



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: MUSIC THERAPIST

June 2024

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

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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.

Music Therapists use an evidence-based clinical practice that uses music and music techniques to target group and individualized goals across the clinical domains. Music interventions can target many goals including enhancement of cognitive processing (e.g., neuroconnectivity, memory, retention), sensory integration, fine and gross motor movement (e.g., initiation, sustaining, inhibiting), communication, and support for mental and emotional well-being and recovery. On July 28, 2023, VA sent letters to the Certification Board for Music Therapists and the American Music Therapy Association to inform them of VA's intent to follow both the Standards of Clinical Practice and the Scope of Music Therapy Practice for the national standard of practice for Music Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. The Standards of Clinical Practice were developed by the American Music Therapy Association—a professional association for Music Therapists. The Scope of Music Therapy Practice was jointly developed by the American Music Therapy Association and the Certification Board for Music Therapists—the certifying body for Music Therapists. VA also sent letters to the 11 state licensing boards for Music Therapists to inform them of VA's intent to follow the certification standards for the national standard of practice for Music Therapists.

In addition, from July 28 to September 26, 2023, VA posted the proposed national standard of practice for VA Music Therapists in the Federal Register, 88 FR 48961 (<https://www.federalregister.gov/documents/2023/07/28/2023-16005/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists>) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Music Therapists received 49 total comments across all platforms—2 responses from the state licensing boards for Music Therapists, 45 comments from VA employees, 1 comment from an individual from the public, and 1 comment from the American Music Therapy Association. VA reviewed all comments received and made four changes to the national standard of practice in response to comments.

This report provides a summary of comments received on the proposed Music 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 Music Therapist: Feedback on National Standard

VA Music Therapists use an evidence-based clinical practice that uses music and music techniques to target group and individualized goals across the clinical domains. Music interventions can target many goals including enhancement of cognitive processing (e.g., neuroconnectivity, memory, retention), sensory integration, fine and gross motor movement (e.g., initiation, sustaining, inhibiting), communication, and support for mental and emotional well-being and recovery. VA employs fewer than 20 Music Therapists in the United States.

On July 28, 2023, VA posted the proposed national standard of practice for Music Therapists in the Federal Register, 88 FR 48961

(<https://www.federalregister.gov/documents/2023/07/28/2023-16005/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists>) 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 Music Therapists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to the 11 state licensing boards, the Certification Board for Music Therapists, and the American Music Therapy Association to inform them of VA's intent to follow the Standards of Clinical Practice and the Scope of Music Therapy Practice and provide them with an opportunity to provide feedback directly to VA. The Standards of Clinical Practice were developed by the American Music Therapy Association—the professional association for Music Therapists. The Scope of Music Therapy Practice was jointly developed by the American Music Therapy Association and the Certification Board for Music Therapists—the certifying body for Music Therapists. Copies of the letters are located in [Appendix B](#).

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 Music Therapists, VA received one comment from an individual from the public through the Federal Register. VA received two comments from state licensing boards for Music Therapists and one comment from the American Music Therapy Association. Through an internal VA site, VA received 45 comments from VA employees. Out of the 45 employee comments, 24 employees *agreed*, and 21 employees selected *not applicable*.¹

Certification Body Feedback

On July 28, 2023, VA sent a letter to the certification body to inform them of VA's intent to follow both the Standards of Clinical Practice and the Scope of Music Therapy Practice for the national standard of practice for Music Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. The Certification Board for Music Therapists did not provide feedback on VA's proposed standard for Music Therapists. A copy of the letter sent

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

to the Certification Board for Music Therapists from the Under Secretary for Health is located in [Appendix B](#).

State Licensing Board Feedback

On July 28, 2023, VA sent letters to the 11 state licensing boards for Music 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 11 state licensing boards, 3 states offer an exemption for employees working at Federal facilities. As discussed below, VA received responses from 2 of the 11 state licensing boards for Music Therapists, one of which confirmed VA's national standard of practice for Music Therapists is consistent with Nevada's licensure requirements. Copies of the letters sent to the state licensing boards from the Under Secretary for Health are located in [Appendix B](#).

Comment: The New Jersey Board of Creative Arts and Activities Therapies informed VA that the rules for Music Therapy licenses in New Jersey are currently being promulgated, and the state is not able to license Music Therapists at this time.

Response: In response to the New Jersey Board of Creative Arts and Activities Therapies' feedback, VA revised the Music Therapist national standard of practice to include a note that pursuant to New Jersey Statue 45:8B-90.5, beginning on July 19, 2020, New Jersey must issue state licenses for Music Therapists practicing music therapy in New Jersey.. As of December 20, 2023, New Jersey has not determined a date of issuance for music therapy licenses. VA will remain in contact with the New Jersey Board of Creative Arts and Activities Therapies to keep informed of licensure updates and revise the national standard of practice accordingly.

Professional Association Feedback

On July 28, 2023, VA sent a letter to the American Music 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. A copy of the letter sent to the American Music Therapy Association from the Under Secretary for Health is located in [Appendix B](#).

Comment: The American Music Therapy Association submitted feedback via the Federal Register. They expressed concern over potential confusion among Music Therapists regarding qualification standards and state licensing. They explained that if a board-certified Music Therapist obtains the Licensed Creative Arts Therapist under the New York State Board for Mental Health Practitioners, New York state law does not require that these individuals maintain their board certification for license renewal. The American Music Therapy Association is concerned that if an individual maintains the Licensed Creative Arts Therapist in New York, it would automatically be considered by VA as equivalent to board certification.

Response: The national standard of practice for Music Therapists does not change VA qualification standards for Music Therapists in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, which require that Music Therapists at VA be board-certified Music Therapists approved by the Certification Board for Music Therapists. Since VA only requires certification, it is at the employee's discretion to choose whether to obtain and maintain their state license.

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 and individuals from the public 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.

“We appreciate the thorough review and proposed adoption of a standard of practice consistent with our profession’s existing national board certification, clinical practice standards, and scope of practice.” – Comment from the American Music Therapy Association

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

Comment: An employee commented that Music Therapists must have at least a bachelor’s degree and 1,200 hours of clinical training prior to receiving board certification.

Response: Music Therapists at VA must meet the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, date June 7, 2019, which require VA Music Therapists have at least a bachelor’s degree from an accredited college or university and be a board-certified Music Therapist approved by the Certification Board for Music Therapists. In addition to the academic coursework, the bachelor’s degree from an accredited college or university requires 1,200 hours of clinical training. The national standard of practice for Music Therapists does not change these qualification standards.

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: An individual from the public commented via the Federal Register that some individuals apply for Music Therapist positions prior to taking their certification test, but there is a six-month waiting period until they can retake the test if they do not pass. This commenter further noted that VA may want to consider this 6-month waiting period for new hires that do not have a license.

Response: The qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, date June 7, 2019, state that non-certified applicants, who otherwise meet the eligibility requirements for certification, may be given a temporary appointment as a graduate Music Therapist for a period not to exceed two years. This exception only applies to positions at the GS-7 and GS-9 level. Applicants who fail to obtain certification during this temporary full-time appointment may be terminated. For grade levels at or above the full performance level, the candidate must be certified as a Music Therapist by the Certification Board for Music Therapists. In all cases, Music Therapists must actively pursue completing certification requirements starting from the date of appointment by VA as a Music Therapist. Failure to become certified as

a Music Therapist within two years from the date of appointment will result in removal from the occupation of Creative Arts Therapist (Music Therapist) 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 Music Therapists. Ohio was not included as a state with licensure in the proposed national standard of practice for Music 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 Music Therapists practice in any state, including Ohio. VA revised the national standard of practice to include Ohio as a state that requires licensure. On July 4, 2023, Ohio determined that Music Therapists practicing music therapy in Ohio must obtain a state license. Other provisions were generally effective October 3, 2023. As of December 20, 2023, Ohio has not determined a date of issuance for music 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: One employee suggested the national standard of practice for Music Therapist include traditional American Indian/Alaska Native music modalities. Another employee asked whether music psychotherapy was within the scope of practice for Music Therapists at VA.

Response: The national standard of practice for Music Therapist 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 Music Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, certification, and other requirements.

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: One employee commented that in New York, therapists practicing under a limited permit working towards licensure must receive one hour per week of clinical supervision by another licensed professional, which can be either a Licensed Creative Arts Therapist or a Licensed Clinical Social Worker.

Response: VA requires that supervision of Music Therapists be performed by a board-certified Music Therapist.

Comment: One employee asked how Music 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., a Music 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 Music 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. The interim final rule applies to all VA health care professionals, including Music Therapists.

VA does not require Music Therapists to obtain a state license to practice music therapy at VA. Instead, VA requires Music Therapists to be board-certified in music therapy by the Certification Board for Music Therapists, according to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. Since VA only requires certification, it is at the employee's discretion to choose whether to obtain and maintain their state license.

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

VA did not receive any feedback in this area.

Conclusion

VA considered all comments that it received. VA is making four changes to the Music Therapist National Standard of Practice based on the reasons described above. VA added a note to the national standard of practice to clarify that pursuant to New Jersey Statue 45:8B-90.5, beginning on July 19, 2020, New Jersey must issue state licenses for Music Therapists practicing music therapy in New Jersey. As of December 20, 2023, New Jersey has not determined a date of issuance for music therapy licenses. 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 Music Therapists practicing music therapy in Ohio. As of December 20, 2023, Ohio has not determined a date of issuance for music therapy licenses. Last, VA updated the date of when VA reviewed license and certification requirements for this occupation to December 2023.

The final VA national standard of practice for Music 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 Music Therapists will be reviewed and recertified at minimum on a five-year cycle.

Appendix A: Draft National Standard of Practice for Music Therapists

Appendix A includes the proposed national standard of practice for Music 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 Music 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. Music Therapists use an evidence-based clinical practice that uses music and music techniques to target group and individualized goals across the clinical domains. Music interventions can target many goals including enhancement of cognitive processing (e.g., neuroconnectivity, memory, retention), sensory integration, fine and gross motor movement (e.g., initiation, sustaining, inhibiting), communication and support for mental and emotional well-being and recovery.
2. VA Music Therapists possess the education and certification required by VA qualification standards. See VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.
3. VA Music Therapists practice in accordance with the Standards of Clinical Practice from AMTA and the Scope of Music Therapy Practice jointly developed by CBMT and AMTA, available at: <https://www.musictherapy.org/about/standards/>. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that all VA Music Therapists follow AMTA and CBMT standards.
4. Although VA only requires a certification, 11 States require a State license in order to practice as a Music Therapist in that State: Georgia, Maryland, Nevada, New Jersey, New York, North Dakota, Oklahoma, Oregon, Rhode Island, Utah and Virginia. Of those, the following States exempt Federal employees from its State license requirements: Maryland, Nevada and Oklahoma.

VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that there is no variance in how VA Music 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 Music Therapy Association	Yes
 Letter from Dept of Veterans Affairs to C	Certification Board for Music Therapists	No
 Letter from Dept of Veterans Affairs to C	Georgia Board of Music Therapy	No
 Letter from Dept of Veterans Affairs to N	Maryland Board of Audiologists	No
 Letter from Dept of Veterans Affairs to N	Nevada Music Therapist Licensing Unit	Yes
 Letter from Dept of Veterans Affairs to N	New Jersey Board of Creative Arts and Activities Therapies	Yes
 Letter from Dept of Veterans Affairs to N	New York State Board for Mental Health Practitioners	No
 Letter from Dept of Veterans Affairs to N	North Dakota Board of Integrative Health Care	No
 Letter from Dept of Veterans Affairs to C	Oklahoma Music Therapy Committee	No
 Letter from Dept of Veterans Affairs to C	Oregon Health Licensing Office	No
 Letter from Dept of Veterans Affairs to F	Rhode Island Department of Health	No
 Letter from Dept of Veterans Affairs to L	Utah Division of Occupational and Professional Licensing	No
 Letter from Dept of Veterans Affairs to V	Virginia Board of Social Work	No

***VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Music 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.**