

## Regarding the Board Guidelines for the Employment of Psychology Students

The Opinion and Declaratory Ruling below is authorized under KRS Chapter 13A; the Kentucky State Board of Psychology is the agency mandated to interpret KRS 319.

### II Psychology Practicum Students

Psychology practicum students have recently found training and employment in a large variety of university and community placements, including a number of psychology private practices. In order to protect the public, a number of restrictions are placed on both practicum students and their employers:

1. Practicum experience must include supervision by a licensed psychologist with Health Services Provider Status.
2. The actual deliverer of psychological services must be clearly identified to the client and on **all billings** for those services. Practicum students sent to hospital settings to provide testing or therapy services shall identify themselves to clients as supervised student therapists. Billing for psychotherapy sessions conducted by practicum student therapists should state the following: Treatment provided by:  
\_\_\_\_\_ , Psychology Practicum Student

\_\_\_\_\_ , Ph.D. Supervising Psychologist

Similarly, psychological testing reports should be signed and billed:

\_\_\_\_\_ , Psychology Practicum Student

\_\_\_\_\_ , Ph.D. Supervising Psychologist

### II. Students Not Enrolled In Psychology Practicum

Students who perform well in practicum placements are frequently offered employment under "non-psychologist job titles" such as counselors or therapists. The Board has consistently been questioned concerning the legality of such employment. The crux of the issue is that psychology students not credentialed by the Board may not function as psychologists unless enrolled in a psychology course practicum with approved supervision by a licensed psychologist. Should psychology students accept employment in fields related to psychology it should be clear to all parties (student, employer, employer's employer (e.g. hospitals, treatment facilities) clients, third party pay sources) who is delivering the services, and the nature of the services provided. A number of procedural safeguards may be used:

1. Psychological testing may not be done by a student who is not credentialed by the Board or who is not currently enrolled in a psychology practicum.
2. If the conditions of employment specify a masters degree (or higher) in a mental Health related field and if student's training is in psychology and if the activities of the employment are within the practice of psychology, then the person's activities are within the regulatory authority of the State Board of Psychology and the student must be credentialed by the Board.
3. Non-credential students who are employed under "non-psychologists job titles" may not administer psychological tests nor may they participate in the provision of services that are provided or billed as psychological services.
4. No licensed or certified psychologist may bill or allow his/her employing organization to bill as psychological services, work done by students or others working under "non-psychologist job titles." Credentialed psychologists are responsible for clearly identifying to the client and on all billings for services rendered who provides the services and what services are delivered.
5. No work done by those with "non-psychologist job titles" (e.g. interviewing, handing out objective testing materials) may be billed as psychological testing.

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Chair, State Board of Psychology