

**DEPARTMENT OF HEALTH
HEALTH REGULATION AND LICENSING ADMINISTRATION**

BOARD OF PSYCHOLOGY
AUTHORITY FOR GUIDANCE

October 1, 2023
DATE OF POLICY

23-004
POLICY NO.

POLICY STATEMENT - UPDATE

**GUIDANCE ON SUPERVISION OF PSYCHOLOGY ASSOCIATES – PRIMARY
SUPERVISOR MUST BE A LICENSED PSYCHOLOGIST – UPDATE TO
DELEGATION OF SUPERVISORY AUTHORITY**

The District of Columbia issues both psychology licenses as well as psychology associate registrations. Licensed psychologists are authorized to practice independently while psychology associates must practice under the *supervision of a licensed psychologist*. **The primary supervisor under whose supervision psychology associates can practice must be a licensed psychologist, and this policy statement serves to clarify that the “primary” or “original” supervisor must be a licensed psychologist.** (See Policy No. 23-001.)

The psychology regulations, themselves, indicate that the primary supervisor must be a licensed psychologist who *can then delegate* aspects of supervision, if necessary and appropriate. **Specifically**, the psychology regulation found at **17 DCMR § 6911.1** addresses the *issue of the “primary supervisor” who must be a licensed psychologist*. For example, the regulation states: “A student or **a psychology associate** accruing Psychological Practice Experience to qualify for licensure **may practice only under the primary supervision of a psychologist licensed in the District...**The **primary supervising psychologist may**, based on his or her professional judgment, **delegate some supervisory responsibility to another psychologist, a psychiatrist, or an independent clinical social worker licensed in the District**, provided that he or she retains full responsibility for ensuring that the supervisee comply with the laws and regulations governing the practice of psychology...” 17 DCMR § 6911.1

Thus, while the “primary supervisor” *may* delegate to other professionals when appropriate, as the above-cited regulation indicates, the “primary supervisor” must be a psychologist, licensed in the District. **This updated policy statement informs that the Board of Psychology has voted to include two, additional categories of professionals, licensed in the District, to whom the PRIMARY supervising psychologist may delegate some supervisory responsibility of psychology associates. These two, additional categories of professionals include: licensed professional counselors, and/or licensed marriage and family therapists. This policy is effective as of October 1, 2023.**

Board of Psychology

Policy Statement 23-003: Guidance on Supervision of Psychology Associates – Primary Supervisor must be a licensed psychologist – Update to Delegation of Supervisory Authority

Further, 17 DCMR § 6912, “Supervision of Psychology Associates”, states in § 6912.1 that: “A supervisor of a psychology associate shall supervise only in those areas within the supervisor’s competence based on the supervisor’s education, training, and experience. The supervisor shall delegate supervisory responsibility to *another* psychologist or psychiatrist to ensure that the psychology associate receives appropriate supervision in areas outside of the expertise of the *original* supervisor.” **Notably, § 6912.1 references the “original supervisor” who is the “primary supervising psychologist.”**

Moreover, the regulations for psychology associates, as well, reinforce the key point that there is a primary supervisor who can delegate authority in certain circumstances. In particular, 17 DCMR § 8611.1 states that the **supervisor “shall delegate supervisory responsibility to *another* psychologist or psychiatrist** to ensure that the psychology associate receives appropriate supervision in areas outside of the expertise of the original supervisor.” **The Board has determined that this regulation deliberately uses the terms, “another” and “original supervisor” to emphasize that there is a primary or “original supervisor” who in some situations delegates to “another” professional; however, a “licensed psychologist” must be the primary supervisor.**

Notwithstanding the fact, also, that the definition section of the psychology associate regulation defines “the supervisor” as “a licensed psychologist with a doctoral degree in psychology or a psychiatrist,” *the regulations, themselves, are what govern*. After deliberate review of the totality of the psychology regulations and the psychology associate regulations, the Board has determined and, therefore, clarifies via this policy statement that ***the primary supervisor must be a licensed psychologist***.

This policy is applicable to psychology practice and supervision going forward.

All inquiries pertaining to the practice of psychology, including the continuing education requirements, may be directed to the Board at dcbopsych@dc.gov.