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April 3, 2019

MEMORANDUM: CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

TO: Brig Zimmerman, Executive Director
Georgia Composite Board of Professional Counselors, Social Workers, and Marriage
and Family Therapists

FROM: Betsy D. Cohen, Assistant Attorney General

RE: Request for advice regarding a supervised internship or practicum for licensure in
professional counseling

On September 11, 2018, this office provided the Board with a memorandum regarding the requirement for completion of a supervised internship or practicum for applicants for licensure as associate professional counselors (APCs)¹. The Board now asks whether applicants for licensure for professional counseling must also have completed an internship or practicum.

O.C.G.A. § 43-10A-11(a) (2) sets forth the education, experience, and training requirements for licensure as a professional counselor as follows:

- (A) A doctoral degree from a recognized educational institution in a program that is primarily counseling in content **and requires at least one year of supervised internship** in a work setting acceptable to the board; or
- (B) A specialist degree from a recognized educational institution in a program that is primarily counseling in content **with supervised internship or practicum** and two years of post-master's directed experience under supervision in a setting acceptable to the board; or
- (C)
 - (i) A master's degree in rehabilitation counseling or in a program that is primarily counseling in content from a recognized educational institution;

¹ APC applications that do not include a supervised internship or practicum as part of the master's degree program do not meet requirements for licensure. The Board does not have the authority to accept a fourth year of directed work experience under supervision in lieu of an internship or practicum for APC applicants. See O.C.G.A. § 43-10A-11(a)(1); and Board Rule 135-5-.01(b)(1).

- (ii) **An internship or practicum** supervised either by a supervisor, as defined in paragraph (16) of Code Section 43-10A-3, or by a Certified Rehabilitation Counselor certified as such by the Commission on Rehabilitation Counselor Certification;
- (iii) The Certified Rehabilitation Counselor designation from the Commission on Rehabilitation Counselor Certification; and
- (iv) Three years of post-master's directed experience providing rehabilitation services in a rehabilitation setting under supervision provided either by a supervisor, as defined in paragraph (16) of Code Section 43-10A-3, or by a Certified Rehabilitation Counselor certified as such by the Commission on Rehabilitation Counselor Certification. **Up to one year of such experience may have been in an approved practicum or internship placement as part of the degree program;** or
- (D) A master's degree from a recognized educational institution in a program that is primarily counseling in content **with supervised internship or practicum** and four years of post-master's directed experience under supervision in a setting acceptable to the board. Up to one year of such experience may have been in an approved practicum placement **as part of the degree program;** or
- (E) A master's degree from a recognized educational institution in a program of applied psychology **with supervised internship or practicum** and four years of post-master's directed experience under supervision in a setting acceptable to the board. Up to one year of such experience may have been in an approved practicum placement **as part of the degree program.** Supervision of the practicum or internship and the post-master's directed experience shall be provided by a supervisor, as defined in paragraph (16) of Code Section 43-10A-3, except that such supervision may be provided all or in part by a psychologist or, before January 1, 2004, by a person with a master's degree from a recognized educational institution in a program of applied psychology.

(Emphasis added).

In response to the Board's question, under Georgia law, the following degree programs must all have contained a supervised internship or practicum for those seeking licensure as a licensed professional counselor:

- (1) A doctoral degree in a program that is primarily counseling in content;
- (2) A specialist degree in a program that is primarily counseling in content;
- (3) A master's degree in rehabilitation counseling or in a program that is primarily counseling in content from a recognized educational institution;
- (4) A master's degree from a recognized educational institution in a program that is primarily counseling in content; or
- (5) A master's degree from a recognized educational institution in a program of applied psychology.

The law is clear as to the academic degrees that require a supervised internship or practicum as part of the degree program in order to meet the qualifications for licensure. The Board may wish review its rules in Chapter 135-5 to ensure that an additional year of post-master's directed

experience under supervision is not accepted in lieu of a supervised internship or practicum as part of a degree program. See e.g., Board Rules 135-5-.02(b)(3); 135-5-.02(c)(3); 135-5-.02(d)(3); 135-5-.02(e)(3); and 135-5-.02(f)(3).

BDC/

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