



State of Vermont
Office of the Secretary of State

Office of Professional Regulation
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To: Vermont-Licensed Mental Health Professionals
From: L. Layman, Staff Attorney
Office of Professional Regulation
Date: March 23, 2020
Re: Continuity of Education and Supervision

The COVID-19 pandemic and related containment measures will prevent mental health counseling, marriage and family therapists, alcohol and drug counseling, psychology, and independent clinical social work students and recent graduates (collectively, the “Students and Graduates”) from working in clinical practice settings and meeting with supervisors. Consequently, these Students and Graduates will have difficulty acquiring the practicum, internship, and supervision hours required for licensure. In view of these developments, this guidance explains how the Office of Professional Regulation (OPR) will interpret and apply administrative rules governing pre-degree practicums and internships, and post-degree supervision.

This guidance applies to the following regulations (collectively, the “Rules”): the Administrative Rules of the Board of Allied Mental Health Practitioners; the Administrative Rules of the Board of Psychological Examiners; the Administrative Rules for Alcohol and Drug Counselors; and the Administrative Rules for Social Workers.

To the extent the guidance herein conflicts with a Rule referenced herein, application of the Rule will be stayed pursuant to 3 V.S.A. § 123(i) until the State of Emergency related to COVID-19 comes to an end. The Director of Professional Regulation finds that State policy, for the duration of the COVID-19 related State of Emergency, calls for maximizing the safety, continuity, and educational integrity of degree programs and post-degree supervision for Vermont mental health provider students and recent graduates, even where doing so may require suspension of the Rules.

Pre-Degree Practicum and Supervised Internships

Due to restrictions on in-person gatherings, Students and Graduates, as well as education programs, have reported difficulty in providing and receiving pre-degree, in-person, supervised internship and practicum hours.

During the State of Emergency related to COVID-19, pre-degree supervised internship and practicum hours may be acquired through audio-visual communications. OPR recognizes that educational programs and clinics have existing requirements for the supervisions of students participating in supervised internships and practicums. The intent of this guidance is to clarify that OPR will recognize remote supervision of students through telephone or videoconference as meeting the supervised internship and practicum requirements in the Rules.

For internships that began after March 1, 2020, or that have yet to begin, and for all practicums, OPR recommends that the educational program or clinic or agency where the internship is taking place implement the following requirements:

- During the first two weeks of the internship or practicum, a supervisor shall observe, by joining a call or videoconference or in person, all counseling sessions provided by an internship or practicum student.
- During the third week of the internship or practicum, a supervisor shall observe, by joining a call or videoconference or in person, a minimum of two counseling sessions provided by an internship or practicum student.
- After the third week of the internship or practicum, a supervisor may observe, by joining a call or videoconference or in person, counseling sessions provided by an internship or practicum student.
- During all weeks of the internship or practicum, an internship or practicum student and supervisor must meet one time each week for one hour. This meeting may occur in person, over a telephone, or by videoconference.

For doctoral-level psychology and independent clinical social worker licenses, the relevant Rules require that a degree program be accredited by a regional accrediting body or a national accreditor. Similarly, the Allied Mental Health Rules recognize CACREP-accredited degrees as acceptable for licensure as a licensed clinical mental health counselor and recognize COAMFTE-accredited degrees as acceptable for licensure as a marriage and family therapist. This Guidance Document does not change these requirements or the acceptability of educational programs relying on these accreditations. The Office will continue to rely on the accreditation from these accrediting bodies, even if the accreditors adjust accreditation standards to allow remote supervision, internships, or practicums.

For Alcohol and Drug Counselor certificate holders and applicants and for Apprentice Addiction Professional Certification, ADAP requirements shall continue to apply. Please refer to that agency for guidance on regulations during the COVID-19 emergency.

Please note that all other requirements of Vermont statutes and regulations, including the Rules, that are relevant to the provision of mental health care services remain in effect. This include statutes and regulations controlling the provision of telehealth, telecounseling, or telemedicine. Guidance on telehealth rules can be found [here](#). There may be changes made to the tele-health laws during this State of Emergency. The Office will update this Guidance Document with relevant links and information when such information becomes available.

Post-Degree Supervised Practice

Due to the COVID-19 emergency, graduates of mental health graduate programs have faced difficulty acquiring supervised hours. Similarly, supervisors to mental health graduates are experiencing challenges in continuing to provide in-person supervision. While the State of Emergency related to COVID-19 remains in effect, supervisors may provide supervision to supervisees by meeting in person, by a telephone, or by videoconference. Applicants acquiring supervised work hours may provide services over the telephone or by videoconference. For the duration of the State of Emergency, these supervised work hours will be considered “direct” clinical service hours. All other relevant requirements for supervised practice, as set forth in the Rules or elsewhere in Vermont law, shall continue to apply.