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**Council for Accreditation of Counseling and Related Educational Programs**

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## **OPEN LETTER**

September 5, 2023

Governing Council  
American Counseling Association  
P.O. Box 31110  
Alexandria, VA 22310-9110

Dear Governing Council Members,

Greetings to the new and returning members of the American Counseling Association (ACA) Governing Council and best wishes to you in this new year of service.

Informed and guided by the ACA Code of Ethics Section C.3.c, we write to correct misstatements and characterizations regarding CACREP's advocacy for the Counseling profession in the July 2023 issue of *Counseling Today* (CT). This issue featured the very first column of the *Compact Corner* aimed to "provide in-depth information on topics related to the compact". In this column CACREP and Chi Sigma Iota were singled out for their advocacy activities. We also write to share with you the scope of CACREP's advocacy for quality assurance and competency, and for the Counseling profession.

We note and appreciate your recognition of CACREP's advocacy to accentuate and protect **Professional Counselor** identity and to ensure that the privilege to practice through the Counseling Compact is granted only to those prepared as **Professional Counselors** who identify as such. To be clear, CACREP strongly supports the enactment of the Counseling Compact, a tangible realization of the initial intent of counselor licensure of portability. CACREP celebrates with the Counseling profession the achievement of this milestone.

The mission of CACREP is "*to promote the professional competence of counseling and related practitioners through the development of preparation standards; ...*". Since its 2009 Standards, CACREP has been explicit in its definition of **Professional Counselor** through the requirements for counselor educators, as well as the expectation that a **Professional Counselor** identity is fostered in students enrolled in CACREP-accredited counselor education programs. CACREP believes that to grow and sustain the Counseling profession, we must maintain the competencies and professional attributes of who we are and what we do (and do not do) as **Professional Counselors**. Our belief in, and pursuit of, the value of professional boundaries mirrors those similarly followed and enacted by our sibling professions in the helping fields (Psychology, Social Work, and Marriage & Family Therapy).

The Counseling profession sets the minimum standards of competence for entry into the Counseling profession. The CACREP Standards are written by the Counseling profession for the Counseling profession. CACREP just completed a public four-year standards revision process. The 2024 CACREP Standards were collaboratively developed through:

1. four drafts disseminated for public comment,
2. the feedback from thousands of individual respondents,
3. feedback from ten professional Counseling organizations, and
4. the job analyses conducted by the National Board for Certified Counselors (NBCC) and the Commission on Rehabilitation Counselor Certification (CRCC) respectively.

The CACREP Standards are recognized as a minimum measure of competence by most state Counselor licensing boards in their educational requirements for licensure. Of the 29 Compact member states, as of this writing and from publicly available information, five states require graduation from a CACREP-accredited program, and another 15 states conduct an expedited review of educational requirements for applicants who are graduates of CACREP-accredited programs. Advocating for the use of minimum professional standards of competence for entry into the profession set by the Counseling profession seems to be logical and reflects the reality of what the majority of member states currently use for their educational requirements. CACREP is the only programmatic accreditor solely in the Counseling profession with Counseling-specific standards. There is one other accreditor that accredits in both the Psychology and Counseling professions under a singular set of standards. Also, a vast majority of non-accredited Counseling programs tout themselves as “being aligned with the CACREP Standards” – an indication of a recognition of CACREP Standards as the gold standard of preparation in the Counseling profession. CACREP welcomes other accreditation partners that also recognize and protect our unique **Professional Counselor** identity.

CACREP does not engage in lobbying, which is a political activity. In contrast, we actively provide information to educate and enlighten people consistent with our mission. Two values held sacred in a Counseling relationship, and by extension valued in the Counseling profession, are authenticity and informed consent. We believe that it is important to speak up and provide salient information for informed decisions to be made. The decisions of the Counseling Compact Commission (CCC) will impact the lives and livelihoods of Professional Counselors and that of the clients they serve. Thus, deliberations must be thoughtful, open to using information from multiple perspectives, and cognizant of long-term consequences.

The CT article characterized CACREP as “relentless.” If by that, the reference is to CACREP being vocal in public fora about threats to the Counseling profession and the need to be vigilant of unintended consequences, encouraging our constituents to make their voices heard, and writing letters to the CCC’s Executive Committee (CCC-EC) and Rules Committee (CCC-RC) respectively, then **yes** CACREP has been relentless. The CCC consists of a representative from each member state. Currently, only about half of the commissioners are Professional Counselors and the other half are not Counselors but are administrators of Counselor licensing boards. CACREP asserts that the CCC, which is operating at a national level, must have information from numerous Counseling organizations at the national level. The ex-officio Counseling organizations that have representation on the CCC, such as ACA, have to manage their conflicts of interest and not exert undue influence. They should also ensure that the voices of relevant professional Counseling organizations are brought into the discussion. Anyone who may have attended any of the public meetings of the CCC-EC and/or CCC-RC have heard commissioners say, “I don’t know about other states.”

The CT article also characterized CACREP as “demanding”. If by that, the reference is to the issues raised and requests of the CCC-EC and CCC-RC (in the dated correspondence to them) listed below, then **yes** CACREP has been demanding:

1. *Separate professions.* Every state has a regulatory structure that recognizes and distinguishes among the different mental health professions. Professional Counseling is a unique profession that has its own philosophy and body of knowledge, required academic preparation, assessment of knowledge, code of ethics, credentials, and professional organizations – the hallmarks of a profession. (CCC-EC 12/13/22)  
[Florida statute](#) allows for the participation of other professions in the Counseling Compact. How will the Rules Committee safeguard that the Privilege to Practice under the Counseling Compact is granted **only** to those licensed as Professional Counselors and not in other professions that have their own license and regulated by that profession’s licensing board? (CCC-RC 2/20/23)
2. *License and regulate Licensed Professional Counselors.* Professional Counseling is a distinct profession as evidenced by the hallmarks of a profession: preparation standards & accreditation (CACREP), its own body of knowledge through scholarship (professional Counseling organization journals), assessment of knowledge through an examination (NBCC & CRCC), code of ethics (ACA, AMHCA, & specialty areas of practice), and credentialing (licensure and certification). Therefore, those granted the Privilege to Practice in the Counseling Compact should be licensed as Professional Counselors and not in other professions. (CCC-RC 2/20/23)
3. *Professional Identity.* The composition of composite licensing board recognizes the importance of professional identity and professional self-regulation by defining board membership by profession. (CCC-EC 12/13/22)
4. *Definition of an LPC.* The stated intent of the language of the Compact was to accommodate the various titles used by each state. However, it created an unintended consequence of the interpretation of licensed professional counselor as an occupational license regulating the activity of counseling instead of a professional license regulating Professional Counseling, the profession. One such example is in [Florida statute](#) that defines who can participate in the Counseling Compact 491.003 Definitions  
5) *“Licensed professional counselor” means a clinical social worker, marriage and family therapist, or mental health counselor authorized to provide services under s. 491.017 (a reference to the section on the Counseling Compact).* (CCC-EC 12/13/22; CCC-RC 2/20/23)
5. *Regulatory limits.* State Counseling regulatory boards cannot ethically sanction those who are trained in and identify with another profession. Mental health professions each have their own regulatory board in every state. (CCC-EC 12/13/22)  
Given the [Florida statute](#), can the Commission ethically and practically regulate or sanction those licensed in another profession if allowed the Privilege to Practice within the Counseling Compact? (CCC-RC 2/20/23)
6. *Pass a nationally recognized exam.* Given that this is a **Counseling** Compact, it stands to reason that the required national exam be in Counseling. [On the attached chart are the exams that are currently used by the Compact states for initial licensure which reveals that 15 states use the NCE.] (CCC-RC 2/20/23)

7. *Require Licensees to have a 60 semester-hour (or 90 quarter-hour) master's degree in counseling or 60 semester-hours (or 90 quarter-hours) of graduate course work including specified topic areas.* For the clause after OR the degree requirement should be at minimum at the Master's-level. The Counseling profession has long-determined that entry into the Counseling profession is at the Master's-level and not the Bachelor's-level. Additionally, the degree should be in a mental health field which includes the specified topic areas identified in the legislation. (CCC-RC 2/20/23)
8. [On the attached chart showing the educational requirements,] three states (OH, KY, NC) currently require graduation from a CACREP-accredited program; two more will in the future (AL 1/1/24 and FL 7/1/25); and the remaining states conduct an expedited review of educational requirements for graduates of CACREP-accredited programs and use the CACREP curricula and fieldwork requirements as the measure of equivalency for non-accredited programs. (CCC-RC 2/20/23)
9. *Required supervised postgraduate professional experience.* The supervisors providing post-graduate supervision must themselves be credentialed as Professional Counselors in the home state and/or be licensing board-approved as supervisors for licensees in the Counseling profession. (CCC-RC 2/20/23)
10. *Public protection.* The Profession of Counseling has a duty to the public to monitor and maintain the integrity of its membership and practitioners:
 

Peer-reviewed professions have a "social contract" with the public to promote and foster their core ideals and values through:

  - "... substantially control entry to the profession ..." (Hamilton, 2008, p. 470);
  - "... maintaining high standards of minimum competence and ethical conduct ..." (p. 471); and
  - requiring "apprenticeships" in their "doctrinal knowledge," "practical skills," and "professional identity formation." (p. 473).

*Hamilton, N. (2008). Assessing professionalism: Measuring progress in the formation of an ethical professional identity. University of St. Thomas Law Journal, (5)2, 470-511. (CCC-EC 12/13/22)*

It is therefore reasonable that in the Counseling Compact, the expectation be that only those prepared as **Professional Counselors**, as evidenced by a degree in Counseling/counselor education, be granted the privilege to practice under the Compact. Furthermore, the Counseling Compact is designed for those who are already licensed as Counselors in their state regardless of the degree they hold. We recognize that each state sets its own requirements to meet the needs of their citizens. In the states that recognize CACREP-accredited program graduate applicants for an expedited review of educational requirements at initial license, there is due diligence in the layer of scrutiny of the curricula and clinical content of the degree in Counseling from a non-CACREP-accredited program or in a related field. We respect each state's prerogative to determine how they regulate who practices nominally under the Counseling profession. Our request is that the denotative *privilege* to practice be granted only to those who are prepared under the standards set by the Counseling profession and identify as **Professional Counselors**.

ACA and AASCB sponsored the [20/20: A Vision for the Future of Counseling](#) project, which over an eight-year period engaged 31 counseling organizations (many of whom are represented on the ACA Governing Council) in creating the blueprint for advancing the Counseling profession. The building blocks to portability were defined as licensure title, scope of practice, and educational requirements. At the conclusion of the project, a list of [future strategies](#) for achieving the goals reflecting the principles for unifying and strengthening the Counseling profession were defined. As one of the participating organizations in the 20/20 project, CACREP has been using, and will continue to use, this blueprint to

both sustain and move the Counseling profession forward. In the ten years since the convening, CACREP has acted upon the following identified strategies:

1. *The counseling profession shall present a clear definition of counseling to the public.* The CACREP Standards are explicit in the content knowledge and clinical skills required of CACREP-accredited program graduates and the requirement of those who prepare future Professional Counselors to themselves be prepared as Counselors and identify with the Counseling profession.
2. *The counseling profession shall focus on a body of core knowledge and skills shared by all counselors.* The CACREP Standards are written by the Counseling profession with an explicit delineation of foundational core knowledge and skills for all Professional Counselors regardless of specialty practice area. There are additional knowledge and skills standards for each specialty practice area.
3. *The counseling profession shall speak with a united voice at the state and federal levels.* CACREP partners with Counseling professional organizations and speaks with one voice in areas where there is mission overlap between the respective organizations.
4. *Counselor education programs shall reflect a philosophy that counseling is a single profession with specialized areas of training.* The CACREP foundational counseling and eight specialized practice area curricula standards are an embodiment of this philosophy. At the conclusion of the 20/20 project, a consensus was not reached on the educational requirements. CORE and CACREP, the two Counseling accrediting bodies at that time, heard the profession and entered into an Affiliation Agreement in 2013 which then led to a merger on July 1, 2017.
5. *The counseling profession shall establish common preparation standards and a single training model to be used by all counselor preparation programs.* The CACREP Standards serve as that single training model for the Counseling profession.
6. *Counselor education programs shall endorse student involvement in professional counseling associations.* The CACREP Standards require students to develop a Professional Counselor identity through involvement in professional counseling organizations.

Given the Vision for the Future of Counseling, we are flummoxed by what seemingly is ACA's current position of considering it exclusionary to:

- require Professional Counselors to be prepared in counselor education programs,
- require those (faculty and supervisors) who prepare the future Professional Counselor workforce to themselves be prepared as and identify as Professional Counselors, and
- value and promote Professional Counselor identity.

CACREP is advocating for ensuring the Counseling Compact will help maintain the requirements for Counselor licensure and not decrease the requirements to include other professions. We invite you, as Governing Council members, to ask yourselves what prevents ACA from doing the same. What motivates ACA to open its membership to non-counselors and advocate for inclusion of non-counselors into the privilege to practice as incepted in legislation and regulations?

CACREP's annual [Vital Statistics reports](#) show a steady growth in the number of CACREP-accredited programs and of Counseling program graduates. CACREP-accredited programs are building capacity in every state and increasing the number of individuals entering the workforce as Professional Counselors. Since March 2020 CACREP-accredited programs have embraced the digital teaching and learning environment, therefore counselor education programs are now more accessible to individuals across the country.

Counselor educators, most of whom are ACES members, implement and assess the CACREP Standards, and are the gatekeepers to the Counseling profession. CACREP offers free consultation and developmental guidance to programs seeking initial accreditation. NBCC, for almost a decade, has provided support grants to programs seeking initial accreditation. CSI only charters chapters in CACREP-accredited programs. Each of these Counseling professional organizations contributes to ensuring a competent workforce of Professional Counselors and facilitate public protection. What are and can other Counseling professional organizations do to expand the availability of counselor education programs, particularly CACREP-accredited programs?

While we applaud the achievement of a Counseling Compact, the Counseling profession needs to be vigilant and aware of the potential trade-offs and costs to Professional Counselor identity and their scope of practice. Securing Professional Counselor licensure in all 50 states was hard-fought over a 33-year period. The Counseling Compact is timely given the current shortages and lack of access to services, but it is critical that the rules and regulations developed be done in a careful, thoughtful, and deliberate manner. We must ensure the quality of services and protect the public from potential harm. The decisions made now will have a ripple effect far into the future for the Counseling profession and the clients served. CACREP will continue to advocate at the state and national levels for: the recognition of Professional Counseling as a separate and distinct profession; Professional Counselors' right to practice; the preservation of the scope of practice of Professional Counselors; and the protection of the public. Mindful of these important considerations and potential consequences, we affirm our unwavering belief and clear position that the **Counseling** Compact should be exclusively for **Professional Counselors**.

Sincerely,  
The CACREP Board of Directors