



Virginia Association of Clinical Counselors

~ Serving the needs of Virginia clinical counselors since 1980~

March 5, 2011

Anthony Briggs, LPC
Mental Health Team Supervisor
City of Alexandria Community Services Board
Alexandria Adult Detention Center
2001 Mill Road
Alexandria, VA 22314

Dear Mr. Briggs:

The Virginia Association of Clinical Counselors would like to clarify the issue of psychological testing by licensed professional counselors. We understand, based on information from Dr. Yorvska Salazar, that there is some objection in regard to performing psychological testing under her license as an LPC. By way of introduction, the Virginia Association of Clinical Counselors is the Virginia chapter of the American Mental Health Counselors Association. We are an advocacy group for the clinical counseling profession and have been intimately involved in addressing the scope of practice of LPCs since our inception in 1980.

The counseling profession had its origins in the educational and vocational sectors. As such, we have had considerable familiarity with testing. Virginia LPCs have had the right to do psychological testing since we were first licensed in 1976. LPCs could perform objective personality assessment, IQ testing, vocational testing, neuropsychological testing, and the like given proper training and education. Until the early 1990's, the Board of Counseling would stipulate on our licenses the areas of specialty, among them the various forms of psychological testing just referenced. However, our original license law stipulated that we could not perform projective testing.

In 1987, LPC's passed a law requiring our reimbursement by third party providers (see Appendix A). Although we had already been reimbursed for psychotherapy and psychological testing by Blue Cross and Blue Shield and CHAMPUS, all insurers were now required to recognize and reimburse clinical services by professional counselors. In 1993, after an extensive survey by the Virginia Association of Clinical Counselors and the Virginia Counselors Association, we updated and redefined our licensure law, in the process removing the stipulation against performing projective testing. For the last 18 years, LPC's have been performing projective testing with the Board of Counseling's approval (see Appendix B). At this point in time, LPCs who perform psychological testing are reimbursed by virtually every third-party payor, including TRICARE, Medicaid, Optima, Anthem Blue Cross, Aetna, CIGNA, Value Options, and myriad others. The only exception at this time is Medicare, and our national organization expects that to change very soon.

Just as with psychologists, there is only a relatively small percentage of the profession who perform psychological testing. Those who do so tend to be well trained, with several graduate courses, extensive supervision, and excellent qualifications. The Board of Counseling makes it clear that failure to practice within the scope of one's competency is an ethical breach. LPCs who perform testing are well aware that they may be called upon to defend their practice. Dr. Salazar's credentials are indeed formidable.

In closing, please rest assured that all forms of psychological testing are within the scope of an LPC's practice, provided they have appropriate training and experience. The fact that virtually all third-party payors routinely reimburse LPC's for psychological testing should provide confirmation, as should the attached appendices.

Sincerely,

Michael E. Nahl, LPC
Advocacy Committee Chair
Virginia Association of Clinical Counselors

Cc: Dr. Salazar
National Fair Access Coalition on Testing