

Board of Licensed Professional Counselors, Marital and Family Therapists, and Clinical Pastoral Therapists

Policy on Pastoral Counseling/Pastoral Therapy

Board Responsibilities

The Tennessee Board for Licensed Professional Counselors, Licensed Marital and Family Therapists and Licensed Clinical Pastoral Therapists (Board) “is responsible for safeguarding the health, safety, and welfare of Tennesseans, by requiring that all who practice professional counseling, marital and family therapy, and clinical pastoral therapy within this state be qualified. The Board interprets the laws, rules, and regulations to determine the appropriate standards of practice in an effort to ensure the highest degree of professional conduct. The Board is also responsible for the investigation of alleged violations of the Practice Act and rules and is responsible for the discipline of licensees who are found guilty of such violation.”

(<https://www.tn.gov/health/health-program-areas/health-professional-boards/pcmft-board.html>)

Statutory Foundation

Tennessee Code Annotated (T.C.A.) § 63-22-204 allows religious and/or spiritual leaders (including but not limited to a pastor, rabbi, priest, minister of the gospel, clergy, Christian Science practitioner, deacon, imam, etc., herein after referred to as “spiritual leader” for simplicity’s sake), to render many types of services, including counseling-related services.

However, when a spiritual leader:

- 1) provides “counseling” or “clinical pastoral therapy” (whether called “Christian Counseling,” “Biblical Counseling,” “Religious-Based Counseling,” “Pastoral Psychotherapy” or any other similar term) per T.C.A. § 63-22-201(4) or
- 2) engages in the “practice of counseling as a mental health service provider” per T.C.A. § 63-22-122(5),

without being duly licensed as a Licensed Clinical Pastoral Therapist, other licensed health professional acting within their scope of practice, or someone preparing for the practice of licensed clinical pastoral therapy and practicing under qualified supervision, the individual violates the Practice Act and could face legal consequences.

This policy is designed to identify examples of activities which could be appropriate for spiritual leaders (if they are within the scope of their training, experience, etc.) and examples of activities which are only appropriate for Licensed Clinical Pastoral Therapists or pastoral therapy trainees under appropriate supervision.

Activities Appropriate for Spiritual Leaders

Ordinary spiritual leadership, pastoral, or religious functioning often involves offering counsel to individuals, families, and groups for a variety of reasons. This counsel would involve the application of resources and techniques from the religious or spiritual community’s traditions, beliefs, values, and texts. This counsel might involve fees being charged, or they may be provided on a *pro bono* basis. This counsel and work could include scenarios such as individual counseling, couples counseling, premarital counseling, family counseling, group counseling, and prison ministry.

Diagnosing and treating a mental illness, however, should not be involved in this counseling.

This remains true whether explicitly stated (e.g., advertisement as defined in T.C.A. § 63-22-201(1), office forms, etc.) or implicitly understood by any parties involved. If an individual is suspected of having a mental illness, that individual should be referred to a licensed practitioner who is qualified to diagnose and treat mental illness. The spiritual leader may continue to provide guidance and counsel but must not engage in treatment of the mental illness.

Activities Within the Scope of Licensed Clinical Pastoral Therapists

As identified in T.C.A. §63-22-201, the following actions would only be permissible if one is a Licensed Clinical Pastoral Therapist (or other licensed health professional acting within their scope of practice):

1. Diagnosing a mental illness
2. Treating a mental illness
3. Integrating recognized principles, methods, and procedures of clinical psychotherapy into their counseling. This would include, but is not limited to, such approaches as:
 - a. Cognitive behavioral therapy
 - b. Rational emotive behavior therapy
 - c. Eye-movement desensitization and reprocessing therapy
 - d. Dialectical behavior therapy
 - e. Solution-focused brief therapy
 - f. Narrative therapy
 - g. Reality therapy
 - h. Bowenian systems therapy
 - i. Structural family therapy
 - j. Adlerian therapy
 - k. Gestalt therapy
 - l. Existential therapy
 - m. Person-centered therapy
 - n. Strategic family therapy
 - o. Psychoanalysis
 - p. Emotionally focused therapy
 - q. Internal family systems
 - r. Hypnotherapy

Additionally, only a Licensed Clinical Pastoral Therapist can represent themselves as a “Licensed Clinical Pastoral Therapist” or “Licensed Pastoral Therapist” or “Licensed Pastoral Counselor.” Individuals who are pursuing the practice of clinical pastoral therapy under qualified supervision should identify themselves as such, by using titles as “pastoral therapy intern” or “pastoral therapy trainee.”

Approved by the Board of Licensed Professional Counselors, Marital and Family Therapists, and Clinical Pastoral Therapists the 22nd day of September, 2025.

Kimberly D. Speakman
Kimberly D. Speakman (Sep 22, 2025 14:45:39 CDT)

President
Board of Licensed Professional
Counselors, Marital and Family Therapists,
and Clinical Pastoral Therapists