



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-20-01.1

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 through August 31, 2023.

Effective Date: September 30, 2022

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OFFICE OF THE CODE REVISER
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Department of Health
Health Systems Quality Assurance

Interpretive Statement

Revised – 10/18/11

Title:	Use of Telepsychology to Fulfill Experience Requirements during and following the COVID-19 Declared Emergency.	Number: EBOP-20-01.1
References:	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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Effective Date:	September 30, 2022	
Supersedes:	EBOP-20-01, effective February 29, 2020	
Approved By:	Sasha de Leon, Assistant Secretary	

It is the Examining Board of Psychology's (board) position that telepsychology services used during the coronavirus disease 2019 (COVID-19) declared emergency and telepsychology services used during the subsequent period through August 31, 2023, may be used in some circumstances 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 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 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 requirements for direct experience and direct client contact during the COVID-19 declared emergency.

Given the social distancing guidelines that were authorized by the Governor's Stay Home – Stay

Healthy proclamations, the board’s first interpretive statement allowing telepsychology services to satisfy client contact requirements, and the possible adverse impact on students of rescinding the interpretive statement in the middle of the school year, 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 August 31, 2023, 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.