

Supervised Professional Experience Required for Licensure

New Procedures
(Effective September 1, 2010)

Introduction:

Many of you know that there have been substantial changes in the statute and regulations governing the professional experience necessary to apply for licensure as a psychologist in Maryland. The statute change was straightforward in that it eliminated the necessity for a post-doctoral year of supervised experience, requiring two years of experience at either the pre- or post-doctoral level. The changes in the regulations are considerably more complicated and require more extensive documentation than previously. The old regulations are on the Board's website and in the "Salmon Book". The new regulations go into effect on September 1, 2010.

The Board of Examiners of Psychologists in Maryland (The Board) has created new forms by which applicants can document their experience and by which academic program directors, internship directors, and post-doctoral supervisors can attest to the accuracy of the applicant's report of their supervised hours.

New Regulatory Changes:

The following summarizes a number of aspects of the new regulations. It will be important, however, for applicants to read the new regulations (COMAR) carefully.

1. Many of you know, Maryland has a generic licensing law, so that anyone from an APA/CPA approved or National Register/Association of State and Provincial Psychology Board designated doctoral program in psychology can apply for licensure in Maryland.
2. The new regulations, for the first time in Maryland, make a distinction between clinical/counseling/school psychology programs (which the Board labels as **practice programs**) and other programs (such as I/O or Social psychology programs, which the Board labels as **non-practice programs**), and they ask detailed information about professional experiences specific to the type of program from which an applicant has graduated.
3. Also, for the first time, if an applicant graduates from a **practice oriented program**, the applicant will have to have had a pre-doctoral internship to be licensed in Maryland as a psychologist. This will help the Board and the public to determine whether a psychologist is operating within the scope of their license. Graduates from other programs need to document two years (2) of supervised experience but do not need a formal, year-long internship.

4. Applicants from **practice oriented programs** need a total of 3,250 hours of supervised professional experience that they may accrue in a number of ways, including some combination of the following:
 - a. Practica or externships, following the first year in a graduate program and prior to the internship, are considered **Pre-Internship Experiences**.
 - b. An internship is labeled as **Internship**.
 - c. Experience following the internship, but before receiving the doctorate is designated with a somewhat awkward but descriptive label of **Post-Internship Pre-Doctoral Experience**. This simply recognizes that many students take an extra year or more to finish their dissertation after completing the internship, and that they may accrue creditable hours if they are supervised and coordinate their work with the academic training program.
 - d. A post-doctoral year is labeled as **Post-Doctoral Experience**. The requirements for this year are essentially unchanged from the previous regulations except for some more specific requirements about the conditions of supervision.
 - e. The internship comprises 1,750 hours and is required for graduates of practice oriented programs, but the remaining 1,500 hours can come from one or any combination of Pre-Internship, Post-Internship Pre-Doctoral, or Post-Doctoral experiences.
5. Applicants from **non-practice programs** also need 3,250 hours and may gain experience at either the pre- or post-doctoral level in areas relevant to their future professional activities. For example, social psychologists, if they wish to be licensed, can count experiences such as teaching, research, or consultation to count as professional experience required for licensure if the experiences are supervised. Note that if a student simply teaches a course, without supervision, this would not count as professionally supervised experience.
6. There are separate forms for documentation of training experiences in practice and non-practice oriented programs, and there are attestation forms for academic program training directors, internship training directors, and/or post-doctoral supervisors to attest that, to the best of their knowledge, the hours that are claimed are accurate.
7. On each of the forms, and at the end of all forms, there are summaries of the hours claimed to simplify the training director's or supervisor's job in attesting to the hours of experience.

FAQs:

The Board is aware that students have a number of questions about the new regulations, and may have more questions as to when and how they will begin to document their experiences. The comments below may be helpful in clarifying the procedures:

1. Q. Why are there so many forms and why are they so detailed?
 - A. The Board wants to make sure that professional experiences are of high quality and are integrated with the doctoral program, and that the applicant has received appropriate and competent supervision. If both years of experience can be pre-doctoral, it is imperative that both years fully prepare the applicant for licensure at the doctoral level. The Board did not believe the public could be adequately assured of competent licensed practitioners if applicants were credited for pre-doctoral experiences which were not integrated with the doctoral program and not closely supervised.
2. Q. Why do the training directors and post-doctoral supervisors have to attest to the accuracy of the applicants claimed experiences?
 - A. They are the only administrators in a position to have information about the accuracy of the claimed hours. Moreover, the supervisors' attestation forms not only assure the Board that the hours listed are accurate, but also state specifically the conditions that must hold for the supervision to be credited. The public needs to be assured that supervision was thorough and that applications for licensure are vetted carefully.
3. Q. How do I collect and collate all the information the application demands?
 - A. If applicants from practice oriented programs have kept copies of their APPIC application forms, the Pre-Internship experience forms can be directly copied from those. However, it will require students for the first time to document their Post-Internship Pre-Doctoral hours in the same way that they have documented the experiences for the APPIC application, if they wish them to count toward licensure requirements. It is important to note that it will now require students to coordinate all of their pre-doctoral experience, before and after the internship, with their academic program if they wish the hours to count toward licensure. For applicants from non-practice oriented programs, the changes do not require a great deal more documentation than under the prior regulations, but they will demand closer coordination of training between program directors and students. These are important changes, and students will need to be notified of them as soon as possible.

4. Q. Do all of the required hours have to be at the pre-doctoral level?

A. The answer is "No." Applicants from practice programs can have an internship and then gain the remainder of their hours at the post-doctoral level, as has been the case in the past. Applicants from non-practice programs can accrue hours from any combination of pre- and post-doctoral supervised experiences.

Summary:

The Board has struggled for some months to develop application forms that we hope will be user friendly while at the same time provide adequate documentation of the applicant's qualification to sit for the licensing examination.

There are two important cautions for prospective applicants. The Board recognizes that current students have been hopeful that the new regulations will help them avoid a post-doctoral year of supervision. Students who are near graduation, however, may not be able to meet the supervisory or program coordination requirements that the new regulations demand. So it will behoove them not to give up plans for post-doctoral supervision until they are sure that they have sufficient hours to sit for the EPPP. Moreover, the vast majority of states still require a year of post-doctoral supervised experience, so that licensure in Maryland under these new regulations may not qualify them for licensure in other states.

Contacts:

If you have questions, please do not hesitate to call or email Ms. Lorraine Smith, Executive Director of the Board at 410-764-4787 or smithl@dhmh.state.md.us).

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