

COMMONWEALTH OF VIRGINIA

BOARD OF COUNSELING



Virginia Department of
Health Professions
Board of Counseling

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Qualified Mental Health Professionals (QMHP) FAQs

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QMHP Registration Requirements

How are QMHP, QMHP-A, QMHP-C and QMHP-Trainee defined?

“Qualified mental health professional or QMHP” means a person who by education and experience is professionally qualified and registered by the board to provide collaborative mental health services for adults or children. A QMHP shall not engage in independent or autonomous practice. A QMHP shall provide such services as an employee or independent contractor of the DBHDS, the Department of Corrections, or a provider licensed by the DBHDS.

“Qualified Mental Health Professional-Adult or QMHP-A” means a registered QMHP who is trained and experienced in providing mental health services to adults who have a mental illness. A QMHP-A shall provide such services as an employee or independent contractor of the DBHDS, the Department of Corrections, or a provider licensed by the DBHDS.

“Qualified Mental Health Professional-Child or QMHP-C” means a registered QMHP who is trained and experienced in providing mental health services to children or adolescents who have a mental illness. A QMHP-C shall provide such services as an employee or independent contractor of the DBHDS, the Department of Corrections, or a provider licensed by the DBHDS.

A supervised trainee working toward the registration of QMHP or QMHP-Trainee is not defined in the Regulations; however, the Regulations do allow for applicants to register their supervised training experience if they so choose. The Board will refer to those individuals as QMHP Trainees, which is comparable to the DBHDS designation of a QMHP-Eligible (QMHP-E). DBHDS and DMAS may require that QMHP-Es register their supervised training experience with the Board of Counseling in order to bill for services.

Why are QMHPs required to register with the Board of Counseling?

During the 2017 General Assembly House Bill 2095 was introduced and passed authorizing the Board of Counseling to register QMHPs and Peer Recovery Specialists. The registration of QMHPs and Peer Recovery Specialists through the Board of Counseling provides accountability and transparency.

At what date will persons be required to be registered with the Board of Counseling to provide services as a QMHP?

Effective January 3, 2018, all QMHPs will be able to register with the Board of Counseling. The Regulations allow a year to become registered with the Board of Counseling. All QMHPs must be registered by December 31, 2018.

Do I need to register to become a QMHP if I hold a behavioral health license or if I am under Board approved residency/supervision?

No. You are not required to register as a QMHP if you hold a LPC, LMFT, LSATP, LMFT, LCSW or LCP license or have been approved as a resident in counseling, resident in marriage and family therapy, resident in substance abuse treatment, resident in psychology or a supervisee in social work.

If I was not employed as a QMHP-A prior to December 31, 2017, what are the education and experience requirements to qualify to register as a QMHP-A in Virginia?

If you have (pick one):

- Master's degree in psychology, social work, counseling, substance abuse, or marriage and family therapy from an accredited college or university, you need:
 - To submit a transcript
 - Evidence you have had an internship or practicum of at least 500 hours of experience with persons who have a mental illness. (Verification of Internship/Practicum for QMHP form)
- Minimum of bachelor's degree in a human services or related field from an accredited college, you need:
 - To submit an official transcript
 - Evidence of 1,500 hours of supervised experience obtained within a 5-year period immediately preceding the application for registration. (hours with adults with mental illness during an internship or practicum can be considered as part of the 1,500 hours of supervised experience requirement)
- Bachelor's from an accredited college in an unrelated field, you need:
 - To submit an official transcript
 - 15 semester credits or 22 quarter hours in a human services field
 - 3,000 hours of supervised experience to be obtained within a 5-year period immediately preceding application for registration
- License as a registered nurse in Virginia, you need:
 - 1,500 hours of supervised experience to be obtained within a 5-year period immediately preceding application for registration.
- License as an occupational therapist in Virginia, you need:

- 1,500 hours of supervised experience to be obtained within a 5-year period immediately preceding application for registration.

If I was not employed as a QMHP-C prior to December 31, 2017, what are the education and experience requirements to qualify to register as a QMHP-C in Virginia?

If you have (pick one):

- Master's degree in psychology, social work, counseling, substance abuse, or marriage and family therapy from an accredited college or university, you need:
 - To submit an official transcript
 - Evidence you have had an intern or practicum of at least 500 hours of experience with persons who have a mental illness. (Verification of Internship/Practicum for QMHP form)
- Minimum of bachelor's degree in a human services or in special education from an accredited college, you need:
 - To submit an official transcript
 - Evidence of 1,500 hours of supervised experience obtained within a 5-year period immediately preceding the application for registration. (hours with children or adolescents with mental illness during an internship or practicum can be considered as part of the 1,500 hours of supervised experience requirement)
- License as a registered nurse in Virginia, you need:
 - 1,500 hours of supervised experience to be obtained within a 5-year period immediately preceding application for registration.
- License as an occupational therapist in Virginia, you need:
 - 1,500 hours of supervised experience to be obtained within a 5-year period immediately preceding application for registration.

Does a person need to register as a QMHP Trainee in order to count supervised experience hours toward QMHP-C or QMHP-A?

If a person is currently a QMHP-E and accruing experience toward the QMHP-A and/or QMHP-C, they are not required to register with the Board. However, in 2019, DMAS will require all QMHP Trainees (QMHP-Es) to be registered with the Board to be reimbursed for services.

Who can supervise a QMHP Trainee (QMHP-E) toward registration as a QMHP-A or QMHP-C?

A Virginia licensed mental health professional or a person under supervision who has been approved by the Boards of Counseling, Psychology, or Social Work as a pre-requisite for licensure can supervise QMHP Trainees, such as a Licensed Professional Counselor (LPC), Licensed Marriage and Family Therapist (LMFT), Licensed Substance Abuse Treatment Practitioner (LSATP), Licensed Clinical Social Worker (LCSW), Licensed Clinical Psychologist (LCP), School Psychologist, School Psychologist-Limited, Psychiatrist, Psychiatric and Mental Health Nurse Practitioner (PMHNP), Board certified Behavioral Analyst (BCBA), Resident in Counseling, and Resident in Psychology or Supervisee in Social Work.

"Mental health professional" means a person who by education and experience is professionally qualified and licensed in Virginia to provide counseling interventions designed to facilitate an individual's

achievement of human development goals and remediate mental, emotional, or behavioral disorders and associated distresses which interfere with mental health and development.

Is a supervisor required to supervise the day-to-day services provided by a QMHP Trainee?

A qualified supervisor is required to provide face-to-face training in the services of a QMHP Trainee (QMHP-E) until the supervisor determines competency, after which supervision may be indirect in which the supervisor is either on-site or immediately available for consultation with the person being trained.

How do I know if my current degree qualifies as a human services or related field?

The Board of Counseling has approved a guidance document to list human services and related degrees. Guidance Document 115-8 can be found on the website at:

https://www.dhp.virginia.gov/counseling/counseling_guidelines.htm.

Is a degree in Sociology considered a human services degree?

On February 9, 2018, the Board voted to allow the addition of Sociology to the human services and related approved degrees until May 31, 2021.

Can I qualify to register as a QMHP-C if I have a bachelor's degree in an unrelated field?

No, QMHP-C is considered a specialty, and therefore an unrelated degree is not currently an option.

If staff have dual qualifications (both QMHP-A and QMHP-C), will they need to register those separately and pay two application fees?

Yes, persons who are both a QMHP-A and QMHP-C will need to apply for both registration types.

Can a person who is a QMHP-A qualify to also register as a QMHP-C (or vice versa) without having to meet the same supervised training experience requirements with a different population?

No. The Regulations are currently written to require a person who has met the supervised training experience requirements for one population to repeat the supervised training experience requirements but with the other population. The Regulations as currently written base the required competencies on experience with specific populations – either adults or children and adolescents.

Will Qualified Paraprofessional in Mental Health (QPPMH) be required to register with the Board of Counseling?

No. Currently only QMHP-A's and QMHP-C's are required to register with the Board. You should contact DBHDS for the requirements for QPPMH.

If I am a LMSW, LSW, CSAC or CSAC-A do I need to register as a QMHP?

Yes. If you are going to be providing QMHP type services, you must meet the requirements outlined in the Regulations and register with the Board for QMHP-A, QMHP-C or QMHP-Trainee.

Where can I find the information on billing for services or Individual Service Plans (ISPs)?

Please refer to DMAS and DBHDS requirements and regulations.

Application Requirements

What types of applications are available and what are the differences?

- The **QMHP-Trainee** application is for those who are starting or are currently accruing supervised experience towards QMHP-A and/or QMHP-C. (Comparable to the DBHDS and DMAS designation QMHP-Eligible or QMHP-E)
- The **QMHP-A** application is used for those who have the required education and have completed their supervised experience with adults with mental illness and are registering to become a QMHP-A.
- The **QMHP-C** application is used for those who have the required education and have completed their supervised experience with children and adolescents with mental illness and are registering to become a QMHP-C.

How do I print out the forms that are required for the application?

Instructions and forms such as the verification of supervised experience and verification of internship can be printed during the [Online](#) application process. QMHP forms are also available on the website under “Applications & Forms”.

What are the application fees?

Application fees can be found on the [fees](#) page of the Board of Counseling website.

Can I fax or email my supplemental documentation to complete my application to the Board?

Yes.

Will the Board accept a copy or an unofficial transcript?

No. All transcripts must be mailed to the Board or received directly from the university by secured electronic methods such as eSCRIPT-SAFE or Parchment.

Will the Board accept paper applications?

No. All applications must be submitted online via the [online application](#) webpage.

Will the Board accept outdated forms?

No. You must submit the current version of the forms in order to be considered.

Do I need to continue to work at the same agency if I have variance?

No. If the Board approved your registration for QMHP-A or QMHP-C, you have met the requirement and are not prohibited from changing employment.

What resources are available to help me with the online application?

Please refer to the [Online Application Handbook](#) for detailed information on how to submit an online application. If you are experiencing technical issues, please contact the DHP Call Center at (804) 367-4444.

How long is my application valid?

An incomplete application can be held for up to one year.

If I do not qualify for registration or change my mind about registering, can I receive a refund?

No. All application fees are non-refundable and non-transferable.

Do the Verification of Internship/Practicum form and Verification of Supervised Experience form need to be mailed into the Board?

No. This form can be emailed or faxed to the Board.

Will I be approved if I have a criminal conviction?

All applications are reviewed on a case-by-case basis. You should refer to Guidance Document 115-2: [Impact of Criminal Convictions, Impairment and Past History on Licensure or Certification, revised February 9, 2018](#)

The following information will be requested from an applicant with a criminal conviction:

- A certified copy of all conviction orders (obtained from the courthouse of record);
- Evidence that all court ordered requirements were met (i.e., letter from the probation officer if on supervised probation, paid fines and restitution, etc.);
- A letter from the applicant explaining the factual circumstances leading to the criminal offense(s); and
- Letters from employers concerning work performance (specifically from Counseling-related employers, if possible).

If a certified copy of your conviction orders is not available from the courthouse of record (conviction over 10 years old), then you must submit an original state police background report from the state in which you were convicted in lieu of the court documentation. All other information will still be required.

Will the Board conduct audits?

The Board may audit applicants that applied for QMHP by grandfather. If the registrant is audited, they will be required to submit evidence that their education and supervised training met DBHDS's requirements prior to December 31, 2017.

What is the mailing address for the Board of Counseling?

Our mailing address is: 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233

How do I notify the board office of an address change and/or name change?

Address changes must be made online through the [Online Licensing](#) website.

QMHP-A, QMHP-C or QMHP-Trainees may submit a name change in writing using the [Name/Address Change Form](#). All name changes must be accompanied by a marriage license, divorce decree, or court order.

How may I obtain a duplicate copy of my registration?

Duplicate copy of your registration can be ordered online through the [Online Licensing](#) website for a fee of \$10.00.

How do I check the status of my application?

You may click on the [Check Application Status](#) link on the left hand side of the Counseling page to check the status of your pending application. You are able to download supporting documentation from this link and/or ensure that all documentation has been received by the Board. It will also provide information on the processing times for your application.

Experience Requirements

In order to qualify to register as a QMHP, does the Board require that the supervised training experience be pre-approved and registered with the Board?

No, a person who has met the education and experience requirements to qualify to register as a QMHP, only has to provide documentation of meeting those requirements. The Board of Counseling does not require that the supervised training experience be pre-approved and registered.

However, the Board allows applicants the ability to register their supervised training experience if they so choose. The Board will refer to those individuals as QMHP Trainees, which is comparable to the DBHDS designation of a QMHP-Eligible (QMHP-E).

Within an agency structure, can some service areas be supervised by QMHPs?

Supervision of collaborative mental health services must be by a licensed person or a person under supervision, that has been approved by the Boards of Counseling, Psychology, or Social Work as a prerequisite for licensure. Currently there is no limitation to the number of individuals a licensee or person under supervision can supervise.

The assessment and development of a service plan must be completed and directed by a licensed mental health professional, but the QMHP can implement the plan. A QMHP is not allowed to deliver services outside of the service plan that is being directed by the licensed professional. In practice this means that a licensed professional directs the service plan, which can be through the assessment process of identifying needs to be incorporated into the service plan. The service plan shall directly reflect what was found and recommended by the licensed professional. DBHDS regulations indicate that the service plan can be signed by the person implementing the plan - which could be a QMHP if the services recommended by the licensed professional are rehabilitative support services. All services also require an assessment before they can be delivered.

Timelines

How long will it take for my application for registration to be approved?

The Board of Counseling follows the Department of Health Professions' performance standards and processes complete applications within 30 days.

New employees who need to obtain required supervised training experience should submit documentation immediately upon hire to be registered for supervised training (QMHP Trainee). In 2019 DMAS will require all QMHP Trainees (QMHP-E) be registered with the Board of Counseling in order to receive reimbursement for services, an employee could not begin providing client services until the Board of Counseling has approved the supervised training or QMHP registration and a registration number is established.

Does the Board of Counseling use or define the term QMHP-E?

No. The term QMHP-E is used by DMAS and DBHDS only. The Board of Counseling refers to individuals under Board approved supervised experience toward the registration of QMHP as a QMHP-Trainee.

Can an agency begin to utilize a staff person (have the employee begin to provide services and bill for these services) once the registration application is submitted, or will the agency have to wait until the Board registers the QMHP or the QMHP Trainee?

No, the QMHP or QMHP Trainee must be registered with the Board before the person can provide services and bill for those services.

QMHP Role and Scope of Practice

Is the QMHP credential a license?

No. The QMHP-A and QMHP-C credential is a registration and **not** a license.

Can a QMHP practice independently?

No, a QMHP may not engage in independent or autonomous practice. A QMHP shall provide such services as an employee or independent contractor of the Department of Behavioral Health and Developmental Services, the Department of Corrections, or a provider licensed by the Department of Behavioral Health and Developmental Services.

Can a QMHP provide counseling?

A QMHP cannot legally perform counseling or apply the principles, standards and methods of the counseling profession.

A QMHP cannot refer to themselves as a counselor.

What services can a QMHP provide?

The purpose of a QMHP is to provide services, as part of a treatment team, to individuals who have significant functional impairments and the inability to perform the following tasks:

- Remember important things
- Find solutions to day-to-day problems
- Understand and comprehend what people are saying
- Start and maintain a conversation
- Wash self, dress, or be alone in the home for a few days
- Remember to eat
- Make or maintain friendships
- Deal with people you don't know
- Take care of household responsibilities/pay bills
- Maintain employment/stay in school
- Recognize danger
- Provide education materials
- Monitor individual needs or potential changes in needs
- Monitor ability to apply learned coping skills
- Communicate back to treatment team on individual status, needs, utilization of skills, or changes

The goal of a QMHP and the treatment team is to increase psychosocial functioning by reducing functional impairments. Clinical services are provided only by licensed mental health professionals, or individuals under board-approved clinical supervision as a prerequisite to licensure (i.e. Resident in Counseling, Resident in Counseling, Resident in Marriage and Family Therapy, Resident in Substance Abuse Treatment, Supervisee in Social Work, Resident in Clinical Psychology)

Specifically, the role of a QMHP is to provide:

- A model of appropriate behavior;
- Skills training in communication, anger management, peer relations, daily living, problem solving, and impulse control;
- Service collaboration and coordination;
- Psychoeducation; and,
- Medication education.

What are some examples of the types of services a QMHP-A can provide?

Mental Health Skill Building Services (MHSS)

Goal directed training to enable individuals to achieve and maintain community stability and independence in the most appropriate, least restrictive environment. Includes goal directed training in the following areas:

- Functional skills and appropriate behavior related to the individual's health and safety
- Activities of daily living, ad use of community resources
- Assistance with medication management
- Monitoring health, nutrition, and physical condition

Day Treatment/Partial Hospitalization

Structured programs of activity or training services for adults with an intellectual disability or a developmental disability, in a nonresidential community-based setting. They are designed to enhance:

- Self-care and hygiene; eating; toileting
- Task learning
- Community resource utilization
- Environmental and behavioral skills
- Social skills
- Medication management
- Prevocational skills
- Transportation skills

Crisis Stabilization

Collaborative treatment to non-hospitalized individuals experiencing an acute crisis that may jeopardize their current community living situation. Services are intended to avert hospitalization or rehospitalization. The treatment team's goal is to stabilize individuals in crisis and mobilize the resources of the community support system, family members, and others for ongoing rehabilitation and recovery.

Psychosocial Rehabilitation

A program of two or more consecutive hours per day provided to groups of adults in a nonresidential setting. This service provides education to teach the individual about mental illness, substance abuse, and appropriate medication to avoid complication and relapse and opportunities to learn and use independent skills and to enhance social and interpersonal skills within a consistent program structure and environment. Psychosocial rehabilitation includes:

- Skills training
- Peer support
- Vocational rehabilitation
- Community resource development oriented toward empowerment, recovery, and competency.

What are some examples of the types of services a QMHP- C can provide?

A QMHP-C can provide all of the services allowed by a QMHP-A, as well as the following:

Intensive In-Home Services

Intensive In-Home means family preservation interventions for children and adolescents who are at risk of being moved to out-of-home placement, or who is being transitioned back home from an out-of-home placement. These services are provided by a treatment team. Services provided by a QMHP may include:

- Life, parenting, and communication skills
- Anger management skills
- Case management
- Coordination with other services and providers

Therapeutic Day Treatment – Children and Adolescents (TDT)

TDT is a treatment program that combines psychotherapeutic interventions with education and mental health or substance abuse treatment. Services provided by a QMHP may include:

- Medication education and management
- Education to learn and use daily living skills and to enhance social and interpersonal skills
- Case management
- Coordination with other services and providers.

Renewal Requirements

Are QMHP-As and QMHP-Cs required to renew their registrations?

Yes, an individual holding a QMHP-A and QMHP-C must renew their registration by June 30th of each year. QMHP-Trainees are not required to renew.

Are QMHPs required to complete continuing education for their first renewal?

No. Completion of continuing education is not required for the first renewal following initial registration in Virginia.

What are the continuing education requirements to renew QMHP registration?

QMHPs are required to complete a minimum of eight contact hours of continuing education for each annual registration renewal. A minimum of one of these hours must be in a course that emphasizes ethics.

Will QMHPs who register between January 3, 2018 and December 31, 2018, be required to renew on June 30th, 2018?

No, QMHPs who register in 2018 will not be required to renew until June 30, 2019. All registrants will get at least 6 months of registration from the time they are approved, before they have to renew.

What are the renewal requirements?

A QMHP must submit the \$30 renewal fee and complete the required continued competency.

How do I renew my registration?

The Board emails renewal notices which contain a PIN number to your email address of record on file with the Board 45-60 days in advance of the June 30 expiration date. You should renew your registration online or return the renewal request by mail to, no later than June 30 to avoid a late fee. If mailing in your renewal, checks or money orders must be payable to the Treasurer of Virginia.

I am dually registered by the Board of Counseling as a QMHP-A and QMHP-C, must I complete 8 hours of continuing education for each registration?

Those individuals dually registered by this Board will not be required to obtain continuing education for each registration. A total of 8 hours will fulfill the requirements of QMHP-A and QMHP-C registrations held from this Board.

Do I need to provide QMHP Services in order to renew my registration?

No. You do not need to be employed or providing QMHP services in order to maintain your registration. You are; however, required to renew each year and complete the required continued competency training.

How do I notify the board office of an address change and/or name change?

Address changes must be made online through the [Online Licensing](#) website.

QMHP-A, QMHP-C or QMHP-Trainees may submit a name change in writing using the [Name/Address Change Form](#). All name changes must be accompanied by a marriage license, divorce decree, or court order.

Any change in the address of record or the public address, if different from the address of record, shall be furnished to the board within 60 days of such change in accordance with the Regulations Governing the Registration of Qualified Mental Health Professionals.

What is my address of record?

Section 54.1-2400.02.B of the Code of Virginia requires the Department of Health Professions (DHP) to collect an official address of record from each health professional to be used by DHP for agency purposes. The Code also requires DHP to provide an opportunity for a health professional to provide a second address for the purpose of public dissemination. If there is no second (public) address provided, the official address of record will be used as the public address for the purpose of public dissemination. If the health professional would prefer that his/her address of record remain confidential, then an alternative public address must be provided to DHP. (Note: the License Lookup feature on the DHP public website does not contain the full address. However, public addresses are available by contacting Virginia Interactive Premium Service or the Board.) An individual is not required to submit a place of residence for either the official address of record or the public address. A post office box or a practice location is acceptable.

Changes to either address may be made at the time of renewal or at any time by written notification to the Board. Changes to the address of record may also be made at any time by accessing your licensure information through the online system. Any change that is made to one of the addresses does not automatically update the other address. Address information should be kept current for the address of record and the public address (if different from the address of record) at all times.

What happens if I fail to renew my registration by the required renewal date?

If no payment is received by your expiration date, the registration status will automatically be reflected as EXPIRED. Renewals submitted after the expiration date and within one year will be required to pay a late fee. If you fail to renew your registration within one year of the expiration date, then you will be required apply for reinstatement, pay reinstatement fee and provide evidence of completion of 20 hours of continuing education consistent with the requirements in 18VAC115-80-80.

Is there a “grace period” if I do not renew my registration by the 30th of June of the renewal year?

No

Can I renew early?

A registration can only be updated within 60 days prior to the expiration date. Early renewal for military deployment may be considered by call (804) 367-3053.

What are the continued competency requirements for renewal of registration?

A QMHP must complete a minimum of 8 contact hours of continuing education for each annual registration renewal. A minimum of one of these hours shall be in ethics.

Can my agency provide me with continuing education training to meet the renewal requirements?

Yes. The regulations allow a licensed health facilities (DHBDS licensed facilities) or local governmental agencies (Department of Corrections) to provide continuing education in competency activities that focus on increasing knowledge or skills in areas directly related to services provided by a QMHP.

How do I know if my CEs are approved?

The Board staff cannot pre-approve any CE courses. Each registrant shall use their best and professional judgment to determine if the course meets the requirements outlined in the regulations.

May I carry over hours of CE for the next renewal period?

No.

Do I need to submit my CE documentation to the Board for renewal?

No, you must maintain this information in your records for a period of three years following renewal. The Board may conduct an audit of licensees to verify compliance with the requirement for that renewal period. If selected, you would be notified by mail that documentation is required and given a time frame within which to comply.

Regulatory Process

How do I know when there is a change to the laws or regulations that may impact my registration?

Make sure your email address remains up-to-date with the Board of Counseling. The Board uses email as its main form of communication, and will send out emails with important notifications regarding changes in the laws and regulations, and will also send out newsletters. Also, request to be added to the Board of Counseling Public Participation List (PPG List). Person on this list will receive email notifications of regulatory actions with the Board.

Additionally, please look to the Board of Counseling website for up to date information.

Finally, please, register with [Virginia Townhall](#). Upon doing this, you will receive notifications of Board meetings, posting of meeting minutes, regulatory changes, and opportunities for public comment.

What if I disagree with, or see a problem with the Regulations?

The current emergency regulations governing the registration of QMHPs will go through the regulatory process to become permanent. As such, throughout this process, there will be ample time for public comment. Please register with [Virginia Townhall](#) to receive notifications of opportunities for public comment.

Additionally, you can always submit a Petition for Rulemaking with the Board of Counseling. To do this, please submit the form for a [Petition for Rule-making](#) for the Board to amend the current regulations. The Board is then required to address this petition at its next Board meeting.