



## Better Protect the Public and Increase Washington's Behavioral Health Workforce: Counseling Compact Legislation

The Washington Mental Health Counselor Association and American Counseling Association of Washington support the Counseling Compact, which will remove barriers to practice across state lines and better protect Washington residents and patients. Updating the state practice act to align with Compact requirements will increase the behavioral health workforce in Washington state. Immediate access to Licensed Professional Counselors in the 17 states that have enacted the Compact will better serve the public. All behavioral health professions in Washington will maintain their current licensure pathway within their field of practice, which is a requirement for all existing behavioral health compacts including PsyPact for Psychologists and the developing social work compact. As these other Compacts will boost those fields in WA while requiring they adhere to their own existing credentialing, we propose maintaining current bill language which specifies education requirements for the LMHC credential meet the 60 semester/90 quarter credits as outlined by the Counseling Compact.

1. **It is discriminatory for the Department of Health to create additional barriers for Washington to join the Counseling Compact as these barriers impact only one profession in the state.**
  - a. The few educational programs that don't meet Compact requirements are those with Psychology or Social Work degrees. DOH has not identified a single counseling program that is not meeting the 60/90 requirement. These include at least 23 current Washington counseling and related field programs. There are an additional 48 online Clinical Mental Health Counseling programs listed on the CACREP website which qualify. They have NOT made the case that this would disqualify any professional counselors in Washington from licensure. They have instead proposed that WA social workers, psychologists or LMFTs wouldn't qualify for credentialing under their own field of study and licensure pathway and thus MUST opt into another pathway as their only recourse. Since credentialing of other professions remains available, no barriers to practice are created by updating LMHC standards.
  - b. **Refusing to update standards impacts only one profession in WA: Professional Counselors.** This is a pattern of discriminatory policy by DOH which allows psychologists, social workers, and LMFT's to credential through their own field and to seek licensure within ours as well. Licensed Mental Health Counselors are not afforded the same opportunity. DOH has refused Licensed Mental Health Counselors the same privileges that exist in all 49 other states. Licensed Mental Health Counselors are the only behavioral health profession in WA prohibited from joining an occupational compact through current licensure. Psychologists and social workers will be able to join their own Compacts effectively pushing Licensed Mental Health Counselors out of the workforce.
  - c. **In 2015 The American Association of State Counseling Boards (AASCB) issued a [Formal statement](#) to state boards on adopting uniform educational requirements.** If Washington does not change our educational standards for LMHC licensure, we are out of alignment with national standards. **Washington is the only state that does not specify the number of degree credit hours.** Only 7 states and Puerto Rico currently require fewer than 60/90 credit hours. Two of these states have proposed legislation to join the counseling compact and will update their credit hours.
2. **Licensure portability is an essential issue for counselors moving between states and in**

**WASHINGTON MENTAL HEALTH COUNSELORS ASSOCIATION &  
AMERICAN COUNSELING ASSOCIATION**

**recruitment of counselors to Washington.**

- a. According to [labor analysis](#), for Psychology, states which do not join their Compact, PsyPact, dis-incentivize practitioners seeking education, initial licensing, or moving into the non-member state.
- b. The Department of Defense has identified occupational compact as an essential issue for military families. 34% of military spouses require an occupational license to work. The inability for military spouses to efficiently seek licensure when moving to a new state is a known issue that has a direct impact on the workforce. Additionally, the inability for military families to maintain their Professional Counseling services is equally problematic. The House Committee on Postsecondary Education & Workforce received testimony on this at their public hearing on January 13<sup>th</sup> from DOD.
- c. Excessive barriers to licensure when moving is a known issue for current Licensed Mental Health Counselors. [Research](#) has shown it can take months, if not years to obtain a license when moving. Barriers include different titles, cost, lack of alignment in education, experience, and examination requirements. Some counselors end up seeking a supervised practice license rather than an independent practice license due to these challenges. **The Compact will eliminate these issues entirely allowing for rapid verification of privileges to practice and an expedited licensure mechanism for counselors who move from one Compact state to another Compact state.**

We have identified the following concerns and solutions with DOH specified programs from which graduates would be ineligible for LMHC:

1. DOH has shared several programs from degree fields other than counseling which require fewer than the 60/90 credit hours including Capella Master of Social Work and Seattle University Couples and Family Therapy and Master of Social Work. **Graduates from these programs are eligible for other master's level licenses (LMFT and LICSW), they will not be prohibited from licensure without an LMHC. [HB 1021](#), Aligning social worker licensing requirements, was unanimously voted out of committee on 1/20, making the pathway to LICSW even easier. Graduates from these programs would not be excluded from the workforce.**
2. DOH has shared a few psychology programs that would not meet the 60/90 credit hour educational requirement. These are broken into three categories: those from out of state that disclose the need for additional course work, those that are not intended for licensing post-degree, and those that would be given the opportunity to adjust their program requirements.
  - d. **Additional Coursework:** DOH has provided data on an MS in Clinical Psychology from Capella University. **According to Capella's website, they already state additional course work beyond the program of study is needed to meet licensure requirements in Washington.** Because this is already an established disclosure, they are equipped to support students in taking additional course work to meet licensing requirements. Per [Capella's website](#): "*Washington regulations indicate completing Capella's MS in Clinical Psychology, Clinical Counseling program alone will not meet the state requirements for professional licensure...Capella learners must add additional course(s) to meet state-specific content areas for licensure. Please contact Enrollment Services or Academic Advising to build a suitable academic plan*"
  - e. **Not intended for Licensure:** DOH has provided data that they license people graduating from Capella's MS in Psychology. **These programs are not intended to provide degrees**

**WASHINGTON MENTAL HEALTH COUNSELORS ASSOCIATION &  
AMERICAN COUNSELING ASSOCIATION**

**from which students can obtain a license to practice.** If graduates from these programs are licensed in Washington, then we need additional data from DOH as this is not the intention of these programs. The Capella MS Psychology program has several specializations with the following disclosures:

- i. The General Psychology; Child and Adolescent Development Psychology; Industrial/Organizational Psychology; and Sport Psychology all include the following disclosure on the [Capella Website](#): "**The requirements for this specialization are not designed to prepare graduates for licensure as professional counselors or psychologists.**"
  - ii. The remaining program, Educational Psychology, also **does not advertise as a licensure track program**. Capella's website states: "*This comprehensive skill set can prepare you for career opportunities in public education and instruction, educational technology, and lifespan development from early childhood to all ages. It can also get you ready for doctoral study in psychology and other related disciplines.*"
- a. **Program Adjustments:** Two programs within Washington would have the option adjust their credit hours to the current national standard by a future effective date for LMHC - Seattle University MA Psychology and University of Washington MA in Applied Child & Adolescent Psychology: Prevention & Treatment.
1. There are additional benefits for the Seattle University MA Psychology and University of Washington MA in Applied Child & Adolescent Psychology: Prevention & Treatment to align their degree requirements with the national standard. This includes licensure portability. The limitations of a license which do not meet the 60/90 credit hour requirement is a known issue since WA is not in alignment with national standards.
  2. **Both programs include disclosures that a degree from their program will likely not meet licensing requirements in other states.**
    - a. Seattle University MA Psychology includes the following statement on their [MAP WA State Licensure Course List](#): "*\*\*\*Please note: Out of state students or those contemplating licensing in another state should check with the appropriate state licensing board(s) to confirm requirements. MAP cannot guarantee compatibility between WA regulations and other state jurisdictions.*"
    - b. University of Washington MA in Applied Child & Adolescent Psychology: Prevention & Treatment program [states on their website](#): "*If you graduate from our program and would like to be licensed outside of Washington state, you will likely be required to take additional coursework to fulfill licensing requirements for that state. It is your responsibility to consider this issue as you determine whether to apply to our program. We advise you research the licensing requirements in the state(s) in which you might want to practice.*"
    - c. The University of Washington MA in Applied Child & Adolescent Psychology: Prevention & Treatment currently has a very limited scope of training specific to working with children, adolescents, and their families. The national professional standard and the scope of practice for

**WASHINGTON MENTAL HEALTH COUNSELORS ASSOCIATION &  
AMERICAN COUNSELING ASSOCIATION**

WA LMHC is to work with a wide variety of treatment issues across the lifespan. Graduates from this program do not have this scope of practice in their training to meet LMHC standards. This does not protect the public adequately. Expanding the curriculum would prepare graduates to be fully prepared for the scope of work they encounter.

- i. The lack of portability for programs that are below the national standard for licensure requirements is a known issue. Saybrook University used to have an MA Psychology, Counseling Specialization program intended for LMHCA or MFT licensure in WA. In 2017, the program was closed and relaunched with a MA Counseling program of 60 semester credits and CACREP aligned curriculum. The program was later moved online. The Saybrook University counseling department regularly gets requests for assistance and complaints from graduates of the former MA Psychology degree about the lack of ability to get licensed in outside states due to WA not meeting national standards. Aligning all programs with national standards is essential for unifying the profession and ensure the ability for graduates to maintain licensure. It better protects the public and ensures qualified counselors are working with clients.
- iii. According to our review, 6 states (AL, DE, GA, MI, SC, & WI) have increased their degree requirements to 60 semester/90 quarter hours in recent years. Two additional states (MN & MO) currently require 48 semester hours and have introduced legislation for the Compact requiring them to change their education standards to join. Increasing educational requirements to meet national standards is a common practice among states. Allowing for an adjustment period for programs to change their curriculum has not been a reported issue in these states. The immediate benefits of the Counseling Compact as well as maintaining current licensure for other behavioral health fields will not only ensure the behavioral health workforce remains stable, it will also ensure that we are providing clients and counselors in training the resources necessary.

The Counseling Compact has been enacted in 17 states and has been introduced in 13 states so far this legislative session. It has received widespread bipartisan support across the nation.

**Privilege to practice through the Compact will be available to counselors by early 2024 allowing for rapid verification and immediate access to all compact member states. This enhances the workforce, ensures WA remains competitive, meets increasing demand, broadens client choice, and creates a national database and network for the first time allowing for advancements in behavioral health while optimizing patient safety.**

**The Compact is the only long-term sustainable solution to the issue of licensure portability, practice across state lines, and workforce shortages in behavioral health.**