



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504-7890

NOTICE OF ADOPTION OF A POLICY STATEMENT

Title of Policy Statement: Provisional Process for Student Interns Registering as Agency Affiliated Counselors | Policy Number: AAC-21-01

Issuing Entity: Department of Health

Subject Matter: The Department of Health's provisional process and requirements for student interns to become agency affiliated counselors under Engrossed Second Substitute House Bill 1504, pending rulemaking.

Effective Date: July 25, 2021

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Department of Health
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Policy Statement

Revised – 10/18/11

<i>Title:</i>	Provisional Process for Student Interns Registering as Agency Affiliated Counselors.	<i>Number:</i> AAC-21-01
<i>References:</i>	Engrossed Second Substitute House Bill 1504 (chapter 170, Laws of 2021) Chapter 18.130 RCW , RCW 18.19.020 , RCW 18.19.050 Chapter 246-810 WAC , WAC 246-810-011	
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It is the Department of Health’s (department) position that a student intern completing an internship or practicum at a behavioral health agency that is eligible to hire an Agency Affiliated Counselor (AAC) and is a current student at a college or university may apply for registration as an AAC under [Engrossed Second Substitute House Bill \(ESSHB\) 1504](#), passed during the 2021 legislative session and effective July 25, 2021, in accordance with this policy statement.

[ESSHB 1504](#) amended [RCW 18.19.020](#) to expand the definition of “agency affiliated counselor” to include not only employees of behavioral health agencies, but also student interns as defined by the department.

Pending completion of permanent rulemaking to implement [ESSHB 1504](#), the department defines “student intern” as a current student at a college or university and who is completing an internship or practicum at a behavioral health agency that is eligible to hire AACs.

The department intends to implement [ESSHB 1504](#) by amending chapter [246-810 WAC](#), Counselors. The department is considering adopting permanent rules defining “student intern” in the context of AACs. The rulemaking process will begin in fall 2021. While the department is collaborating with AACs, behavioral health agencies, partners, and other interested parties in the permanent rulemaking process, students interested in obtaining an AAC certificate under [ESSHB 1504](#) may apply for approval under the provisional standards of this policy statement.

It is the department’s position that a college or university student may apply for registration as an AAC under the following Provisional Process for Student Interns Applying for the Agency Affiliated Counselor Registration. The provisional process explains who is eligible to apply for registration as an AAC, the application process, the statutory exemption for students, and professional standards for student AACs. After department rules are finalized and adopted, all student AACs and behavioral health agencies must come into compliance with the new rules. If appropriate, the department will provide a grace period to minimize impacts on student AACs whose internships are in progress.

Provisional Process for Student Interns Applying for the Agency Affiliated Counselor Registration

1. **Exemption for Students.** A student is not required to become an AAC to practice counseling at a behavioral health agency, as students may practice under the statutory exemption in [WAC 246-810-011](#).
2. **Eligibility.** A student is eligible to apply for an AAC registration if:
 - a. They are a current student at a college or university; and
 - b. They are completing an internship or practicum at a behavioral health agency that is eligible to hire AACs.
3. **Professional Standards and Disciplinary Action.**
 - a. A student who obtains an AAC registration is considered a professional, like other employees of behavioral health agencies.
 - b. A student registered as an AAC is under the disciplinary authority of the department. If appropriate, they may be investigated and placed under disciplinary action according to the Uniform Disciplinary Act at chapter [18.130 RCW](#) and professional regulations at chapter [246-810 WAC](#).
 - c. This section does not apply to a student who practices under the statutory exemption, rather than as an AAC.
4. **Application process.**
 - a. An applicant student must complete the AAC [application](#), required [forms](#), and pay the application fee as directed on the department's website. Additional documentation may be required.
 - b. An applicant student uses the same application packet and follows the same application process as an applicant employee. The Employee/Student Verification form indicates whether the applicant is an employee or a student.
 - c. A behavioral health agency will need to complete the Employment/Student Verification form for the applicant student. This form has been updated to include an option for student interns.
5. **Conclusion of Internship**
 - a. Once the internship or practicum is complete, a student is no longer eligible to practice as an AAC and does not renew their registration when it expires.
 - b. A student intern can be hired as an employee by the behavioral health agency to continue working as an AAC after the conclusion of the internship; however, they must submit a new Employee/Student Verification form as an Employee. A new application is not required.
6. **Compliance with New Rules Defining "Student Intern"**
 - a. The department is beginning rulemaking to implement [ESSHB 1504](#) and define "student intern," which may impact student eligibility to register as an AAC.
 - b. When rules are finalized and adopted, the department will provide a grace period to minimize impact on student interns with internships in progress.