

- Art therapy is a profession, it is **not** a modality, and is classified as a **distinct mental health profession** by the Bureau of Labor Statistics and is not currently within the ambit of the BAMH.
- Marriage, Couples, and Family Counseling, Addictive Disorders and Psychoanalytic Psychotherapy, are all described as areas of study or treatment modalities to fulfill requirements towards licensing as a Clinical Mental Health Counselor (LCMHC); however, the OPR has opted to license these as distinct professions.
- Art therapy **differs** dramatically from the other mental health professions that are regulated in VT with its emphasis on the non-verbal creative process and the theoretical training and clinical art therapy supervised training that supports it.
- The regulated mental health professions in Vermont actually share many more similarities with each other, then with art therapy, considering the verbal premise of the work. In addition there is much overlap and similarities in the content of their codes of professional standards and ethics.
- Art therapists who maintain their ATR-BC credentials, are required to abide by a professional code of ethics and professional standards that specifically addresses the use of art materials, the art making process, the storage of art, and potential for harm.
- The only easily attainable option the BAMH provides for art therapists seeking to practice in the state is the nonlicensed, noncertified psychotherapists roster. The roster provides minimal oversight and there is no requirement for continuing education (as there is for all of the other licensed mental health professions) that ensures best practice and competency of the professional. There is no insurance reimbursement for this title.
- The OPR report attempts to show that current LCMHC degree requirements are sufficiently flexible to allow art therapists holding non-CACREP master's degrees to qualify with course credits in only five of seven counseling-related areas of study identified in section 3.8 of the Board's rules. This ignores the requirement in the previous section of the rules, in 3.7(c), requiring that all applicants must complete 60 credits of graduate course work "in mental health counseling" to qualify for licensure. The specialized training required for competent practice of art therapy cannot be accommodated in graduate curriculums focused entirely on mental health counseling. Board interpretations of what constitutes coursework in mental health counseling has served to block art therapy graduates with comparable education and experience from gaining counseling licenses in this state and numerous other state across the nation.
- Art therapists who do not wish to maintain their ATR-BC can stay on the roster indefinitely, with no requirement to maintain continuing education credits. The average consumer is not aware of art therapy credentialing and is very unlikely to research it.
- Roughly 30% of the 1,028 nonlicensed noncertified psychotherapists have remained on the roster for five years or more, and therefore are unlikely to attain licensure in VT.
 - There are roughly 70 art therapists (master's degree) in Vermont:
 - 13 have been on the roster for more than five years and will not be licensed
 - 4 are on the roster pursuing their license
 - 15 art therapists are LCMHCs
 - 1 art therapist is licensed as a Marriage and Family Therapist

- The ATR-BC is required for licensure. The ATR designation requires 1,000 hours of supervised postgraduate clinical art therapy supervision. This number of hours for the ATR is increased for the Vermont bill to 2,000. The BC designation requires the successful completion of a board certifying art therapy exam and requires continuing education credits to maintain.
- The 2016 OPR report misstated the supervision requirements for postgraduate clinical art therapy hours. There are currently 36 art therapists with the ATR designation capable of providing supervision. Skype is an option when distance is problematic.
- The use of art by artists and non-mental health professionals for “healing” and “engaging the transformative power of the arts to prevent and heal abuse and other traumas” is increasing in Vermont and poses significant risk of harm. There is no regulation of these practices. 26 V.S.A. 4085. (3) exempts “healing arts” from the statutes governing nonlicensed, noncertified psychotherapists. An art therapy license would help to define the profession and offer the consumer a credentialed art therapist who understands the power and potential of art, in addition to the risks. When art, trauma and healing are described together in the same sentence, it sounds very much like art therapy and at a minimum like therapy.
- Without a license and the insurance reimbursement that comes with it, Vermont’s most vulnerable citizens **lack access to care** including children and families devastated by the opioid epidemic, refugees and veterans. In the *2015/16 Preliminary Sunrise Assessment: Massage Therapy*; “OPR considered that it may be necessary to define *harm*, which is not expressly defined in Chapter 57, more broadly than simply as affirmative injury or damage, to include failure to realize optimal social benefits available from licensure. In this respect, we considered that lack of insurance coverage or access to care could represent harm for sunrise purposes. “
- As art therapists we **do not** expect that other mental health professionals not use art in their work. However, with licensure only credentialed art therapists can use the art therapy title, and state that they are providing art therapy.
- The nonverbal nature of art therapy is the ideal preventive treatment for children and decreases the likelihood of unresolved mental health problems becoming increasingly complicated and difficult to treat exacting significant cost to the individual and society.
- Licensure for art therapists would make Vermont a very attractive place to live and practice their profession. It would also increase the internship opportunities for students in graduate art therapy programs to provide art therapy to VT citizens at little cost.