



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: DANCE/MOVEMENT THERAPIST

June 2024

PURPOSE: This report provides a summary of internal and external feedback received for the draft Dance/Movement Therapist VA national standard of practice during the comment period from July to September 2023.

Table of Contents

EXECUTIVE SUMMARY	3
AUTHORITY.....	4
PURPOSE	4
DEVELOPMENT PROCESS.....	5
VA DANCE/MOVEMENT THERAPIST: FEEDBACK ON NATIONAL STANDARD.....	6
CERTIFICATION BODY AND PROFESSIONAL ASSOCIATION FEEDBACK.....	7
STATE LICENSING BOARD FEEDBACK.....	8
FEEDBACK ACROSS FIVE AREAS	8
CONCLUSION	10
APPENDIX A: DRAFT NATIONAL STANDARD OF PRACTICE FOR DANCE/MOVEMENT THERAPISTS	11
APPENDIX B: VA UNDER SECRETARY FOR HEALTH LETTERS	12

Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Dance/Movement Therapists use psychotherapeutic movement to promote emotional, social, cognitive, spiritual, and physical integration of the individual, for the purpose of improving health and well-being. Dance/Movement Therapists observe and assess the individual's movements, using verbal and nonverbal communication to create and implement interventions that will address the emotional, social, physical, and cognitive integration of that individual. On July 28, 2023, VA sent a letter to the Dance/Movement Therapy Certification Board and the American Dance Therapy Association to inform them of VA's intent to follow the standards developed jointly by the American Dance Therapy Association and Dance/Movement Therapy Certification Board for the national standard of practice for Dance/Movement Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. The American Dance Therapy Association is the professional association for Dance/Movement Therapists, while the Dance/Movement Therapy Certification Board is the credentialing affiliate of the American Dance Therapy Association. VA also sent a letter to the New York State Board for Mental Health Practitioners—the single state licensing board for Dance/Movement Therapists—to inform them of VA's intent to follow the certification standards for the national standard of practice for Dance/Movement Therapists.

In addition, from July 28 to September 26, 2023, VA posted the proposed national standard of practice for VA Dance/Movement Therapists in the Federal Register ([88 FR 48949](#)) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Dance/Movement Therapists received 43 total comments across all platforms—40 comments from VA employees, 1 comment from an individual from the public, 1 comment from the Dance/Movement Therapy Certification Board, and 1 comment from the American Dance Therapy Association. VA reviewed all comments received and made no changes to the national standard of practice in response to comments.

This report provides a summary of comments received on the proposed Dance/Movement Therapist National Standard of Practice. It also provides VA's response to the comments and changes made to the national standard of practice in response to feedback received.

Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There is one overarching directive to describe Veterans Health Administration (VHA) policy on national standards of practice. The directive is accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external). As each individual national standard of practice is finalized, it is published as an appendix to the directive and accessible at the same websites.

Purpose

It is critical that VA, the Nation's largest integrated health care system, develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA

employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring states to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and the Department of Defense (DoD), providing a complete picture of a Veteran's health information and improving VA's delivery of health care to the Nation's Veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

It is also imperative that VA, as a national health care system, can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in Executive Order (EO) 13132 to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA medical facility Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

VA has developed a robust process to engage with partners, members of the public, states, and employees on the proposed national standard of practice. In addition, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. VA provides the proposed national standard of practice to our DoD partners as an opportunity to flag inconsistencies with DoD standards. VA also engages with labor partners informally as part of a pre-decisional collaboration. Consistent with EO 13132, VA sends a letter to each state board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

VA Dance/Movement Therapist: Feedback on National Standard

VA Dance/Movement Therapists use psychotherapeutic movement to promote emotional, social, cognitive, spiritual, and physical integration of the individual, for the purpose of improving health and well-being. Dance/Movement Therapists observe and assess the individual's movements, using verbal and nonverbal communication to create and implement interventions that will address the emotional, social, physical, and cognitive integration of that individual. VA employs fewer than 20 Dance/Movement Therapists in the United States.

On July 28, 2023, VA posted the proposed national standard of practice for Dance/Movement Therapists in the Federal Register, 88 FR 48949

(<https://www.federalregister.gov/documents/2023/07/28/2023-16006/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists>) and within VA's intranet for public and employee feedback, respectively. The proposed national standard of practice remained open for comment for 60 days, through September 26, 2023. A copy of the national standard of practice for Dance/Movement Therapists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to the New York State Board for Mental Health Practitioners, the Dance/Movement Therapy Certification Board, and the American Dance Therapy Association to inform them of VA's intent to follow the standards jointly developed by the Dance/Movement Therapy Certification Board and the American Dance Therapy Association and provide them with an opportunity to provide feedback directly to VA. The American Dance Therapy Association is the professional association for Dance/Movement Therapists, while the Dance/Movement Therapy Certification Board is the credentialing affiliate of the American Dance Therapy Association. Copies of those letters are located in [Appendix B](#).

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

In response to the proposed national standard of practice for Dance/Movement Therapists, VA received one comment from an individual from the public through the Federal Register. VA received one comment from the American Dance Therapy Association and one comment from Dance/Movement Therapy Certification Board. Through an internal site, VA received 40 comments from VA employees. Out of the 40 employee comments, 18 employees *agreed*, and 22 employees selected *not applicable*.¹

Certification Body and Professional Association Feedback

On July 28, 2023, VA sent a letter to the Dance/Movement Therapy Certification Board and the American Dance Therapy Association to inform them of VA's intent to follow their joint standards for the national standard of practice for Dance/Movement Therapist and provided them with an opportunity to discuss the proposed national standard of practice with VA. Copies of the letters sent to the Dance/Movement Therapy Certification Board and the American Dance Therapy Association from the Under Secretary for Health are located in [Appendix B](#). The organizations provided joint feedback to VA.

¹ At the time of feedback, employees were prompted to select "concur," "concur with comments," and "non-concur."

Comment: The Dance/Movement Therapy Certification Board and the American Dance Therapy Association jointly acknowledged and endorsed VA's proposed standard for Dance/Movement Therapists. They provided specific requirements to maintain certification, including maintaining a minimum of 100 continuing education hours every 5 years. They explained that all certified Dance/Movement Therapists must renew their certification annually and adhere to the American Dance Therapy Association Code of Ethics. The two organizations also noted that state licensure laws may require extra course work or training.

Response: The national standard of practice does not change the qualification standards for Dance/Movement Therapists, as detailed in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. VA Dance/Movement Therapists must be board-certified in dance/movement therapy by the Dance/Movement Therapy Certification Board. It is the employee's responsibility to obtain and maintain their certification. A Dance/Movement Therapist who fails to maintain the required certification will be removed from the occupation, which may also result in termination of employment. Since VA only requires certification, it is at the employee's discretion to choose whether to obtain and maintain state licensure.

State Licensing Board Feedback

On July 28, 2023, VA sent a letter to the New York State Board for Mental Health Practitioners—the single state licensing board for Dance/Movement Therapists—with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. The New York State Board for Mental Health Practitioners did not provide feedback on VA's proposed standard for Dance/Movement Therapists. A copy of the letter sent to the state licensing board from the Under Secretary for Health is located in [Appendix B](#).

Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees and individuals from the public that were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice.

1. Are there any required trainings for the aforementioned practices that we should consider?

Comment: An individual from the public commented that Dance/Movement Therapists are required to obtain continuing education units to maintain board certification while employed at VA.

"[We] want to express our support and appreciation for your work on the proposed National Standards of Practice for Dance/Movement Therapists." – Comment from American Dance Therapy Association and Dance/Movement Therapy Certification Board

Response: Dance/Movement Therapists must adhere to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, which requires Dance/Movement Therapists to be board certified by the Dance/Movement Therapy Certification Board. VA expects all Dance/Movement Therapists to meet all requirements necessary to maintain board certification. The qualification standards are not changing as a result of the national standard of practice.

2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?

Comment: One employee and an individual from the public suggested that to provide more clarity, the national standard of practice should include information from the qualification standards on the process for being hired as a graduate Creative Arts Therapist (Dance/Movement).

Response: The national standard of practice for Dance/Movement Therapists includes a reference to the qualification standards for Dance/Movement Therapist in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. Non-certified applicants, who otherwise meet the eligibility requirements for certification, may be given a temporary appointment as a graduate Dance/Movement Therapist for a period not to exceed two years. The exception only applies to positions at the GS-7 and GS-9 level. For grade levels at or above the full performance level, the candidate must be certified. In all cases, Dance/Movement Therapists must actively pursue meeting certification requirements, starting from the date of appointment. Failure to become certified within two years from the date of appointment will result in removal from the occupation of Creative Arts Therapist (Dance/Movement) and may result in termination of employment.

3. Is there any variance in practice that we have not listed?

Comment: Several employees suggested additional language be added to the national standard of practice. An employee recommended that VA include traditional American Indian/Alaska Native dance therapy modalities. Another employee recommended that the national standard of practice include the importance of dance and therapeutic movement from a cultural perspective.

Response: The national standard of practice for Dance/Movement Therapist does not include an exhaustive list of every task and duty that each VA health care professional can perform. Rather, it is designed to highlight whether there are any areas of variance in how Dance/Movement Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, certification, and other requirements.

4. What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?

Comment: One employee asked how Dance/Movement Therapists would be impacted in states that require licensure and do not exempt employees working at Federal facilities. Several employees asked if licenses were recognized across state lines (i.e., a Dance/Movement

Therapist with a license in one state could move to a different state and their license would be recognized in the new state). An employee also asked if there is any grace period by which Dance/Movement Therapists must acquire licensure if they are practicing in a state that requires licensure or must they be licensed prior to being hired.

Response: On November 12, 2020, VA published an interim final rule ([85 FR 71838](#)) confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement. The interim final rule applies to all VA health care professionals, including Dance/Movement Therapists.

In addition, VA requires Dance/Movement Therapists to be board-certified in dance/movement therapy by the Dance/Movement Therapy Certification Board, according to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. Since VA only requires certification, it is at the employee's discretion to choose whether to obtain and maintain state licensure.

5. Is there anything else you would like to share with us about these national standards of practice?

Comment: An employee recommended that VA Dance/Movement Therapists should engage in the DoD/VA Dance/Movement Therapy community of practice to uphold and continue to develop best practices across the military health care system.

Response: As part of the national standard of practice development process, VA provided the proposed national standard of practice for Dance/Movement Therapist to VA's partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards, prior to being posted to the internal VA website and in the Federal Register. VA will consider further opportunities to collaborate with other partners, including DoD, to ensure VA provides best practices in this area of care.

Conclusion

VA considered all comments that it received. VA is not making any changes to the Dance/Movement Therapist National Standard of Practice based on the comments for the reasons described above. VA carefully considered all comments when making this decision.

The final VA national standard of practice for Dance/Movement Therapists will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA's national policy process, the national standard of practice for Dance/Movement Therapists will be reviewed and recertified at minimum on a five-year cycle.

Appendix A: Draft National Standard of Practice for Dance/Movement Therapists

Appendix A includes the proposed national standard of practice for Dance/Movement Therapists posted in the Federal Register and within VA on July 28, 2023, for individuals to provide feedback on. The final national standard of practice for Dance/Movement Therapists is written into VHA Directive 1900, VA National Standards of Practice, published at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

1. Dance/Movement Therapists use psychotherapeutic movement to promote emotional, social, cognitive, spiritual and physical integration of the individual, for the purpose of improving health and well-being. Dance/Movement Therapists observe and assess the individual's movements, using verbal and nonverbal communication to create and implement interventions that will address the emotional, social, physical and cognitive integration of that individual.
2. Dance/Movement Therapists in VA possess the education and certification required by VA qualification standards. See VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.
3. VA Dance/Movement Therapists practice in accordance with the Code of Ethics and the Standards of the ADTA and DMTCB, available at: <https://www.adta.org/dmtcb>. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that all Dance/Movement Therapists in VA follow this national certification.
4. Although VA only requires a certification, one State requires a State license in order to practice as a Dance/Movement Therapist in that State: New York. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that there is no variance in how VA Dance/Movement Therapists practice in any State.

Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA as of June 2024*
 Letter from Dept of Veterans Affairs to A	American Dance Therapy Association	Yes
 Letter from Dept of Veterans Affairs to C	Dance Movement Therapy Certification Board	Yes
 Letter from Dept of Veterans Affairs to N	New York State Board for Mental Health Practitioners	No

***VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Dance/Movement Therapists in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.**