The Board would like to address some misinterpretations or mischaracterizations of the Board's proposed endorsement provisions and coursework review.

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 The Goal of the Periodic review is to expand pathways to licensure by endorsement significantly beyond what the Regulations currently allow. That is all. We have expanded the options for all types of applicants and the Board's actions have not limited any applicant's options. An applicant's own choices may limit the availability of options, but the Board attempted to allow multiple scenarios for obtaining a license by endorsement.

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- Licensure by endorsement allows a licensed professional in one state to obtain a comparable license in another state potentially without having to retake the exam or meet all of Virginia's requirements for initial licensure in Virginia.
- Currently there are only 2 pathways to licensure by endorsement:
 - Have clinically practiced for 24 out of the past 60 months prior to submitting your application; or
 - Submit evidence of meeting the education and experience Virginia requires for licensure by examination.
- Now, the Board proposes to significantly expand on those two pathways to licensure by endorsement in the following ways:
 - If an applicant has not clinically practiced for 24 out of the past 60 months prior to submitting an application (in which case the applicant would not have to meet Virginia's education or experience requirements), then the applicant now can obtain licensure by endorsement if by meeting ONE of the following options:
 - 3 years of active licensure (which does not mean active practice) along with a National Certified Counselor (NCC) credential issued by the National Board for Certified Counselors (NBCC), or
 - 2. Hold a graduate degree from a CACREP-accredited program, or,
 - 3. Have 10 years of active licensure (which again does not mean active practice). The applicant just has to maintain a license in an active status.
- Even if after January 2022, NBCC requires graduation from a CACREP program, the Board still has expanded the pathways for endorsement, which is a positive step forward in this environment. Additionally, the Board considered these options at the behest of the national organizations and considered public comment.

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• An individual who did not graduate from a CACREP program would still have the same options as are currently available: An applicant could obtain licensure in another state, practice for 2 years, and then apply by endorsement in Virginia. If the Board did not expand the options for licensure then these individuals would still have the same opportunities for licensure in Virginia as they do now.

- At this point, all of Virginia's universities are either CACREP accredited or seeking accreditation.
- The Board wants to encourage applicants to attend accredited programs, as all other health
 professions require graduation from accredited programs. Because CACREP is currently the
 only accreditation program, the Board has left it open to allow acceptance of other
 programs. The Board, unlike other health programs has not required graduation from an
 accredited program. All graduates still have an opportunity to obtain licensure in Virginia.
- It helps applicants to know that graduation from a CACREP program will help ensure an easier path to licensure so they do not find themselves spending money on a program that does nothing to further their pursuit of licensure.

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- Graduates from non-CACREP programs would still have their transcripts reviewed by staff, but
 having a degree from an accredited program ensures staff can trust the program has already
 required all of the coursework that the Board requires in regulation.
- It does benefit the applicant to graduate from an accredited program for the same reasons it benefits all other professions to graduate from an accredited program. It protects the applicant from any uncertainty within the process.