PSYCHOLOGY TRAINEE SCOPE OF PRACTICE

1. PURPOSE: To establish scope of practice for psychology externs, predoctoral-level interns and postdoctoral fellows in psychology.

2. POLICY: This policy is designed to delineate the scope of practice for psychology trainees at the VA Maryland Health Care System (VAMHCS). Each psychology trainee will be granted a scope of practice in psychology determined by his or her level of professional education, professional experience, and demonstrated competence. Supervision will be provided by clinicians chosen and approved by the Psychology Training Program Committee, such that appropriate supervision in professional and ethical psychological practice is available to all trainees.

3. RESPONSIBILITY:

   a. The VAMHCS Chief Psychologist, through the Psychology Training Program Director and the Psychology Training Program Committee, has the ultimate responsibility for ensuring the scope of practice of psychology trainees.

   b. The Psychology Training Program Director, Program Directors of Training (DOTs) and the Psychology Training Program Committee are responsible for ensuring that trainees have completed the required graduate training and achieved basic competencies in clinical psychology commensurate to their level of training. The DOTs carry out such functions such as assigning rotations and supervisors to achieve training objectives. The Psychology Training Program Director and DOTs will oversee the supervision of all trainees and ensure that all supervisors are fulfilling their responsibilities. The Psychology Training Program Director and DOTs are further responsible for ensuring that the level and extent of supervision meet standards for supervision set by the Department of Veterans Affairs Office of Academic Affairs, VAMHCS, American Psychological Association (APA), Association of Post-Doctoral and Internship Centers (APPIC), state licensing, and contractual agreements with the affiliated schools or university programs. In the event that an extern, intern or postdoctoral fellow is not meeting basic competencies required for completion of the training year, the Psychology Training Program Director and DOTs will adhere to the VAMHCS Due Process document for Remediation of Problematic Performance, Due Process, and Grievance Procedures. The DOT is responsible for regular communication to university programs on students’ progress throughout the year, as applicable for externs and interns.

   c. Supervising psychologists are responsible for the supervision of trainees as assigned. The supervisor is responsible for evaluating the level of competence of psychology trainees at the start of the training year/rotation, the level of supervision necessary, and devising an appropriate training plan based on a developmental model of training. Supervisors have the responsibility to provide educational materials and training to psychology students in order to assist them in achieving the goals designated in their training plan. The supervisor is responsible for ensuring the quality of care the...
patient receives and must assess the appropriate level of supervision commensurate with the trainees’ level of experience and provide the quantity and nature of supervision required for high quality patient care. Supervisors are responsible for being available to trainees for supervision and consultation as needed. If a supervisor is not available for on-site supervision, he or she should designate appropriate coverage or be available by pager or phone. Supervisors have the responsibility of reviewing all clinical work, including documentation in the medical record, which is noted by the supervisors’ signature on such documentation. Supervisors will be doctoral-level psychologists with appropriate credentialing to practice psychology, and have a responsibility to maintain adequate continuing education credits and state licensure. According the APA Implementing Regulations, supervisors have the responsibility of "enhancing the professional functioning of the more junior person(s); monitoring the quality of professional services offered to the clients that she, he, or they see; and serving as a gatekeeper for those who are to enter the particular profession."

The following supervision requirements, differentiated by training level, adhere to APA Implementing Regulations.

(1) **Externship Supervision Requirements:** Supervisors will provide a minimum of 2 hours of structured training activities per week, 1 hour of which will be individual, face-to-face supervision. They will complete a supervision contract with externs at the start of training, provide written and verbal feedback at mid-year and at the end of the training, and provide this documentation to both the extern and Director of Training.

(2) **Internship Supervision Requirements:** Supervisors will provide a minimum of 4 hours of supervision per week, 2 hours of which will be individual, face-to-face supervision. They will complete a supervision contract with interns at the start of the rotation, provide written and verbal feedback at mid-rotation and at the end of the rotation, and provide this documentation to both the intern and Director of Training.

(3) **Postdoctoral Fellowship Supervision Requirements:** Supervisors will provide a minimum of 4 hours of structured training activities per week, 2 hours of which will be individual, face-to-face supervision. They will complete a supervision contract with fellows at the start of the rotation, provide written and verbal feedback at mid-rotation and at the end of the rotation, and provide this documentation to both the intern and Director of Training.

(4) **“Vertical Supervision” Requirements:** In addition to the fulfillment of the requirements above, the Executive Committee of the Veteran Affairs Psychology Training Committee (VAPTC) affirms the value of “vertical supervision” of psychology trainees by unlicensed psychologists, or advanced trainees, once appropriate competency has been demonstrated and documented.

(a) In such cases, the unlicensed supervisor must be supervised by a licensed psychologist regarding the supervision of the junior trainee. In all cases, it is ultimately the licensed and privileged supervisor who retains clinical, ethical, and legal responsibility for all supervision and patient care provided by trainees.
(b) Meetings between advanced trainee and junior trainee should be conducted face-to-face when possible, but in circumstances where trainees are unable to do so (e.g., trainees are located at different VAHMCS sites), telephone consultation is permitted. Although APA supervision guidelines dictate that tele-supervision may occur, the VHA requires supervision to be provided on-site as delineated in Handbook 1400.04. In situations where the advanced trainee provides supervision to junior trainee via telephone, both trainees will receive face-to-face on site supervision from a licensed psychologist in accordance with VHA policy.

(c) To help facilitate the modeling of supervision by the licensed psychologist to the advanced trainee, the off-site advanced trainee is encouraged to join by telephone meetings conducted face-to-face on site between junior trainee and licensed psychologist. The method of delivery of supervision (face-to-face, telephone) and the frequency and duration of supervision provided by the more advanced trainee to junior trainee must be approved by the licensed psychologist prior to the delivery of supervision.

(d) Trainees are responsible for acquiring knowledge of and adhering to: (1) the most current version of the APA's *Ethical Principles of Psychologists and Code of Conduct*; (2) federal and state law as it applies to mental health practices, and (3) VAMHCS patient care and administrative policies and procedures. Psychology trainees are expected to meet standards set for psychology trainees by relevant organizations (e.g., APA, APPIC, training committees) and to assume the role of professional psychologists within their training assignments, with appropriate supervision. However, to the extent that trainees deliver services, such service delivery is considered to be incidental to the learning process. Trainees are not expected to assume duties, workload, or responsibilities normally assigned to the professional psychology staff. Trainees are expected to have knowledge of their limited scope of practice as trainees, and seek supervision/consultation when necessary. Trainees are responsible for providing all clients with knowledge of their training status, limits of confidentiality within the supervisory relationship, and contact information for their primary supervisor. This information and all clinical interactions should be documented in the medical record, which trainees have the responsibility of sharing with their supervisor. Trainees are expected to maintain timely documentation of all clinical interactions and maintain professional, ethical and high-quality care for clients at all times. Trainees are not expected to provide psychodiagnostic impressions in the clinical record or practice independently. However, they may provide input into a clinical impression that informs a diagnosis, which their supervisor has the ultimate responsibility to confirm.

4. **ACTION:**

   a. **Scope of Practice:** Psychology trainees will carry out those professional psychological responsibilities that the DOTs, the Psychology Training Program Committee, and their supervisors think appropriate to their level of clinical training and competence and for which appropriate supervision is available. A sample scope of practice for a fellow is contained in attachment C. The actual details of the scope of practice for a given trainee may be modified as needed to reflect the unique training
needs and experiences that the trainee has.

b. **Level of supervision** will depend on the trainee's level of education and previous experience in the particular clinical procedure and the level of complexity of the intervention appropriate to the patient's condition. Specific levels of supervision are detailed in the most current version of VAMHCS Standard Operating Procedure No. 116/MH-039, Psychology Training Program.

5. **REFERENCES:** American Psychological Association Standards for Providers of Psychological Services
   American Psychological Association Commission on Accreditation: Policy Statements and Implementing Regulations, December 2010 (or must current)
   American Psychological Association: *Ethical Principles of Psychologists* and Code of Conduct
   VAMHCS SOP NO. 116/MH-039, Psychology Training Program
   VAMHCS Due Process Document for Remediation of Problematic Performance, Due Process, and Grievance Procedures
   VA Psychology Training Council (VAPTC), Executive Committee, Statement on Vertical Supervision
   VHA Handbook 1400.04, Supervision of Associated Health Trainees

6. **RESPONSIBLE OFFICE:** The Director, Mental Health Clinical Center (116/MH) is responsible for the contents of this standard operating procedure.


8. **RECERTIFICATION:** This document is scheduled for recertification on/before the last working day of April 2019.

SARAH A. READING, M.D.
Director, Mental Health Clinical Center

ATTACHMENTS: A – Scope of Practice, Psychology Intern
               B – Scope of Practice, Psychology Extern
               C – Scope of Practice, Psychology Postdoctoral Fellow
SCOPE OF PRACTICE

Psychology Intern

As a psychology intern in the VA Maryland Health Care System—University of Maryland—Baltimore Psychology Internship Consortium, I understand that I practice, train and provide clinical services under the privileges of my supervisor. I understand that I will receive supervision as needed and appropriate for my level of training, experience, and competence from my supervisor in my provision of patient care. I understand that I do not practice or provide psychodiagnostic or treatment services independently.

Psychology Intern (Printed Name)

Psychology Intern (Signature) Date

Aaron M. Jacoby, Ph.D.
Chief Psychologist
VA Maryland Health Care System

Jade N. Wolfman-Charles, Ph.D.
Psychology Training Program Director
VA Maryland Health Care System

Joseph G. Liberto, M.D.
Associate Chief of Staff for Education
VA Maryland Health Care System

Sarah A. Reading, M.D.
Director, Mental Health Clinical Center
VA Maryland Health Care System

Melanie E. Bennett, Ph.D.
Director of Psychology
University of Maryland Baltimore
SCOPE OF PRACTICE

Psychology Extern

As a clinical psychology extern in the VA Maryland Health Care System, I understand that I practice, train and provide clinical services under the privileges of my supervisor. I understand that I will receive supervision as needed and appropriate for my level of training, experience, and competence from my supervisor in my provision of patient care. I understand that I do not practice or provide psychodiagnostic or treatment services independently.

__________________________
Psychology Extern (Printed Name)

__________________________
Psychology Extern (Signature) Date

Aaron M. Jacoby, Ph.D.
Chief Psychologist
VA Maryland Health Care System

Jade N. Wolfman-Charles, Ph.D.
Psychology Training Program Director
VA Maryland Health Care System

Joseph G. Liberto, M.D.
Associate Chief of Staff for Education
VA Maryland Health Care System

Sarah A. Reading, M.D.
Director, Mental Health Clinical Center
VA Maryland Health Care System
SCOPE OF PRACTICE

Psychology Postdoctoral Fellow

As a clinical psychology postdoctoral fellow in the VA Maryland Health Care System, I understand that I practice, train and provide clinical services under the privileges of my supervisor. I understand that I will receive supervision as needed and appropriate for my level of training, experience, and competence from my supervisor in my provision of patient care. I understand that I do not practice or provide psychodiagnostic or treatment services independently.

__________________________
Psychology Postdoctoral Fellow
(Printed Name)

__________________________
Fellowship Director of Training
VA Maryland Health Care System
(Printed Name)

__________________________ /__________
Psychology Postdoctoral Fellow
(Signature) /Date

__________________________ /__________
Fellowship Director of Training
VA Maryland Health Care System
(Signature) /Date

__________________________
Aaron M. Jacoby, Ph.D.
Chief Psychologist
VA Maryland Health Care System

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Psychology Training Program Director
VA Maryland Health Care System

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