



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF AN INTERPRETIVE STATEMENT

Title of Interpretive Statement: Use of Telepsychology to Fulfill Experience Requirements during and following the COVID-19 Declared Emergency | Policy Number: EBOP-20-01.2.

Issuing Entity: Examining Board of Psychology

Subject Matter: Clarifying the Examining Board of Psychology's (board) position on using telepsychology to fulfill experience requirements for practica, internships, and preinternships. The board has extended this interpretive statement until the conclusion of permanent rulemaking on this topic.

Effective Date: May 19, 2023

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OFFICE OF THE CODE REVISER
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Interpretive Statement

<i>Title:</i>	Use of Telepsychology to Fulfill Experience Requirements during and following the COVID-19 Declared Emergency.	<i>Number:</i> EBOP-20-01.2
<i>References:</i>	RCW 18.83.050 , RCW 18.83.070 . Chapter 246-924 WAC , WAC 246-924-049 , WAC 246-924-053 , WAC 246-924-056 . Governor's Stay Home - Stay Healthy Proclamations, 20-25 through 20-25.7 . DHHS OCR, Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency, 1/20/21.	
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<i>Effective Date:</i>	May 19, 2023	
<i>Supersedes:</i>	EBOP-20-01.1, effective September 30, 2022	
<i>Approved By:</i>	Sasha de Leon, Assistant Secretary	

It is the Examining Board of Psychology's (board) position that, pending permanent rule amendments to chapter 246-924 WAC regarding telepsychology services, telepsychology services may be used to fulfill experience requirements for practica, internships, and preinternships.

Practica, internships, and preinternships require students obtain direct experience with clients. Under WAC [246-924-049\(1\)](#), a practicum must include "direct experience." Under WAC [246-924-056\(2\)\(c\)\(ii\)\(B\)](#) and WAC [246-924-053\(3\)](#), internships and preinternships both require "direct client contact."

During the coronavirus disease 2019 (COVID-19) declared emergency, the Governor issued Proclamation [20-25 Stay Home - Stay Healthy](#) and subsequent [proclamations to protect Washingtonians and to help prevent the spread of coronavirus disease 2019 \(COVID-19\)](#). In response the board issued Interpretive Statement EBOP-21-01. Within the board's authority under RCW [18.83.070\(3\)](#) to define circumstances under which supervised experience qualifies a candidate for licensure and within the board's authority under RCW [18.83.050\(2\)](#) to determine which applicants are eligible for licensing, the board recognized telepsychology services as a means for meeting the requirements for direct experience and direct client contact during the COVID-19 declared emergency. This policy was later extended past the end of the COVID-19 declared emergency to allow students and academic programs to complete the 2022-2023 academic year under consistent supervised experience requirements.

Given the board's interest in supporting continuity of care, continuity of training, and access to vital mental health services, the board will continue to consider practicum, internship, or preinternship supervised experience to be "direct experience" or "direct client contact" if:

1. Telepsychology services were provided through technology compliant with HIPAA, as modified by the Department of Health and Human Services (DHHS), Office of Civil Rights (OCR) [Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#). Providers should be aware that audio- and video-capable technology may be required for Medicare reimbursement. Providers are encouraged to verify coverage and reimbursement requirements before providing telepsychology services through technology that is only audio-capable;
2. Telepsychology services occurred in one of the following time periods:
 - a. During the COVID-19 declared emergency, from February 29, 2020 to October 31, 2022,
 - b. After the Washington State COVID-19 declared emergency through the conclusion of permanent rulemaking on this topic, or
 - c. If the provider/patient relationship began during the Washington State COVID-19 declared emergency, then for the remainder of the current treatment episode; and
3. The experience satisfied applicable time and other requirements as defined in WAC [246-924-049](#), WAC [246-924-053](#), or WAC [246-924-056](#).

The board's position on the use of telepsychology services in circumstances identified in this interpretive statement to fulfill experience requirements for practica, internships, and preinternships will remain in effect for all applicants who completed supervised experience within the time periods described above, regardless of when they apply for licensure.