



Can Licensed Mental Health Counselors Administer and Interpret Psychological Tests?

ANALYSIS AND POSITION PAPER BY THE NATIONAL BOARD OF FORENSIC EVALUATORS

The National Board of Forensic Evaluators (NBFE) adopts the position that appropriately trained licensed mental health counselors may administer and interpret psychological tests, a viewpoint consistent with various state licensure boards including Florida, the state the NBFE is headquartered in, which declared that licensed mental health counselors, clinical social workers, and marriage and family therapists “may administer and interpret such tests as long as they have received the appropriate training, and thus, are qualified to perform such procedures” ([Susan J. Foster, personal communication, February 4, 2000](#)).

Our position is based on seven facts and findings:

- (1) Counselors have always been experts in testing.
- (2) Counselors are trained to administer and interpret psychological tests in graduate school.
- (3) There is a consensus among all major counseling authorities that psychological testing is within the scope of practice of counselors.
- (4) The federal government recognizes the competency of counselors with respect to psychological testing.
- (5) Many commercial insurance companies contract with counselors for psychological testing.
- (6) All four of the largest psychological test distributors in the U.S. certify counselors with the highest level of testing qualification.
- (7) Depriving counselors of the ability to administer and interpret such tests is unethical and harmful to the American public.

FACT: COUNSELORS HAVE ALWAYS BEEN EXPERTS IN TESTING

The counseling profession began in the late 1890s and early 1900s. The first professional counselors were vocational guidance counselors who specialized in the administration and interpretation of various tests, including intelligence and aptitude tests. The counseling profession is generally traced back to the work of Frank Parsons (1909), who outlined a counseling process using the scientific method, psychological tests, and a way of communicating with clients. The first counseling centers in the United States were called “counseling and testing centers” (Hays, 2017, p. 14). Counselors have been publishing written guidelines on administering and interpreting clinical tests intended to diagnose, treat, and prevent mental disorders since at least the 1930s (e.g., Brewer, 1932; Williamson, 1939). We believe Gladding and Newsome (2018) put it well when they wrote that the first counselors “quickly embraced psychometrics to gain a legitimate foothold in psychology” (p. 8).

FACT: COUNSELORS ARE TRAINED TO ADMINISTER AND INTERPRET PSYCHOLOGICAL TESTS IN GRADUATE SCHOOL

The primary counselor education accrediting body is the Council for Accreditation of Counseling & Related Educational Programs (CACREP). CACREP's 2024 education standards compel all accredited counseling degree programs teach counselors to administer and interpret tests:

Section 3: Foundational Counseling Curriculum

The eight foundational curriculum areas represent the knowledge required of all entry-level counselor education graduates. Counselor education programs must document where and in what manner each of the numbered standards listed below is covered in the curriculum.

G. Assessment and Diagnostic Processes

1. historical perspectives concerning the nature and meaning of assessment and testing in counseling
2. basic concepts of standardized and non-standardized testing, norm-referenced and criterion-referenced assessments, and group and individual assessments
3. statistical concepts, including scales of measurement, measures of central tendency, indices of variability, shapes and types of distributions, and correlations
4. reliability and validity in the use of assessments
5. culturally sustaining and developmental considerations for selecting, administering, and interpreting assessments, including individual accommodations and environmental modifications
6. ethical and legal considerations for selecting, administering, and interpreting assessments
7. use of culturally sustaining and developmentally appropriate assessments for diagnostic and intervention planning purposes
8. use of assessments in academic/educational, career, personal, and social development
9. use of environmental assessments and systematic behavioral observations
10. use of structured interviewing, symptom checklists, and **personality and psychological testing**
11. diagnostic processes, including differential diagnosis and the use of current diagnostic classification systems
12. procedures to identify substance use, addictions, and co-occurring conditions
13. procedures for assessing and responding to risk of aggression or danger to others, self-inflicted harm, and suicide
14. procedures for assessing clients' experience of trauma
15. procedures for identifying and reporting signs of abuse and neglect
16. procedures to identify client characteristics, protective factors, risk factors, and warning signs of mental health and behavioral disorders
17. procedures for using assessment results for referral and consultation ([CACREP, 2023](#), pp. 15-16)

FACT: THERE IS A CONSENSUS WITHIN THE COUNSELING PROFESSION THAT TESTING IS PART OF THE PRACTICE OF COUNSELING

There is a consensus within the counseling profession that testing is within the scope of practice of professional counselors.

The National Board for Certified Counselors (NBCC) is the first and largest certifying body in the United States for professional counselors. The credential NBCC has established for clinical mental health counselors is Certified Clinical Mental Health Counselor (CCMHC). Attainment of the CCMHC credential requires a passing score on the National Clinical Mental Health Counseling Examination (NCMHCE), which includes test items on the administration of psychological tests for purposes of assessment, diagnosis, and treatment planning ([NBCC, 2022](#)).

The American Counseling Association (ACA) is the largest association representing counselors in the United States. The ACA identifies “the administration of assessments, tests, and appraisals” as a primary component of the scope of professional counseling ([Counseling Today, 2014](#), para. 12). The ACA’s 2014 *Code of Ethics* refers repeatedly to the ability of counselors to administer and interpret tests, provided that counselors are appropriately trained in the tests they utilize ([ACA, 2014](#)). The ACA takes an official position that “professional counselors with a master’s degree or higher and appropriate coursework in appraisal/assessment, supervision, and experience are qualified to use objective tests. With additional training and experience, professional counselors are also able to administer projective tests, individual intelligence tests, and clinical diagnostic tests” ([ACA, 2003](#), para. 1).

The American Mental Health Counselors Association (AMHCA) was originally formed as a division of the ACA that exclusively represents clinical mental health counselors. AMHCA’s published standards for clinical mental health counseling clarify that mental health counselors are expected to be trained in clinical assessment and testing ([AMHCA, 2021](#)), and AMHCA’s published report on the professional identity of clinical mental health counselors includes assessment and testing as one of the eight common core areas of training and education for counselors ([AMHCA, 2016](#)). Like the ACA, AMHCA’s 2020 *Code of Ethics* refers to the ability of counselors to administer and interpret psychological tests provided that counselors are appropriately trained ([AMHCA, 2020](#)). AMHCA co-authored a document outlining standards for assessment in mental health counseling with the Association for Assessment and Research in Counseling (AARC), formerly the Association for Assessment in Counseling and Education, clearly defining the competencies that counselors must possess to administer and interpret psychological tests such as the MMPI-II and the MCMI-III ([AACE & AMHCA, n.d.](#)).

From 2005 to 2013, the 31 major counseling associations, organizations, and certifying bodies met to arrive at a consensus for the definition and scope of practice for professional counseling. The scope of practice they adopted includes “Assessment: The practice of counseling includes the administration and interpretation of assessments for appraisal, diagnosis, evaluation, and referral determination to help establish individualized counseling plans and goals that may include the treatment of individual with emotional, mental, and physical disorders” ([Counseling Today, 2014](#), para. 12; [Kurt L. Kraus, personal communication](#), n.d., p. 3).

FACT: THE FEDERAL GOVERNMENT RECOGNIZES THAT COUNSELORS CAN ADMINISTER AND INTERPRET PSYCHOLOGICAL TESTS

Counselors are also recognized as competent test administrators by various organizations outside of the profession. For example, in September 2016 the Social Security Administration clarified its long-

standing position test results administered by clinical mental health counselors can be used for disability determination cases:

2. *Evidence from medical sources.* We will consider all relevant medical evidence about your disorder from your physician, psychologist, and other medical sources, which include health care providers such as physician assistants, psychiatric nurse practitioners, licensed clinical social workers, and **clinical mental health counselors**. Evidence from your medical sources may include:
 - a. Your reported symptoms.
 - b. Your medical, psychiatric, and psychological history.
 - c. The **results of physical or mental status examinations, structured clinical interviews, psychiatric or psychological rating scales, measures of adaptive functioning, or other clinical findings.**
 - d. **Psychological testing**, imaging results, or other laboratory findings.
 - e. Your diagnosis.
 - f. The type, dosage, and beneficial effects of medications you take.
 - g. The type, frequency, duration, and beneficial effects of therapy you receive.
 - h. Side effects of medication or other treatment that limit your ability to function.
 - i. Your clinical course, including changes in your medication, therapy, or other treatment, and the time required for therapeutic effectiveness.
 - j. Observations and descriptions of how you function during examinations or therapy.
 - k. Information about sensory, motor, or speech abnormalities, or about your cultural background (for example, language or customs) that may affect an evaluation of your mental disorder.
 - l. The expected duration of your symptoms and signs and their effects on your functioning, both currently and in the future ([Federal Old-Age, Survivors and Disability Insurance, 2023](#))

In response to SSA's announcement, AMHCA issued a statement clarifying that appropriately trained counselors can administer intellectual aptitude exams and diagnose intellectual disorders ([Finley, 2016](#)). Many licensed counselors are also contracted with TriCare, the health program for military service members, retirees, and their families, to provide (and bill for) psychological testing for service members and their families using current procedural terminology (CPT) codes for psychological testing (e.g., 96130). Additionally, with the passage of the Consolidated Appropriations Act of 2023, counselors are now approved as Medicare Part B providers ([ACA, n.d.](#)). While the final rule issued by CMS does not explicitly define which CPT codes counselors may bill Medicare for, §410.54 establishes that mental health counselor services are covered under Medicare Part B, defining "mental health counselor services as:

...services furnished by a mental health counselor (as defined in paragraph (a) of this section) for the diagnosis and treatment of mental illnesses (other than services furnished to an inpatient of a hospital), which the mental health counselor is legally authorized to perform under State law (or the State regulatory mechanism provided by State law) of the State in which such services are furnished. The services must be of a type that would be covered if they were furnished by a physician or as an incident to a physician's professional service and must meet the requirements of this section ([Supplementary Medical Insurance \[SMI\] Benefits, 2023](#))

Therefore, it appears that when testing services are within the scope of practice of a licensed counselor who is a Medicare provider in the state in which the counselor is providing testing services, those services are billable under Medicare.

FACT: MANY COMMERCIAL INSURANCE COMPANIES CONTRACT WITH COUNSELORS FOR PSYCHOLOGICAL TESTING

In addition to TriCare and Medicare, many commercial insurance companies contract with licensed counselors for psychological testing CPT codes (i.e., 96130, 96131, 96132, 96133, 96136, 96137, 96138, 96139, and 96146), such as Aetna, Cigna, Humana, and United.

FACT: COUNSELORS MEET THE STANDARDS OF TEST DISTRIBUTORS

Licensed counselors meet the criteria for the highest qualification levels of the four most popular psychological test distributors in the United States.

Level C is the highest qualification level established by **Psychological Assessment Resources (PAR)**. This level of qualification requires “an advanced professional degree that provides appropriate training in the administration and interpretation of psychological tests, or license or certification from an agency that requires appropriate training and experience in the ethical and competent use of psychological tests” ([PAR, 2022](#), para.8). Because licensed counselors must have a minimum of a master’s degree, which is an advanced professional degree, and because CACREP- and CACREP-equivalent counselor education programs require training in the administration and interpretation of psychological tests, most licensed counselors meet PAR’s criteria for qualification level C and are commonly certified as such by PAR. In fact, PAR guarantees Level C qualification to any licensed mental health professional who completes NBFE’s testing workshop, including licensed counselors ([Daniel McFadden, personal communication, 2015](#)).

Similar to PAR, **Pearson Clinical** drafted a Level C qualification policy for tests administered in the category of clinical psychology requiring that evaluators earn a “doctorate degree in psychology, education, **or** closely related field with formal training in the ethical administration, scoring, and interpretation of clinical assessments related to the intended use of the assessment OR licensure or certification to practice in your state in a field related to the purchase OR certification by or full active membership in a professional organization (such as APA, NASP, NAN, INS) that requires training and experience in the relevant area of assessment” ([Pearson, n.d.](#), para. 6). Because they possess “licensure or certification to practice...in a field related to the intended use of the assessment,” licensed counselors should meet criteria for Level C qualification with Pearson regardless of whether they possess a master’s degree or a doctorate.

Like PAR and Pearson, the highest level of testing qualification established by **MHS Assessments** is Level C, which requires the evaluator to have completed a graduate-level course in in tests and measurement at a university “or...equivalent documented training” (para. 4), training and/or experience in the use of tests, and an advanced degree in an appropriate profession ([MHS Assessments, n.d.](#)). As

previously noted, counselors graduating from CACREP-accredited clinical mental health counseling programs and CACREP-equivalent programs are required to complete a graduate level course in testing. Although MHS offers psychology and psychiatry as examples of “an appropriate profession,” they do not explicitly exclude clinical mental health counseling, which we have already established is an appropriate profession for test access.

Western Psychological Services (WPS) provides two advanced qualification levels. Level C permits an evaluator to purchase “all products except advanced psychiatric instruments and advanced neuropsychological instruments” and requires evaluators to have “a master’s degree (MA, MS, MSW, CAGS) in psychology, school counseling, occupational therapy, speech–language pathology, social work, education, special education, or related field” ([WPS, n.d.](#), p. 1). Again, licensed counselors meet this criterion because they hold master’s degrees in a related occupation. Level N is the highest level designated by WPS, allowing purchase of all tests. This level requires “a doctoral degree (PhD, PsyD, MD) in psychology or related field **or** MA (psychologist, social worker) a master’s degree (MA, MS, MSW) in fields listed above and at least a weekend workshop on neuropsychological assessment” ([WPS, n.d., p. 1](#)). Many, though not all, licensed mental health counselors will meet these guidelines. Specifically, counselors who hold a doctoral degree in a related field meet the criteria, as well as master’s-level counselors who have completed at least a couple days of additional training in neuropsychological evaluation.

PREVENTING COUNSELORS FROM ADMINISTERING AND INTERPRETING PSYCHOLOGICAL TESTS WOULD BE IMPRACTICAL AND UNETHICAL

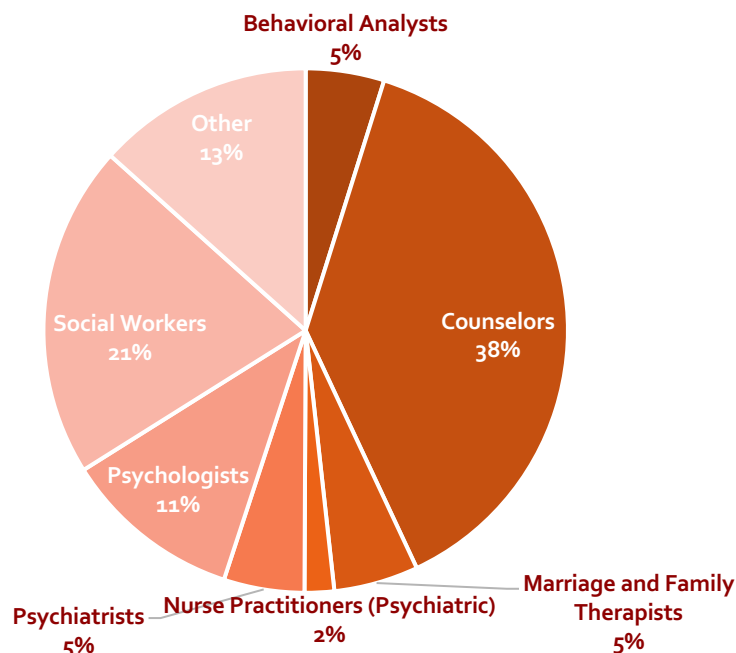
The demand for evidence-based practices and treatment approaches continues to rise in the United States, and there is an increasing shortage of mental health professionals to meet this demand ([HHS, 2018](#)). Third party payers and authorities in the behavioral healthcare sector continue to apply pressure to providers to offer evidence substantiating diagnoses and treatment methods, as well as efforts to measure response to behavioral health interventions. Increasingly, testing provides an integral source of data to comply with these standards of care. Testing aids counselors in formulating a diagnosis, planning treatment, and measuring client progress (Hays, 2014).

According to the Centers for Medicaid and Medicare Services, counselors comprise the largest percentage of the licensed US behavioral healthcare workforce in the National Provider Identifier database ([CMS, 2022](#)). To deny the largest sector of the US behavioral healthcare workforce the opportunity to administer and interpret psychological tests is, in our opinion, illogical. It implies that licensed mental health counselors are qualified to treat mental disorders but not to diagnose them nor evaluate the efficacy of their treatment approaches. This practice is akin to expecting a physician to diagnose and treat hypertension without allowing the physician to measure a patient’s blood pressure.

Counselors cannot be expected to treat what they cannot objectively diagnose or measure. The ethical codes and professional standards that govern counselors require counselors to use multiple sources of data when diagnosing and treating clients, including testing ([ACA, 2014](#), pp. 11-12, ; [AMHCA, 2020](#), pp. 9-10; [AMHCA, 2021](#), pp. 13-18). Such ethical guidelines were written because, ultimately, depriving counselors of the ability to administer and interpret psychological tests would negatively impact client

care. Thus, NBFE views any efforts to restrict the rights of counselors from administering and interpreting psychological tests as potentially harmful to clients and therefore unethical.

Licensed Mental Health Professionals, NPI Database, June 2022



POSITIONS OF STATE LEGISLATURES AND LICENSURE BOARDS

NBFE conducted an analysis of the laws and rules of all 50 states and 6 US territories and districts, concluding that in 45 (80%) out of 56 states, districts, and territories, laws and rules either specifically acknowledge that licensed counselors can administer and interpret psychological tests without excluding any specific tests or identify that counselors can assess, evaluate, and diagnose mental disorders without affirming or denying their capacity to administer and interpret tests ([Norton, 2023](#)).

However, exceptions were noted in 11 (20%) states and territories. Alabama, Arkansas, and Texas permit counselors to administer and interpret tests except projective tests (ACA, 2016), and Alaska restricts counselors from both projective and individually administered intelligence tests. Maine permits counselors to administer and interpret tests but prohibits them from offering psychological testing as their primary or sole service. Nebraska permits counselors to administer and interpret aptitudes, attitudes, abilities, achievements, interests, and personal characteristics but prohibits counselors from interpreting “psychological testing” except under the supervision of a licensed psychologist. New Jersey refers only to the capacity of counselors to administer and interpret tests and inventories to assess abilities and interests and identify career options ([Norton, 2023](#)).

California allows counselors to administer and interpret tests except “projective techniques in the assessment of personality, individually administered intelligence tests, neuropsychological testing, or utilization of a battery of three or more tests to determine the presence of psychosis, dementia, amnesia, cognitive impairment, or criminal behavior” (ACA, 2016, p. 133). Louisiana’s licensure board

restricts counselors to tests of language, education and achievement tests; adaptive behavioral tests; symptoms screening checklists or instruments; tests of abilities; tests of interests; and tests of aptitudes ([Norton, 2023](#)).

Tennessee prohibits counselors from “the use of projective techniques in the assessment of personality, nor the use of psychological or clinical tests designed to identify or classify abnormal or pathological human behavior, nor the use of individually administered intelligence tests” (ACA, 2016, p. 158). Finally, Nevada, which appears to be the most restrictive state on the issue, does not permit counselors to use psychometric tests, assessments or measures, including, “without limitation,” psychological, neuropsychological, developmental, neurodevelopmental, cognitive, neurocognitive, intelligence, achievement, personality or projective tests ([Norton, 2023](#)).

Licensed counselors should consult their state licensure boards and state chapters of their counseling associations and/or seek legal consultation to verify scope of practice in their respective states. However, regulations in most states affirm the competency of counselors to administer and interpret psychological tests, suggesting a national standard related to this issue.

A CALL TO ACTION FOR FAIR AND ETHICAL TESTING PRACTICES

The National Board of Forensic Evaluators calls on state legislatures, licensure boards, and authorities in all disciplines of the mental health profession to advocate for laws, rules, and policies that protect the rights of all appropriately-trained licensed mental health professionals to administer and interpret psychological tests. We also acknowledge that licensure in a profession for which psychological testing is part of one’s scope of practice is, by itself, insufficient to ensure competency in testing. We therefore encourage licensed counselors to seek ongoing training in this area that exceeds that which they received in graduate school. Counselors should abide by the ethical guidelines related to testing outlined in the ACA and AMHCA ethical codes, including the obligation to “use only those testing and assessment services for which they have been trained and are competent” ([ACA, 2014](#), p. 11; [AMHCA, 2020](#), p. 10).

ABOUT THE NATIONAL BOARD OF FORENSIC EVALUATORS



The National Board of Forensic Evaluators (NBFE) is a 501(c)(3) not-for-profit organization dedicated to providing quality training and certification of all licensed mental health professionals (e.g., counselors, social workers, marriage and family therapists, psychologists, psychiatrists) in the specialty area of forensic mental health evaluation. NBFE is a proud partner of the American Mental Health Counselors Association and several other state, local, and international organizations in the mental health field. To learn more about NBFE, visit www.nbfe.net.

This position paper was authored by Dr. Aaron Norton, Executive Director of NBFE, edited by Dr. Norman Hoffman, President and Founder of NBFE, and approved by the NBFE Board of Directors 8/15/16. Revised/updated 9/4/17, 12/18/17, 5/25/18, 2/10/20, 8/15/21, 7/24/22, 10/17/23, 1/1/24.

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