

DISCUSSION PAPER

A PROCESS FOR SETTING ENTRY STANDARDS

FOR THE COLLEGE OF COUNSELLING THERAPISTS OF BC

Prepared for the Task Group for Counsellor Certification

By George K. Bryce¹ & Dr. David Cane²

January 5, 2004

¹ **George K. Bryce** is a Vancouver-based lawyer and mediator, and has been legal counsel to the Task Group since its inception in 1997. After being called to the BC bar in 1990, he acted as Assistant Legal Counsel to the BC Royal Commission on Health Care and Costs. Since 1991 he has practiced in the areas of administrative law, with a particular interest in professional governance. He has helped six professions seek designation under the *Health Professions Act*, and each was recommended for designation or an alternative form of regulation. To date, two of these professions have been designated under the *HPA* and three have designations pending. In addition, George has provided legal and strategic planning advice, and drafted bylaws for three colleges established under the *HPA*. He continues to provide advice to a number of professional associations on subjects ranging from hiring/firing of staff through to complaint investigation, resolution and discipline. In addition to a law degree, he holds a Master's degree in Health Administration and undergraduate degrees in both psychology and biology.

² **Dr. David Cane** is an educational consultant with over twenty-five years of employment and experience in education, management and leadership, including twelve years of employment at senior executive and chief executive levels of large institutions. He has broad experience in post-secondary education institutions (public and private), the health sector and aboriginal organizations. David's background includes positions as college president, vice-president, dean of health sciences, department chair, faculty member and instructional skills / group facilitator. A full-time consultant since 1998, he is a partner in Catalysis Consulting of Kamloops, BC. His current work focuses on the development of employment and training standards: occupational analysis and profiling; professional certification, regulation and labour mobility issues; and training program accreditation.

INTRODUCTION

This discussion paper proposes a process to identify the entry-level standards that would be necessary for an applicant to obtain, so as to be registered as a counselling therapist by the anticipated College of Counselling Therapists to be established under the *Health Professions Act*. The Task Group for Counsellor Certification could employ this or some other process to establish such standards, or recommend a process to the first board of the College to undertake.

The proposed process involves the identification of standards through a two-stage approach:

1. The development of an entry-level Competency Profile (CP), which would define the knowledge, skills and behaviours that are required for the practice of counselling therapy at an entry-level.
2. The identification of the educational and clinical experience standards that would normally be required in order to become registered with the College.

In addition, the proposed process will produce outcomes that would position the College to:

- (a) Identify the criteria for porting existing members of the Task Group organizations to become the first registrants of the new College on a time-limited basis,
- (b) Evaluate other combinations of educational achievement and clinical experience (such as those of out-of-province or out-of-country applicants) relative to the requirements of the College, and
- (c) Develop an examination process that could be used to assess the competencies of applicants for registration outside the porting process.

In the November 1998 Joint Response, the Task Group proposed a two-tiered registration model. The first tier would register counsellors at a generalist level of practice. The second tier would register counsellors at an advanced level or in specialized areas of counselling practice. Whether or not the two-tiered model is pursued by the first board of the new College, or some other model is approved, the issue of setting the entry standards for BC counsellors will have to be addressed by that board and set out in the College's bylaws.

Given the anticipated designation of counselling therapy as a health profession under the *Health Professions Act* – hopefully in early 2004 – defining the entry standards required of applicants is an issue that is more important to address now than five years ago. While the first board of the new College will have the sole legal authority to make the final decision on this issue, the Task Group can help to inform that decision by, before the first

board is appointed, proposed standards and indicating why they were chosen. It would then be up to the first board to accept the Task Group's recommendation or develop some alternative set of standards.

While this paper assumes that the first board will adopt the two-tiered registration model first proposed in 1998, the process described herein could also be employed to set entry standards if the board eventually adopts only a single level of registration. In other words, the proposed process could be applied to both single tier and two-tiered registration models.

Specific questions are asked throughout this paper as a way to guide or frame discussions within the Task Group concerning this proposal. These are not exhaustive questions and the member organizations should feel free to generate other questions to probe this proposal.

In summary, if the Task Group accepts this proposal, or develops an alternative process, the result should be a comprehensive and defensible set of standards for initial registration for counsellors in BC (be this for a single tier or a two-tiered model). In turn, those standards could help the first board (a) port existing memberships in the various professional associations as the first registrants of the new College, and (b) establish mechanisms for assessing the competencies of other applicants who would not be included in that porting of credentials.

WHY IS IT IMPORTANT TO IDENTIFY COMPETENCIES?

Approaching the setting of entry-level registration standards from the perspective of stating specific competency requirements is an almost universal practice for regulatory bodies in Canada, the United States and throughout the western industrialized world. There are many reasons for this, as summarized below from the perspective of the new College of Counselling Therapists.

Competencies are measurable learning outcomes that can be objectively tested. Properly stated, competencies include knowledge, practical skill and attitudinal or behavioural components, thus providing a comprehensive description of the requirements for effective counselling practice. Because they focus on the outcomes of learning, competency statements are independent of the learning process, and recognize that different individuals may acquire learning in distinct ways. Therefore, competency statements may be used to compare the results of education programs or various combinations of education and clinical experience.

A clear articulation of the entry-level competencies for counselling practice in the form of a CP is of critical importance to a profession with a potentially very diverse membership. Developing competency statements that are fair and objective will help the College ensure safe and ethical counselling practice regardless of how the counsellor

obtained those competencies. It will also help the College avoid lawsuits where applicants could claim that the registration standards were arbitrary or discriminatory.

An agreed-to set of entry-level competency statements will allow the first board of the new College to decide which members from the existing counselling organizations can automatically become members of the College without having to pass any sort of registration examination or similar process. (This is described as “porting” of existing credentials.³)

An entry-level CP will allow the first board to determine the combination(s) of education and clinical experience that will commonly be accepted as providing these competencies. In addition it will assist the board identify other (less common) combinations of education and clinical experience that it may deem to be “substantially equivalent”. This will allow persons from other countries who have obtained their competencies as counsellors in different ways to be registered, on approval of the board.

The first board could also utilize the entry-level competency statements to develop a registration examination process if it determines this to be necessary. Registration examinations that are not developed from published, objective competency statements are often not legally defensible.

A document that properly describes the required practice competencies for registration as a counselling therapist will guide the post-secondary education programs that train counsellors. Firstly, it will be important for all counselling education programs to integrate the required competencies into their programs so that graduates may qualify for registration. (In this context it is important to understand that the College’s required practice competencies will not limit the scope of education programs; rather the entry-level CP will be a minimum standard for registration upon which programs may build according to their own specific goals and focus.)

Secondly, should the College want to establish an accreditation process for counselling education programs (either voluntary or mandatory), the CP would become an important part of the accreditation standards.⁴ (Accreditation standards commonly include many other requirements, such as length of the program, faculty credentials, program financing, student fees and refunds, student discipline, etc.) To obtain and maintain accreditation

³ The term “grandparenting” is not used here because that term presumes that an applicant would not meet the new College’s entry standards, so the applicant would have to be given a period of time to become registered without having to prove competencies to the defined level. Porting, on the other hand, ensures that the membership criteria that are employed by an existing association are sufficiently similar to the entry-level competencies required by the College, thus allowing members in good standing of the current associations to apply for registration with the new College without having to take a registration examination.

⁴ As noted in the Canadian Counselling Association’s 2003 *Accreditation Procedures and Standards*, it is important to distinguish between the accreditation of a counselling educational program and the certification or registration of graduates from these or other programs to become registrants of the new College. The CCA’s procedures and standards are focused on the accreditation of programs and do not contain a set of competency profile statements, which would be the result of this proposed process.

with the new College, an education program would have to demonstrate that it provides graduates with the required competencies. This would apply under a single tier or a two-tiered registration model.

Finally, articulating the practice competencies for counselling will provide a basis for the College to compare BC's counselling entry requirements with those from Quebec and from any other provinces where counselling may be regulated. Such a comparison – based explicitly on competencies - is required in order to comply with the *Agreement on Internal Trade*. Many professions have found it necessary to undertake such a task for the purposes of developing their labour mobility agreements under the AIT.

THE PROPOSED PROCESS

Stage 1: Identifying an Entry-Level Competency Profile

What's involved in developing a CP?

The board of the new College acting alone will be ultimately responsible for approving the Competency Profile that defines its registration requirements. This fact is inherent in the regulatory process.

However the College will represent various diverse professional groups and – in a broader sense – both the profession at large and the public of British Columbia. Consequently it is advisable for any new regulatory body to undertake a broad and open consultative and consensus building process in establishing its requirements. While the College will have sole authority, it will inevitably rely upon the general support of the profession and the public.

There are typically three components to establishing a CP:

1. Develop and publish a draft document. A delegated task group would normally produce the draft CP. The draft must be a high-quality, comprehensive and credible document that will engage the positive attention of those who review it.
2. Undertake a broad consultative process on the draft CP. Consultation would normally involve two sub-components: a validation whereby working professionals in the field are asked about the accuracy of the draft relative to their work experience, and stakeholder input wherein groups such as professional associations, education programs etc are formally requested to give comment and feedback. Sometimes stakeholder focus groups are held to obtain input and (more importantly) to build awareness and work toward consensus.
3. Finalize and approve the CP. Typically the task group that drafted the CP would edit the document based on the results of the consultative process, and then

make a recommendation to the board of the College who would review and approve a final version.

What would a CP for Counselling Therapy look like?

The CP should be based on the Scope of Practice (or the anticipated Scope of Practice) for Counselling Therapy in BC. (The Task Group for Counsellor Certification proposed a scope of practice definition to the Ministry in its May 2001 submission, but a final decision has not yet been made on this definition.)

In the hierarchy of documentation that controls practice in regulated professions, the HPA exists at the top, followed by the designation regulation, then the bylaws of the regulatory body (the College), followed by College policies and procedures, such as practice directives. The scope of practice for counselling therapy will be defined by the government within the designation regulation, but it will be a general not an itemized statement of practice.

The scope of practice outlines in a broad sense the functions of the counselling therapist. The next level of detail is the CP, which clearly must be bounded by the scope. (A further level of detail – below the CP in the hierarchy – would be the curricula of education programs that train for the profession; this paper does not discuss curriculum, but assumes that eventually the curricula of education programs that are approved by the new College will incorporate the competencies in the CP.)

The competencies listed in the CP will attempt to define the specific tasks of the entry-level counselling therapist. In order to be objectively measurable, the competency statements should not be multi-faceted – that is they should contain no more than one task component. Conversely, competencies should not be broken down to too many sub-components or the CP will become unwieldy and appear as a sea of detail with no focus. Common practice is to identify competencies that represent complete tasks rather than sub-components of tasks. This is always a matter of judgment, but as an example an acceptable competency statement might be interview client to obtain comprehensive medical history whereas breaking this statement down into sub-components such as question client regarding history of injuries, question client regarding surgical history, obtain list of client's current medications... would usually be seen as too detailed.

Based on this approach, it is reasonable to expect the final CP for Counselling Therapy to consist of several hundred statements (most likely between 200 and 300). To maintain focus and enhance readability, the competency statements should be organized under various headings. Logically the headings should match or be similar to those in the scope of practice document, although other organizational approaches are feasible.

For example, its May 2001 submission, the Task Group proposed the following definition:

“counselling therapy” means assessing, describing, preventing and treating of intrapsychic and interpersonal difficulties (e.g. mental or emotional dysfunctions and disorders), by using scientific, behavioural, systemic, and expressive theories, methods and techniques, including but not limited to

- the use of individual and systemic diagnostic procedures,
 - counselling and psychotherapeutic principles, theories and techniques,
 - clinical research into psychotherapeutic modalities,
- for the purpose of enhancing mental, emotional, physical and spiritual health, and growth and development throughout the human lifespan.

From this definition it is possible to develop a framework or a list of headings under which more specific competencies could be organized. The following is one possible breakdown of the scope statement for the purposes of this proposal:

1. Assessing intrapsychic difficulties
2. Assessing interpersonal difficulties
3. Describing intrapsychic difficulties
4. Describing interpersonal difficulties
5. Preventing intrapsychic difficulties
6. Preventing interpersonal difficulties
7. Treating intrapsychic difficulties
8. Treating interpersonal difficulties
9. Specific theories, methods and techniques:
 - 9.1 the use of individual and systemic diagnostic procedures,
 - 9.2 counselling and psychotherapeutic principles, theories and techniques,
 - 9.3 clinical research into psychotherapeutic modalities,

In order to ensure that the competencies are objectively measurable, it is important to pay close attention to detail when competency statements are written. In particular the number of verbs that describe the competencies should be limited and closely defined. Verbs can be used to specify the domain of the competency (i.e. knowledge, skill or behaviour) and also the level of complexity (e.g. “to explain” is more complex than “to describe”). Established educational theory is normally followed in this regard.

Because of the technical expertise required to establish a defensible CP, most development projects employ a consultant to guide the work of a team of subject-specialist experts. The authors of this paper recommend this approach to the Task Group.

Where would the competency statements come from?

Competency statements are sometimes developed from first principles by undertaking a comprehensive job analysis. Typically this involves a consultant working with a representative group of expert practitioners (in this case counselling therapists) and developing a skill list that is then refined into competency statements.

In established professions, often a somewhat quicker and more satisfying approach is to identify various source documents that contain competency-like statements (e.g. curriculum materials, job descriptions, statements from professional associations), synthesize these into a comprehensive document, and then edit to remove redundancy and ensure consistency. Again this work should be guided by a consultant and involve an expert group.

Whatever methodology is used to develop an initial set of competency statements, considerable work is necessary to reach consensus within the task group on what job skills are to be included, even at the draft level. It is important to remember that the CP being developed seeks to describe minimum entry-level requirements for safe practice and not the all the competencies that may be expected from a seasoned veteran.

Who would do the work? What is the timeframe and cost?

Because of the magnitude and importance of the task of developing a CP for the profession of counselling therapy, clearly it would be inappropriate to embark on this task without confidence that the results will be incorporated into the final decision of the board of the new College.

Developing a draft CP, consulting, and obtaining a final document may be anticipated to require a minimum of 18 months – more time if the profession is extremely diverse or if there is difficulty reaching consensus. Since it appears likely that the College will be formed within this 18-month period, this should be born in mind when determining the path ahead.

A delegated task group that represents the profession should undertake the development of the draft CP, oversee the consultation, and synthesize the results into a package for submission to the board of the College. An ideal group size would be 8 to 12 individuals, who are both interested and able to devote significant hands-on time to the project. Several full days per month of time over the project period should be anticipated. The process should be guided by an expert competency consultant who would organize group activities, ensure the involvement and input of group members, manage the emerging competency data, and assist with the consultation process.

The costs of the project are dependent upon several factors:

- The anticipated costs of supporting meetings of the task group;
- The decision on whether task group members will receive honoraria;
- Anticipated consultant costs;

- The nature of the envisaged consultation process, which might involve questionnaires (electronic or mail-out), meetings, advertising and promotional activities, focus groups, data analysis etc.

At this point in time it would be reasonable for the Task Group for Counsellor Certification to determine a general path ahead, and then engage in specific project planning and budgeting.

How would a CP apply to advanced-level(s) in a two-tiered registration model?

If the new College adopts a two-tiered registration model, a CP will be required for each level. The entry-level CP should be a stand-alone document (which applies in the case of either a single tier or a two-tiered model). Advanced-level CP(s) should be developed that build-upon rather than incorporate the entry-level CP. Separate advanced CPs could be developed for different counselling specialties.

In general, a similar process to that outlined above for the entry-level CP should be undertaken to develop one or more advanced-level CPs. It is feasible for the development of advanced-level CP(s) to be integrated with the development of the entry-level profile, although doing so would pre-suppose the board's decision on adopting either a single tier or a two-tiered model.

How does a CP fit into the establishment of a registration examination process?

The board of the new College will need to determine whether to establish its own examination process to assess the competency of registration candidates or adopt an examination developed by a recognized (usually national) organization. Under the *HPA*, the registration committee has the exclusive mandate to manage the registration process, including any examination of applicants, but the process must be set out in the bylaws to be approved by the College board.

College examinations are common practice, and can enhance the apparent objectivity of the registration process, but they are not mandatory. If the Board establishes a CP that determines the requirements for candidate registration, and if the Board objectively establishes certain specific educational credentials or clinical experiences that produce those competencies, it could proceed to register without any examination (its own or a national examination). So, for example, an applicant who graduates from an accredited training program and completes a period of supervised practice without complaint could be admitted without further examination.

Where regulatory bodies use their own examinations, it is important that such examinations can withstand legal challenges relative to their credibility and objectivity. For this reason it is standard practice to base examinations on an accepted and properly approved CP. The CP provides a blueprint for the examination, with the specific content and administration procedures being developed under the guidance of a professional psychometrician according to Standards for Educational and Psychological Testing [the

American Psychological Association, the American Educational Research Association and the National Council on Measurements in Education].

Establishing an examination is a lengthy and expensive process, a decision on which is likely best left to the board of the new College. An entry-level CP is a necessity with or without an examination.

Stage 2: Identifying Combinations of Education and Clinical Experience that Produce the Required Competencies

What combinations of education and clinical experience might produce the required competencies?

Because of the diversity of the counselling therapy professions, it is reasonable to anticipate that there may be several education programs, or combinations of education and clinical experience, that would meet the requirements for initial registration. Should a two-tiered registration process be established, it is logical that at the advanced level(s) fewer combinations of education or experience would comply.

For convenience, in this section of the discussion paper, a completed education program, or a combination of completed education and clinical experience, that a candidate presents to the board of the College in a registration application is referred to as a “qualification set”.

It will be incumbent upon the first board of the College to determine which of the commonly presented qualification sets meet the requirements of the CP. In this way the board can handle most registration applications quickly and efficiently. Should the College establish a registration examination process, then these “approved” qualification sets would become prerequisites to writing the examination.

In addition, by publishing the “approved” qualification sets, the College can ensure that those interested in entering the profession have clear information on the routes to initial registration.

How would the College determine if a qualification set meets the requirements of the CP?

All qualification sets generate learning outcomes. Provided the learning outcomes can be identified, it is a relatively simple matter to compare them with the competency statements in the CP and determine whether the CP requirements are met by the qualification set in question.

In order to assess a particular education program relative to the CP, it would be reasonable for the board of the new College to put the onus on education programs to identify their learning outcomes and compare them with the requirements of the CP. The board could then review a program’s own assessment, and either confirm or modify it. A

framework for learning outcome or CP comparison could be developed by the board or by a committee or task group established by the board. This committee or task group could then review comparisons and make an appropriate recommendation to the board.

It is not unreasonable to ask an education program to carry out an initial assessment and comparison for these purposes. After all, programs have a considerable vested interest in becoming recognized by the College as meeting the entry-level competency requirements for the profession.

Unless it is provided within and supervised by an education program, clinical experience is harder to assess in terms of learning outcomes. The board could handle this concern by first assessing education programs (inclusive of any clinical experience required within those programs). Then, if education programs were found to fall short of meeting the CP requirements (which would in itself depend on the content of the yet to be developed CP), the issue of additional required clinical experience could be addressed. If the board were to require some specific pre-registration clinical experience, in addition to education, it is reasonable that the board would first closely define the expectations of the clinical experience, and then require that an appropriate registered counselling therapist both supervise such experience and verify the candidate's learning outcomes relative to it.

How would the CP profile apply when assessing other combinations of education and clinical experience?

In addition to establishing the common qualification sets that would qualify candidates for registration, the College has an obligation to review less common qualification sets that may be presented by some registration candidates. For example, registration applicants may include those who trained in another Canadian province, or even outside of Canada.

It is difficult to imagine how the board of the College would proceed with such assessments unless its registration requirements consist of a list of objective and measurable learning outcomes in the form of competency statements (i.e. a CP). But given a CP, there exists a solid framework for making such assessments, and the work of doing so could be delegated by the board to an appropriate committee or task group.

How does a CP relate to the responsibilities of the College under the Agreement on Internal Trade?

The College of Counselling Therapists of BC will be required to give special consideration to the registration of candidates who are currently registered counselling therapists in other regulated Canadian jurisdictions. At the present time this applies only to the Province of Québec, although other provinces may initiate regulation on the future. According to the Labour Mobility Chapter of the *Agreement on Internal Trade* (AIT), regulated jurisdictions are obligated to enter into a Mutual Recognition Agreement to ensure that "labour mobility applicants" are treated in accordance with the certain principles. Labour mobility requirements explicitly state that "...licensing, certification

and registration practices are to be based principally on competence...” and goes on to say that, where regulatory bodies differ in their recognition of certain programs or educational institutions, “the recognition of qualifications should be based on the competencies of the worker...” [Guidelines for meeting the obligations of the Labour Mobility Chapter, *Agreement on Internal Trade*, page 31].

It is difficult to see how the College could comply with AIT unless its entry-level registration requirements are expressed as competencies.

SUMMARY

It should be clear from the above discussion that the development of an entry-level Competency Profile is the starting point that will enable the new College of Counselling Therapists to move ahead with a number of initiatives:

- The identification of requirements for initial counsellor registration;
- The identification of education programs or combinations of education programs and clinical experience that meet these initial requirements;
- The development of a registration examination or the adoption of an existing national examination (should the College so desire);
- The development of requirements for advanced registration (should the College wish to establish a two-tiered registration model);
- The assessment relative to the registration requirements of other education programs and program or experience combinations that may be presented by candidates for registration;
- The porting of current members of the Task Group organizations to become the first registrants of the new College;
- The creation of accreditation procedures and standards, or the adoption or modification of existing standards;
- The development of a Mutual Recognition Agreement relative to the registration of applicants from other Canadian regulated jurisdictions, as required by the *Agreement on Internal Trade*.

Furthermore the development of an entry-level CP, based as it is on objectively defined, measurable job tasks, will enable the College to carry out its functions in a legally defensible manner.

The creation of an entry-level CP is a time consuming task, and perhaps it will be seen as an expensive one. But it is necessary if the College is to be positioned to move ahead efficiently once it is formed. At this point in time it is recommended that the Task Group for Counsellor Certification consider initiating a process to develop an entry-level CP, with a plan to transition the project to the control of the new College once it is in place.