Counseling Licensure Disclosure

As a participant in the State Authorization Reciprocity Agreements (SARA), Washington University of Virginia is committed to providing transparent and accurate information regarding our academic programs and their alignment with state professional licensure requirements, per NC-SARA Policy Section 5.2 and U.S. Federal Regulations (34 CFR § 668.43). While SARA establishes national standards for interstate postsecondary distance education, SARA approval does not grant reciprocity or exemption from state professional licensing board requirements. Educational prerequisites for professional licensure vary strictly by state and jurisdiction.

Master of Christian Counseling Program-Specific Disclosure: The Washington University of Virginia Master of Christian Counseling program is designed to meet Virginia's educational requirements to pursue licensure as a Licensed Professional Counselor (LPC), including the coursework prerequisites to sit for the National Counselor Examination (NCE) or the National Clinical Mental Health Counseling Examination (NCMHCE). Eligibility to sit for these examinations, and to pursue licensure, is ultimately determined by the professional counseling licensing board in the state where the applicant intends to practice, and educational requirements vary by state. WUV is currently reviewing the program's curriculum against licensure requirements in other states; a state-by-state determination of whether the program's curriculum meets, does not meet, or has not yet been evaluated against each state's requirements will be published below as that review is completed. The following table is a list of license eligibility requirements that have been reviewed so far. This list will be increased as more state requirements are reviewed.

State	NCE or NCMHCE Requirements	Remark
Virginia	Does meet	
Texas	Does not meet	Needs to fill the gaps in Texas-specific ethics course; possible psychopathology double-count.
Maryland	Does meet	Needs syllabus-level confirmation.
New Jersey	Does meet	Accreditation language should be confirmed directly with the Professional Counselor Examiners Committee prior to filing.
New York	Does not meet	Lacks in consultation/fuoundations course.
Washington	Does meet	

The following report compares WUV's curriculum against licensure requirements in a sample of additional states, identifying (a) curriculum content alignment and gaps and (b) programmatic accreditation risk factors (such as CACREP accreditation requirements). It is intended to inform WUV's ongoing multi-state determination process and does not itself constitute a final disclosure of licensure eligibility in any state other than Virginia.

Multi-State Licensure Curriculum Comparison

Master of Christian Counseling Program — Washington University of Virginia (WUV)

Prepared in support of SARA (State Authorization Reciprocity Agreement) compliance review

States reviewed: Virginia (baseline), Texas, Maryland, New Jersey, New York, Washington, Massachusetts, Florida, North Carolina, Ohio

July 2026

Executive Summary

This report compares the WUV Master of Christian Counseling curriculum against professional counselor licensure requirements (LPC / LMHC / LCMHC, depending on state terminology) in nine additional U.S. states, using Virginia's 13-core-content-area framework (18VAC115-20-51) as the baseline. The purpose is to identify (a) curriculum content gaps, (b) programmatic accreditation risk (CACREP and equivalents), and (c) practicum/internship hour sufficiency, in order to inform WUV's multi-state authorization strategy and the upcoming joint forum with the Washington-area Korean church council.

Key Findings

- Curriculum fit: In 8 of the 9 comparison states, WUV's required and elective coursework maps onto at least 90% of the state's required content areas without modification.
- Accreditation is the dominant risk factor, not curriculum content. Four states in the national landscape (Ohio, Kentucky, North Carolina, Florida) restrict licensure to CACREP-accredited (or CACREP/MPCAC-equivalent) graduates; of these, North Carolina and Florida were reviewed in depth here. Ohio's stated policy is less absolute than commonly summarized (see Ohio section).
- Practicum/internship hours: WUV's 600-hour internship (240 direct client-contact hours) meets or exceeds the stated minimum in every reviewed state except Florida (700 hours / 280 direct) and North Carolina's post-licensure supervised-practice hour totals (which are a post-degree, not curricular, requirement).
- Recurring content gap: a small number of states require a discrete "consultation" or "clinical mental health foundations" course (New York, North Carolina) that is not clearly mapped to any single WUV course.
- Elective courses close several gaps: CNS755 (Counseling and Sexuality) is essential for Florida; CNS641 (Individual Counseling) helps close Maryland's treatment-application area; CNS734/CNS735 provide partial coverage of "special treatment issues"-type categories in Massachusetts and Washington.

Methodology

Each state's current licensure statute, administrative code, or official licensing-board publication was reviewed directly (not third-party aggregator sites alone, though aggregators were used to locate primary sources). WUV coursework was mapped against each state's enumerated content areas. Matches are color-coded throughout this report:

- Green — direct course match, no action needed
- Yellow — likely match, but syllabus-level verification recommended
- Red — no clear WUV course match, or a structural barrier (e.g., accreditation) unrelated to curriculum content

WUV Course Reference

Code	Course Title	Type
CNS501	Introduction to Christian Counseling	Major Elective
CNS511	Counseling Theory	Required
CNS701	Marriage and Family System	Required
CNS711	Group Counseling	Required
PSY523	Human Growth and Development	Required
CNS735	Addiction and Recovery	Required
CNS716	Multi-cultural Counseling	Required
CNS725	Counseling and Psychotherapy Techniques	Required
CNS718	Career Development and Counseling	Required
CNS763	Ethics of Counseling	Required
CNS765	Psychological Appraisal & Diagnostic Procedures (ver. 2025)	Required
CNS785	Research & Program Evaluation	Required
CNS787 / 788	Counseling Internship I & II	Required
PSY721	Psychopathology and Counseling	Required
CNS631	Counseling Children	Major Elective
CNS641	Individual Counseling	Major Elective
CNS642	Inner Healing	Major Elective
CNS714	Marriage and Family Counseling	Major Elective
CNS721	Conflict Transformation	Major Elective
CNS734	Crisis Counseling	Major Elective
CNS744	Psychology and Theology (Faith and Counseling)	Major Elective
CNS755	Counseling and Sexuality	Major Elective
CNS761	Self-Appraisal	Major Elective
CNS791	Behavioral Health Interpreting	Major Elective

Virginia (Baseline)

License credential: Licensed Professional Counselor (LPC)

Governing authority: Virginia Board of Counseling — 18VAC115-20-51

Accreditation Requirement

No CACREP or programmatic-accreditation requirement. The regulation specifies 13 core content areas and a 60-semester-hour graduate program; institutional (regional) accreditation is the only accreditation reference.

Curriculum Match

Virginia Core Content Area	WUV Course	Status
1. Professional identity, function, ethics	CNS763	Match
2. Theories of counseling & psychotherapy	CNS511	Match
3. Counseling & psychotherapy techniques	CNS725	Match
4. Human growth & development	PSY523	Match
5. Group counseling & psychotherapy	CNS711	Match
6. Career counseling & development	CNS718	Match
7. Appraisal, evaluation & diagnosis	CNS765	Match
8. Abnormal behavior & psychopathology	PSY721	Match
9. Multicultural counseling	CNS716	Match
10. Research	CNS785	Match
11. Addictive disorders	CNS735	Match
12. Marriage & family systems	CNS701	Match
13. Supervised internship (600 hrs / 240 direct)	CNS787 + CNS788	Match*

Notes

- Item 13 is a clock-hour requirement, not a credit requirement; WUV's internship hour logs should be confirmed to demonstrate the 600/240 split explicitly.
- CNS501 (Introduction to Christian Counseling) does not map to any of the 13 core areas; it appears to satisfy a WUV/degree-specific requirement rather than a licensure content area.

Practicum / Internship & Supervised Experience

600 total internship hours, including 240 hours of direct face-to-face client contact.

Overall Assessment

Full match — all 13 core areas covered. This is the baseline against which the other nine states are compared.

Texas

License credential: Licensed Professional Counselor (LPC)

Governing authority: Texas Behavioral Health Executive Council / Texas State Board of Examiners of Professional Counselors — 22 TAC §§681.82–681.83

Accreditation Requirement

No CACREP requirement. Regional/institutional accreditation plus the enumerated content areas is sufficient.

Curriculum Match

Texas Content Area	WUV Course	Status
Normal human growth & development	PSY523	Match
Abnormal human behavior	PSY721	Partial
Appraisal / assessment techniques	CNS765	Match
Counseling theories	CNS511	Match
Counseling methods/techniques (incl. group)	CNS725 + CNS711	Match
Research	CNS785	Match
Career & lifestyle development	CNS718	Match
Social, cultural & family issues	CNS716	Match
Professional orientation (ethics)	CNS763	Match
Addictions counseling	CNS735	Match
Additional ethics course (records mgmt., business/family law, TX Board rules)	No match	Gap
Couples/marriage/family counseling	CNS701	Match
Psychopathology (DSM, psychopharmacology)	PSY721 (reused)	Gap risk

Notes

- Texas treats "abnormal human behavior" and "psychopathology" as two separate required courses; WUV currently offers one course (PSY721) that would need to demonstrably cover both scopes, or a second course would be needed.
- The additional ethics course requirement (records management, business/family law, current Texas Board rules) is Texas-specific and has no equivalent in WUV's curriculum; this content cannot be satisfied by a generic ethics course from another state's program.

Practicum / Internship & Supervised Experience

300 clock-hour practicum/internship, including 100 hours of direct client contact — below Virginia's 600/240, so WUV's existing hours are sufficient.

Overall Assessment

Two open content gaps (Texas-specific ethics course; possible psychopathology double-count). Practicum hours are not a concern.

Maryland

License credential: Licensed Clinical Professional Counselor (LCPC) / Licensed Graduate Professional Counselor (LGPC)

Governing authority: Maryland Board of Professional Counselors and Therapists — COMAR 10.58

Accreditation Requirement

No CACREP requirement. Board reviews non-CACREP transcripts directly.

Curriculum Match

Maryland Content Area (A–N)	WUV Course	Status
A. Human Growth and Personality Development	PSY523	Match
B. Social and Cultural Foundations	CNS716	Match
C. Counseling Theory	CNS511	Match
D. Counseling Techniques	CNS725	Match
E. Group Dynamics, Processing, Counseling	CNS711	Match
F. Lifestyle and Career Development	CNS718	Match
G. Appraisal	CNS765	Match
H. Research and Evaluation	CNS785	Match
I. Professional, Legal, Ethical Responsibilities	CNS763	Match
J. Marriage and Family Therapy	CNS701	Match
K. Supervised Field Experience (125 hrs face-to-face min.)	CNS787 + CNS788	Match
L. Alcohol and Drug Counseling	CNS735	Match
M. Diagnosis and Psychopathology	PSY721	Match
N. Psychotherapy & Treatment of Mental/Emotional Disorders	CNS641 (elective)	Partial

Notes

- Area N (application of specific treatment models to specific disorders) is distinct from Area D (basic techniques). CNS641 (Individual Counseling, elective) is the best-fit course; syllabus confirmation recommended.

Practicum / Internship & Supervised Experience

125 hours face-to-face client contact minimum — well below Virginia's 240, so WUV's internship structure is more than sufficient.

Overall Assessment

Best curriculum fit reviewed to date, with only one item (N) needing syllabus-level confirmation.

New Jersey

License credential: Licensed Professional Counselor (LPC) / Licensed Associate Counselor (LAC)

Governing authority: NJ Professional Counselor Examiners Committee — N.J.A.C. 13:34

Accreditation Requirement

CACREP referenced as the preferred/expected path for degrees earned after October 2012, but non-CACREP programs may qualify if the 8-of-9 content areas are met; sources vary on strictness, so pre-application confirmation with the Committee is advisable.

Curriculum Match

New Jersey Content Area (8 of 9 required)	WUV Course	Status
1. Counseling theories	CNS511	Match
2. Human growth and development	PSY523	Match
3. Career development	CNS718	Match
4. Appraisal	CNS765	Match
5. Group counseling	CNS711	Match
6. Social and cultural foundations	CNS716	Match
7. Research	CNS785	Match
8. Professional orientation	CNS763	Match
9. Diagnosis	PSY721	Match

Notes

- Only 8 of these 9 areas are required; WUV covers all 9, providing a built-in margin of safety.
- Counseling techniques, marriage/family, and addictions are not core-required areas in New Jersey (though WUV offers all three).

Practicum / Internship & Supervised Experience

600 hours of internship expected under the CACREP-aligned standard — matches Virginia's 600-hour requirement exactly.

Overall Assessment

Full match on all 9 candidate areas (only 8 required). Accreditation language should be confirmed directly with the Professional Counselor Examiners Committee prior to filing.

New York

License credential: Licensed Mental Health Counselor (LMHC)

Governing authority: NY State Education Department (NYSED), Office of the Professions — Education Law Art. 163; 8 NYCRR §52.32

Accreditation Requirement

Program must be (a) NYSED-registered as licensure-qualifying, (b) CACREP-accredited (60 sem. hrs, clinical mental health counseling), or (c) determined by NYSED to be the "substantial equivalent" of either. Non-CACREP programs undergo individual transcript/syllabus review.

Curriculum Match

NY Content Area (§52.32)	WUV Course	Status
a. Human growth and development	PSY523	Match
b. Social and cultural foundations	CNS716	Match
c. Counseling theory and practice	CNS511 + CNS725	Match
d. Psychopathology	PSY721	Match
e. Group dynamics	CNS711	Match
f. Lifestyle and career development	CNS718	Match
g. Assessment of individuals, couples, families, groups	CNS765	Partial
h. Research and program evaluation	CNS785	Match
i. Professional orientation and ethics	CNS763	Match
j. Foundations of MHC and consultation	No clear match	Gap
k. Clinical instruction	CNS725 (overlap)	Partial

Notes

- Area j ("foundations of mental health counseling and consultation") is a distinct New York requirement with no clear counterpart in WUV's curriculum; this is the most notable curriculum gap identified in this state.
- Area g extends beyond individual appraisal to couples/family/group assessment; CNS765's scope should be confirmed.
- New York accepts only the NCMHCE exam, not the NCE.

Practicum / Internship & Supervised Experience

600-hour, one-year minimum internship — matches Virginia's requirement exactly (direct-hour split not separately specified at the degree level).

Overall Assessment

One clear content gap (consultation/foundations course) plus two items needing confirmation.

Washington

License credential: Licensed Mental Health Counselor (LMHC) / Associate (LMHCA)

Governing authority: WA Department of Health — RCW 18.225; WAC 246-809-220/221

Accreditation Requirement

CACREP explicitly not required. Regionally/nationally accredited institution is sufficient; CACREP graduates simply receive a post-degree experience-hour credit (500 hrs) as a bonus, not a licensure gate.

Curriculum Match

WA Content Areas (7 of 17 required, ≥5 from a–h)	WUV Course	Status
a. Assessment/diagnosis	CNS765 / PSY721	Match
b. Ethics/law	CNS763	Match
c. Counseling individuals	CNS725 / CNS641	Match
d. Counseling groups	CNS711	Match
e. Counseling couples/families	CNS701	Match
f. Developmental psychology	PSY523	Match
g. Psychopathology	PSY721	Match
h. Research and evaluation	CNS785	Match
i–k. Career, multicultural, substance abuse (optional extras)	CNS718 / CNS716 / CNS735	Match (bonus)

Notes

- Washington requires only 7 of 17 possible content areas (with at least 5 drawn from the first 8). WUV satisfies all 8 of the first-tier areas plus 3 of the remaining 9 — far beyond the minimum.
- No fixed practicum/internship hour total applies to the standard graduate-program pathway; a 600-hour minimum applies only to a narrow alternate credentialing route not relevant to WUV graduates.

Practicum / Internship & Supervised Experience

No fixed hour minimum for the standard graduate-degree pathway (qualitative "supervised, direct client contact" standard only). Virginia's 600/240 comfortably satisfies this.

Overall Assessment

No curriculum gaps identified. The most flexible state reviewed.

Massachusetts

License credential: Licensed Mental Health Counselor (LMHC)

Governing authority: MA Board of Registration of Allied Mental Health and Human Services Professions — 262 CMR 2.00

Accreditation Requirement

CACREP explicitly not required. Regional accreditation is sufficient; non-CACREP programs are verified against the 10 content areas via transcript/syllabus review.

Curriculum Match

MA Content Area (10 required)	WUV Course	Status
1. Professional organization (ethics/orientation)	CNS763	Match
2. Counseling theory	CNS511	Match
3. Human growth and development	PSY523	Match
4. Cultural and social foundations	CNS716	Match
5. Psychopathology	PSY721	Match
6. Group work	CNS711	Match
7. Clinical skills	CNS725	Match
8. Appraisal	CNS765	Match
9. Special treatment issues	CNS734 / CNS735 (elective)	Partial
10. Evaluation and research	CNS785	Match

Notes

- Massachusetts does not require career development or marriage/family coursework as a core area — notably lighter than most other states reviewed.
- "Special treatment issues" (area 9) is a loosely defined elective-style category (may include topics such as trauma, crisis, or community mental health); a WUV elective such as Crisis Counseling (CNS734) or Addiction and Recovery (CNS735) likely satisfies it, subject to confirmation.

Practicum / Internship & Supervised Experience

Practicum: 100 hours (40 direct / 25 supervision). Internship: 600 hours (240 direct / 45 supervision) — an exact numeric match to Virginia's requirement.

Overall Assessment

Strong fit; only one area (special treatment issues) needs syllabus-level confirmation. Accreditation risk is low.

Florida

License credential: Licensed Mental Health Counselor (LMHC)

Governing authority: Florida Board of Clinical Social Work, Marriage & Family Therapy and Mental Health Counseling

Accreditation Requirement

As of July 1, 2025, Florida requires a degree from a CACREP-, MPCAC-, or equivalent-accredited program. This is a threshold requirement that precedes any curriculum-content review.

Curriculum Match

Florida Content Area (12 listed)	WUV Course	Status
1. Counseling theories and practice	CNS511	Match
2. Human growth and development	PSY523	Match
3. Diagnosis and treatment of psychopathology	PSY721	Match
4. Human sexuality	CNS755 (elective)	Match (via elective)
5. Group theories and practice	CNS711	Match
6. Individual evaluation and assessment	CNS765	Match
7. Career and lifestyle assessment	CNS718	Match
8. Research and program evaluation	CNS785	Match
9. Social and cultural foundations	CNS716	Match
10. Substance abuse	CNS735	Match
11. Legal, ethical, professional standards	CNS763	Match

Notes

- Florida is the only state reviewed that names "Human Sexuality" as a mandatory, stand-alone content area; CNS755 (Counseling and Sexuality) must be a required elective for any student pursuing Florida licensure.
- The CACREP/MPCAC accreditation requirement (see above) is a gating issue independent of curriculum content and should be resolved before curriculum mapping is treated as sufficient.

Practicum / Internship & Supervised Experience

700 hours total internship, including 280 hours of direct client contact — the only state reviewed that exceeds Virginia's 600/240 standard. WUV internship hours should be verified against this higher threshold.

Overall Assessment

Curriculum content is a strong fit if CNS755 is required, but accreditation status and internship-hour sufficiency are both open, high-priority items.

North Carolina

License credential: Licensed Clinical Mental Health Counselor (LCMHC) / Associate (LCMHCA)

Governing authority: NC Board of Licensed Clinical Mental Health Counselors — 21 NCAC 53, Rules .0701 and .0206

Accreditation Requirement

CACREP accreditation is required with no stated alternative pathway (no "or equivalent," "or substantially equivalent," or individual-syllabus-review provision was found in the governing rule). This is the strictest accreditation requirement among all states reviewed.

Curriculum Match

NC Content Area	WUV Course	Status
Helping relationships (counseling + consultation)	CNS725	Partial
Practicum and internship	CNS787 + CNS788	Match
Professional orientation to counseling	CNS763	Match
Human growth and development	PSY523	Match
Social and cultural foundations	CNS716	Match
Group counseling	CNS711	Match
Career counseling and lifestyle development	CNS718	Match
Assessment in counseling	CNS765	Match
Research and program evaluation	CNS785	Match
[2025+] Intro to clinical MHC + prof. ethics	CNS501 (differs in framing)	Gap
[2025+] Internship must occur in a clinical mental health setting	Placement-dependent	Gap
[2025+] Appraisal incl. DSM, psychopharmacology, differential dx	CNS765 + PSY721	Partial

Notes

- As of July 1, 2025, North Carolina added three new requirements beyond the original CACREP core areas, including a mandate that all internship placements occur in a clinical mental health setting (private practice, hospital, community mental health agency, etc.). This is a practicum-placement policy issue, not a curriculum issue, and may conflict with pastoral/church-based placement patterns common in WUV's program.
- CNS501 (Introduction to Christian Counseling) addresses pastoral/theological framing rather than the secular "clinical mental health counseling" introduction North Carolina specifies; this may not be accepted as equivalent.

Practicum / Internship & Supervised Experience

300 combined practicum/internship clock hours (below Virginia's 600, so hours are not the constraint). Post-licensure supervised practice separately requires 3,000 hours, including 2,000 direct — this is a post-degree career requirement, not a curricular one.

Overall Assessment

Highest-risk state reviewed: mandatory CACREP accreditation with no alternative pathway, plus a 2025 clinical-setting placement rule that may conflict with WUV's pastoral-counseling practicum model.

Ohio

License credential: Licensed Professional Counselor (LPC) / Clinical (LPCC)

Governing authority: Ohio Counselor, Social Worker and Marriage and Family Therapist Board — Ohio Revised Code §4757.22

Accreditation Requirement

Ohio strongly prefers CACREP-accredited degrees, and multiple sources (including CACREP's own published state list) describe Ohio as a CACREP-only state. However, several detailed licensure guides and the Board's own non-CACREP application instructions describe an alternate pathway: a degree from an institution accredited by an agency recognized by the U.S. Secretary of Education or CHEA, combined with a Board-reviewed "Counselor Course Worksheet" demonstrating the required content areas. This is a genuine discrepancy across sources and should be confirmed directly with the Ohio CSWMFT Board before treating Ohio as either fully open or fully closed.

Curriculum Match

Ohio Content Area (representative)	WUV Course	Status
Human growth and development	PSY523	Match
Counseling theories and techniques	CNS511 / CNS725	Match
Group counseling	CNS711	Match
Career development	CNS718	Match
Social and cultural foundations	CNS716	Match
Research	CNS785	Match
Professional/ethical orientation	CNS763	Match
Assessment/appraisal	CNS765	Match
Clinical psychopathology, personality, and abnormal behavior	PSY721	Match
Methods of prevention, intervention, and treatment of mental/emotional disorders	CNS725 (overlap)	Partial

Notes

- Ohio's underlying content areas closely track the standard CACREP 8-core model plus a clinical-diagnosis/treatment addition — a pattern similar to Texas and North Carolina.
- Ohio law ties practicum/internship hour totals directly to "CACREP standards in effect," rather than stating a fixed number in statute; for a non-CACREP program, the Board determines hour sufficiency case by case via the Counselor Course Worksheet.
- This state should be treated as unresolved rather than definitively closed; the source conflict itself (CACREP.org says "required," the Board's own published non-CACREP instructions say otherwise) is worth raising directly with the Ohio Board.

Practicum / Internship & Supervised Experience

No fixed statutory hour total; Ohio ties hours to "CACREP standards in effect at time of completion," typically 100-hour practicum (40 direct) + 600-hour internship (240 direct) — matching Virginia's figures under the CACREP-aligned standard.

Overall Assessment

Ambiguous / unresolved — sources conflict on whether a non-CACREP pathway is genuinely available. Requires direct confirmation with the Ohio CSWMFT Board before this state is treated as open or closed.

Summary Comparison Matrix

This table consolidates the ten states reviewed. "Accreditation risk" reflects whether CACREP (or equivalent) accreditation functions as a hard gate independent of curriculum content.

State	Curriculum Gaps	Accreditation Risk	Internship Hours vs. VA (600/240)
Virginia (baseline)	None	None	= (baseline)
Washington	None	None	No fixed minimum (VA sufficient)
Maryland	1 (confirm only)	None	Lower (125 hrs face-to-face)
Massachusetts	1 (confirm only)	None	Equal (600 / 240)
New Jersey	0 of 9 required	Low–moderate	Equal (600)
Texas	2 (1 structural)	None	Lower (300 / 100)
New York	1 clear + 2 to confirm	Low–moderate	Equal (600)
Florida	0 (with CNS755 required)	High	Higher (700 / 280)
North Carolina	2 (1 structural)	Highest (no alt. pathway)	Lower (300 combined)
Ohio	1 (confirm only)	Unresolved / conflicting sources	Equal, if CACREP-aligned

Recommendations

Priority 1 — Resolve accreditation status

- Determine WUV's current CACREP/MPCAC accreditation status, or the feasibility of pursuing it. This single factor determines whether Florida and North Carolina are viable states at all, and clarifies Ohio's genuinely ambiguous position.
- If CACREP accreditation is not planned, Florida and North Carolina should be deprioritized or flagged as long-term / contingent targets rather than near-term expansion states.

Priority 2 — Close confirmable curriculum gaps

- Verify that PSY721 (Psychopathology and Counseling) syllabus content explicitly covers DSM-based differential diagnosis and psychopharmacology, which several states (Texas, North Carolina, Ohio) require as a distinct focus.
- Confirm whether any current or planned course addresses "consultation" processes and/or a secular "foundations of mental health counseling" framing, to close the New York and North Carolina gaps.
- If pursuing Florida licensure pathways, formally designate CNS755 (Counseling and Sexuality) as a required course rather than a general elective.

Priority 3 — Practicum/internship structure

- Confirm that WUV's internship hour logs explicitly document the direct-client-contact component (not just total hours), since several states require this split to be independently verifiable.
- For Florida specifically, verify whether current internship placements can reach 700 total hours / 280 direct hours, which exceeds Virginia's baseline.
- For North Carolina specifically, evaluate whether current and planned internship placement sites qualify as "clinical mental health settings" under the state's 2025 placement rule, given the program's pastoral-counseling orientation.

Priority 4 — Monitor pending regulatory change

- Georgia is in the process of formally adopting a CACREP accreditation requirement, with grandfathering for degrees conferred before May 1, 2026. If Georgia is added to future comparisons, this deadline should be tracked closely.

This report reflects publicly available regulatory information as of July 2026. State licensure rules change frequently; final confirmation with each state licensing board is recommended before submission of any authorization or partnership documentation.