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The Military Health Systems and Professional Counselors

The National Board for Certified Counselors (NBCC) is committed to supporting service members, veterans and their families and ensuring access to qualified mental health counselors. NBCC pursues numerous legislative and advocacy priorities for this purpose, as well as its own programs.

For years, professional counselors were excluded from the Department of Defense (DOD), reducing the availability of needed mental health care providers. NBCC has had great success in its advocacy efforts to open the military health systems to counselors, but there is still work to do before counselors are employed on equal terms with other professions.

TRICARE

For over a decade, NBCC advocated for independent practice authority for counselors under TRICARE, the health care program for military, retirees and their families. Previously, counselors were required to obtain physician referral and supervision when serving TRICARE beneficiaries, a burdensome requirement not placed on other mental health professions.

NBCC, in coalition with other counseling organizations, passed legislation to remove those restrictions and allow for independent practice. After further advocacy, the DOD established qualifications for independent practice in December 2011.

[Read more](#) about the history of counselor practice under TRICARE.

The Army Substance Abuse Program

In July 2011, the DOD authorized the Army Substance Abuse Program (ASAP) to employ licensed counselors as independent practitioners. This policy was a great success for NBCC's advocacy efforts for counselor parity within the military health system.

The policy change also coincided with an ASAP national hiring initiative for substance abuse counselors, which increased the opportunities for counselors to serve military personnel.

[Learn more](#) about counselors and the ASAP.

Latest Developments

NBCC is pleased to announce that the Department of Defense (DOD) released the final rule on July 14, 2014, establishing standards for counselor participation in the TRICARE program. The DOD released an interim final rule (IFR) in December 2011, which created the initial criteria for counselor independent practice under TRICARE. The final rule modifies the IFR in response to comments and concerns expressed by the public.

NBCC has been an active proponent of independent practice rights for counselors in TRICARE for over a decade and this rule is the final culmination of that effort. The IFR granted independent practice authority to counselors, but contained a number of limitations and requirements that were burdensome to the counseling profession. The final rule is a significant improvement over the IFR and NBCC is pleased to see many of our recommendations were incorporated. The entirety of the rule can be read here, but highlights of the changes include:

- Extension of the transition period to 2017.

Previously, the IFR was scheduled to end December 31, 2014, but the final rule extends the transition period for two years, until January 1, 2017.

Additionally, TRICARE clarified that any counselor meeting the transition criteria before January 1, 2017, could apply at any time under those standards (including after the transition period closes). Many organizations, including NBCC, have advocated for a longer transition period. With this extension, the transition period is five years.

The transition period educational and test requirements include:

- Possession of a master's degree or higher from a mental health counseling program accredited by the Council for Accreditation of Counseling & Related Educational Programs and passage of the [National Counselor Examination for Licensure and Certification \(NCE\)](#)

OR

- Possession of a master's degree or higher in counseling from a regionally accredited institution and passage of the [National Clinical Mental Health Counseling Examination \(NCMHCE\)](#).
- Indefinite continuation of the supervised counselor status.

The IFR allowed counselors to continue to practice under physician supervision as supervised mental health counselors (SMHCs) until January 1, 2015. After that date, the SMHC status would no longer be reimbursed. The final rule removes the expiration date and extends the SMHC status indefinitely. Therefore, counselors currently practicing under supervision may continue to do so for the foreseeable future.

The final rule took effect on August 18, 2014.

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National Board for Certified Counselors, Inc. and Affiliates

3 Terrace Way

Greensboro, NC 27403

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