January 22, 2024

The President
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Biden:

The American Counseling Association (ACA) is a not-for-profit, professional, and educational organization dedicated to the growth and enhancement of the counseling profession. Founded in 1952, ACA is the world’s largest association exclusively representing professional counselors in various practice settings, with most of our approximately 60,000 members practicing in the United States.

As the preeminent advocate and resource for professional mental health counselors and the patients they serve, ACA is encouraged by your Administration’s leadership on Artificial Intelligence (AI) and strongly supports Executive Order (EO) 14110 on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence. These actions demonstrate a crucial recognition of the transformative impact that this technology will have on our society and the importance of accountability in how AI is developed and deployed across sectors, including mental health care.

As your Administration continues to carve out a regulatory framework aimed at ensuring AI is leveraged in a responsible and ethical manner, we would like to offer the expertise of ACA. Notably, ACA has established an AI Work Group charged with advising counselors on their use of AI while balancing both the challenges and opportunities this technology presents. This work along with our organization’s robust history of advocating for thoughtful policies that can help advance the counseling profession while keeping patients safe makes ACA well-equipped to provide valuable insights into the impact of AI on mental health services and patient care.

Licensed professional mental health counselors understand the importance of regulating AI to protect those seeking mental health support. Counselors are aware of positive uses of AI to support clients’ needs and increase the efficiency of counseling practice, all while understanding

the potential ethical questions and pitfalls that may come with adopting new technology. For example:

- **AI** can help track client progress through accurate notes, allowing the mental health professional to work in a more effective and efficient manner to make informed decisions on client’s mental health needs, however;
- **AI cannot** be used as the sole tool for diagnosis and assessment. Counselors will continue to maintain adequate training to understand the limitations of AI, and to effectively diagnose and assist a client in a clinical setting.

As licensed professional mental health counselors move forward with AI technology, it is vital that the federal government ensures regulations governing client data are enacted, and that individual privacy is secure and protected. ACA is also working to educate the counseling community on emerging technologies through the development of our Artificial Intelligence Work Group, which has already developed recommendations for both counselors and clients. The recommendations include:

- Exploration of AI in current mental health counseling clinical practices and the potential effects and ethical considerations of AI in mental health care across practice settings.
- Discussion around incorporating clinical experience and training where AI falls short; including understanding of a client’s history, and cultural context to ensure a comprehensive and ethically sound assessment.

ACA applauds your commitment to leveraging AI for the betterment of society, and to navigating the complex and unique intersection of AI and mental health care. Thank you for your attention to this matter, and we hope to be a resource to you as you continue your work to ensure the responsible development of AI.

Most respectfully,

Shawn Boynes, CEO

CC:  
Senator Chuck Schumer (D-NY)  
Senator Mike Rounds (R-SD)  
Senator Martin Heinrich (D-NM)  
Senator Todd Young (R-IN)  
Hon. Deirdre K. Mulligan, Deput US Chief Technology Officer