



U.S. Department  
of Veterans Affairs

# **NATIONAL STANDARD OF PRACTICE: ART THERAPIST**

**June 2024**

**PURPOSE:** This report provides a summary of internal and external feedback received for the draft Art Therapist VA national standard of practice during the comment period from July to September 2023.

## Table of Contents

<b>EXECUTIVE SUMMARY</b> .....	<b>3</b>
<b>AUTHORITY</b> .....	<b>4</b>
<b>PURPOSE</b> .....	<b>4</b>
DEVELOPMENT PROCESS .....	5
<b>VA ART THERAPIST: FEEDBACK ON NATIONAL STANDARD</b> .....	<b>6</b>
REGISTRATION BODY FEEDBACK .....	7
STATE LICENSING BOARD FEEDBACK.....	8
PROFESSIONAL ASSOCIATION FEEDBACK.....	10
FEEDBACK ACROSS FIVE AREAS .....	10
<b>CONCLUSION</b> .....	<b>14</b>
<b>APPENDIX A: DRAFT NATIONAL STANDARD OF PRACTICE FOR ART THERAPISTS</b> .....	<b>15</b>
<b>APPENDIX B: VA UNDER SECRETARY FOR HEALTH LETTERS</b> .....	<b>16</b>

## Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Art Therapists integrate psychotherapeutic principles and art interventions to evaluate, diagnose, and treat individuals with various clinical mental health and rehabilitation issues that impact their health, function, and quality of life.

On July 28, 2023, VA sent letters to the Art Therapy Credentials Board and the American Art Therapy Association to inform them of VA's intent to follow the American Art Therapy Association's standards for the national standard of practice for Art Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. VA explained that although the Art Therapy Credentials Board is the registration body for Art Therapists, the American Art Therapy Association has developed the Ethical Principles for Art Therapists, which is followed by all VA Art Therapists. VA also sent letters to the 14 state licensing boards for Art Therapists to inform them of VA's intent to follow the registration standards for the national standard of practice for Art Therapists.

In addition, from July 28 to September 26, 2023, VA posted the proposed national standard of practice for VA Art Therapists in the Federal Register, 88 FR 48955 (<https://www.federalregister.gov/documents/2023/07/28/2023-16008/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists-art>) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Art Therapists received 48 total comments across all platforms—1 response from a state licensing board for Art Therapists, 46 comments from VA employees, and 1 comment from the national registration body for Art Therapists. VA reviewed all comments received and made three changes to the national standard of practice in response to comments.

This report provides a summary of comments received on the proposed Art Therapist national standard of practice. It also provides VA's response to the comments and changes made to the national standard of practice in response to feedback received.

## Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There is one overarching directive to describe Veterans Health Administration (VHA) policy on national standards of practice. The directive is accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external). As each individual national standard of practice is finalized, it is published as an appendix to the directive and accessible at the same websites.

## Purpose

It is critical that VA, the Nation's largest integrated health care system, develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA

employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring states to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and the Department of Defense (DoD), providing a complete picture of a Veteran's health information and improving VA's delivery of health care to the Nation's Veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

It is also imperative that VA, as a national health care system, can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

### Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in Executive Order (EO) 13132 to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA medical facility Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

VA has developed a robust process to engage with partners, members of the public, states, and employees on the proposed national standard of practice. In addition, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. VA provides the proposed national standard of practice to our DoD partners as an opportunity to flag inconsistencies with DoD standards. VA also engages with labor partners informally as part of a pre-decisional collaboration. Consistent with EO 13132, VA sends a letter to each state board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

## VA Art Therapist: Feedback on National Standard

VA Art Therapists integrate psychotherapeutic principles and art interventions to evaluate, diagnose, and treat individuals with various clinical mental health and rehabilitation clinical issues that impact their health, function, and quality of life. Art Therapists use art-making and the creative process to improve cognitive and sensorimotor functions, foster self-esteem and emotional resilience, promote insight, enhance social skills, and reduce and resolve conflicts and distress in order to ameliorate biopsychosocial conditions. VA employs fewer than 20 Art Therapists in the United States.

On July 28, 2023, VA posted the proposed national standard of practice for Art Therapists in the Federal Register, 88 FR 48955 (<https://www.federalregister.gov/documents/2023/07/28/2023-16008/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists-art>) and within VA's intranet for public and employee feedback, respectively. The proposed national standard of practice remained open for comment for 60 days, through September 26, 2023. A copy of the national standard of practice for Art Therapists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to the registration body for Art Therapists, the Art Therapy Credentials Board, and the standards body for Art Therapists, the American Art Therapy Association, to inform them of VA's intent to follow the American Art Therapy Association standards and provide them with an opportunity to provide feedback directly to VA. Copies of those letters are in [Appendix B](#). Although the Art Therapy Credentials Board is the registration body for Art Therapists, the American Art Therapy Association has developed the Ethical Principles for Art Therapists, which is followed by all VA Art Therapists.

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

In response to the proposed national standard of practice for Art Therapists, VA received 46 comments from VA employees from an internal VA site, 1 response from a state licensing board for Art Therapists, and 1 comment from the Art Therapy Credentials Board—the registration body for Art Therapists. Out of the 46 employee comments, 25 employees *agreed*, 1 employee *disagreed*, and 20 employees selected *not applicable*.<sup>1</sup>

### Registration Body Feedback

On July 28, 2023, VA sent a letter to the Art Therapy Credentials Board with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. A copy of the letter sent to the Art Therapy Credentials Board from the Under Secretary for Health is located in [Appendix B](#).

Comment: The Art Therapy Credentials Board provided feedback on VA's proposed standard for Art Therapists. They advised VA to consider state licensure and Art Therapy Credentials Board standards for supervision of Art Therapists working towards getting their registration. Some states require those with a supervisory license or the highest level of their professional licensure to provide supervision. The Art Therapy Credentials Board requires at least half of the

---

<sup>1</sup> At the time of feedback, employees were prompted to select “concur,” “concur with comments,” and “non-concur.”

supervised hours required for Art Therapist registration to be conducted by someone who is board certified.

The Art Therapy Credentials Board clarified that individuals credentialed by them must follow the Art Therapy Credentials Board Code of Ethics, Conduct, and Disciplinary Procedures. It also stated that the American Art Therapy Association is the professional association for art therapy; not a regulatory and compliance board. The Art Therapy Credentials Board noted that it has a rigorous code of ethics, with numerous Ethics Officers investigating self-reports of misconduct and third-party complaints from the public. In addition, they explained that they have a disciplinary panel to review cases where the investigation renders violations against the Art Therapy Credentials Board code and remedies required.

Response: The national standard of practice for Art Therapists only applies to registered Art Therapists. Art Therapists working toward obtaining registration may be appointed as graduate Art Therapists according to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.

VA has Art Therapists who may not have the Registered Art Therapist credential from the Art Therapy Credential Board because they were grandfathered into their positions. VA Handbook 5005, Staffing, Part II, Appendix G60 includes a grandfathering provision for employees who, on the effective date of the qualification standard (June 7, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and registration that are part of the basic requirements of the occupation of Art Therapist. As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. Therefore, all VA Art Therapists abide by the American Art Therapy Association Ethical Principles for Art Therapists and will continue to do so under the national standard of practice for Art Therapists. The Art Therapist national standard of practice is not changing how VA Art Therapists practice.

Note that this section addresses all comments from the Art Therapy Credential Board, including those in response to the questions posted in the Federal Register Notice.

### State Licensing Board Feedback

On July 28, 2023, VA sent letters to the 14 state licensing boards for Art Therapists with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. Of the 14 state licensing boards, 1 offers an exemption for employees working at Federal facilities. VA received a response from 1 of the 14 state licensing boards for Art Therapists. Copies of the letters sent to the state licensing boards from the Under Secretary for Health are located in [Appendix B](#).

Comment: The New Mexico Counseling and Therapy Practice Board provided information on New Mexico's additional requirements to maintain licensure, such as education requirements in ethics and supervision. The New Mexico Counseling and Therapy Practice Board also highlighted the differences between the American Art Therapy Association and the Art Therapy Credentials Board. They stated that the American Art Therapy Association is a membership



organization that does not require anyone to have training, education, or licensing while the Art Therapy Credentials Board is the most important regulating body that registers Art Therapists. They also noted that being a Registered Art Therapist or an Art Therapist with Board Certification is expected at minimum for anyone practicing independently at a qualifying skill level.

The New Mexico Counseling and Therapy Practice Board believes national registration as a Registered Art Therapist with Board Certification, not just American Art Therapy Association membership, is essential. They explained that the Art Therapist with Board Certification credential requires a board examination, while the Registered Art Therapist credential does not and therefore the Registered Art Therapist credential does not confirm one has those skills and knowledge covered by the credential.

The New Mexico Counseling and Therapy Practice Board believes the highest level for supervision should be the standard, unless there are extenuating circumstances. The New Mexico Counseling and Therapy Practice Board therefore believes there should be flexibility regarding state supervision requirements, especially in areas that are rural, underserved, or otherwise inaccessible to clinicians with higher levels of training and credentialing. They stated that the ability to provide Art Therapy via telehealth and supervision across state lines would be one way to create more accessibility to highly trained and competent providers.

Response: VA has Art Therapists who may not have the Registered Art Therapist credential from the Art Therapy Credential Board because they were grandfathered into their positions. VA Handbook 5005, Staffing, Part II, Appendix G60 includes a grandfathering provision for employees who, on the effective date of the qualification standard (June 7, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and registration that are part of the basic requirements of the occupation of Art Therapist. As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. Therefore, all VA Art Therapists are required to abide by the American Art Therapy Association Ethical Principles for Art Therapists and will continue to do so under the national standard of practice for Art Therapists. The Art Therapist national standard of practice is not changing how VA Art Therapists practice.

This national standard of practice will not change qualification standards for VA Art Therapists detailed in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. Qualification standards require VA Art Therapists to possess a full, current, and unrestricted registration as a Registered Art Therapist. Art Therapists working toward obtaining registration may be appointed as graduate Art Therapists. The national standard of practice only applies to registered VA Art Therapists.

VA has statutory authority under 38 U.S.C. 1730C to allow VA Art Therapists to practice telehealth in any state regardless of where they are licensed or registered.

## Professional Association Feedback

On July 28, 2023, VA sent a letter to the American Art Therapy Association with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. The American Art Therapy Association did not provide feedback to VA. A copy of the letter sent to the American Art Therapy Association from the Under Secretary for Health is located in [Appendix B](#).

## Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees that were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice.

---

*“It’s refreshing to see VA has interest in helping Veterans through art therapy.” – Comment from New Mexico Counseling and Therapy Practice Board*

---

### 1. Are there any required trainings for the aforementioned practices that we should consider?

Comment: One employee commented that it would be important to acquire training in fields directly related to the prevention of suicidal ideation/gestures, military sexual trauma, and post-traumatic stress disorder.

Response: The national standards of practice do not address optional trainings. VA qualification standards, located in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, set the minimum training and registration requirements for VA Art Therapists. VA ensures all Art Therapists have the appropriate education and training to perform their job duties. Specialized trainings are supplementary and optional for VA Art Therapists who are interested in advancing their skills.

### 2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?

Comment: One employee commented that the unrestricted Registered Art Therapist registration earned after graduation from a master’s program may take several years to attain after completing a master’s program and being employed. The credential also requires supervised and clinical experience post-graduation, significantly limiting those entering the workforce with a master’s degree from attaining a job with VA. They suggested VA consider a requirement of active supervision and a Provisional Registered Art Therapist (ATR-P) registration as an alternative to requiring the full Registered Art Therapist registration for employment.

One employee stated California requires licensure in Marriage and Family Therapy to be considered an Art Therapist. In addition, there is a high number of individuals who receive degrees in "expressive arts therapy" in California. They are registered as Registered Expressive

Arts Therapists, which are professionals who combine multiple forms of the creative arts (drama, movement, visual arts, music, writing, etc.) in counseling, psychotherapy or in other forms of interdisciplinary mental health professions to address behavioral and mental health challenges or stressors with individuals or groups. They are registered with the International Expressive Arts Therapy Association. The employee believes VA restrictions in hiring based only on the Registered Art Therapist registration makes finding specific creative art therapists almost impossible.

Response: The Art Therapist national standard of practice will not change qualification standards for VA Art Therapists, located in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. The qualification standards require VA Art Therapists to possess a full, current, and unrestricted registration as Registered Art Therapists. However, non-registered applicants, who otherwise meet the eligibility requirements for registration, may be given a temporary appointment as a graduate Art Therapist for a period not to exceed two years. The exception only applies to positions at the GS-7 and GS-9 level. For grade levels at or above the full performance level, the candidate must be registered. In all cases, Arts Therapists must actively pursue registration requirements, starting from the date of appointment as a VA Art Therapist. Failure to become registered within two years from the date of appointment will result in removal from the GS-0638 recreation and creative arts therapist occupation and may result in termination of employment.

### *3. Is there any variance in practice that we have not listed?*

Comment: An employee informed VA that Ohio passed a law in July 2023 to begin licensing Art Therapists. Ohio was not included as a state with licensure in the proposed national standard of practice for Art Therapists when it was posted on July 28, 2023.

Response: VA reviewed license and certification requirements in Ohio and confirmed there is no variance in how VA Art Therapists practice in any state, including Ohio. VA revised the national standard of practice to include Ohio as a state that requires licensure. Pursuant to Ohio Revised Code Sec. 4757.24, beginning on July 4, 2024, Ohio must issue state licenses for Art Therapists practicing art therapy in Ohio. As of December 20, 2023, Ohio has not determined a date of issuance for art therapy licenses. VA will remain in contact with the Ohio Counselor, Social Worker, and Marriage and Family Therapist Board to keep informed of licensure updates and revise the national standard of practice accordingly.

Comment: Several employees suggested adding additional practice areas to the Art Therapist national standard of practice. An employee recommended that the Art Therapy national standard of practice include traditional American Indian/Alaska Native Art Therapy modalities.

Response: The Art Therapist national standard of practice does not include an exhaustive list of every task and duty that each VA health care professional can perform. Rather, it is designed to highlight whether there are any areas of variance in how Art Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, registration, and other requirements.

Comment: One employee suggested adding that Art Therapists use art-making and the creative process to improve cognitive and sensorimotor functions, foster self-esteem and emotional resilience, promote insight, enhance social skills and reduce and resolve conflicts and distress in order to ameliorate biopsychosocial conditions, support one's self-care, and to promote well-being.

Response: The Art Therapist national standard of practice states that Art Therapists use art-making and the creative process to improve cognitive and sensorimotor functions, foster self-esteem and emotional resilience, promote insight, enhance social skills and reduce and resolve conflicts and distress in order to ameliorate biopsychosocial conditions, support one's self-care, and to promote well-being.

Comment: Another employee asked if VA would recognize that many Art Therapists are able to practice in a similar manner as Social Workers, Marriage and Family Therapists, and Licensed Professional Counselors.

Response: Individuals hired as VA Art Therapists under the VA qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, may have educational backgrounds from related fields, such as Counseling, Marriage and Family Therapy, Social Work, Psychology, Addictions Counseling, Psychiatric Nursing, and Psychiatry. However, VA Art Therapists must possess a full, current, and unrestricted registration as a Registered Art Therapist approved by the Art Therapy Credentials Board. VA Art Therapists practice according to the American Art Therapy Association's Ethical Principles for Art Therapists and within their functional statement.

*4. What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*

Comment: An employee recommended VA carefully review requirements established by the respective state, taking into consideration the coursework, field experience, internships, residencies, and state examinations if required.

Response: VA conducted research on each state to review requirements prior to drafting the proposed Art Therapist national standard of practice. In addition, VA sent letters to each state licensing board for Art Therapists and asked for feedback on the proposed national standard of practice. VA will continue to maintain communication with state licensing boards throughout implementation of the national standard of practice.

Comment: Another employee noted that due to the limitations in hiring an Art Therapist who requires supervision, other disciplines can provide supervision, including Licensed Clinical Social Workers, Licensed Marriage and Family Therapists, and Licensed Professional Clinical Counselors while working at VA.

Response: For Art Therapist registration, the Art Therapy Credentials Board requires at least half of the required supervised hours be conducted by someone who is board certified. Only Art

Therapists provide supervision for Art Therapists in VA. Other disciplines are not permitted to fulfill supervision requirements for VA Art Therapists.

Comment: One employee asked how Art Therapists would be impacted in states that require licensure and do not exempt employees working at Federal facilities. They also asked if licenses were recognized across state lines (i.e., an Art Therapist with a license in one state could move to a different state and their license would be recognized in the new state). The employee also asked if there is any grace period by which Art Therapists must acquire licensure if they are practicing in a state that requires licensure, or must they be licensed prior to being hired.

Response: On November 12, 2020, VA published an interim final rule, 85 FR 71838 (<https://www.federalregister.gov/documents/2020/11/12/2020-24817/authority-of-va-professionals-to-practice-health-care>) confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. This rulemaking also confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement.

VA does not require Art Therapists to obtain a license to practice art therapy at VA. Instead, VA requires Art Therapists to have a full, current, and unrestricted registration as a Registered Art Therapist, according to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. It is at the employee's discretion to choose whether to obtain and maintain state licensure.

*5. Is there anything else you would like to share with us about these national standards of practice?*

Comment: An employee commented that VA should consider the Art Therapy Credentials Board's Code of Ethics, Conduct, and Disciplinary Procedures over the American Art Therapy Association Code of Ethics. This employee explained that the American Art Therapy Association is a membership organization which Art Therapists can choose to join, while the Art Therapy Credentials Board is Art Therapy's national credentialing board, which all registered Art Therapists must follow. This employee further explained that the American Art Therapy Association is only relevant to an Art Therapist if they choose to be a member of the American Art Therapy Association.

Response: VA has Art Therapists who may not have the Registered Art Therapist credential from the Art Therapy Credential Board because they were grandfathered into their positions. VA Handbook 5005, Staffing, Part II, Appendix G60 includes a grandfathering provision for employees who, on the effective date of the qualification standard (June 7, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and registration that are part of the basic requirements of the occupation of Art Therapist. As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. Therefore, all VA Art Therapists abide by the

American Art Therapy Association Ethical Principles for Art Therapists and will continue to do so under the national standard of practice for Art Therapists. The Art Therapist national standard of practice is not changing how Art Therapists at VA practice.

Comment: Another employee suggested each profession, via their professional association, should be encouraged to establish universal standards consistent with other similar professions in an effort to conduct research and promote ethical practice in the hope of improving care and providing legitimacy to the profession.

Response: In addition to Art Therapists, VA is creating national standards of practice for Recreation Therapists, Dance/Movement Therapists, Drama Therapists, and Music Therapists. VA sent letters to each profession's certifying or registration body, along with relevant professional associations, to provide an opportunity for the organizations to give feedback on the proposed national standards of practice.

Comment: One employee commented that Art Therapists should be knowledgeable of VA's shift to a Whole Health approach to care and their role in supporting shared goals developed between the individual and the clinical team that are efficacious as treatment, but also support the individual's development of mission, aspiration and purpose, their personal health plan, and self-care pursuits that optimize health and well-being.

Response: Art Therapists' responsibility within VA's Whole Health approach is to ensure that Veterans receive patient-centered, holistic, and personalized care that acknowledges their physical, mental, emotional, and social well-being. Art Therapists follow the Whole Health approach through collaboration, education, promotion of well-being, cultural competence, adaptability, outcome assessments, community engagement, and a commitment to continuous learning.

## Conclusion

VA considered all comments that it received. VA is making several changes to the Art Therapist national standard of practice based on the reasons described above. VA revised this national standard of practice to include Ohio in the list of states that require a license. VA also added a note to the national standard of practice to clarify that pursuant to Ohio Revised Code Sec. 4757.24, beginning on July 4, 2024, Ohio must issue state licenses for Art Therapists practicing art therapy in Ohio. As of December 20, 2023, Ohio has not determined a date of issuance for art therapy licenses. Finally, VA updated the date of when VA reviewed license and registration requirements for this occupation to December 2023.

The final VA national standard of practice for Art Therapists will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA's national policy process, the national standard of practice for Art Therapists will be reviewed and recertified at minimum on a five-year cycle.

## Appendix A: Draft National Standard of Practice for Art Therapists

Appendix A includes the proposed national standard of practice for Art Therapists posted in the Federal Register and within VA on July 28, 2023, for individuals to provide feedback on. The final national standard of practice for Art Therapists is written into VHA Directive 1900, VA National Standards of Practice, published at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).




1. Art Therapists integrate psychotherapeutic principles and art interventions to evaluate, diagnose and treat individuals with various clinical mental health and rehabilitation issues that impact their health, function and quality of life. Art Therapists use art-making and the creative process to improve cognitive and sensorimotor functions, foster self-esteem and emotional resilience, promote insight, enhance social skills and reduce and resolve conflicts and distress in order to ameliorate biopsychosocial conditions.
2. Art Therapists in VA possess the education and registration required by VA qualification standards. See Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.
3. VA Art Therapists practice in accordance with the Ethical Principles for Art Therapists from the American Art Therapy Association (AATA), available at: <https://arttherapy.org>. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that all Art Therapists in VA follow the AATA standards.
4. Although VA only requires a registration, 14 States require a State license in order to practice as an Art Therapist in that State: Connecticut, Delaware, District of Columbia, Kentucky, Maryland, Mississippi, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Tennessee, Texas and Virginia. Of those, the following State exempts Federal employees from its State license requirements: Virginia.

VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that there is no variance in how VA Art Therapists practice in any State.

## Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA as of June 2024*
 Letter from Dept of Veterans Affairs to A	American Art Therapy Association	No
 Letter from Dept of Veterans Affairs to t	Art Therapy Credentials Board	Yes
 Letter from Dept of Veterans Affairs to t	Connecticut Department of Public Health	No
 Letter from Dept of Veterans Affairs to t	Delaware Board of Mental Health and Chemical Dependency Professionals	No
 Letter from Dept of Veterans Affairs to t	District of Columbia Board of Professional Counseling	No
 Letter from Dept of Veterans Affairs to t	Kentucky Board of Licensure for Professional Art Therapists	No
 Letter from Dept of Veterans Affairs to t	Maryland state Board of Professional Counselors and Therapists	No
 Letter from Dept of Veterans Affairs to t	Mississippi state Department of Health	No
 Letter from Dept of Veterans Affairs to t	New Jersey Board of Creative Arts and Activities Therapies	No
 Letter from Dept of Veterans Affairs to N	New Mexico Counseling and Therapy Practice Board	Yes
 Letter from Dept of Veterans Affairs to t	New York state Board for Mental Health Practitioners	No
 Letter from Dept of Veterans Affairs to C	Oregon Health Policy Board	No



 Letter from Dept of Veterans Affairs to t	Tennessee Board of Examiners of Psychology	No
 Letter from Dept of Veterans Affairs to T	Texas state Board of Examiners of Professional Counselors	No
 Letter from Dept of Veteran Affairs to th	Virginia Board of Counseling	No

**\*VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Art Therapists in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.**