Article 9

Counselor Licensure Supervision Across the United States: A Comparative Look

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Abstract

Professional Counselor Supervisors have the task of ensuring the competence of new counselors entering the profession. Because of the push towards a more uniform counselor identity, the authors examined the similarities and differences of pre-licensure requirements and counselor supervisor requirements in all 50
Almost 10 years after the beginning of the 20/20 initiative started by delegates from 29 different counseling associations to unify the counseling profession on various levels, there continues to be disparity among the 50 states, districts, and U.S. territories (Rollins, 2007). The issue of license portability and strengthening counselor identity continues to be a topic of discussion (King & Stretch, 2013; Mascari, 2004; Mascari & Webber, 2013; Nate & Haddock, 2014; Rollins, 2007). In response to the 20/20 initiative from the American Counseling Association (ACA) and the American Association of State Counseling Boards (AASCB), King and Stretch (2013) conducted a thorough critical analysis of counseling’s professional identity. In this analysis, researchers concluded that a unified counselor identity, including licensure portability, was critical to the counseling profession. However, Rollins (2007) indicated that the process of developing a unified identity is difficult and that continues to be the case.

In order to form one voice for the counseling profession that leads to common training and supervision practices, the similarities and differences of many state boards for counselor licensure needs to be fleshed out. In a recent article, Nate and Haddock (2014) noted the inconsistencies for professional counselors across the United States. Specifically, researchers (Nate & Haddock, 2014) closely examined various criteria for Licensed Professional Counselors in nine states. Even with the narrowly defined search criteria, Nate and Haddock noted inconsistencies including, but not limited to, who can supervise, separate supervisor license, and clinical experience to supervise licensees. It is our purpose to broaden the lens and discuss the similarities and differences of all counselors in the 50 states and Washington D.C.

Why Counselor Supervision?

Supervisors have the privilege and responsibility of serving as gatekeepers for counseling interns. According to Bernard and Goodyear (2009), “supervision is an intervention provided by a more senior member of a profession to a more junior member or members of that same profession” (p. 7).

The relationship between supervisors and supervisees influences the quality of the supervision experience (Borders & Cashwell, 1995; Fall & Sutton, 2003; Magnuson, Norem, & Wilcoxon, 2002). Just as relationships are important in counseling, they are equally important in supervision and should not be overlooked. Supervisors have the responsibility to monitor the counselors in training and their clients at the same time (Magnuson et al., 2002). In this manner, the supervisor is continually evaluating supervisees, their counseling relationships, and serving as gatekeeper. According to the Ethical Guidelines for Counseling Supervisors, adopted by the Association for Counselor Education and Supervision in 1993 (American Counseling Association, 1995), the supervisory role of the counseling supervisor includes: (a) ensuring that practices support
client welfare; (b) promoting ethical, legal, and professional standard compliance; (c) observing and critiquing professional practice and professional development; and (d) evaluating professional performance and potential. However, even though we are aware of what is necessary in the supervision process that will lead to the development of competent counselors, we also recognize the presence of challenges.

**Problems in Supervision**

All counselors-in-training across the 50 states and Washington, D. C. are required to receive supervision prior to licensure. However, there are different requirements depending on the state where the supervisory experience occurs (Borders & Cashwell, 1992; Nate & Haddock, 2014). These differences make it difficult for counseling interns to move from one state to another once they have received full licensure. There is now movement towards a centralized standard of practice. According to the American Association of State Counselor Boards (AASCB), their purpose is to “encourage and aid collaborative efforts among Member Boards in developing compatible standards and cooperative procedures for the legal regulation of counselors in the several jurisdictions toward the goal of simplifying the licensing, registration and certification process” (AASCB, 2015, para. 5). The 2014–2015 American Counseling Association President, Dr. Robert Smith, stated “There needs to be a common set of post-master’s supervision hours required for licensure” (Smith, 2015, para. 5). Additionally, Dr. Smith stated, “There needs to be a common licensure title and a common scope of practice for counselors. The 20/20 Building Blocks to Portability Project, co-sponsored by ACA and AASCB, concluded this past year with widespread endorsement of both a single licensure title for counselors and a scope of practice for professional counseling” (Smith, 2015, para. 5).

Currently, there is no consistency in supervision across states for counselors-in-training and no consistency in requirements for counseling licensure. This leads to a lack of licensure portability across states for counselors. The identity of counselors can be strengthened with a unified approach to counselor training and supervision. The purpose of this study was to evaluate the current state of supervision for counselors-in-training and discuss the need for a more unified counselor license.

**Method**

The purpose of this study was to identify and aggregate the requirements for supervisors and supervision for professional counselors across the 50 United States and District of Columbia. We focused on collecting the laws and rules from all current jurisdictions and then completing a comparative analysis. This was an instrumental case study (Stake, 1995) because we focused on and wanted to provide insight into a single issue: supervision.

**Data Collection**

Data were obtained from URLs linking to official state licensing boards via the American Counseling Association Web site. The URL was connected to the most current rules and regulations for licensed counselors in each state. If the link was broken or
incorrect, authors e-mailed the state agency or searched independently to locate the needed information. When state statutes were unclear, authors used *member checking* (Creswell, 2013) by contacting the states’ regulatory boards to verify information. In some instances, authors were unable to get verification from the regulator boards. In those instances more than one author would search the laws and rules for a particular state and see if they could come to a consensus or the state licensing board was contacted for clarification.

In order to develop themes for licensed counselor supervisor requirements and counseling interns, the authors discussed categories to include in the compilation of data (e.g., supervisor qualifications, supervisor training, supervision experience, continuing education, ethics, supervision requirements). The authors surveyed the guidelines separately for each state and categorized the information found.

**Data Analysis**

Through the use of comparative analysis, the first and third authors developed categories related to both supervisors and the supervision of interns. In order to keep only one current spreadsheet, authors used Google Docs and worked with one copy. The first and third authors recorded analyzed data from all states and completed a comparative analysis of each other’s work in order to identify similarities, differences, and ultimately the final thematic categories. The comparative analysis resulted in 85% agreement of resulting categories and their content. The first three authors rechecked the remaining 15% until agreement on theme identification and content was achieved. The fourth author verified the final data prior to submission of the manuscript. Thematic categories were determined based on the similarities of information discovered and the review of counselor supervision literature. Authors met throughout the data collection process to discuss findings and related themes.

**Results**

After a thorough investigation of the licensure boards’ statutes for licensed counselors in the 50 United States and District of Columbia, authors identified the following thematic categories: (a) supervisor qualifications, (b) supervisor training, (c) required experience for supervisors, and (d) supervision requirements for counselors-in-training. Table 1 displays the supervisor qualifications, broken down among states who restrict supervision of professional counselors to only Licensed Professional Counselor Supervisors (LPC-S) or a similar title (Licensed Mental Health Counselor [LMHC], Licensed Professional Clinical Counselor [LPCC], Licensed Clinical Professional Counselor [LCPC], or Licensed Professional Counselor - Mental Health [LPCMH]) and states who allow other licensed or certified supervisors to supervise professional counselors. For simplicity, authors will use the term LPC to refer to similar license titles (i.e., LMHC, LPCC, LCPC, LPC-MH).

**Supervisor Qualifications**

The authors identified 12 states that require a professional counselor supervisor or similar license title to supervise professional counselor interns. However, West Virginia and Nevada also allow non-professional counselor supervisors to provide supervision to
counselor interns in extenuating circumstances, with board approval. At the other end of
the spectrum, the authors identified 38 states that defined professional counselor
supervisors more loosely. Three states allow an equivalent supervisor, but the specific
license is not defined. The remaining states allow various licenses for approved
supervisors. Depending on the state, psychiatrists, medical doctors, physician’s assistants,
psychological associates, alcohol and drug abuse counselors, licensed art therapists,
career counselors, school counselors, and/or pastoral counselors were allowed to
supervise counselor interns.

Table 1

*Supervisor Qualifications*

<table>
<thead>
<tr>
<th>Supervisor</th>
<th>Licensed Professional Counselor</th>
<th>Licensed Clinical Social Worker</th>
<th>Licensed Marriage and Family Therapist</th>
<th>Licensed Psychologist</th>
<th>Other/ Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL, AR, LA, MI, NH, MS, OH, OK, PA, TX, WV, NV</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>MO, ND</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>—</td>
</tr>
<tr>
<td>DC, IL</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>X</td>
<td>—</td>
</tr>
<tr>
<td>NJ</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>CO, FL, GA, RI, SD</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>—</td>
</tr>
<tr>
<td>DE, NY</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>MD</td>
<td>X</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>X</td>
</tr>
<tr>
<td>MN, NE, SC, WI</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>IA, NC, WA</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>X</td>
</tr>
<tr>
<td>AK, AZ, CA, CT, HI, IN, ID, KS, KY, ME, MA, MT, NM, OR, TN, UT, VT, VA, WY</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

**Supervisor Training**

Even within the states that narrowly define who can supervise counselor interns
(i.e., LPC or similar license title), the authors found differences among those states with
regards to the minimum supervision training requirements and experience. Specifically,
Table 2 displays the minimum amount of training for LPC supervisors. Training
requirements were grouped according to similarities (i.e., no training, counseling related
doctoral degree, a doctoral course in supervision, approved supervision continuing
education courses, supervision certification via other recognized entity, and supervision-
of-supervision). States indicating a doctoral degree in counseling or a doctoral
supervision course included supervision-of-supervision as part of that training.
Nevada indicated 25 hours of mentored supervision experience was necessary if an approved training course option was chosen. Depending on the state, a doctoral course could range from two to three semester hours. Furthermore, Alabama and Ohio require supervision-of-supervision in addition to any of the training option(s) chosen. All other states indicated the option of choosing one or more of the trainings shown in Table 2. Presently, Pennsylvania does not have a training requirement. Still, according to The Pennsylvania Code, § 49.14.1 Standards for supervisors, “The supervisor shall be qualified by training and experience to practice in the supervisee’s areas of supervised practice” (2014, para. 1). Until January 2016, New Hampshire also did not have a training requirement for supervisors. However, as of 2016, New Hampshire counselors wanting to become approved supervisors must either take a graduate level clinical supervision course, a 12-hour approved continuing education course in supervision, or have an approved clinical supervision certificate from one of several designated counseling organizations (i.e., American Association of Pastoral Counselors, National Association of Social Workers, American Mental Health Counseling Association, or American Association for Marriage and Family Therapy).

Table 2

<table>
<thead>
<tr>
<th>State</th>
<th>No Specific Training</th>
<th>Counseling Related Doctoral Degree</th>
<th>A Doctoral Level Supervision Course</th>
<th>Approved Training (12–30 hrs.)</th>
<th>Approved Training (40–45 hrs.)</th>
<th>Certified by Other/ Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>X</td>
</tr>
<tr>
<td>AR</td>
<td>—</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>LA, TX, NV</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>—</td>
</tr>
<tr>
<td>MI, MS</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>X</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>NH</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>X</td>
</tr>
<tr>
<td>OH</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>OK</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>X</td>
<td>X</td>
<td>—</td>
</tr>
<tr>
<td>PA</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>WV</td>
<td>—</td>
<td>X</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
</tbody>
</table>

States allowing different qualifications for professional counselor supervisors had more differences among them than states restricting supervision to professional counselors. For example, 16 states did not mention specific training requirements for supervisors, only that supervisors need to be trained in supervision. Furthermore, one state indicated that 45 hours of on-the-job training was allowable. Continuing education supervision training ranged from 3 hours to 45 hours. Additionally, five states had partial
descriptions for supervisor training that were unclear. Thus, not only do these states allow supervisors from other professions to supervise counselors-in-training, they also allow many different training options for clinical supervisors.

**Required Experience for Supervisors**

Table 3 indicates the years of experience required prior to becoming a supervisor. The table is grouped according to years of experience post-licensure and total experience. Clinical experience ranges from 3 years of counseling experience to 5 years post-licensure experience. Furthermore, descriptions of counseling experience range from vague to concrete.

Table 3

*Clinical Experience Requirement for LPC Supervisors*

<table>
<thead>
<tr>
<th>State</th>
<th>Years of Clinical Experience</th>
<th>Post-Licensure</th>
<th>Total Experience</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA</td>
<td>2</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>MS, WV</td>
<td>2</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>NH, OK</td>
<td>2</td>
<td>—</td>
<td></td>
</tr>
<tr>
<td>AR</td>
<td>3</td>
<td>—</td>
<td></td>
</tr>
<tr>
<td>AL</td>
<td>2/5</td>
<td>—</td>
<td></td>
</tr>
<tr>
<td>MI</td>
<td>—</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>PA</td>
<td>5</td>
<td>—</td>
<td></td>
</tr>
<tr>
<td>OH</td>
<td>1</td>
<td>—</td>
<td>1,500 hours</td>
</tr>
<tr>
<td>TX, NV</td>
<td>3</td>
<td>—</td>
<td></td>
</tr>
</tbody>
</table>

For example, Michigan states 3 years of counseling experience is required, while Arkansas requires 3 years of experience as a Licensed Professional Counselor in the setting in which supervision will be provided. It is unclear if the clinical experience for Michigan is post-licensure or total experience. Another distinction among the states is that the clinical experience for Alabama depends on whether the counselor is engaged in supervision-of-supervision. If Alabama counselors engage in supervision-of-supervision, then only 2 years of full-time practice are required. However, if Alabama counselors do not engage in supervision-of-supervision, then the minimum requirement for clinical experience is 5 years of full-time clinical practice. For counselors in Ohio, 1 year and 1,500 hours of clinical experience is required for supervisors. This also includes at least one supervision-of-supervision client. Lastly, Pennsylvania requires 5 years of experience within the last 10 years as a professional counselor.

The clinical experience for states allowing different qualifications for supervisors ranged from unspecified (11 states) to 5 years post-licensure (three states). Fifteen states indicated supervisors needed 2 years post-licensure clinical experience, whereas nine states indicated supervisors needed 3 years post-licensure experience. Two states had 5
years counseling experience listed, but it is unclear if this is post-licensure or total experience. Finally, Georgia and Wisconsin made a distinction in clinical experience according to the supervisor’s education. Less experience was required of supervisors who had a doctoral degree as opposed to a master’s degree.

Supervision Requirements

There were no noticeable differences for supervisor requirements among states with more restrictive standards to states with less restrictive. However, not all states had a thorough description of supervisor requirements. The supervision requirements for counselors-in-training ranged from a minimum of 1 year of supervision to a minimum of 4 years of required supervision. Furthermore, the requirements for the number of clinical hours varied from state to state. The most common number of total clinical hours was 3,000 hours. Additionally, one state indicated a counselor-in-training needed 10 years of counseling experience if they graduated from a non-accredited counseling program. All states required individual supervision. However, the time frame for supervision ranged from a minimum of one year to a minimum of four years. There were also differences regarding group supervision among states. There were 26 states that did not specify if group supervision was allowed, and three states did not allow group supervision. The differences in the group size and the percentage of group sessions allowed also varied among states. Other differences included states allowing triadic and electronic supervision.

The results provide a brief overview of the differences in counselor supervision across states. It is not meant to be a comprehensive listing of all differences. The authors’ intentions were to bring into awareness the differences and to further the discussion on licensure portability and counselor identity. Furthermore, the authors’ interpretations of the data are in no way meant to replace the official rules and regulations of each state’s licensure boards.

Discussion and Implications

The purpose of this study was to identify and aggregate the requirements for supervisors and supervision for professional counselors across the 50 United States and District of Columbia. We found a great amount of disparity among the states and very little consistency. Obviously there is much work to be done before the counseling profession has a unified identity, especially because of the wide range of expectations for counselors and supervisors across states. There even is disparity among states that agree counselors-in-training should be supervised by Licensed Professional Counselor Supervisors. Because this was the first study that compared and contrasted all states and the District of Columbia in one study, there is no way to make direct comparisons to the literature. Because licensure and supervision requirements are continually changing, continued research, and updating of the findings on an annual basis will provide opportunities to view and analyze the development of supervision nationally and will also aid in the process of establishing consistency in supervision and licensure across states. In fact, since the presentation of this paper at the ACA conference in March 2015, two states have announced proposed changes for 2016 and 2017, and one state has met to discuss what changes are needed to meet the needs of a unified counselor identity.
Counselor supervision is one of the fundamental processes all counselors experience in the process of becoming a counselor. Ensuring that all counselors receive appropriate and competent supervision is one of the key components to licensure portability. Researchers have discussed the importance of and benefits to licensure portability (Mascari, 2004; Mascari & Webber, 2013). More specifically, Mascari (2004) found that the barriers to portability were related to the lack of uniformity with state standards for licensure.

States are seeking to ensure the public that all counselors they license meet specific requirements and are qualified for independent practice. Making the licensure board aware of these differences is one way to move the profession toward a more uniform set of requirements and will aid in the process of gaining licensure portability.

References


Note: This paper is part of the annual VISTAS project sponsored by the American Counseling Association. Find more information on the project at: http://www.counseling.org/knowledge-center/vistas