



June 8, 2020

Pennsylvania to Count Telemedicine Services Provided During COVID-19 Emergency Towards Clinical Experience Requirement for Pre-Licensure Behavior Specialists

The Department of State previously obtained approval from the Governor to waive certain regulations that substantially increased the ability of health care practitioners licensed by the Bureau of Professional and Occupational Affairs (BPOA) as well as certain out-of-state licensed practitioners to make use of telemedicine. *See Licensed Health Care Practitioners Can Provide Telemedicine Services to Pennsylvanians During Coronavirus Emergency (3/18/2020)*.

The Department also previously issued waivers, suspensions and related guidance for certain professions that allows supervisors to use electronic means to supervise a trainee's clinical experience during the COVID-19 emergency rather than requiring that such supervision occur "in-person" as called for by the regulations. *See Pennsylvania Suspends Certain Licensure Requirements for State Board of Psychology, and State Board of Social Work, Marriage and Family Therapy, and Professional Counselors (3/22/2020)*.

A further waiver was subsequently approved to give similar authorization not just to licensed practitioners and supervisors, but also to the *supervisees themselves*. *See Certain Requirements Temporarily Waived for Those Seeking Licensure as Psychologists, Social Workers, Therapists and Counselors (3/26/2020)*.

More specifically, one of the requirements for individuals working toward becoming licensed social workers, marriage and family therapists, professional counselors, and psychologists, is that a certain number of hours of supervised clinical experience must be accumulated prior to licensure. Due to the COVID-19 emergency, individuals who were in the midst of accumulating clinical hours of experience as they worked towards licensure ceased being able to meet with clients/patients in person. The waiver that was granted authorizes those supervisees to utilize telemedicine or "teletherapy." This waiver states that supervised clinical experience hours obtained through its use will be counted toward their experience requirements thereby enabling these as-yet unlicensed practitioners to move closer to achieving licensure than would otherwise be the case without the waiver.

The Department of State has identified that behavior specialists under the jurisdiction of the State Board of Medicine also need relief. The Department requested that the "in-person" requirement be waived, and the Governor granted this request. **Under this waiver, hours of**

clinical experience obtained by individuals working toward licensure as a behavior specialist via telemedicine or teletherapy during the duration of the COVID-19 emergency which began on March 6, 2020, and which was extended for an additional 90 days on June 4, 2020, be recognized as valid and counted towards the 1,000 hours of clinical experience. This waiver ceases 30 days after the end of the COVID-19 emergency, and any hours of clinical experience thereafter would need to be “in-person.”