

Internships in Health Service Psychology Meet Criteria for a Fulltime Academic Workload
2016 Statement by the Council of Chairs of Training Councils (CCTC)

Health service psychology doctoral programs accredited by the American Psychological Association (APA) require all students to complete an internship. The internship is the equivalent of 1 year of full-time training to be completed in no fewer than 12 months (or 10 months for school psychology internships) and no more than 24 months. Recently, some institutions have encountered difficulties documenting students' full-time academic status during the internship year. Most institutions have policies for documenting full-time status for students who have completed all requirements but their dissertation, but many institutions lack a parallel policy for documenting full-time status for students who may have completed all requirements but internship. This statement is a guide for addressing that issue as well as the question of whether internships constitute a full-time academic workload.

CCTC recommends the following mechanisms for documenting the status of health service psychology doctoral students who have completed all requirements except their internship:

- 1. Create a course reflecting internship (e.g., "Psychology Internship") that has very few (e.g., 0, 1) credits but is understood to indicate full-time status (similar to a 1-credit dissertation enrollment that indicates full-time status).**
- 2. Create a course reflecting internship (e.g., "Psychology Internship") with a larger number of credits to indicate full-time status but provide a tuition waiver to cover the cost of enrollment in that course.**

Either of these mechanisms would (a) be in full compliance with federal regulations, (b) recognize the internship year as a fulltime academic workload, and (c) charge students at a level commensurate with their use of university resources.

Full-time (12-month) internships include a minimum of 40 hrs/wk of training experiences that include didactic instruction, hands-on practice, supervision, and sometimes research. Health service psychology internships are run through various service entities across the country, such as Veterans Affairs Medical Centers, community mental health clinics, university counseling centers, school districts, and other such organizations. Students do not control where their internship takes place, as internships are obtained through a national matching process, similar to medical residency.

This set of circumstances means that health service psychology doctoral students are required to complete an internship *prior to* the conferral of their doctoral degree, but internship training is often delivered at a site or at an institution *other than* the program's college or university (hereafter referred to as "home institution"). Although there is no teaching and limited mentorship by faculty at the home institution during this training year, the academic workload of interns is entirely consistent with the definition of "full-time student" provided in the U.S. Government Code of Federal Regulations 34-668.2 (Title 34, Subtitle B, Chapter VI, Part 668, Subpart A), as amended on October 30, 2015 (retrieved from: <http://www.ecfr.gov/cgi-bin/text-idx?SID=debbf7931b6bc4ac8d1d6f5cfb4c9716&mc=true&node=20151030y1.24>):

An enrolled student who is carrying a full-time academic workload, as determined by the institution, under a standard applicable to all students enrolled in a particular educational program. The student's workload may include any combination of courses, work, research, or special studies that the institution considers sufficient to classify the student as a full-time

student. For a term-based program, the student's workload may include repeating any coursework previously taken in the program but may not include more than one repetition of a previously passed course (Note. *Additional minimum requirements noted in this definition are relevant only for undergraduate students and do not apply to graduate students*).

There are two key points in this definition: a) The home institution determines what constitutes a full-time academic workload, and b) the workload can include the kinds of training activities (e.g., work, special studies) common to internships. Thus, home institutions are in full compliance with federal regulations when they classify health service psychology doctoral students who are on internship as “full-time” students.

At the same time, for students who have completed all other requirements, no teaching and limited mentorship is required during this year by faculty at the home institution. Therefore, charging students tuition for 6-12 credits per semester as a way to document their full-time status while on internship is not commensurate with the resources actually provided by the home institution.