

**POLICY REGARDING USE OF APPROVAL LETTERS AS PROVISIONAL TRAINEE
STATUS LETTERS**

The Board recognizes that effective September 1, 2016, any individual undergoing his or her post-doctoral year of supervised experience (i.e., the informal year) in this state must be provisionally licensed, or must have applied for provisional licensure with the Board and received a provisional trainee status letter. See Board rules 461.10 and 463.10(d). The only exception to this requirement is set forth in Board rule 461.10(c). According to 461.10(c), the activities or services of a post-doctoral fellow enrolled in a formal program meeting the requirements of that rule are exempt from the Board's jurisdiction, i.e. no license or trainee status is needed to provide services.

The Board also recognizes that effective September 1, 2016, there will be applicants undergoing their post-doctoral year of supervised experience who have been previously approved to sit for the Board's written examinations and who have received a *Letter of Approval to Sit for Board Exams*, yet do not have a separate provisional trainee status letter. The Board further recognizes that the criteria for issuance of the provisional trainee status letter set forth in Board rule 463.10(d), are the same criteria used to decide whether an applicant should be approved to sit for the Board's written examinations.

The Board is also aware of the possibility for confusion by the public, applicants, and licensees employing or utilizing individuals who are neither provisionally licensed nor exempt, and who do not have a provisional trainee status letter authorizing them to practice psychology in this state while under supervision after August 31, 2016. As a result, the Board has promulgated this policy to provide guidance and assurance to those individuals regarding the authority of applicants who have been issued a *Letter of Approval to Sit for Board Exams* to practice psychology in this state as provisional trainees.

Effective September 1, 2016, a *Letter of Approval to Sit for Board Exams* held by an applicant with a pending application for licensure under Board rule 463.10 that does not also expressly reference or confer provisional trainee status upon the applicant, shall be treated as a provisional trainee status letter under Board rule 463.10(d). The provisional trainee status recognized under this policy shall be retroactive to the date of the letter for purposes of calculating the two year period set forth in Board rule 463.10(d). The intent being, the period of provisional trainee status must coincide with the two year period applicants have to successfully complete all written examinations under Board rule 463.19. Under no circumstances may the provisional trainee status period exceed that time period. Applicants may attach a copy of this policy to their *Letter of Approval to Sit for Board Exams* as proof of their authority to practice pursuant to Board rule 463.10(d). Any supervised experience obtained under a *Letter of Approval to Sit for Board Exams* recognized under this policy as a provisional trainee status letter, shall be acceptable for licensure purposes so long as it also meets all other licensing requirements.

While the primary focus of this policy is to avoid confusion for those applicants who have not yet completed their post-doctoral year of supervised experience, but who have already been approved to sit for the Board's written examinations, this policy will also serve to avoid confusion for those applicants approved to sit for the written examinations after September 1,

2016 whose *Letter of Approval to Sit for Board Exams* does not contain a reference to their provisional trainee status. While the Board intends to modify its *Letter of Approval to Sit for Board Exams* to include provisional trainee status language, such updates will take some time to implement and cannot be made prior to September 1, 2016. Thus, the Board felt this policy would be the simplest and best solution to avoid confusion and allay any future fears of applicants and licensees alike.

This policy should not be construed to apply to any applicant whose application was denied or went void prior to September 1, 2016.

Effective: August 2016