



Council for Accreditation of Counseling and Related Educational Programs

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CACREP is a corporate affiliate of the American Counseling Association (ACA)

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Federal Docket Management System Office
4800 Mark Center Drive, 2nd Floor
East Tower, Suite 02G09
Alexandria, VA 22350-3100

Re: 32 CFR Part 199; DOD 2011 HA 0134; RIN 0720 AB55

We are writing this letter in strong support of the U.S. Department of Defense's recent decision to accept the recommendations from the Institute of Medicine and recognize Clinical Mental Health Counselors (CMHCs) for independent practice under TRICARE and as of January 1, 2015 to require all CMHCs to have graduated from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) and pass the National Clinical Mental Health Counseling Exam (NCMHCE). We believe these requirements best protect the public by ensuring the highest standard of preparation and qualification of CMHCs and will enable sufficient numbers of CMHCs to adequately serve the population requiring their services.

CACREP is the most widely recognized accreditation for counselor education programs. CACREP currently accredits 601 counseling programs in 264 institutions, representing the majority of counselor education programs nationally. Currently, 27 states specifically cite CACREP in their rules or regulations as meeting the educational requirements for licensure. Of the remaining 23 states, 15 require the CACREP core areas. The Institute of Medicine considered other accrediting bodies, including the Council on Rehabilitation Counseling (CORE) before reaching the decision to only recommend CACREP as the accrediting body for counselor education. CACREP standards require a minimum of 60 semester hours of coursework in clinical mental health counseling and a minimum of 700 clock hours of practicum and internship under the supervision of licensed professional counselors.

CACREP Standards are outcome based requiring that programs measure and evaluate student learning outcomes. Other accrediting bodies use only input-based standards and do not require documentation and evaluation of student learning outcomes. CACREP Standards require faculty members to engage in continuous systematic program evaluation indicating how the mission, objectives, and student learning outcomes are measured and met.

CACREP Standards accredit counseling programs that are taught by faculty members and supervisors with counselor identities and who prepare students to become professional counselors with counselor identities. Other accrediting bodies that purport to review programs training counselors do not require that students are taught and supervised by counselors, nor do they require the degree be a counseling degree.

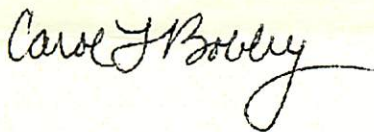
CACREP standards were originally developed by and adopted by the *American Counseling Association* (ACA) as the national standards for the preparation of counselors. They have been officially recognized for over 30 years and are revised every seven years based on extensive feedback from constituents including licensed counselors and licensure boards to ensure the requirements are current and reflect actual practice needs.

Therefore we believe that the Institute of Medicine was correct in recommending the requirement of graduation from a CACREP-accredited program. We believe the Veterans Administration is correct in requiring graduates of CACREP-accredited programs as approved providers. And we believe that TRICARE should keep requirements as they are and require graduation from a CACREP-accredited program. We believe these things, because we know that these decisions are the only way to ensure uniform, high national standards of counselor preparation, which in turn is the only way to protect and serve the public.

Sincerely,



Martin Ritchie
Board Chair



Carol L. Bobby
President & CEO