

June 16, 2022

**Vermont Secretary of State
Office of Professional Regulation
Board of Allied Mental Health Practitioners
Policy Regarding Remote Pre-Degree Internships and Practicums, and Post-Degree
Supervision**

The Vermont Office of Professional Regulation (OPR) and the Board of Allied Mental Health Practitioners (Board), recognize that the COVID-19 pandemic has had and will continue to have significant impacts on mental health professionals, students, and graduates working toward licensure in a mental health profession. This policy is intended to provide schools, students, professionals, and supervisors with information about the interpretation and application of allied mental health practitioner licensing requirements that have been impacted by the COVID-19 pandemic. Please note that all other requirements of Vermont statutes and regulations relevant to the provision of mental health care services and licensing of allied mental health practitioners in Vermont remain in effect.

Education: Pre-Degree Supervised Internship Hours

Under current Vermont statutes and rules, licensed clinical mental health counselors (LCMHC) and licensed marriage and family therapists (LMFT) must complete a pre-degree internship and practicum to be eligible for a Vermont license. This policy explains OPR's and the Board's interpretation of pre-degree internship and practicum requirements to permit remote participation.

Accredited Institutions

The Administrative Rules of the Board of Allied Mental Health Practitioners (Rules) provide that CACREP-accredited degrees may be used toward licensure as a LCMHC and COAMFTE-accredited degrees can be used toward licensure as a LMFT. Consistent with the Rules, OPR and the Board will continue to accept, for LCMHC and LMFT licensure, educational programs that are accredited by CACREP and COAMFTE, respectively, even if CACREP and/or COAMFTE revise accreditation standards in response to the COVID-19 pandemic. Further, OPR and the Board shall continue to accept degrees from educational programs that are accredited by CACREP or COAMFTE while the applicant attends or attended the program, regardless of whether CACREP and/or COAMFTE revert to pre-COVID-19 accreditation standards in the future.

Unaccredited Institutions: Pre-Degree Supervised Internship and Practicum Hours Requirements

The following policy applies to students who graduate between **March 1, 2020 and July 1, 2023**:

The Rules require applicants for LCMHC and LMFT licenses, who have obtained degrees from non-accredited degree programs, to complete a certain number of pre-degree internship and practicum hours to be eligible for licensure. Most of these internship and practicum hours may not be supplemented post-degree. See Rules 3.8(f) and (g), 3.12, 4.10, and 4.11.

Because of the COVID-19 pandemic, students may not have the opportunity to complete the pre-degree supervised internship and/or practicum hours in-person. Therefore, for students who graduate between **March 1, 2020 and July 1, 2023**, OPR and the Board will accept degrees from educational programs that otherwise meet the requirements of the Rules and that allow students to acquire pre-degree internship and supervised practicum hours through live, synchronous, remote means (e.g., audio-visual communication).

Post-Degree Supervised Practice

Due to the COVID-19 emergency, graduates of mental health graduate programs have faced difficulty acquiring supervised hours. Similarly, supervisors of mental health graduates are experiencing challenges providing in-person supervision. To address this concern, supervisors may provide supervision to supervisees by meeting in-person, by a telephone, or by videoconference until **December 31, 2024**. Applicants acquiring supervised practice hours may provide services over the telephone or by videoconference. These supervised practice hours shall be counted as “direct” clinical service hours. All other relevant requirements for supervised practice, as set forth in the Rules or elsewhere in Vermont law, shall continue to apply.

Approved by:  DocuSigned by:
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