SUPERVISION STUDY COMMITTEE

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Miki Paul, Ph.D., Chairperson/Psychologist Member
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DATE: October 22, 2007

RE: Supervision Study Committee Report

FROM: Jim Cox, Ed.D, Chairperson, Supervision Study Committee

History of the Supervision Study Committee

The Board of Psychologist Examiners, through the Legislative and Rules Committee, formed the Supervision Study Committee (SSC) which was comprised of psychologists who are not Board members. The Board assigned the SSC the task of addressing thirteen different, but related issues pertaining to the role of the supervisor in the internship and postdoctoral process. The SSC was allowed the opportunity to bring additional issues to the table if any arose during the committee's work. The SSC met twice via telephone and established direction in this endeavor. In the beginning phases of the committee's work, each committee member interviewed training directors in both university settings and in nonacademic settings. Information from those interviews was discussed in the second meeting of the committee.

The committee also wished to gather information from other sources, including psychologists, students, interns, postdocs and members of the public. The SSC scheduled a full-day meeting in June which was held in Phoenix. At that time, attendees were allowed opportunities to speak on each of the 13 points, and were offered the opportunity to introduce other points for the committee to consider. A transcriptionist recorded the meeting and furnished a copy of the transcription to the Board office. The report was then mailed to each of the SSC members who reviewed the transcript of the public meeting and were assigned individual components of the 13 points initially identified by the Legislative and Rules Committee to work on. This work involved

compiling the comments made at the June meeting and taking those into consideration along with the earlier input received from training directors. Committee members also reviewed research materials and opinions that have been acquired during the committee's term. Individual committee members engaged in further research as was necessary in fully addressing the individual components assigned to them.

Committee members then submitted their work directly to the Board office, which, in turn sent the collective work of the four committee members back to the committee for further review and refinement.

The SSC met in a telephone conference in August to review and refine recommendations to the Board. The committee members reviewed all of the 13 points at that time.

The committee met again via telephone on September 9th to discuss and finalize the work and submit recommendations to the Board for review and consideration. The recommendations were consolidated and sent to the chair of the Board and to the Executive Director.

The thirteen issues the Board of Psychologist Examiners asked the committee to address are shown below and are followed by recommendations

Supervision Issues Examined by the SSC

1. **Should the prohibition on a substantial financial interest (R4-26-209) between a supervisor and supervisee be eliminated? Modified? Clarified? (i.e., supervisor paying intern and/or intern paying supervisor).**

Issues Related to the financial interest prohibition

- This prohibition was originally put into place to prevent the exploitation of supervisees
- Problems emerged when psychologists in private practice found it difficult, if not impossible, to provide supervision for interns, since supervisees were often employed directly by the practitioner
- Supervisees needing supervision from a specialist could not pay for supervision

Recommendation:

The Supervision Study Committee recognized the potential for exploitation and considered various approaches to addressing this issue, if this prohibition was eliminated or modified. It is the SSC's recommendation that the prohibition be eliminated. Supervising psychologists are reminded that they should follow the ethical guidelines established by the American Psychological Association. In addition, in the event that a supervisee feels that exploitation may be taking place, that supervisee may choose to file a complaint with the Board of Psychologist Examiners.

2. **Should supervisors be required to register with the Board?**
   a. **What do other jurisdictions do?**

Issues related to registering with the Board

- The Board's executive director reported that the Board has the ability to establish and maintain a register
- The majority of Boards surveyed do not maintain a registry for supervisors

Recommendation:

The committee recommends that the Board not maintain a registry. Licensees in Arizona are required to abide by APA Ethical Guidelines and should not provide services, including supervision that they are not competent to provide

3. **Should the Board set requirements to be a supervisor including coursework and CE?**
   a. **Where could such coursework and CE be obtained?**
   b. **Cost of coursework and CE?**
   c. **Does there need to be a Grandparenting Clause for current supervisors?**

Issues pertaining to supervision coursework and continuing credit

- Coursework in supervision is generally included in doctoral-level training programs
- The supervision coursework is not generally offered to non-matriculated students, making it difficult to access for postgraduates
- The limited supervision coursework that is available at the graduate level is quite expensive
- Continuing education workshops are infrequently offered

Recommendation:

As with the previous recommendation, supervisors, who are licensees of this board are required to follow APA Ethical Guidelines. Licensees should ensure that they possess the requisite skills in this area before engaging in supervision

4. **Should the Board allow face-to-face, individual supervision by Electronic Means?**
   a. **Confidentiality issues**
   b. **Direct observation not possible**
   c. **Supervisors at risk for malpractice suits by a supervisee who later claims that she/he had not been <u>adequately</u> supervised.**
   d. **Determine distance between supervisor/supervisee before electronic supervision could occur.**

e. **Board of Behavioral Health Examiners currently requires supervisors to take a course – this should be researched. Does the BBHE allow supervision by electronic means?**
f. **Can AzPA's Consortium develop a Supervisor Course? If so, would it be comparable to a university course?**
g. **Can ASPPB or APA provide any guidance or assistance on electronic supervision?**
h. **Should the rules state an exception for those in the military?**

Issues regarding electronic supervision include

- Potential problems with confidentiality
- Definition of electronic supervision
    - Does it include cellular phones
    - Land line phones
    - Cordless phones
    - Videoconferencing
    - Email
    - Blackberries
- Problems with identifying a supervisor in a rural or underserved area is a reality
- Problems with rural-area supervision in that supervisor may be over a 100 miles away
- Problems with specialty supervision
- Concerns about crisis management
- What type of information should be not included in an electronic supervision system?
- Two supervisors
    - Getting a second supervisor in a rural area is often impossible
- IHS telemedicine system works very well and is secure
- What percentage of time should be allowed in electronic supervision
- What training or continuing education should be required, if any?

Electronic supervision has often been seen as a convenience, or even a luxury, rather than a necessity. This issue, however, has been a significant problem in rural and underserved settings. Even in urban practices, a supervisee may work in an area where the distance and/or driving time to the supervisor's office is excessive and takes valuable time away from the professional work day or personal life of the supervisee. Electronic supervision would allow for ongoing, regularly-scheduled supervision meetings and would also allow for emergency supervision, when necessary.

The benefits of electronic supervision are significant but are mediated by the concerns listed above, including potential problems with confidentiality, and with a certain lack of quality that takes place when an electronic format is used.

Recommendation:

Electronic supervision is a viable alternative and should be considered by the Board;
Supervision through electronic means should be limited to "real time" interactions;
Confidentiality has to be maintained. Electronic devices that can be compromised through scanners, such as cordless phones, should not be used;
The ratio between electronic supervision and direct face-to-face supervision should not exceed 20%;
When engaged in electronic supervision the identity of the person(s) discussed in the supervision should be protected as much as possible

5. **Should the Board adopt the APA's recommendation of eliminating the mandatory post-doctoral supervised training experience, allowing all of an applicant's supervised hours to be completed pre-doctorally?**

It is the unanimous recommendation of the SSC that the Arizona Board of Psychologist Examiners advocate for the elimination of the mandatory post-doctoral supervised training experience as a pre-requisite for obtaining licensure in Arizona. Comments heard during public hearings, and committee member consensus, support changing regulations to adopt a model consistent with American Psychological Association recommendations. Specifically the SSC recommends that the Board takes a leadership role in promoting changes to licensure law for psychologists consistent with the following guidelines and regulations:

a. A candidate for licensure in psychology must obtain a minimum of 3000 hours of supervised experience prior to applying for a license. As detailed below, the 3000 hours shall be obtained via Practica experiences of not less than 1000 total hours, and Pre-doctoral Internship experience of not less than 2000 hours.

b. At least 2000 of the supervised hours must be obtained through participation in formal pre-doctoral internship program in psychology. Although internship experiences may vary, certain uniform standards are required. The internship program/experience must conform to APA or APPIC standards for an internship. Interns must be supervised by no fewer two (2) licensed psychologists who serve as directors and/or supervisors of the internship experience. Other behavioral health professionals may also serve as mentors or additional supervisors. The internship shall be completed in one year (full time work) or in two years of half time work.

c. Prior to beginning the internship experience, candidates for licensure must have completed at least 1000 supervised hours of Practicum experience. Practica experiences are also variously known as externships, or supervised field work. At least 500 of the 1000 hours of Practicum experience must be obtained in settings under the supervision of a licensed psychologist. Other licensed or certified

behavioral health professionals may serve as the primary supervisor for the remaining 500 hours.

d. To enhance diversity of training experiences, it is recommended that psychology students obtain internship training at a site different from where they obtain Practicum hours; however this is not required. If students elect to obtain both practicum and internship training hours at the same agency or setting, then consistent with APPIC and APA guidelines, there must be a clear demarcation between the Practicum and Internship settings and experiences.
e. Upon completion of: (1) the 3000 hours of supervised experience; (2) receipt of a Ph.D., Psy.D. or Ed.D. Degree from an accredited university; and (3) passing of the EPPP examination; a candidate may apply for licensure.

f. The Continuing Education requirement for a newly licensed psychologist shall be increased to 60 hours per year for the first renewal period. Previously licensed psychologists from other jurisdictions are exempted from this requirement which is intended to promote additional education for a psychologist in her/his early career.

g. Prior to adoption of these new statutes, the Board shall specify a reasonable transition period to allow all currently enrolled graduate students to complete training under existing standards if so desired.

6. **Should different supervisors and different training sites be required for pre-doctoral and post-doctoral hours?**

This is no longer a relevant issue once the Post Doctoral training experience is no longer required. However, consistent with recommendation that the Practicum and Pre-Doctoral Internship occur in different settings, it is recommended that students electing to do additional Post-Doctoral training complete it under the supervision of different psychologists to diversify experiences.

7. **Should the Board allow the second supervisor of an internship be a certified school psychologist [A.R.S. § 32-2075(A)(1)]?**

No. The internship experience must, at a minimum, have the participation of at least two licensed psychologists who serve as supervisors in some capacity. However, the second psychologist supervisor may play a less significant role than the primary supervisor, and other licensed or certified behavioral health professionals including certified school psychologists may serve as additional supervisors in an internship program.

8. **Should a certified school psychologist with 10 plus years certification be exempt from the postdoctoral requirement [A.R.S. § 23-2071(H)]?**

Issues related to this issue

- Primary rotations with licensed psychologists could be maintained
- Licensee's license is on the line, while the secondary supervisor's license, or certification may not be affected
- The Board of Psychologist Examiners does not have jurisdiction over certified school psychologists
- A supervisee could attain a richer experience with a certified school psychologist with an extensive background
- ADE certifies school psychologists but does not police them
- Could secondary supervisor be monitored by consortium
- Different ethical standards
- Diagnosing from DSM
- Could the secondary supervisor be university-based
- AASP members have an ethical code to follow
- Consortium model creates a structured entity
- Secondary supervisor should have the same concerns and priorities that the primary supervisor has

There are benefits to having a supervisee work with an experienced school psychologist, even if that person is not licensed by the board. Nonetheless, the Board does not have jurisdiction over the nonlicensed school psychologist, thus, a psychologist who is the primary supervisor may be held responsible for actions recommended and taken during supervision by the nonlicensed person. If another entity such as the Consortium maintains oversight of the supervision, the legal responsibility for problems that emerge may then fall on the Consortium

Nonlicensed supervisors do not have the depth of training in psychological assessment that psychologists do, even though their training in psychoeducational assessment may be very sound. In addition, nonlicensed school psychologists are not trained in, nor allowed to engage in, DSM-related diagnoses.

Recommendation:

Nonlicensed professionals, whether they be school psychologists or from another discipline, should not be allowed to provide direct supervision. They should be allowed to provide training and may also be called in for consultation, however.

9. **Should the Board change wording of the internship written statement requirements in A.A.C. R4-26-210 to make them less specific (i.e., "otherwise acceptable to the Board").**

The committee members discussed the points related to this questions and received input from the audience at the Open Meeting on June 14, 2007. The general consensus was that a written statement was beneficial but that it shouldn't be an obstacle to licensure.

Recommendation

The inclusion of the statement "otherwise acceptable to the Board" would be advisable.

10. **Should a <u>pre-doctoral</u> supervisor be required to be licensed for a minimum of 2 years to match the 2-year requirement for a <u>post-doctoral</u> supervisor?**

The literature does not support the premise that more experience has a significant effect on ones ability to supervise. Psychologists are ethically bound to only provide services that he/she has been trained to do and has developed a level of competency. It would seem to be more relevant that the psychologist have formal knowledge of the supervision process and skills required to be a supervisor. APA is now requiring that training in supervision be part of doctoral programs.

Recommendation:

The committee is not in favor of adding the two year post licensure requirement to pre-doctoral supervision.

11. **Do psychologist supervisors at federal facilities in Arizona (i.e. VA Medical Centers) or on Indian reservations need to be licensed in Arizona?**

Direct communications with the Training Director at the VA facility in Phoenix confirmed that all psychologists are currently licensed in the state but that they are not required to do so. The general standard of practice is for the personnel to become licensed in the state they are practicing however. Information is not currently available about the status of psychologists working on the reservations but the personnel fall under the same federal regulations. The availability of supervisors in the rural areas, such as on the reservation, is often extremely limited and it could potential create hardships to limit the number of potential supervisors.

Recommendation

The consensus of the committee was that supervision of services provided in a remote area could be obtained from a licensed psychologist who is not licensed in the state of Arizona. The important factor is that he/she has to be licensed somewhere in the country.

12. **Should licensees receive CE for providing supervision?**

Issues regarding CE credit for supervision

- Supervision requires a great deal of effort
- Supervisor has to remain current in order to provide appropriate supervision
- Should CEU's come from category 1 or 2
- Differentiating between preparing for supervision and providing supervision
- If CE's are given for supervision, would they also be allowed for other work, such as volunteer work
- Would CE be allowed for certain types of therapy that lead to learning by the psychologist

Requirements for continuing education credits, particularly in category 2, are quite liberal and would allow for the licensee to obtain credit for research and other related preparations for supervision. If continuing education is also granted for direct supervision, the stage is set for people who provide volunteer services, crisis management services, and even for-pay services if they can show that they benefited from that experience.

Recommendation:

Category 2 credits and even category 1 credits can be obtained in the course of preparation for supervision. Additional credit for supervision should not be allowed

13. Should a psychologist who is not yet licensed in this state be allowed to provide psychological services under the supervision of a licensed psychologist pending approval of their application?

Issues

- If a postdoc finishes requirements of the postdoc and is awaiting a license, could that person provide supervision
- If a person who is licensed in another jurisdiction could that person provide supervision – would the 20 day permission to practice apply
- If the application is delayed for some reason, could the person apply for a waiver
- The Applications Review Committee (ARC) meets monthly and reviews applications for approval. Recommendations are made prior to the monthly Board meeting
- Applications could take some time before licensing is approved, especially in cases where applications are incomplete or if the ARC has specific questions for the applicant. In most cases, applications can be approved and recommendations for licensure made during the initial screening process

Recommendation:

The committee recommends that there be no change in the current statute. Psychologists licensed in other jurisdictions may provide psychological services for up to 20 days per year in Arizona.