a revised generic statement, “faculty must identify with the counseling profession through sustained memberships in professional counseling organizations.” The current 2009 edition of the CACREP standards states in section I.W.4 that faculty are required to, “identify with the counseling profession through memberships in professional organizations **(i.e. ACA and/or its divisions)**” [bolded emphasis added]. We are not sure why ACA and ACA divisions were removed, but it seems to be a step backward. ACA and ACA divisions are clearly the premier membership organizations for professional counselors. As such, it makes sense to continue to identify the central organizations for our profession rather than create confusion among faculty perhaps leading some to choose to identify with organizations from counseling-related professions other than ACA and ACA divisions. **The American Counseling Association therefore requests that “(i.e. ACA and/or its divisions)” be inserted back into section I.X.**

Finally, as discussed in the CACREP-ACA meeting in December 2012, ACA believes it is a missed opportunity for CACREP to not include a corollary provision pertaining to student memberships in professional associations as a further step to enhance the orientation of students new to the profession. As such, **ACA encourages the CACREP board to create a standard which specifies that “students must identify with the counseling profession through sustained memberships in professional counseling organizations (i.e., ACA and/or its divisions).”** This provision will also promote professional identity and advance the unification of the counseling profession.

Once again, on behalf of the American Counseling Association’s 52,000 members I thank you for the opportunity to provide input into the first draft of the 2016 CACREP standards. We look forward to reviewing and commenting on future drafts.

Sincerely,



Bradley T. Erford, PhD  
President  
American Counseling Association

cc: Dr. Sylvia Fernandez, CACREP Chair  
Dr. Carol Bobby, CACREP President and CEO  
Rich Yep, ACA Executive Director and CEO  
ACA Governing Council member