

July 14, 2008

SUPERVISION OF PSYCHOLOGISTS AND SOCIAL WORKERS PREPARING FOR LICENSURE

1. PURPOSE: This Veterans Health Administration (VHA) Directive clarifies the duties and responsibilities of Department of Veterans Affairs (VA) staff who are licensed independent practitioners and who serve as clinical supervisors to psychologists or social workers who are not yet licensed to practice at the independent level.

2. BACKGROUND

a. VHA Psychology Qualification Standards (VA Handbook 5005, Pt. II, App. G18) require that a VHA psychologist must hold a full, current, and unrestricted license to practice psychology at the doctoral level in a State, Territory, or Commonwealth of the United States, or the District of Columbia. It allows an exception to this requirement for individual psychologists, for a period not to exceed 2 years from the date of employment, on the condition that such a psychologist provide care only under the supervision of a psychologist who is fully licensed.

b. Social Work Qualification Standards (VA Handbook 5005, Pt. II, App. F7) require all social workers hired after August 14, 1991, to possess a license, certificate, or registration, issued by a State, to practice social work independently. Exceptions can be made for certain new appointments, subject to meeting the full requirements within 3 years of appointment, or 1 year from the time that the social worker meets the full State prerequisites for licensure, whichever is greater.

c. Because most state licensure laws require postgraduate clinical supervision experience, many newly-hired psychologists and social workers who are recent graduates work under the supervision of a licensed clinician while completing full licensure requirements.

d. Definitions

(1) **Supervision.** Supervision consists of clinical consultation between the independent practitioner serving as supervisor and the psychologist or social worker who is not licensed, for the purposes of monitoring, informing, and guiding the provision of services.

(2) **Psychotherapy.** Psychotherapy refers to a specific psychological treatment modality utilized to address a DSM-IV diagnosis.

(3) **Psychosocial Counseling.** Psychosocial Counseling is a primarily educational service provided to address a psychosocial problem.

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3. POLICY: It is VHA policy that a VHA psychologist or social worker, who does not yet have a license that allows independent practice, must be supervised by a licensed independent practitioner of the same discipline who is a VA staff member and who has access to the electronic health record.

4. ACTION

a. **Facility Director.** The Facility Director is responsible for ensuring:

(1) A VHA psychologist or social worker, who does not yet have a license that allows independent practice, is supervised by a licensed independent practitioner of the same discipline who is a VA staff member and who has access to the electronic health record.

(2) A psychologist or social worker, not yet licensed, meets regularly with the supervisor to discuss cases and proposed interventions. The frequency and nature of ongoing supervision is determined by the complexity of the patient's needs and the documented competency of the not-yet licensed psychology or social work staff member providing clinical services.

(3) In all cases, the supervisor remains regularly informed and updated on the nature of the clinical services provided by the supervisee. In no instance is the amount of supervision to be less than that required for unlicensed providers still in training according to the state licensing standards.

(4) All clinical supervisors, acting in the best interests of the patient, take the necessary corrective steps to address any deficiencies in care provided by supervisees.

(5) The clinical supervisor arranges for alternate supervision when the clinical supervisor is unavailable, when clinical supervision of a particular case would not be ethically appropriate for the primary supervisor (as in the case of a potential conflict of interest or dual relationship), or when the clinical issues presented by a patient are outside of the primary supervisor's areas of expertise.

(6) For not-yet licensed psychologists, hired directly after completion of internship, supervision for the first year of employment is equivalent to the amount required for American Psychological Association (APA) accreditation of a postdoctoral program. For these individuals, at least 4 hours of supervision are required each week, at least 2 hours of which must be individual, face-to-face supervision.

a. **Clinical Supervisors.** The clinical supervisor is responsible for ensuring:

(1) The veteran's health record clearly demonstrates involvement of the clinical supervisor in the supervised staff member-veteran encounters, by co-signing the health record entry. A supervisor's co-signature signifies that the supervisor has reviewed the entry and concurs with the content of the entry. The supervisor may provide additional comments or information, as appropriate, in an addendum to the entry. The amount and type of supervision provided also must be indicated either in the note or in an addendum added by the supervisor.

(2) The signature and dating of progress notes by the supervisor with indication of level of supervision; this comprises adequate documentation of supervision provided for VA purposes. For the veteran who is seen by the not-yet licensed staff member weekly or less frequently, each health record entry must have documentation of supervision. For the veteran who is seen more than once a week, at least one health record entry each week must have documentation of supervision, provided there is not a major change in the veteran's condition that requires more frequent or closer supervision. **Exception:** If an unlicensed social worker is only providing psychosocial counseling services and is not evaluating for, diagnosing, or treating a DSM-IV diagnosis, the notes pertaining to those counseling visits do not need to be co-signed; however, the nature of the service must be clear in the progress note.

(3) That if the supervision also provides necessary hours toward licensure eligibility, the supervisor and unlicensed staff member abide by any additional state regulations concerning documentation of supervision.

5. REFERENCES

- a. VHA Handbook 1110.02, Social Work Professional Practice.
- b. VA Handbook 5005, Part II, Appendix G18, Psychologist Qualification Standard.

6. FOLLOW UP RESPONSIBILITIES: The Deputy Chief Patient Care Services Officer for Mental Health (116) is responsible for the contents of this Directive. Questions may be referred to 202-461-7304.

7. RESCISSION: None. This VHA Directive expires July 31, 2013.

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