

Agency Response to Economic Impact Analysis

The Board of Counseling has the following comment regarding the Economic Impact Analysis of the Department of Planning and Budget on proposed amended regulations for 18 VAC 115-20-10 et seq., Regulations Governing the Practice of Professional Counseling.

- 1) The Analysis stated that Liberty University Online is *working towards* CACREP accreditation. In fact, Liberty Online program in Clinical Mental Health Counseling became fully accredited by CACREP in January 19, 2019.
- 2) The Analysis stated that the Board of Nursing “*anticipates* requiring national accreditation for certain nursing programs.” In fact, a regulatory action that became effective February 7, 2018 requires all pre-licensure registered nursing education programs in Virginia to have accreditation or candidacy status by three years after the effective date of the regulation (by February 2021). The Board is not anticipating adopting a requirement; it has already taken action to require national accreditation for RN nursing educational programs.
- 3) The Analysis stated that these proposed changes could “reduce the supply of counselors.” It then asserted that the changes could result in a reduction in the demand for services by other practitioners, such as social workers, marriage and family therapists, and psychologists. The two statements appear to be illogical. Following supply and demand theory - if the supply of counselors is reduced, the demand for counseling services by other types of practitioners would increase. Therefore, the agency does not agree with the assertion that the proposal may have any indirect costs for related professions because of a decreased demand for their services.