

**[STAFFING**

**1. REASON FOR ISSUE:** To revise the Department of Veterans Affairs (VA) qualification standard for Licensed Professional Mental Health Counselor (LPMHC), GS-0101, appointed under 38 U.S.C. § 7401(3) and 38 U.S.C. § 7405(a)(1)(B).

**2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook revision contains mandatory VA procedures on staffing, and replaces the LPMHC qualification standard in VA Handbook 5005, Part II, Appendix G43. Revised text is contained in [brackets]. Significant changes include the addition of certain doctoral degrees as qualifying education and a Senior LPMHC assignment at the GS-12 grade level. Under VA's title 38 Hybrid excepted service employment system in accordance with the authority established under the "Caregivers and Veterans Omnibus Health Services Act of 2010" (Public Law 111-163), authority is given to the Secretary of the VA under 38 U.S.C. § 7402 to prescribe qualifications for occupations identified in or established under 38 U.S.C. § 7401(3) and 38 U.S.C. § 7405(a)(1)(B). The new standards are effective on the date of this publication, however no action may be taken to convert or promote employees until training and guidance is received. This new qualification standard will be incorporated into the electronic version of VA Handbook 5005 that is maintained on the [Office of Human Resources Management Web site](#).

**3. RESPONSIBLE OFFICE:** The Recruitment and Placement Policy Service (059), Office of the Deputy Assistant Secretary for Human Resources Management.

**4. RELATED DIRECTIVE:** VA Directive 5005, Staffing.

**5. RESCISSIONS:** None.

**CERTIFIED BY:**

**BY DIRECTION OF THE SECRETARY  
OF VETERANS AFFAIRS**

/s/  
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**Distribution:** Electronic Only



**[APPENDIX G43. LICENSED PROFESSIONAL MENTAL HEALTH COUNSELOR  
QUALIFICATION STANDARD  
GS-0101  
Veterans Health Administration**

1. **COVERAGE.** The following are requirements for appointment as a Licensed Professional Mental Health Counselor (LPMHC) in the Veterans Health Administration (VHA). LPMHCs provide professional counseling and mental health services using knowledge, theory, and training foundations in professional counseling. LPMHCs may be assigned to any VHA program area, may consult with peers and supervisors, and may be involved in program evaluation and/or research activities. These requirements apply to all VHA LPMHCs in the GS-0101 series, including those assigned to VA Medical Centers, Community-Based Outpatient Clinics (CBOCs), Vet Centers, Veterans Integrated Service Network (VISN) offices, and VHA Central Office.
2. **DEFINITIONS.**
  - a. **Appointing Official.** The Human Resources Management Officer is delegated appointing authority to process and authenticate notifications of personnel actions, and authority to effect management-approved employment actions on behalf of officials, employees and facilities for which service is provided.
  - b. **Approving Official.** The Veterans Integrated Service Network (VISN) Director, facility Director, or designee is the approving official and will determine whether to approve or disapprove the appointment of employees in the hybrid occupations.
  - c. **Journey Level.** The full performance level for this qualification standard is the GS-11 grade level.
  - d. **Creditable Experience.** To be creditable, the experience must have required the use of knowledge, skills, abilities, and other characteristics (KSAs), also referred to as core competencies associated with the scope of LPMHC practice.
  - e. **Part-Time Experience.** Part-time experience is creditable according to its relationship to the full-time work week. For example, one week of full-time credit is equivalent to two weeks of part-time work.
  - f. **LPMHC professionals.** LPMHC professionals may be referred to differently in each state and titles may reflect different levels of practice. For example, states may license an LPMHC as a Licensed Professional Counselor (LPC), Licensed Professional Clinical Counselor (LPCC), Licensed Clinical Professional Counselor (LCPC), Licensed Mental Health Counselor (LMHC) etc. Please refer to specific state licensing guidelines. VA refers to the occupation as LPMHCs.

- g. **Clinical supervision.** Clinical supervision is between a licensed and unlicensed clinician or trainee in which the supervisee's clinical work is reviewed and reflected upon, with the aims of: improving the supervisee's work with clients; ensuring client welfare; supporting the supervisee in relation to their work, and supporting the supervisee's professional development. This includes co-signing clinical notes and supervising an individual as they are working towards licensure. Some state licenses do not license an individual to provide clinical supervision to trainees or unlicensed LPMHCs. Please refer to specific state licensing laws regarding the requirements for providing clinical supervision.
- h. **Administrative Supervision.** Administrative supervision is supervisory responsibility including but not limited to assigning and evaluating the work of subordinate staff; resolving complex problems to ensure patient services are met; making final decisions on selections; evaluating performance, and taking disciplinary action when necessary. The employee has full administrative and professional responsibility for planning and directing the work.

**3. BASIC REQUIREMENTS.** The basic requirements for employment as a LPMHC are prescribed by statute in 38 U.S.C. §7402(b)(11). To qualify for appointment as a LPMHC all applicants must:

- a. **Citizenship.** Be a citizen of the United States. (Non-citizens may be appointed when it is not possible to recruit qualified citizens in accordance with VA Handbook 5005, Part II, Chapter 3, Section A, paragraph 3.g.).
- b. **Education.** Hold a master's or doctoral degree in: Clinical Mental Health Counseling; Clinical Rehabilitation Counseling; Clinical Mental Health Counseling and Clinical Rehabilitation Counseling; **or** a related field, from a program accredited by the Council on Accreditation of Counseling and Related Educational Programs (CACREP). Examples of related mental health counseling fields include, but are not limited to Addiction Counseling; Community Counseling; Gerontology Counseling; Marital, Couple, and Family Counseling. CACREP defines the date when graduates are considered to have graduated from a CACREP accredited program. Additional information may be obtained from <http://www.cacrep.org/directory/>. **NOTE:** Traditional Rehabilitation counseling programs that are accredited by CACREP do not meet the LPMHC qualification standards as Traditional Rehabilitation counseling differs from Clinical Rehabilitation counseling.
- c. **Licensure.** Persons hired or reassigned to LPMHC positions in the GS-0101 series in VHA must hold a full, current, and unrestricted license to independently practice as a Licensed Professional Mental Health Counselor, which includes diagnosis and treatment. **NOTE:** It is VHA policy that a LPMHC who does not yet have a license that allows independent practice must be supervised by a licensed independent practitioner of the same discipline who is a VA staff member and who has access to the electronic health record.

- (1) **Exception.** VHA may waive the licensure requirement for persons who are otherwise qualified, pending completion of state prerequisites for licensure. This exception only applies up to the full performance level. For grade levels at or above the full performance level, the candidate must be licensed.
  - (2) The appointing official may waive the requirement of licensure for a period not to exceed 3 years for a LPMHC that provides care under the clinical supervision of a licensed LPMHC who is at or above the full performance level. This exception only applies at the entry level (GS-9). For grade levels at or above the full performance level, the candidate must be licensed. The Human Resources Office will provide the unlicensed LPMHC in writing the requirement to obtain licensure, the date by which the license must be acquired, and the consequences for not becoming licensed by the deadline. The written notice must be provided prior to the entrance on duty date.
  - (3) **Failure to Obtain License.** In all cases, LPMHCs must actively pursue meeting state prerequisites for licensure starting from the date of their appointment. Failure to become licensed within three years from date of appointment will result in removal from the GS-0101 LPMHC series and may result in termination of employment.
  - (4) **Loss of Licensure.** Once licensed, LPMHCs must maintain a full, valid, and unrestricted license to independently practice mental health counseling, which includes diagnosis and treatment. Loss of licensure will result in removal from the GS-0101 LPMHC occupation and may result in termination of employment.
- d. **Grandfather Provision.** All persons employed in VHA in as LPMHC on the effective date of this qualification standard are considered to have met all qualification requirements for the grade held, including positive education and licensure/certification/registration that are part of the basic requirements of the occupation. For employees who do not meet all the basic requirements required in this standard, but who met the qualifications applicable to the position at the time they were appointed to it, the following provisions apply:
- (1) Such employees in an occupation that requires a licensure, may be reassigned, promoted up to and including the full performance level, or demoted within the occupation, but may not be promoted beyond the full performance level or placed in supervisory or managerial positions.
  - (2) Such employees in an occupation that requires a licensure/certification/registration only at higher grade levels must meet the licensure/certification/registration requirement before they can be promoted to those higher grade levels.

- (3) Employees who are appointed on a temporary basis prior to the effective date of the qualification standard may not have their temporary appointment extended or be reappointed, on a temporary or permanent basis, until they fully meet the basic requirements of the standard.
- (4) If an employee who was retained (grandfathered) under this provision leaves that occupation, the employee loses protected status and must meet the full VA qualification standard requirements in effect at the time of reentry to the occupation.
- (5) Employees initially grandfathered into this occupation, who subsequently obtain additional education and/or licensure/certification/registration that meet all the basic requirements of this qualification standard must maintain the required credentials as a condition of employment in the occupation.

e. **Physical Requirements.** See VA Directive and Handbook 5019.

f. **English Language Proficiency.** LPMHCs must be proficient in spoken and written English in accordance with VA Handbook 5005, Part II, chapter 3, section A, paragraph 3.j.

#### 4. GRADE REQUIREMENTS.

##### a. Creditable Experience

- (1) **Knowledge of Current LPMHC Practices.** To be creditable, the experience must have demonstrated the knowledge, skills, and abilities associated with current mental health counseling practice. Experience satisfying this requirement must be active professional practice at the post- master's degree level, which is paid/non-paid employment as a professional mental health counselor.
- (2) **Quality of Experience.** Experience is only creditable if it is post- master's degree experience as a mental health counselor directly related to the position to be filled. Qualifying experience must be at a level comparable to LPMHC experience at the next lower grade level. For all assignments above the full performance level, the higher level duties must consist of significant scope, administrative independence, complexity (difficulty) and range of variety as described in this standard at the specified grade level and be performed by the incumbent at least 25% of the time.
- (3) **Part-Time Experience.** Part-time experience as a LPMHC is creditable according to its relationship to the full-time workweek. For example, a LPMHC employed 20 hours a week, or on a 1/2-time basis, would receive one full-time workweek of credit for each two weeks of service.

(4) **Fellowships or Post-Graduate Training.** Fellowship and post-graduate training programs are typically in a specialized area of clinical practice, i.e., mental health counseling. Training as a fellow or post-graduate may be substituted for creditable experience on a year-for-year basis.

(5) **Practicum in a VA Setting.** VHA practicum experience may not be substituted for experience, as the practicum (field placement) is completed prior to graduation with a master's degree in mental health counseling or related field.

**b. Grade Determinations.** In addition to the basic requirements for employment, the following criteria must be met when determining the grade of candidates.

**(1) Licensed Professional Mental Health Counselor, GS-9 (Entry Level)**

(a) **Experience, Education, and Licensure.** The GS-9 grade level is the entry grade level for LPMHCs with less than one year of experience (post-master's degree) **or** for LPMHCs at the master's or doctoral level) who are graduates not yet licensed at the independent practice level. Unlicensed LPMHCs at the GS-9 grade level have completed the required education listed in paragraph 3.b., and are working toward completion of prerequisites for licensure. In addition, the candidates must demonstrate the KSAs in subparagraph (c) below.

(b) **Assignments.** Individuals assigned as GS-9 LPMHCs are considered to be at the entry level and are closely supervised, including co-signatures where required, as they are not functioning at the full performance level. They are typically assigned to VHA areas that do not require specialized knowledge or experience. Since they are not practicing at an independent level, they should not be assigned to areas where independent practice is required, such as in a CBOC, unless there is a licensed LPMHC in the area who can provide supervision for practice. Under supervision, LPMHCs at this level provide professional mental health counseling services.

(c) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the basic requirements, the candidates must demonstrate all of the KSAs below:

1. Ability to engage in intake and assessment, problem identification, diagnosis, treatment planning and implementation, continuum of care, evaluation and follow-up.
2. Knowledge of current Diagnostic and Statistical Manual (DSM) of Mental Disorders in formulation of treatment goals and application

of appropriate clinical interventions using professional counseling practices.

3. Basic knowledge of professional counseling practice with emphasis on human development principles through cognitive, affective, behavioral or systemic interventions, and strategies that address high risk behaviors, wellness, personal growth, and career development across the life span.
4. Ability to use a wide variety of individual, group, or family counseling interventions; demonstrates sensitivity to diversity and possesses multicultural counseling skills.
5. Ability to serve on an interdisciplinary team with focus on the intrapersonal, interpersonal, and relational functioning of individuals, groups and families and on the counseling approaches, strategies, and techniques that will best help patients function effectively.
6. Basic skill in the use of computer software applications for drafting documents, data management, maintaining accurate, timely and thorough clinical documentation and delivery of services, such as Telehealth.
7. Ability to learn and utilize software programs in use by VHA.
8. Knowledge and understanding of existing relevant statutes, case laws, ethical codes, and regulations affecting professional practice of counseling.
9. Ability to communicate effectively, both orally and in writing, with people from varied backgrounds.

**(2) Licensed Professional Mental Health Counselor, GS-11 (Full Performance Level)**

- (a) Experience, Education, and Licensure.** In addition to the basic requirements, candidates must have at least one year of post-master's or post- doctoral degree mental health counseling experience (VA or non-VA experience) and must be licensed to practice at the independent practice level and demonstrate the KSAs in subparagraph (c) below. LPMHCs may provide clinical supervision over the clinical practice of an unlicensed LPMHC or LPMHC trainee. Some state licenses do not license an individual to provide clinical supervision to trainees or unlicensed LPMHCs. Please refer to specific state licensing laws regarding the requirements for providing clinical supervision.



**(b) Assignments.** This is the full performance grade level for LPMHCs. At this level they are licensed to independently practice professional counseling and to provide mental health services within the knowledge, theory, and training foundations of professional counseling. LPMHCs may be assigned to any VHA area, consulting with peers and supervisors as appropriate. LPMHCs may be involved in program evaluation and/or research activities.

**(c) Demonstrated Knowledge, Skills, and Abilities.** In addition to meeting the KSAs for the GS-9 grade level, the candidate must demonstrate all of the KSAs below:

1. Ability to make professional evaluations, decisions, and recommendation for treatment planning and implementation.
2. Advanced knowledge and mastery of the fundamentals of the counseling process which includes defining patient/family problems and maintaining an effective counseling relationship.
3. Ability to provide subject matter consultation to colleagues and trainees on the counseling process within various specialty areas, build on the foundation of competence through regular meetings and discussions to explain assignments, review progress of cases and confer about the counseling perspectives and orientation.
4. Ability to provide complex crisis intervention and stabilization to patients who are in psychological distress. Requires independent judgment and skill.
5. Ability to establish goals/treatment through a collaborative process with the patient utilizing advanced counseling skills, including evidenced- based practices, screening, and psychosocial assessment.
6. Ability to use a wide variety of individual, group, or familial counseling interventions; demonstrates sensitivity to diversity and possesses multicultural counseling skills.
7. Ability to fully utilize the current DSM in making diagnoses and formulation of treatment goals and application of appropriate clinical intervention using professional counseling practices.
8. Ability to develop and facilitate psychotherapy and psycho-education groups that include life skills, family support, and community integration. This may include evidence based psychotherapy.

### **(3) Senior Licensed Professional Mental Health Counselor, GS-12**

- (a) **Experience, Education, and Licensure.** In addition to the basic requirements, candidates must have at least one year of progressively complex LPMHC experience equivalent to the GS-11 grade level. Senior LPMHCs must have five years of post-licensed experience that demonstrates possession of advanced practice skills and judgment, demonstrating progressive professional competency and expertise and be licensed to provide clinical supervision to trainees or unlicensed LPMHCs.
- (b) **Assignments.** Senior LPMHCs provide treatment to patients with complex needs including multiple mental health diagnoses, and numerous psychosocial issues, using independent judgment. LPMHCs at this level provide clinical consultation to less experienced staff which may include coordinating crisis situations. Senior LPMHCs will provide clinical supervision to LPMHC staff and/or LPMHC trainees, and may serve as the subject matter expert for the discipline. Senior LPMHCs develop behavioral health related training curriculum and often conduct trainings for clinical staff. LPMHCs model ethical and professional behaviors and standards to include multicultural awareness. Senior LPMHCs meet routinely with inter-professional team members and leadership to communicate about program and patient issues for in depth problem solving. Senior LPMHCs collaborate with internal and external stakeholders and frequently serve as a liaison. This assignment is to be relatively few in number based on the size of the facility/service and applying sound position management. This assignment must represent substantial additional responsibility over and above that required at the full performance grade level and cannot be used as the full performance level of this occupation.
- (c) **Demonstrated Knowledge, Skills, and Abilities.** In addition to meeting the KSAs for the GS-11 grade level, the candidate must demonstrate all of the KSAs below:
1. Advanced knowledge of and mastery of theories and modalities used in the specialized treatment of complex mental illness. Ability to incorporate complex multiple causation in differential diagnosis and treatment of veteran patients, including making psychosocial and psychiatric diagnoses within approved clinical privileges or scope of practice. Ability to determine priority of services needed and provide specialized treatment.
  2. Advanced and expert skill in a range of specialized interventions and treatment modalities for Veterans with complex needs. This includes individual, group, and/or family counseling, or

psychotherapy and advanced level psychosocial, and/or case management interventions used in the treatment of Veterans.

3. Ability to coordinate the delivery of specialized psychosocial services and programs. Ability to design system changes based on data.
4. Ability to provide subject matter consultation to colleagues and trainees on the psychosocial treatment of patients, rendering professional opinions based on experience, expertise and role modeling effective clinical skills.
5. Ability to teach, mentor staff and trainees, and provide supervision for licensure or for specialty certifications.
6. Ability to engage in written and oral communication with leadership/staff and community stakeholders regarding policies, procedures, practice guidelines, and issues pertaining to the practice of the profession.

**(4) Licensed Professional Mental Health Counselor (Program Coordinator), GS-12**

- (a) **Experience, Education, and Licensure.** In addition to the basic requirements, candidates must have at least one year of progressively complex experience equivalent to the GS-11 grade level. Experience must have been in a major specialty treatment program area such as, but not limited to, Post-Traumatic Stress Disorder (PTSD), mental health intensive case management (MHICM), or other areas of equivalent scope and complexity. Experience must demonstrate possession of advanced practice skills and judgment, demonstrating progressively more professional competency.
- (b) **Assignments.** LPMHC Program Coordinators are administratively responsible for a clinical program and provide treatment to patients in a major specialty. They manage the daily operations of the program, develop policies and procedures, and prepare reports and statistics for facility, VISN, and national use. They may supervise unlicensed graduate LPMHCs and may administratively manage any employees assigned to their program.

- (c) **Demonstrated Knowledge, Skills, and Abilities.** In addition to meeting the KSAs for the GS-11 grade level, the candidate must demonstrate all of the KSAs below:
1. In depth knowledge of the program coordinated, and demonstrated knowledge and ability to write policies procedures and or practice guidelines for the program.
  2. Ability to make key decisions in the hiring and identification of top candidates.
  3. Ability to provide leadership in facilitating the process of coordinating program consults, assessments, admissions, care assignments and discharges.
  4. Ability to provide subject matter consultation to other colleagues and trainees within the field of counseling working on an interdisciplinary team.

**(5) Supervisory Licensed Professional Mental Health Counselor, GS-12**

- (a) **Experience, Education, and Licensure.** In addition to the basic requirements, candidates must have at least one year of progressively complex experience equivalent to the GS-11 grade level. Experience must demonstrate possession of advanced practice skills, judgment, and competency.
- (b) **Assignments.** At this level, LPMHCs administratively supervise their licensed staff and/or graduates and are considered LPMHC subject matter experts and may serve as the discipline lead. LPMHCs may provide treatment to patients. They direct the development and implementation of services and treatment to patients through the administrative supervision, mentoring, and oversight of assigned clinical staff. Their experience must demonstrate practice skills in a specialty area or in administration demonstrating progressively more professional competency and judgment.
- (c) **Demonstrated Knowledge, Skills, and Abilities.** In addition to meeting the KSAs for the GS-11 grade level, the candidate must demonstrate all of the KSAs below:
1. Ability to administratively supervise other providers and conduct meetings.
  2. Ability to maintain a professional environment by following organizational policies, guidelines and safety standards.

3. Ability to establish and clearly communicate guidelines and performance expectations for staff.

**(6) Licensed Professional Mental Health Counselor (Program Manager), GS-13**

- (a) Experience, Education and Licensure. In addition to the basic requirements, candidates must have at least one year of progressively complex experience equivalent to the GS-12 grade level. The experience must demonstrate possession of advanced practice skills and judgment, demonstrating progressively more professional competency.
- (b) Assignments. LPMHCs manage the daily operations of multiple programs, develop and implement program policies and procedures, or serve as chief or principal counselor to a number of LPHMCs. They are responsible for oversight of administrative and programmatic resources and monitoring of outcomes. They prepare reports and statistics for facility, VISN, and national leadership. Decisions may affect staff and other resources associated with the programs managed and are made while exercising wide latitude and independent judgment. They may be responsible for the program's budget. They may also supervise employees assigned to the program.
- (c) Demonstrated Knowledge, Skills, and Abilities. In addition to meeting the KSAs for the GS-12 grade level, the candidate must demonstrate the KSAs below:
  1. Ability to make judgments and decisions associated with program management.
  2. Ability to monitor program outcomes using data driven quality assurance process.
  3. Ability to develop productivity standards appropriate to each service provided.
  4. Ability to manage a wide range of programs which include the operation and management of key clinical, training or administrative programs.

**(7) Licensed Professional Mental Health Counselor (Care Line Manager/VISN/National), GS-14 - Program Manager Leadership Assignments**

- (a) **Experience, Education and Licensure.** In addition to the basic requirements, candidates must have at least one year of progressively

complex experience equivalent to the GS-13 grade level. They must demonstrate possession of advanced practice skills in administration, demonstrating progressively more professional competency skills and judgment.

- (b) **Assignments.** Typical assignments include serving at a facility as a care line manager or at the VISN/national level. A care line manager is assigned to manage, direct, and oversee complex treatment programs within the medical center. Supervisory responsibilities cover multiple disciplines that may be separated geographically or in multi-division facilities. They have responsibility for staffing, work assignments, budget, ensuring availability and timeliness of clinical services to be provided and admission criteria for the program, day-to-day program operation, and all reporting requirements. Leadership positions at the VISN or national level are characterized by their scope, level of complexity, significant impact on VHA mission, significant importance to the VISN. They direct mental health, behavioral science or other patient care program components at the VISN or national level or direct organizational development at the national level. Duties are exercised with wide latitude, autonomy, and independence. They have delegated authority to determine long range work plans and assure that implementation of the goals and objectives are carried out. They may serve as consultants to other management officials in the field, VISN, or national level.
- (c) **Demonstrated Knowledge, Skills, and Abilities.** In addition to meeting the KSAs for the GS-13 grade level, the candidate must demonstrate all of the KSAs below:
1. Advanced knowledge and skill in management/administration of multidisciplinary mental health programs at complex facilities and/or across multiple sites which includes supervision, consultation, negotiation, and monitoring.
  2. Demonstrated global knowledge of mental health counseling practice to develop, maintain, and oversee programs in all settings.
  3. Ability to provide consultation on policy implementation, qualification standards, counseling practice, and competency with medical center director, VISN, or national program managers that are consistent with organizational goals and objectives.
  4. Advanced knowledge of evidence-based practices and mental health practice guidelines in multiple professional areas, and the ability to use these resources to guide the program staff in providing appropriate treatment interventions.

5. Ability to influence high level officials in adoption of, and conformance to, performance measures, monitors, and other policy guidelines.

## **5. DEVIATIONS**

- a. The approving official may, under unusual circumstances, approve reasonable deviations to the grade determination requirements for LPMHCs in VHA whose composite record of accomplishments, performance, and qualifications, as well as current assignments, warrant such action based on demonstrated competence to meet the requirements of the proposed grade.
- b. Under no circumstances will the educational requirements be waived. Under no circumstances will licensure requirements be waived for grade levels GS-11 or above.
- c. The placement of individuals in assignments and/or grade levels not described in this standard must be approved by the Under Secretary for Health, or designee, in VHA Central Office.

**Authority 38 U.S.C. 7402, 7401, 7403]**