

Louisiana State Board of Examiners of Psychologists
Opinion #012-Revised
5.13.11

Supervision of Psychology Students/Interns/Post-Docs Toward Licensure

In October 2010, the Louisiana State Board of Examiners of Psychologists (LSBEP) rendered Opinion #012 on the supervision of psychology students/interns/post-docs toward licensure by Medical Psychologists. At that time, this opinion was based on an examination of the statutes created under ACT 251 of the 2009 legislature and the statute that give LSBEP regulatory authority over psychologists who are defined in LA R.S. 37:2352(6). LSBEP using a conservative interpretation of the respective statutes determined that because LAC Title 46, Part 63, Chapter 7, section 705(A) in part states: "Responsibility for the overall supervision of the supervisee's professional growth resides in the licensed psychologist," that the 'psychologist' referred to here is someone who meets the definition in LA R.S. 37:2352(6). Therefore, LSBEP felt that only those psychologists who were currently licensed by LSBEP may be clinical supervisors of those individuals who need such supervision to meet the requirements for licensure under LAC Title 46, Part 63, Chapter 7.

Since this opinion was rendered, Dr. John Bolter, representing the Medical Psychologist Advisory Committee (MPAC) and Dr. Robert Marier, representing the Louisiana State Board of Medical Examiners (LSBME) has each formally requested that LSBEP reconsider the opinion rendered in October of 2010. These representatives presented evidence from the respective statutes and from prior LSBEP actions, particularly related to approving supervision of applicants and candidates for licensure by psychologists who are licensed in states other than Louisiana. Had LSBEP used Opinion 012 of 10.19.10, it should have declared that supervision to be invalid based on the argument that those out of state psychologists did not meet the statutory definition of 'psychologist' under R.S. 37:2352(6). This has not been the case as LSBEP routinely accepts that psychologists duly licensed by other jurisdictions can be supervisors of those seeking licensure by LSBEP. LSBEP further sought a legal opinion from its attorney and that opinion confirmed that medical psychologists (MPs) could act as valid supervisors in this context. This was based on a broader interpretation of the applicable sections under Chapter 28 of the Revised Statutes, particularly Subpart A of Section 2365 that expressly authorizes those duly licensed as medical psychologists by LSBME to represent themselves as psychologists.

Therefore, based on an examination of the evidence presented above, LSBEP now revises Opinion 012, to state that MPs may supervise psychology interns/students/post-docs toward licensure. This opinion also creates an understanding that LSBEP does not have direct regulatory control over supervisors not licensed by LSBEP. Should a complaint arise based on the supervisory relationship, LSBEP would have the authority to investigate and based on the outcome of that investigation, take appropriate action against a Louisiana licensee. LSBEP does not have that authority when the psychologist is licensed in another jurisdiction. LSBEP's only option in that circumstance is to submit a complaint to the board with jurisdiction. The same would hold true if a complaint was filed against an MP acting as supervisor. In this case, LSBEP could only file a complaint with LSBME. It is hoped that no such action will be necessary but if it does occur, that LSBEP and LSBME would work together to find the most appropriate method to fulfill our obligations to protect the public through the proper exercise of regulatory control.