



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 the COVID-19 Declared Emergency. Interpretive Statement Number: EBOP 20-01

Issuing Entity: Examining Board of Psychology

Subject Matter: Clarifying the Examining Board of Psychology's position on using telepsychology to fulfill experience requirements for practica, internships, and preinternships.

Effective Date: February 29, 2020

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Interpretive Statement

Revised – 10/18/11

Title:	Use of Telepsychology to Fulfill Experience Requirements during the COVID-19 Declared Emergency.	Number: <i>EBOP-20-01</i>
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, 3/30/20.	
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It is the Examining Board of Psychology's (board) position that during the coronavirus 2019 disease (COVID-19) declared emergency and subsequent 180 day period, telepsychology services may be used in some circumstances to fulfill experience requirements for practica, internships, and preinternships.

In response to the Governor's Proclamation [20-25 Stay Home - Stay Healthy](#) and subsequent [proclamations](#) requiring social distancing to mitigate the public health threat posed by COVID-19; 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 is interpreting the requirements for direct experience and direct client contact during the COVID-19 declared emergency consistent with the social distancing standards established by the Governor.

Currently 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."

Given the social distancing guidelines authorized by the Governor's Stay Home – Stay Healthy proclamations, the board considers 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 during the COVID-19 declared emergency or subsequent 180 day period, or, if the provider/patient relationship began during the 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 complete supervised experience hours during the COVID-19 declared emergency and subsequent 180-day period, regardless of when they apply for licensure.