NATIONAL BOARD FOR CERTIFIED COUNSELORS® AND AFFILIATES

National Board for Certified Counselors (NBCC)
Position Regarding Counseling Compact

NBCC's Recommendation for Legislative Committees:

NBCC recommends the adoption of Counseling Compact legislation with the contingency that a graduate degree in counseling from an accredited institution or program be included as a specific requirement for state participation in the compact. State legislators have the power to **expand portability** and **protect the public** through the proposed **Compact**, lending the power of your vote by requiring the addition of a completed degree will help us to achieve both imperatives.

Foundational Positions:

- The National Board for Certified Counselors and its affiliate organizations strongly support the concept and principle of portability for professional counselors.
- NBCC support for counselor license portability is conditioned on the inclusion of important standards and requirements that serve to confirm the licensed counselor's training, experience, and competency, and thereby offering essential public protections.
- **These important standards include some elements not currently required by the proposed compact**: the completion of a graduate degree in counseling from an accredited institution or program; the completion of a supervised clinical counseling practicum or internship; and, the successful completion of a required ***counseling*** licensure examination.
- NBCC requests that legislative committees reviewing **Counseling Compact** bills, do so with these important considerations in mind. We recommend the adoption of the compact with the contingency that a graduate degree in counseling from an accredited institution or program be included as a specific requirement for state participation in the compact.

NBCC supports each state's authority to regulate the profession of counseling as the state regulatory board best sees fit to meet the needs of their citizens. Interstate compacts, and the privilege to practice such compacts afford, help to promote sustained services with trusted clinicians/service providers. Contemporary compacts also enable appropriate telehealth delivery of mental health services through virtual means, ensuring the continuity of client care across a distance.

A compact that includes clear and appropriate baseline requirements will be a helpful and important tool to advance portability for counselors. Licensure portability is needed for regulated professions in the contemporary world. The proposed **Counseling Compact** will serve as an important tool for advancing multi-state privilege to practice and telemental health service delivery.

NBCC also firmly asserts that some oversight of the educational requirements by the profession are necessary to ensure that counselors are appropriately trained to provide services to clients. Requiring appropriate training is also an essential responsibility of regulators tasked with ensuring key public protections. The current proposed terms of the compact fail to adequately ensure that counselor training aligns with nationally recognized standards and this limitation presents public protection and safety concerns.

A Completed Graduate Degree

The educational requirements described in the compact should include a clear requirement for a completed graduate degree in counseling. At present, the compact includes language allowing sixty semester hours of graduate coursework, rather than the completion of a degree. This is unacceptable and presents significant risks to the public and the regulatory process. A counseling degree should be required to be licensed for professional practice as a counselor.

Appropriate External Review of Credit-Granting Institution

Any training program offering course credit for counselors must be subject to external review through accreditation. As a profession, we require that continuing education providers be externally reviewed for credibility and accountability and we must require the same of training programs leading to licensure.

Completion of a Supervised Clinical Practicum or Internship

The counseling compact must also require the completion of a clinical practicum or internship during the training program. This is not currently required in the proposed compact.

Moving Forward

NBCC's firm position is that the current compact language should be modified to include the requirement of a graduate degree in counseling, accreditation at either the program or institution level, and the requirement of a clinical experience (practicum or internship) course during the training program.

Requiring a degree from a credible institution helps ensure that mental health counselors are held to the same high standards that the public expects of all health professions. Mental health counselors are providing essential, impactful services and proper training to prepare these professionals is necessary. It is imperative that this be reflected in the interstate Counseling Compact, in order for states to be assured that those professionals granted a privilege to practice are appropriately prepared and the public protections are afforded to citizens.

Addressing the deficiencies in the description of baseline educational requirements in the compact will serve to solidly cement the proposed compact as a tool for advancing portability. The failure to address these deficiencies may result in counselors with inadequate training and harm key public protections. In comparison to other professional licensure compacts, this one minimizes educational requirements. This can be remedied easily and will ensure that the compact is aligned with current baseline requirements set by state licensure boards.

The proposed compact will launch the profession into an era of greater cohesiveness, professional recognition, and regulatory efficiency. It can be transformative for the profession in a myriad of positive ways. Counselors are some of the best builders on the block, NBCC has benefited from the visionary, systemic thinkers leading the field of counseling for years on our **Subject Matter Expert** committees, advisory councils, and boards.

We know counselors are prepared to serve clients and their communities even more broadly. We look forward to the next phase of the counseling profession's history and believe that the proposed **Counseling Compact** is a necessary and important component of our profession's trajectory. Counselors and regulators must come together to correct the areas of concern and propel the compact forward.

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