



# Can Licensed Mental Health Counselors Administer and Interpret Psychological Tests?

## ANALYSIS AND POSITION PAPER BY THE NATIONAL BOARD OF FORENSIC EVALUATORS

The National Board of Forensic Evaluators (NBFE) adopts the position that appropriately trained licensed mental health counselors may administer and interpret psychological tests, a viewpoint consistent with various state licensure boards including Florida, the state the NBFE is headquartered in, which declared that licensed mental health counselors, clinical social workers, and marriage and family therapists “may administer and interpret such tests as long as they have received the appropriate training, and thus, are qualified to perform such procedures.”<sup>1</sup> We support the efforts of organizations such as the National Fair Access Coalition on Testing that advocate for “the protection and support of public access to professionals and organizations who have demonstrated competence in the administration and interpretation of assessment instruments, including psychological tests.”<sup>2</sup>

Our position is based on four premises: (1) Counselors have always been experts in testing; (2) Testing is within the scope of practice of counselors; (3) Counselors meet the standards of test manufacturers; and (4) It is impractical and unethical to prohibit counselors from administering and interpreting tests.

### FACT: COUNSELORS HAVE ALWAYS BEEN EXPERTS IN TESTING

The counseling profession began in the late 1890s and early 1900s. The first professional counselors were vocational guidance counselors who specialized in the administration and interpretation of various tests, including intelligence and aptitude tests. We believe Gladding and Newsome (2018) put it well when they wrote that the first counselors “quickly embraced psychometrics to gain a legitimate

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<sup>1</sup> Foster, S.J. (2000, February 4). [Letter](#) to Judge Roger McDonald

<sup>2</sup> National Fair Access Coalition on Testing (n.d.). *The National Fair Access Coalition on Testing mission*. Retrieved from <http://www.fairaccess.org/home.html>.

foothold in psychology” (p. 8)<sup>3</sup>. Counselors have continued to administer and interpret such tests up to the present day.

## **FACT: TESTING IS WITHIN THE SCOPE OF PRACTICE OF COUNSELORS**

There is a consensus within the counseling profession that testing is within the scope of practice of professional counselors.

The primary counselor education accrediting body is the Council for Accreditation of Counseling & Related Educational Programs (CACREP). CACREP’s 2016 education standards refer to the expectation that all accredited counseling degree programs teach counselors to administer and interpret tests:

### **Section 2: Professional Counseling Identity**

Subsection: Counseling Curriculum

The eight common core areas represent the foundational knowledge required of all entry-level counselor education graduates. Therefore, counselor education programs must document where each of the lettered standards listed below is covered in the curriculum.

#### **7. ASSESSMENT AND TESTING**

- a) historical perspectives concerning the nature and meaning of assessment and testing in counseling
- b) methods of effectively preparing for and conducting initial assessment meetings
- c) procedures for assessing risk of aggression or danger to others, self-inflicted harm, or suicide
- d) procedures for identifying trauma and abuse and for reporting abuse
- e) use of assessments for diagnostic and intervention planning purposes
- f) basic concepts of standardized and non-standardized testing, norm-referenced and criterion-referenced assessments, and group and individual assessments
- g) statistical concepts, including scales of measurement, measures of central tendency, indices of variability, shapes and types of distributions, and correlations
- h) reliability and validity in the use of assessments
- i) use of assessments relevant to academic/educational, career, personal, and social development
- j) use of environmental assessments and systematic behavioral observations
- k) use of symptom checklists, and personality and psychological testing
- l) use of assessment results to diagnose developmental, behavioral, and mental disorders
- m) ethical and culturally relevant strategies for selecting, administering, and interpreting assessment and test results<sup>4</sup>

The National Board for Certified Counselors (NBCC) is the first and largest certifying body in the United States for professional counselors. The credential NBCC has established for clinical mental health counselors is Certified Clinical Mental Health Counselor (CCMHC). In order for this credential to be awarded to a counselor, the counselor must have been educated on the administration of psychological

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<sup>3</sup> Gladding, S.T. & Newsome, D.W. (2018). *Clinical mental health counseling in community and agency settings* (5th ed.). Boston: Merrill.

<sup>4</sup> CACREP (2016). *2016 CACREP standards*. Retrieved from <http://www.cacrep.org/section-3-professional-practice/>.

tests<sup>5</sup>. In addition, counselors must pass the National Clinical Mental Health Counseling Examination (NCMHCE), which includes test items on the administration of psychological tests for purposes of assessment, diagnosis, and treatment planning<sup>6</sup>.

The American Counseling Association (ACA) is the largest association representing counselors in the United States. The ACA identifies “the administration of assessments, tests, and appraisals” as a primary component of the scope of professional counseling.<sup>7</sup> The ACA’s most recent *Code of Ethics* refers repeatedly to the ability of counselors to administer and interpret tests, provided that counselors are appropriately trained in the tests they utilize.<sup>8</sup> The ACA takes an official position that “professional counselors with a master’s degree or higher and appropriate coursework in appraisal/assessment, supervision, and experience are qualified to use objective tests. With additional training and experience, professional counselors are also able to administer projective tests, individual intelligence tests, and clinical diagnostic tests.”<sup>9</sup>

The American Mental Health Counselors Association (AMHCA) is a division of the ACA that exclusively represents clinical mental health counselors. AMHCA’s published standards for clinical mental health counseling clarify that mental health counselors are expected to be trained in clinical assessment and testing, and AMHCA’s published report on the professional identity of clinical mental health counselors includes assessment and testing as one of the eight common core areas of training and education for counselors.<sup>10,11</sup> Like the ACA, AMHCA’s 2015 *Code of Ethics* refers to the ability of counselors to administer and interpret psychological tests provided that counselors are appropriately trained.<sup>12</sup> AMHCA co-authored a document outlining standards for assessment in mental health counseling with the Association for Assessment and Research in Counseling (AARC), formerly the Association for Assessment in Counseling and Education, clearly defining the competencies that counselors must possess to administer and interpret psychological tests such as the MMPI-II and the MCMI-III.<sup>13</sup>

From 2005 to 2013, the 31 major counseling associations, organizations, and certifying bodies met to arrive at a consensus for the definition and scope of practice for professional counseling. The scope of practice they adopted includes “Assessment: The practice of counseling includes the administration and interpretation of assessments for appraisal, diagnosis, evaluation, and referral determination to

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<sup>5</sup> NBCC (2016). *Certified Clinical Mental Health Counselor*. Retrieved from <http://www.nbcc.org/Certification/CertifiedClinicalMentalHealthCounselor/>.

<sup>6</sup> NBCC (2016). Content covered in the NCMHCE. Retrieved from <http://www.nbcc.org/InnerPageLinks/ContentCoveredInTheNCMHCE>.

<sup>7</sup> ACA (2016). Endorsed scope of practice for professional counseling. Retrieved from <https://www.counseling.org/about-us/about-aca/aca-media-center>.

<sup>8</sup> ACA (2014). *2014 ACA code of ethics*. Retrieved from <http://www.counseling.org/docs/ethics/2014-aca-code-of-ethics.pdf?sfvrsn=4>.

<sup>9</sup> ACA (2003). Standards for qualifications of test users. Retrieved from <http://aarc-counseling.org/assets/cms/uploads/files/standards.pdf>.

<sup>10</sup> AMHCA (2017). *AMHCA standards for the practice of clinical mental health counseling*. Alexandria, VA: AMHCA.

<sup>11</sup> AMHCA (2016). *The professional identity of clinical mental health counselors*. Alexandria, VA: AMHCA.

<sup>12</sup> AMHCA (2015). *Code of ethics*. Retrieved from <http://www.amhca.org/?page=codeofethicsia>.

<sup>13</sup> AARC & AMHCA (n.d.) Retrieved from <http://aarc-counseling.org/assets/cms/uploads/files/AACE-AMHCA.pdf>.

help establish individualized counseling plans and goals that may include the treatment of individual with emotional, mental, and physical disorders.”<sup>14</sup>

Counselors are also recognized as competent test administrators by various organizations outside of the profession. For example, in September 2016 the Social Security Administration clarified its long-standing position test results administered by clinical mental health counselors can be used for disability determination cases. In response, AMHCA issued a statement clarifying that appropriately trained counselors can administer intellectual aptitude exams and diagnose intellectual disorders.<sup>15</sup>

## FACT: COUNSELORS MEET THE STANDARDS OF TEST MANUFACTURERS

Licensed counselors meet the criteria for the highest qualification levels of the four most popular psychological test distributors in the United States.

Level C is the highest qualification level established by **Psychological Assessment Resources (PAR)**. This level of qualification requires “an advanced professional degree that provides appropriate training in the administration and interpretation of psychological tests, or license or certification from an agency that requires appropriate training and experience in the ethical and competent use of psychological tests.”<sup>16</sup> Because licensed counselors must have a minimum of a Master’s degree, which is an advanced professional degree, and because CACREP- and CACREP-equivalent counselor education programs require training in the administration and interpretation of psychological tests, licensed counselors meet PAR’s criteria for qualification level C and are commonly certified as such by PAR.

Similar to PAR, **Pearson Clinical** drafted a Level C qualification policy for tests administered in the category of clinical psychology requiring that evaluators earn a “doctorate degree in psychology, education, **or** closely related field with formal training in the ethical administration, scoring, and interpretation of clinical assessments related to the intended use of the assessment **OR** licensure or certification to practice in your state in a field related to the purchase **OR** certification by or full active membership in a professional organization (such as APA, NASP, NAN, INS) that requires training and experience in the relevant area of assessment.”<sup>17</sup> At first glance, readers may deduce that Pearson Clinical requires test administrators to earn a doctoral degree. However, Pearson emphasizes the word “or” repeatedly in their policy through bold print and/or capitalized letters to denote that an evaluator need only meet one of the listed criteria. Because licensed mental health counselors are licensed, and in some cases certified, to practice mental health counseling in their respective states, the second criterion should be met by all licensed mental health counselors. In addition, some counselors will meet the first and third criteria depending on education level and association membership.

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<sup>14</sup> 20/20 Task Force (2013). [Meeting notes](#) from Delegates meeting.

<sup>15</sup> NBFE (2016). Social Security Administration clarifies that counselors can evaluate for disability. Retrieved from <https://www.nbfe.net/Articles/4321134>

<sup>16</sup> PAR (2012). *Qualification levels*. Retrieved from <http://www4.parinc.com/Supp/Qualifications.aspx>.

<sup>17</sup> Pearson (2016). *Clinical psychology qualifications policy*. Retrieved from <http://www.pearsonclinical.com/psychology/qualifications.html>.

Like PAR and Pearson, the highest level of testing qualification established by **MHS Assessments** is Level C, which requires the evaluator to have completed a graduate-level course in tests and measurement at a university “or...equivalent documented training,” training and/or experience in the use of tests, and an advanced degree in an appropriate profession<sup>18</sup>. As previously noted, counselors graduating from CACREP-accredited clinical mental health counseling programs and CACREP-equivalent programs are required to complete a graduate level course in testing. Although MHS offers psychology and psychiatry as examples of “an appropriate profession,” they do not explicitly exclude clinical mental health counseling, which we have already established is an appropriate profession for test access.

**Western Psychological Services (WPS)** provides two advanced qualification levels. Level C permits an evaluator to purchase “all products except advanced psychiatric instruments and advanced neuropsychological instruments” and requires evaluators to have “a master’s degree (MA, MS, MSW, CAGS) in psychology, school counseling, occupational therapy, speech–language pathology, social work, education, special education, or related field.”<sup>19</sup> Again, licensed mental health counselors meet this criterion because they hold master’s degrees in a related occupation. Level N is the highest level designated by WPS, allowing purchase of all tests. This level requires “a doctoral degree (PhD, PsyD, MD) in psychology or related field or MA (psychologist, social worker) a master’s degree (MA, MS, MSW) in fields listed above and at least a weekend workshop on neuropsychological assessment.” Many but not all licensed mental health counselors will meet these guidelines. Specifically, counselors who hold a doctoral degree in a related field meet the criteria, as well as master’s-level counselors who have completed at least a couple days of additional training in neuropsychological evaluation.

## **PREVENTING COUNSELORS FROM ADMINISTERING AND INTERPRETING PSYCHOLOGICAL TESTS WOULD BE IMPRACTICAL AND UNETHICAL**

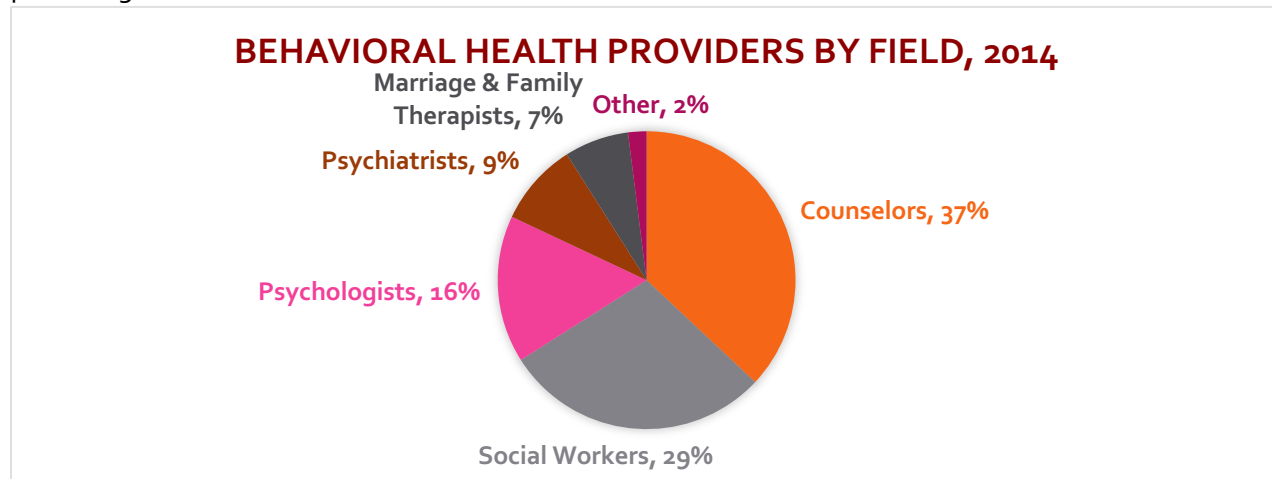
The demand for evidence-based practices and treatment approaches continues to rise in the United States. Third party payers and authorities in the behavioral healthcare sector continue to apply pressure to providers to offer evidence substantiating diagnoses and treatment methods, as well as efforts to measure response to behavioral health interventions. Increasingly, testing provides an integral source of data to comply with these standards of care. Testing aids counselors in formulating a diagnosis, planning treatment, and measuring client progress.

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<sup>18</sup> MHS Assessments (n.d.). Qualification criteria and who can order. Retrieved from <https://www.mhs.com/support/qual-criteria>

<sup>19</sup> WPS (n.d.). Qualification guidelines. Retrieved from [http://www.wpspublish.com/store/Qualification\\_Guidelines%20V3.pdf](http://www.wpspublish.com/store/Qualification_Guidelines%20V3.pdf)

According to the Centers for Medicaid and Medicare Services, counselors comprise the largest percentage of the U.S. behavioral healthcare workforce in the National Provider Identifier insurance.<sup>20</sup>



To deny the largest sector of the U.S. behavioral healthcare workforce the opportunity to administer and interpret psychological tests is illogical. It implies that licensed mental health counselors are qualified to treat mental disorders but not to diagnose them nor evaluate the efficacy of their treatment approaches. This practice is akin to expecting a physician to diagnose and treat hypertension without allowing the physician to measure a patient’s blood pressure.

Counselors cannot be expected to treat what they cannot objectively diagnose or measure. Ultimately, such a practice would negatively impact client care. Thus, NBFEE views any efforts to restrict the rights of counselors from administering and interpreting psychological tests as potentially harmful to clients and therefore unethical.

## POSITIONS OF STATE LICENSURE BOARDS

Although most state licensure boards do not prohibit appropriately trained licensed counselors from administering and interpreting psychological tests, there are rare exceptions. For example, licensure boards in Alabama, Arkansas, and Texas permit counselors to administer and interpret all tests except projective tests. California allows counselors to administer and interpret tests except “projective techniques in the assessment of personality, individually administered intelligence tests, neuropsychological testing, or utilization of a battery of three or more tests to determine the presence of psychosis, dementia, amnesia, cognitive impairment, or criminal behavioral.”<sup>21</sup> Louisiana’s licensure board restricts counselors to tests of language, education and achievement tests; adaptive behavioral tests; symptoms screening checklists or instruments; tests of abilities; tests of interests; and tests of

<sup>20</sup> American Psychological Association (2014, September). *What percentage of the nation’s behavioral health providers are psychologists?* Retrieved from <http://www.apa.org/monitor/2014/09/datapoint.aspx>.

<sup>21</sup> American Counseling Association (2016). *Licensure requirements for professional counselors: A state-by-state report*. Alexandria, VA: Author.

aptitudes<sup>22</sup>. Tennessee, the most restrictive state on this issue, prohibits counselors from “the use of projective techniques in the assessment of personality, nor the use of psychological or clinical tests designed to identify or classify abnormal or pathological human behavior, nor the use of individually administered intelligence tests.”<sup>21</sup> Licensed counselors should consult their state licensure boards and state chapters of their counseling associations to verify scope of practice in their respective states.

## A CALL TO ACTION FOR FAIR AND ETHICAL TESTING PRACTICES

The National Board of Forensic Evaluators calls on state legislatures, licensure boards, and authorities in all disciplines of the mental health profession to advocate for laws, rules, and policies that protect the rights of all appropriately-trained licensed mental health professionals to administer and interpret psychological tests. We also encourage licensed counselors to seek ongoing training in this area that exceeds that which they received in graduate school. Counselors should abide by the ethical guidelines related to testing outlined in the ACA and AMHCA ethical codes, including the obligation to “use only those testing and assessment services for which they have been trained and are competent.”<sup>23</sup>

## ABOUT THE NATIONAL BOARD OF FORENSIC EVALUATORS

The National Board of Forensic Evaluators (NBFE) is a 501(c)(3) not-for-profit organization dedicated to providing quality training and certification of all licensed mental health professionals (e.g., counselors, social workers, marriage and family therapists, psychologists, psychiatrists) in the specialty area of forensic mental health evaluation. NBFE is a proud partner of the American Mental Health Counselors Association and several other state, local, and international organizations in the mental health field. To learn more about NBFE, visit [www.nbfe.net](http://www.nbfe.net).



*Position paper authored by Aaron Norton, Executive Director of NBFE, edited by Dr. Norman Hoffman, President and Founder of NBFE, and approved by the NBFE Board of Directors 8/15/16. Revised 9/4/17, 12/18/17, 5/25/18, 2/10/20.*

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<sup>22</sup> Louisiana Professional Counselors Board of Examiners (2016). Position statement on appraisal activities clarification of the distinction between appraisals and psychological tests. Retrieved from [https://www.lpcboard.org/assets/docs/Resources/Position-Statement\\_Appraisal\\_Revised-11.18.16.pdf](https://www.lpcboard.org/assets/docs/Resources/Position-Statement_Appraisal_Revised-11.18.16.pdf).

<sup>23</sup> ACA (2014). 2014 ACA code of ethics. Retrieved from <http://www.counseling.org/docs/ethics/2014-aca-code-of-ethics.pdf?sfvrsn=4>.