Chapter 4. Regulations Regarding Work in Psychology and Additional Training

Students in the program will sometimes wish to take jobs within the field of psychology or additional training (other than practica, externships, and internship) before completion of the doctorate. This is a **very important** matter with far-reaching academic, legal, and ethical implications. While a student is enrolled in the doctoral program, the clinical psychology faculty and the university are legally responsible for the student's work related to psychology. The clinical psychology faculty has developed a set of regulations to be followed by any student who wishes to take such a job or additional training. Read these regulations carefully and follow them explicitly **before** accepting any job or additional training within the field of psychology. If you are unsure of the meaning of the regulations or whether they apply to your situation, it is important that you receive clarification from the Director and/or Associate Director of Clinical Training.

**Regulations**

These regulations derive from our serious concern that students engaging in any psychological service must follow the ethical standards and practices of the American Psychological Association and also the applicable licensing/certification laws of the local states and the District of Columbia. The regulations apply to all students in the clinical program who have not yet received the Ph.D. degree. Any work or training that is non-psychological in nature is outside the province of these regulations. Still, the student should discuss all employment with the student’s advisor so the advisor can give the best assistance about staying on track for completing the program.

The term "psychological services" is broadly interpreted to mean any of the functions in which psychologists serve or present themselves to the public in a professional way, with or without remuneration. Thus, for example, once a student has entered the clinical training program, involvement in therapy/counseling will always be interpreted as psychological services, even if given some other label. As another example, any psychological testing would fall under the psychological service label of assessment. Students must **not** present themselves as "Psychologist," "Counselor," "Therapist," or "Psychotherapist." Instead, students' title must indicate their trainee status commensurate with their responsibilities and training. (Note: the term “Doctoral Candidate” has a specific meaning, i.e., the semester after passing the comprehensive exam students are “admitted to candidacy” and receive the M.A. degree; prior to that the student has no title other than simply “Doctoral Student.”)

Students must complete the Clinical Training Plan form (available on the program Blackboard site) along with the supervisor, and submit it to the Director of Clinical Training within the first 3 weeks of any clinical training job. That is necessary in order for the experience to qualify for clinical hours, and for liability insurance to cover your work.
To what experiences do these regulations apply? As a point of clarification, these regulations do not apply to clinical training experiences performed in our practica, official externships, or internship settings that are arranged or approved by the clinical faculty and for which the student is registered. These regulations do apply to Advanced Clinical Training (see below).

A note to first and second year students: First and second year students must obtain advance approval from both their academic advisor and the Director of Clinical Training before applying for any clinical work to be performed during the first academic year, in the summer between the first and second years, or during the second academic year. That includes any work involving clinical contact, including research jobs that involve conducting assessments of clinical research participants. We will not ordinarily approve clinical placements during the first or second academic year that require more than 10 hours/week of work; summer placements that require more than 10 hours of work per week are permitted. To obtain approval, students must discuss the specifics of the training experience with their academic advisor, including the setting, the number of hours per week, the activities/duties to be performed, the frequency and format of the supervision, and the qualifications of the supervisor. The advisor must approve the work prior to the student taking on the commitment (in consultation with the DCT, as necessary). In addition, students will also need to complete a Clinical Training Plan form before beginning work, and submit it to the Director of Clinical Training (see the program blackboard site for a copy of the form).

Supervision. It is not ethical for a student to offer psychological services in any area without adequate preparation and supervision. Students offering psychological services must be adequately supervised by a person competent in the particular area, who carries the ultimate responsibility for those services. Under most circumstances, the program expects supervisors to be licensed psychologists in the jurisdiction in which the services are to be given.

Malpractice insurance. The employer or student must also obtain professional malpractice insurance to cover the psychological services performed by the student. CUA offers inexpensive malpractice insurance, but you should be aware that it only covers students under the following circumstances. The insurance carrier’s rule is that for a student to be covered, that student has to be registered for a course that involves the experience that puts the student at risk. Experiences eligible for CUA insurance are courses the student is registered for with practicum components; practica; externship; internship (if the internship does not provide insurance); and Advanced Clinical Training (see below) if the student registers for it, completes the Clinical Training Plan with the supervisor, and submits it within three weeks to the Director of Clinical Training for written approval. Of course, the student must pay for the insurance for it to be in force. Having the insurance for one experience (e.g., a practicum) does not cover the student for other experience (e.g., supervision with a psychologist in the community for which the student is
not registered). A student doing an externship or other arrangement with a facility in the community who is not registered for that experience is not eligible for the university’s insurance for that experience.

DO NOT “go bare”—i.e., without insurance, and DO NOT do work or practice without having it approved by the program. You are risking your whole professional and financial future if you do. You may assume that because you are ethical, you are not likely to be sued, but people file lawsuits for many reasons. Even if it is a baseless lawsuit, just hiring a lawyer to defend yourself will cost tens of thousands of dollars. Further, if you get sued, so will the program. Thus, you are putting the program and university at risk as well. If you practice without insurance or fail to get approval for work or training in psychology and the program discovers it, we will consider it a serious professional breach and will act accordingly.

**Violations.** Violations of these regulations will be considered a very serious matter and could lead to probation or being dismissed from the clinical program. Students who are considered to be in violation will be asked to meet with a committee of the clinical faculty to explain their view of the situation. If a student continues to be in violation of the decision of the clinical faculty, it will be recommended to the Psychology Department that the student be dismissed from the clinical program.

**Advanced Clinical Training**

Advanced Clinical Training (ACT) is a course that is designed for students who are doing clinical training that is not part of any of the following: (1) our courses, (2) an externship that a student is registered for during the third year, or (3) internship. Students doing local externships in fourth or fifth year register for ACT. Taking ACT and getting the training approved by filling out the required Clinical Training Plan form allows the program to approve your training, verify that you are being supervised by a licensed clinical psychologist, and verify that you have malpractice insurance for it. See Chapter 9 for details on Advanced Clinical Training.