



AMERICAN COUNSELING  
ASSOCIATION

*Your Passion. Your Profession. Our Purpose.*

January 24, 2013

Dr. Alberto Salas-Roman  
President, Puerto Rico Counselors Board of Examiners

Re: Dr. Luis F. Gonzalez

Dear Dr. Salas-Roman,

Dr. Luis F. Gonzalez has asked me to write to you in your role as President of the Puerto Rico Counselors Board of Examiners and clarify the position of the American Counseling Association (ACA) about qualifications for testing for Licensed Professional Counselors (LPC).

It is the position of both ACA and the profession of counseling (as represented through the Fair Access Coalition on Testing) that education and training are the two most important factors when determining who is competent to utilize a particular instrument. A specific academic degree (e.g., a master's or a Ph.D.) in any field does not by itself qualify an individual to use a particular test. Therefore, it is the official position of the American Counseling Association that licensing boards should not restrict the use of particular tests to particular professions (e.g. counseling, psychology, or social work). Again, the decision about whether an LPC should utilize a particular instrument should be made on the basis of whether the licensed individual has the education and training to understand relevant psychometrics and the administration and scoring of the inventory or test.

The position stated above is not only the position of the American Counseling, but to the best of my knowledge is also the position of almost all state counseling boards in the United States.

It should also be noted that the scope of practice of one profession cannot infringe on the scope of practice of a different profession. The Puerto Rico licensure law for Licensed Professional Counselors states that LPC's may select, administer, and interpret instruments for evaluating personal characteristics. The psychology board cannot infringe on the right of LPC's to do so with tests and inventories for which the counselor has the appropriate education and training. And it is up to the Counselors Board of Examiners – not the psychology board – to determine the parameters of appropriate education and training for LPC's.

Sincerely,

A handwritten signature in black ink that reads "David M. Kaplan".

David M. Kaplan, PhD  
Chief Professional Officer