

# PSYCHOLOGY TRAINEE SCOPE OF PRACTICE

SOP 116/MH-072

VA Maryland Health Care System  
(VAMHCS)  
Baltimore, MD 21201

**Service Line(s):**  
Mental Health Clinical Center (MHCC)

**Signatory Authority:**  
Director, MHCC

**Effective Date:**  
October 6, 2020

**Responsible Owner:**  
Psychology Training Program Director,  
MHCC

**Recertification Date:**  
October 31, 2025

## 1. PURPOSE AND AUTHORITY

a. The purpose of this standard operating procedure (SOP) is to establish scope of practice for psychology externs, predoctoral-level interns and postdoctoral fellows in psychology.

b. This SOP is designated 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.

## 2. PROCEDURES

a. **Scope of Practice:** Psychology trainees will carry out those professional psychological responsibilities that the Psychology Training Program Director, the TCs, 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 employee 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 documented on the Graduated Levels of Responsibility for Psychology Trainees form are detailed in the most current version of VAMHCS Standard Operating Procedure No. 116/MH-039, Psychology Training Program.

### 3. ASSIGNMENT OF RESPONSIBILITIES

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 (TD), Track Coordinators of (TCs) 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 TD/TCs carry out such functions such as assigning rotations and supervisors to achieve training objectives. The Psychology Training Program Director and TCs will oversee the supervision of all trainees and ensure that all supervisors are fulfilling their responsibilities. The Psychology Training Program Director and TCs 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 TCs will adhere to the VAMHCS Due Process document for Remediation of Problematic Performance, Due Process, and Grievance Procedures. The TD/TCs are 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 and by entry of an independent note OR an addendum to a note initiated by a trainee. 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 Graduated Levels of Responsibility form and 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 Graduated Levels of Responsibility form and a supervision contract with interns at the start of the rotation, provide written and verbal feedback at 30 days into the 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 Graduated Levels of Responsibility form and 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.

1. 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. DEFINITIONS

None.

#### 5. REFERENCES

a. American Psychological Association Standards for Providers of Psychological Services.

b. American Psychological Association Commission on Accreditation: Policy Statements and Implementing Regulations, December 2015 (or most current).

c. American Psychological Association: *Ethical Principles of Psychologists* and Code of Conduct.

d. SOP 116/MH-039, Psychology Training Program, dated September 2018.

e. VAMHCS Due Process Document for Remediation of Problematic Performance, Due Process, and Grievance Procedures.

f. VA Psychology Training Council (VAPTC), Executive Committee, Statement on Vertical Supervision.

g. VHA Handbook 1400.04, Supervision of Associated Health Trainees.

## 6. REVIEW

This SOP will be reviewed at a minimum of 5 years from current publication or updated when there are changes required.

## 7. RECERTIFICATION

This SOP is scheduled for recertification on or before the last working day of October 2025. In the event of contradiction with national policy, the national policy supersedes and controls.

## 8. SIGNATORY AUTHORITY



Aaron M. Jacoby, PH.D.  
Director, Mental Health Clinical Center  
Date Approved: 10/06/2020

**NOTE:** *The signature remains valid until rescinded by an appropriate administrative action.*

**DISTRIBUTION:** SOPs are available at: VAMHCS Policy, SOP, and Committee Charter SharePoint

## 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 from my supervisor as needed and appropriate for my level of training, experience, and competence in my provision of patient care. I understand that I do not practice or provide psychodiagnostic or treatment services independently.

\_\_\_\_\_  
Psychology Intern (Printed Name)

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Psychology Intern (Signature)

\_\_\_\_\_  
Date

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**Jade N. Wolfman-Charles, Ph.D.**  
Chief Psychologist  
VA Maryland Health Care System

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**Moira C. Dux, Ph.D.**  
Psychology Training Program Director  
VA Maryland Health Care System

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**Ryan M. Scilla, M.D.**  
Acting Associate Chief of Staff for  
Education  
VA Maryland Health Care System

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**Aaron M. Jacoby, Ph.D.**  
Director, Mental Health Clinical Center  
VA Maryland Health Care System

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**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 from my supervisor as needed and appropriate for my level of training, experience, and competence in my provision of patient care. I understand that I do not practice or provide psychodiagnostic or treatment services independently.

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Psychology Extern (Printed Name)

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Psychology Extern (Signature)

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Date

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**Jade N. Wolfman-Charles, Ph.D.**  
Chief Psychologist  
VA Maryland Health Care System

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**Aaron M. Jacoby, Ph.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 from my supervisor as needed and appropriate for my level of training, experience, and competence 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 Track Coordinator**  
VA Maryland Health Care System  
(Printed Name)

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**Psychology Postdoctoral Fellow**  
(Signature) / Date

\_\_\_\_\_  
**Fellowship Track Coordinator**  
VA Maryland Health Care System  
(Signature) / Date

\_\_\_\_\_  
**Jade N. Wolfman-Charles, Ph.D.**  
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