



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: DRAMA THERAPIST

June 2024

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

Table of Contents

EXECUTIVE SUMMARY	3
AUTHORITY.....	3
PURPOSE	4
DEVELOPMENT PROCESS.....	5
VA DRAMA THERAPIST: FEEDBACK ON NATIONAL STANDARD	6
REGISTRATION BODY FEEDBACK	7
STATE LICENSING BOARD FEEDBACK.....	7
FEEDBACK ACROSS FIVE AREAS	7
CONCLUSION	10
APPENDIX A: DRAFT NATIONAL STANDARD OF PRACTICE FOR DRAMA 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.

Drama Therapists use an active, experiential approach to facilitate social, emotional and cognitive change. Through storytelling, projective play, purposeful improvisation, and performance, Drama Therapists invite participants to rehearse desired behaviors, practice being in relationship, expand and find flexibility between life roles and perform personal and social change. On July 28, 2023, VA sent a letter to the North American Drama Therapy Association to inform them of VA's intent to follow their registration standards for the national standard of practice for Drama Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. VA also sent a letter to the New York State Board for Mental Health Practitioners—the single state licensing board for Drama Therapists—to inform them of VA's intent to follow the registration standards for the national standard of practice for Drama Therapists.

In addition, from July 28 to September 26, 2023, VA posted the proposed national standard of practice for VA Drama Therapists in the Federal Register, 88 FR 48951 (<https://www.federalregister.gov/documents/2023/07/28/2023-16004/notice-of-request-for-information-on-the-department-of-veterans-affairs-creative-arts-therapists>) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Drama Therapists received 41 total comments across all platforms. All 41 comments were from VA employees. 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 Drama 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 Drama Therapist: Feedback on National Standard

VA Drama Therapists use an active, experiential approach to facilitate social, emotional, and cognitive change. Through storytelling, projective play, purposeful improvisation, and performance, Drama Therapists invite participants to rehearse desired behaviors, practice being in relationship, expand and find flexibility between life roles and perform personal and social change. VA employs fewer than 20 Drama Therapists in the United States.

On July 28, 2023, VA posted the proposed national standard of practice for Drama Therapists in the Federal Register, 88 FR 48951

(<https://www.federalregister.gov/documents/2023/07/28/2023-16004/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 Drama 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 and the North American Drama Therapy Association to inform them of VA's intent to follow the North American Drama Therapy Association registration standards and provide them with an opportunity to provide feedback directly to VA. 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 Drama Therapists, VA received 41 comments from VA employees from the internal VA site. Out of the 41 employee comments, 19 employees *agreed*, and 22 employees selected *not applicable*.¹ VA did not receive a response from the state licensing board for Drama Therapists or the North American Drama Therapy Association.

Registration Body Feedback

On July 28, 2023, VA sent a letter to the North American Drama Therapy Association to inform them of VA's intent to follow the registration standards for the national standard of practice for Drama Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. The North American Drama Therapy Association did not provide feedback on VA's proposed national standard of practice for Drama Therapists. A copy of the letter sent to the North American Drama Therapy Association from the Under Secretary for Health is located in [Appendix B](#).

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 Drama 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 the proposed national standard of practice for Drama 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.

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

VA received comments from employees 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.

“The importance of drama therapy is that it has the ability to directly impact and alter negative and potentially deadly behavior without permanent consequences.” – Comment from VA employee

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

Comment: One employee commented that it would be important to acquire training in the fields directly related to the prevention of suicidal ideation/gestures, military sexual trauma, and post-traumatic stress disorder.

Response: The national standards of practice do not address optional trainings. VA qualification standards, located in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, set the minimum training and registration requirements for VA Drama Therapists. VA ensures all Drama Therapists have the appropriate education and training to perform their job duties. Specialized trainings are supplementary and optional for VA Drama Therapists who are interested in advancing their skills.

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 commented that it is currently almost impossible to identify Drama Therapists in California due to VA’s restrictions on hiring only registered Drama Therapists. In addition, they stated that in California, there is a high number of individuals who receive degrees in “expressive arts therapy” and are registered as Registered Expressive Arts Therapists, which are professionals who combine multiple forms of the creative arts (drama, movement, visual arts, music, writing, etc.) in counseling, psychotherapy, or in other forms of interdisciplinary mental health professions to address behavioral and mental health challenges or stressors with individuals or groups. This employee noted that such individuals are registered with the International Expressive Arts Therapy Association.

Response: The national standard of practice for Drama Therapist will not change this occupation’s qualification standards, which are detailed in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. These qualification standards require VA Drama Therapists possess a full, current, and unrestricted registration as a Registered Drama Therapist. However, non-registered applicants, who otherwise meet the eligibility requirements for registration, may be given a temporary appointment as a graduate Drama 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 registered. In all cases, starting from the date of appointment, Drama Therapists must actively pursue registration requirements. Failure to become registered within two years from the date of appointment will result in removal

from the occupation of Creative Arts Therapist (Drama) and may result in termination of employment.

Comment: An employee inquired if upon implementation of the national standard of practice, would VA Drama Therapists who have met the GS-12 criteria, in accordance with VA Handbook 5005, Part II, Appendix G60, and have been serving at their full performance level for many years, officially be granted GS-12, to recognize and reflect on their education, areas of expertise, and experiences accordingly.

Response: VA Handbook 5005, Staffing, Part II, Appendix G60, June 7, 2019, describes the qualification standards applicable to Drama Therapists. The qualification standards are not changing as a result of the national standard of practice for Drama Therapist, and the national standards of practice do not affect who can be hired nor promoted.

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

Comment: One employee recommended that the national standard of practice include traditional American Indian/Alaska Native story telling modalities.

Response: The national standard of practice for Drama 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 Drama Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, registration, 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: An employee asked how Drama Therapists would be impacted in states that require licensure but do not exempt employees working at Federal facilities. They also asked if licenses were recognized across state lines (i.e., a Drama Therapist with a license in one state could move to a different state and their license would be recognized in the new state). The employee also asked if there is any grace period by which Drama 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 (<https://www.federalregister.gov/documents/2020/11/12/2020-24817/authority-of-va-professionals-to-practice-health-care>) 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 Drama Therapists.

In addition, VA requires Drama Therapists to possess a full, current, and unrestricted registration as a Registered Drama Therapist, according to the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. Since VA only requires registration, it is at the employee's discretion to choose whether to obtain and maintain their state license.

Comment: An employee recommended VA carefully review requirements established by the respective state, taking into consideration the course work, field experience, internships, residencies, and state examinations if required.

Response: VA conducted research on each state to review requirements prior to drafting the proposed Drama Therapist national standard of practice. In addition, VA sent a letter to the New York State Board for Mental Health Practitioners and asked for feedback on the proposed national standard of practice. VA will continue to maintain open communication with the state licensing board throughout implementation of the national standard of practice.

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

Comment: One employee commented on the importance of Drama Therapy's ability to directly impact and alter negative and potentially deadly behavior without permanent consequences.

Response: VA Drama Therapy services play an important role in Veteran care, including impacting and altering negative behavior. However, the national standard of practice for Drama 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 Drama Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, registration, and other requirements.

Conclusion

VA considered all comments that it received. VA is not making any changes to the Drama Therapist National Standard of Practice based on the comments for the reasons described above. VA carefully considered all comments when making this decision. Note that VA changed the requirement of VA Drama Therapists from "certification" to "registration" in the proposed NSP to accurately reflect the VA qualification standards for Drama Therapists.

The final VA national standard of practice for Drama Therapists will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at <https://vawww.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 Drama Therapists will be reviewed and recertified at minimum on a five-year cycle.

Appendix A: Draft National Standard of Practice for Drama Therapists

Appendix A includes the proposed national standard of practice for Drama 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 Drama 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. Drama Therapists use an active, experiential approach to facilitate social, emotional and cognitive change. Through storytelling, projective play, purposeful improvisation and performance, participants are invited to rehearse desired behaviors, practice being in relationship, expand and find flexibility between life roles and perform personal and social change.
2. Drama Therapists in the Department of Veterans Affairs (VA) possess the education and registration required by VA qualification standards. See VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.
3. VA Drama Therapists practice in accordance with the Registered Drama Therapists (RDT) national standards from the North American Drama Therapy Association, available at <https://www.nadta.org/>. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that all Drama Therapists in VA follow this national registration.
4. Although VA only requires a registration, one State, New York, requires a State license to practice as a Drama Therapist in that State.

VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that there is no variance in how VA Drama 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 N	New York State Board for Mental Health Practitioners	No
 Letter from Dept of Veterans Affairs to N	North American Drama Therapy Association	No

***VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Drama 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.**