

Agency Response to Economic Impact Analysis

The Board of Counseling mostly concurs with the analysis of the Department of Planning and Budget for the licensure of art therapists under 18VAC115-90 *et seq.* The Board would like to make two clarifications.

First, there is an implication in the analysis that art could not be used in certain settings, such as schools or in working with the elderly, unless the individual facilitating the use of art held a license as an art therapist. Under § 54.1-3516 of the Code of Virginia, an individual cannot practice art therapy without a license. Art, however, can be used in schools, assisted living facilities, and other locations without incorporating art therapy or requiring a license to practice art therapy.

Second, the analysis states that art therapists can receive continuing education to satisfy licensure renewal requirements from the Art Therapy Credentials Board, or ATCB. While that is true, the ATCB is far from the only body that the Board recognizes to provide continuing education for art therapists. Proposed 18VAC115-90-90 lists 15 organizations which the Board recognizes as providers of continuing education for art therapists.