

From: Bayla Travis <[REDACTED]>
Sent: Monday, February 19, 2024 7:23 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: I am in opposition to the board supporting AB 2051

Dear BOP,

Here are my arguments against PSYPACT:

1. Acceptance of PSYPACT would undermine the long history of the Board's valuing the diversity of quality doctoral psychology training within the state.
2. That adopting PSYPACT would go against California state law: § 2914. Section 2 which states:
No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.
3. That PSYPACT discriminates against non-APA schools and seeks to prevent their graduates from rightful practice as state licensed psychologists.
4. That acceptance of the PSYPACT and the resulting exclusion of California licensed psychologists from these doctoral programs, will result in a loss of new job opportunities and revenue for in-state psychologists.
5. Acceptance of the PSYPACT will open the door for psychologists from other states that are PSYPACT members to provide services to Californians, yet they will not pay taxes within state as their own businesses are out of state. This could reduce state tax revenue for California and services that are dependent on these dollars.
6. That doctoral students from these regionally accredited non-APA programs provide substantial and much needed psychological services to California consumers of mental health treatment, and especially to underserved and underrepresented communities.

Sincerely,
Bayla Travis, PsyD
Bayla G. Travis, Psy.D.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: Dallas <[REDACTED]>
Sent: Tuesday, February 20, 2024 3:08 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposition to AB2051 and PSYPACT in California

To Whom it May concern:

I am writing as a psychologist in a group practice to oppose the passage of AB2051 and to oppose the participation of California in PSYPACT. It has come to my attention that joining PSYPACT, and the passage of AB2051, would prohibit qualified California psychologists who have not graduated from an APA or ASPPB approved programs, from using Telehealth in their practices. In addition, the bill would have a devastating impact on regionally accredited schools who are ineligible to participate in PSYPACT, and the thousands of California licensees and hundreds of students who are currently earning their credentials to practice in the state of California.

According to State law: **§ 2914. Section 2:** *No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.*

I understand that in the past the Board of Psychology has not approved PSYPACT in California when it has been submitted for consideration. I urge you to continue in that direction.

With regard,

Dr. Dallas Mark, PsyD
Registered Clinical Psychologist 33205
The Berkeley Therapy institute
[REDACTED]

To: Board of Psychology

From: Katharine A, Pearson MSW, Paralegal Certificate

RE: AB 2051: PSYPACT

I am writing to express my view that PSYPACT not be implemented.

According to State law: Section 2914. Section 2: No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists and nothing in this chapter or any administration of this chapter shall require the registration with the board by educational institutions of their department of psychology or their doctoral departments in psychology.

Although the PsyD Department of the California Institute of Psychological Studies is accredited by a regional association, as are other regionally accredited schools in California, PSYPACT would have a discriminatory effect on them. It would result in the exclusion of California licensed psychologists from these doctoral programs and will result in a loss of new job opportunities and revenue for in-state psychologists.

Additionally, psychologists from other states that are PSYPACT members who will be able to practice in California will not pay California taxes. Prior to January 1985 based on a regionally accredited institution, a doctoral degree met the requirements for the E, Passport and/or interjurisdictional Practice Certificate IPC).

PSYPACT will have a devastating impact on regionally accredited schools.

From: Margaret Boucher [REDACTED] >
Sent: Tuesday, February 20, 2024 12:39 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposition to AB 2051

Dear BOP,

I am writing as a licensed psychologist and a faculty member in the PsyD Department of the California Institute of Integral Studies (CIIS). I understand that you will be discussing Assembly Member Bonta's Bill, AB 2051 at the upcoming BOP meeting. I am very concerned about the potential adoption of PSYPACT in California due to the devastating impact such a bill would have on regionally accredited schools who are ineligible to participate in PSYPACT, and the thousands of California licensees and hundreds of students who are currently earning their credentials to practice in the State. I, along with my colleagues, see our institution and students as being unnecessarily discriminated against if PSYPACT is carried through as planned.

Together with our sister universities we produce hundreds of graduates every year and provide tens of thousands of clinical hours in Californians through the public mental health system. Most of our students work in community mental health settings with socio-economically disadvantaged individuals, minority communities, and marginalized groups.

According to State law: **§ 2914. Section 2:** *No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.*

I would like to request that the BOP upholds its prior decision to not join PSYPACT and to strongly come out against AB 2021. I urge you to ensure the continued fairness and equity among psychological licensees and the State's educational institutions.

Thank you for your time and attention.

Margaret Boucher, PsyD [REDACTED]



Margaret Boucher, PsyD (she/hers)

Assistant Professor
Clinical Psychology

[REDACTED]
[REDACTED]

From: Dr. Dana Blu Cohen PsyD <[REDACTED]>
Sent: Wednesday, February 21, 2024 9:43 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposing PSYPACT APA schools only

To whom it may concern at the Board of Psychology,

I'm writing to oppose the rule of PSYPACT only accepting APA accredited schools. My school lost accreditation WHILE I was enrolled as a student and I and my colleagues would suffer as a result. I want to share the following arguments with you. Please consider this on behalf of my colleagues and I.

Thank you,

Arguments against PSYPACT

1. Acceptance of PSYPACT would undermine the long history of the Board's **valuing the diversity of quality doctoral psychology training** within the state.
2. That adopting PSYPACT would go against California state law: **§ 2914. Section 2 which states:**

No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.

-
-
3. That **PSYPACT discriminates against non-APA schools** and seeks to prevent their graduates from rightful practice as state licensed psychologists.
 4. That acceptance of the PSYPACT and the resulting exclusion of California licensed psychologists from these doctoral programs, **will result in a loss of new job opportunities** and revenue for in-state psychologists.
 5. Acceptance of the PSYPACT will **open the door for psychologists from other**

states that are PSYPACT members to provide services to Californians, yet they will not pay taxes within state as their own businesses are out of state. This could reduce state tax revenue for California and services that are dependent on these dollars.

6. That doctoral students from these regionally accredited non-APA programs provide substantial and much needed psychological services to California consumers of mental health treatment, and especially to **underserved and underrepresented communities.**

--

Dr. Dana Blu Cohen PsyD
Licensed Clinical Psychologist PSY29203 PSY022678

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From: Chehrzad Shadman <[REDACTED]>
Sent: Wednesday, February 21, 2024 1:01 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposition to AB2051 and PSYPACT in California

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To Whom it May concern:

I am writing as a psychologist in a group practice to oppose the passage of AB2051 and to oppose the participation of California in PSYPACT. It has come to my attention that joining PSYPACT, and the passage of AB2051, would prohibit qualified California psychologists who have not graduated from an APA or ASPPB approved programs, from using Telehealth in their practices. In addition, the bill would have a devastating impact on regionally accredited schools who are ineligible to participate in PSYPACT, and the thousands of California licensees and hundreds of students who are currently earning their credentials to practice in the state of California.

According to State law: **§ 2914. Section 2:** *No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.*

Furthermore, I do not believe that my ability to practice telehealth psychotherapy should be limited due to having a degree from a non-APA accredited school. It is not fair to continue to penalize former or current students who based their decision to attend certain programs that are recognized by the Board. My decision to study at CIIS was made before PSYPACT was even a consideration. This feels arbitrary at best and discriminatory at worst. My psychology license should be the only credential used when determining my eligibility to practice psychotherapy, either in person or via telehealth.

I understand that in the past the Board of Psychology has not approved PSYPACT in California when it has been submitted for consideration. I urge you to continue in that direction.

Thank you for taking the time to read my letter.

Sincerely,

Dr. Chehrzad Shadman, PsyD

Dr. Chehrzad Shadman, PsyD (She/Her)
Director of Clinical Training
Licensed Clinical Psychologist

[REDACTED]
[REDACTED]
[REDACTED]

From: Courtney Hartman <[REDACTED]>
Sent: Tuesday, February 20, 2024 7:08 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposing PSYPACT Bill AB2051

Hello to whom this may concern,

I am writing as a concerned psychologist licensed and working both remotely and in person in CA. I am vehemently opposing PSYPACT Bill AB2051 and plead with you to reconsider supporting this bill. I have worked very hard to earn my degree and licensure and have devoted my life to helping people through the tool of psychotherapy. I believe my graduate institution indescribably helped me to do that even though they were not accredited with APA. Providing tele-therapy allows for much more accessibility to my work with my clients and will also limit my ability to retain clients when competing with other psychologists who do offer remote work.

Please do not support this bill. It discriminates against psychologists who did not attend APA accredited schools and from what I understand will allow out of state psychologists with PSYPACT to see clients in CA remotely, which takes away revenue both from us licensed psychologists working in the state, but also the state itself.

I Implore you, please reconsider your support of this bill. It will hurt many of us psychologists working remotely with people who would not otherwise attend therapy in CA.

--

Courtney Alex
she/her/hers

I reside on traditional and unceded land of the Muwekma Ohlone people.

From: David Cushman <[REDACTED]>
Sent: Sunday, February 25, 2024 6:54 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Re: Board meeting on March 1st public comments

Thank you. Below is my comment for the Board of Psychology for the March 1st agenda item of legislation AB2051, Mia Bonta's bill that force the BoP to join PsyPACT:

I am a licensed clinical psychologist and am faculty at CIIS PsyD program. I urge the Board of Psychology to oppose AB2051. The BoP has very recently analyzed the pros and cons of joining PsyPACT and wisely decided to not join. AB2051 does not change anything about PsyPACT and therefore the same concerns the BoP had before remain in tact. AB2051 would stripe the BoP of its oversight and decision-making powers, and lead to potential future legislation that would put the BoP at the whims of political opinion and not focused on what is best for the consumers of psychology in California.

PsyPACT would discriminate against regionally accredited programs in California, going against state law 2914 Section 2. Regionally accredited programs service underrepresented and marginalized students, and underrepresented and marginalized communities. PsyPACT would lead to two different types of licensed psychologist in the state of California, unfairly targeting thousands of excellent psychologists.

Regionally-accredited programs maintain CAPIC, the California-only internship consortium. APA internships are nation-wide, and students at APA-accredited programs go to internship sites across the nation, while regionally accredited programs guarantee their students stay in California for their internships. CAPIC is responsible for many low-fee/CMH clinics. Consumers who otherwise are unable to afford therapy rely on CAPIC internship sites. Many CAPIC sites are unable to afford the difficult and expensive requirements to become an APA internship site, and therefore stay CAPIC sites. PsyPACT would lead to CAPIC being severely negatively impacted and ultimately lead to its disintegration, and therefore lead to low-income and disenfranchised consumers having less access to mental health services in California. It would also allow an influx of clinicians into the state who do not pay taxes in California and therefore do not support vital social services, and are not under the purview of the BoP to guard against ethical or legal breaches.

I again urge the BoP to oppose AB2051.

Thank you,
David Cushman, PsyD
PSY28312

From: Mark Pearson <[REDACTED]>
Sent: Thursday, February 22, 2024 7:50 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposition to AB2051

I am a molecular biologist, former professor, biotech executive and entrepreneur now retired and living in Walnut Creek. I have a multi-decade professional and personal interest in mental health, both through my multi-decade research and development experience in the diagnosis and treatment of cancer and Alzheimer's disease, and through relatives and colleagues with a variety of mental health conditions and experiences. I have recently become aware of the proposed PSYPACT bill AB2051, introduced by CA Assembly Member Mia Bonta, for which BOP support is being sought. I write to request that BOP **NOT SUPPORT** the passage of AB2051 in its current form.

My reasons for this are:

- Many claim that we are in a state of crisis with respect to the availability of qualified professional psychotherapists to provide timely support and services to Californians in need of mental health care.
- BOP can help alleviate the likely negative affects of PSYPACT bill AB2051 by withholding BOP support from the current proposed legislation until patients, service providers, regulators and the public at large have a chance to revise the bill so as to eliminate its negative effects.
- In my view, these negative effects include:
 - PSYPACT narrows rather than expands the diversity of quality doctoral training programs in California.
 - The proposed bill is contrary to **state law § 2914. Section 2**. It specifically discriminates against the PsyD Department of the California Institute of Integral Studies (CIIS), a non-APA but regionally accredited school ineligible to participate in PSYPACT.
 - Loss of this internationally recognized department through the discriminatory effects of this bill will **decrease** the pool of doctoral-level health-care professionals available in-state for Californians, especially for those in underserved communities at a time when the need for such mental health services is increasing
 - The pool of graduates from CIIS who will see their job opportunities shrink in the absence of PSYPACT approval is not a one-time occurrence. The annual graduation of new psychotherapists will be choked off by the longer term effects of AB2051.
 - This will reduce California's tax base directly (as well as indirectly since out-of-state psychologists will not pay resident business taxes to our state for their telemedicine services).

The Board of Psychologists has an opportunity here to play a catalytic role in enhancing the number of high-quality health care providers offering mental health services in the state by withholding its approval of Assembly Member Bonta's current bill as written, and by stimulating its reconsideration and modification by an expanded group of stake-holders. I hope the BOP will take my comments under serious consideration prior to your next Board meeting.

Sincerely,

Mark L. Pearson

Mark L. Pearson, BAsC, MA, Ph.D.

████████████████████
████████████████

From: Azadeh Weber <[REDACTED]>
Sent: Thursday, February 22, 2024 9:50 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Opposition to PSYPACT

Dear Board of Directors,

I am writing for the PsyD Department and California Institute of Integral Studies (CIIS), in regard to the potential adoption of (PSYPACT) in California. As an alumna of the PsyD program at CIIS my intent is to point out the devastating impact such a bill would have on regionally accredited schools who are ineligible to participate in PSYPACT, and the thousands of California licensees and hundreds of students who are currently earning their credentials to practice in the State.

I see California Institute of Integral Studies and its students and alumni as being unnecessarily discriminated against if PSYPACT is carried through as planned. Together with our sister universities we produce hundreds of graduates every year and provide tens of thousands of clinical hours in Californians through the public mental health system. Most of our students work in community mental health settings with socio-economically disadvantaged individuals, minority communities, and marginalized groups.

According to State law: § 2914. Section 2: No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.

I would like to request that you reconsider the implementation of this bill until you and your staff have had a chance to hear from affected members of the psychological community. As a member of a school that will be deeply impacted by this, we would appreciate meeting with you and/or your staff to discuss this either in person, by phone, or virtually.

We urge you to ensure the continued fairness and equity among psychological licensees and the State's educational institutions.

Kind regards,
Dr. Azadeh Weber

[REDACTED]
[REDACTED]
[REDACTED]

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From: Stephanie Chiquillo <[REDACTED]>
Sent: Monday, February 26, 2024 12:03 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Re: Opposition to the BOP supporting AB 2051

I am writing regarding the potential adoption of (PSYPACT) in California. I intend to point out the devastating impact such a bill would have on regionally accredited schools that are ineligible to participate in PSYPACT and the thousands of California licensees and hundreds of students who are currently earning their credentials to practice in the State. I am a PsyD graduate who would be unnecessarily discriminated against if PSYPACT is carried through as planned. I currently provide clinical hours to Californians through the public mental health system. I also work in a community mental health setting with socio-economically disadvantaged individuals, minority communities, and marginalized groups.

According to State law: § 2914. Section 2: No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.

We would like to request that you reconsider the implementation of this bill until you and your staff have had a chance to hear from affected members of the psychological community. As a school that will be deeply impacted by this, we would appreciate meeting with you and/or your staff to discuss this either in person, by phone, or virtually. We urge you to ensure the continued fairness and equity among psychological licensees and the State's educational institutions.

Stephanie Chiquillo, PsyD



SUMMARY

AB 2051 would ratify, and approve the Psychology Interjurisdictional Compact (PSYPACT), an interstate compact that allows for the practice of telepsychology and temporary in-person psychology across state lines.

BACKGROUND

Occupational licensure compacts allow states to adopt policies that improve the transferability of licenses. Through licensure compacts, states establish and agree upon uniform standards that enable multi-state practice. There are currently 15 Occupational Licensure Compacts recognized by the National Center for Interstate Compacts.

PSYPACT was created, and approved, by the Association of State and Provincial Psychology Boards (ASSPB) in 2014. In 2016, Arizona became the first state to adopt PSYPACT. The compact became fully operational in 2019, once seven states had joined. To date, 40 states have enacted PSYPACT legislation. By providing a means for psychologists to practice across state lines, PSYPACT increases access to care and allows for continuity of care when patients or providers relocate or travel. Because all compact states enact the same model legislation, PSYPACT promotes cooperation between states and provides a means for telepsychology regulation and consumer protection.

EXISTING LAW

Existing law establishes the Board of Psychology to license and regulate the practice of psychology. In California, to practice psychology or represent oneself as a psychologist, an individual must be licensed by the state. In January 2023, Congress added a new provision to the Servicemembers Civil Relief Act (SCRA) that makes it easier for service members and military spouses to have their professional licenses recognized when they relocate to another state due to military orders. Additionally, the U.S. Department of Veterans Affairs (VA) allows VA healthcare providers, including psychologists, to administer care using telehealth across state lines.

PROBLEM

According to the California Healthcare Foundation (CHCF), mental illnesses are among the most common

health conditions faced by Californians, with nearly one in six Californians experiencing some form of mental illness. A statewide poll conducted in 2018 by CHCF and the Kaiser Family Foundation (KFF) revealed that 57% of Californians are not able to get the mental health services they need.

Psychologists make up around 18% of California’s Licensed Behavioral Health Professionals. In 2016, there were 42.5 psychologists for every 100,000 Californians. With 37% of psychologists over the age of 60, the number of psychologists in California is expected to decline by 11% in the next four years. Around 78% of psychologists in California are white, with only 7% fluent in Spanish and 10% able to speak another language. When Californians do find a psychologist, they are not able to see them when they are travelling out of state, or if they relocate to another state, disrupting their care. This is critically important for young adults who move out of the state to attend college. The current psychology workforce and existing laws surrounding the practice of psychology do not adequately address or accurately reflect the needs of Californians.

SOLUTION

AB 2051 will create an opportunity to grow the behavioral health workforce and increase access to mental health providers. Specifically, this bill will ratify and approve PSYPACT to give Californians immediate access to psychologists across 40 other compact states. By joining PSYPACT, Californians will be able to continue seeing their psychologist while traveling or while temporarily or permanently relocating to another state. This is crucial for continuity of care and ensuring people have continued access to their psychologist, when and where they need them.

SUPPORT

- Mental Health America, California (co-sponsor)
- Steinberg Institute (co-sponsor)
- American Telemedicine Association
- National Alliance on Mental Illness, California

FOR MORE INFORMATION

Natalie Pita, *Assembly Fellow*

Natalie.Pita@asm.ca.gov (916) 319-2018

From: Karen Lese-Fowler [REDACTED] >
Sent: Friday, February 16, 2024 2:37 PM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: AB 2051, PSYPACT

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Greetings Board members,

I am writing in strong support of AB 2051, which would codify PSYPACT and in doing so, facilitate steady access to care for our clients who travel for business, school or pleasure. I have frequently needed to temporarily or permanently suspend treatment when my clients travel, even when maintaining consistent therapy would be in their best interest, because it is not possible for me to be licensed in every US jurisdiction. Of course I attempt to arrange for local care, but this is not easily accomplished in every situation. Given that 41 states have now enacted PSYPACT with more considering legislation, obtaining an E-Passport would allow me much more flexibility in caring for my clients while still abiding by local laws.

I understand that reservations have been expressed about PSYPACT--namely that a subset of California licensees, those who have graduated from unaccredited training programs, would not qualify for the E-Passport. This is one way California licensing law is less stringent than many other states' laws. In my view, that is an issue which should not prohibit BoP support. Since the Board's purview is protection of the public and "supporting the evolution of the profession," whether or not California psychologists from unlicensed programs could access an E Passport is not relevant to that mission, and if desired, could be taken up when a California representative becomes part of the PSYPACT governing body.

Thank you for your hard work on behalf of the profession.

Sincerely,

Karen Lese-Fowler, Ph.D.
Mindful Growth Psychology, APC

[REDACTED]
[REDACTED]
[REDACTED]


Pronouns: She/Her/Hers

[REDACTED]



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From: Alyssa Winstead [REDACTED] >
Sent: Monday, February 26, 2024 10:08 AM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Advocating to become part of Psypact network

Hello, my name is Alyssa Winstead I am 29 yrs old! I had a wonderful therapist I had been seeing for the past decade on and off. Originally from Montana , I can no longer see her due to her practice being out of the state.

I have continued to struggle to find a therapist here in the lower desert, CA.

I urge you to vote in becoming part of the PSYPACT network so I may get the most outstanding healthcare I need!

By becoming part of the Psypact network you never know if you may save a life, because someone got the mental care they so deserve.

Thank you so much for your consideration!

From: Jordan Harmon <[REDACTED]>
Sent: Monday, February 26, 2024 10:12 AM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: PSYPACT advocates

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To whom it may concern,

As a California native, I reach out today in hopes that California Board of Psychology can become part of the Psypact network. After decades of having a mental health network that is desperately in need of updating as well as more mental health therapeutics providers I find that joining the PSYPACT network would give much relief on the mental health care system we currently have. There is also a major demand for more diversity in the mental healthcare sector and joining Psypact network would alleviate the lack of diversity and increase availability to those struggling most.

Thank you so much for your time, if you have any questions, comments or concerns please do not hesitate to reach out to me.

Sincerely,

Jordan A. Harmon

From: [REDACTED]
Sent: Monday, February 26, 2024 10:49 AM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Board of Psychology - Contact Form - General Information



Hello,

A contact form was submitted with the following details:

Name

- Sean snider

Email Address

[REDACTED]

Reason for Inquiry

- General Information

Message

- I am advocating for California to become a part of the Psypact network. I think people should have as many options available to them as possible for receiving mental health services. Thank you

Board of Psychology
1625 North Market Blvd., Suite N-215
Sacramento, CA 95834

2024 Bill Analysis

Author: Assembly Member Bonta	Bill Number: AB 2051	Related Bills:
Sponsor: TBD	Version: Introduced	
Subject: Psychology interjurisdictional compact.		

SUMMARY

This bill would approve the Psychology Interjurisdictional Compact (PSYPACT), to facilitate the practice of telepsychology and the temporary in-person, face-to-face practice of psychology across state lines in California. This bill would require California to join as a compact state, to recognize the right of a psychologist, licensed in a compact state in compliance with the compact, to practice telepsychology in other compact states in which the psychologist is not licensed, as approved in the compact.

RECOMMENDATION

FOR DISCUSSION – Staff recommend the Board take an Oppose position on AB 2051.

Summary of Suggested Amendments
 None on file.

Other Boards/Departments that may be affected:	
<input type="checkbox"/> Change in Fee(s)	<input type="checkbox"/> Affects Licensing Processes
<input type="checkbox"/> Urgency Clause	<input type="checkbox"/> Affects Enforcement Processes
<input type="checkbox"/> Regulations Required	<input type="checkbox"/> Legislative Reporting
<input type="checkbox"/> New Appointment Required	
Legislative & Regulatory Affairs Committee Position:	Full Board Position:
<input type="checkbox"/> Support <input type="checkbox"/> Support if Amended	<input type="checkbox"/> Support <input type="checkbox"/> Support if Amended
<input type="checkbox"/> Oppose <input type="checkbox"/> Oppose Unless Amended	<input type="checkbox"/> Oppose <input type="checkbox"/> Oppose Unless Amended
<input type="checkbox"/> Neutral <input type="checkbox"/> Watch	<input type="checkbox"/> Neutral <input type="checkbox"/> Watch
Date: _____	Date: _____
Vote: _____	Vote: _____

REASON FOR THE BILL

As provided in PSYPACTs Article I, the compact is designed to increase public access to professional psychological services and allow for telepsychology across state lines as well as temporary in-person, face-to-face services. The compact will enhance a state's ability to protect the public and ensure patient safety, while encouraging the cooperation of Compact State in the field of psychology.

ANALYSIS

The bill would require the state of California to join PSYPACT and would be required to establish the Psychology Interjurisdictional Compact Commission (The Commission), to administer and enforce the compact and to address future issues surrounding telepsychology and temporary in-person, face-to-face practice as needed. The Commission serves to provide as a mechanism for solving interstate matters. The Commission has a number of powers; which include: to purchase and maintain insurance and bonds; to borrow, accept or contract for services of personnel, including, but not limited to, employees of a Compact State; to establish a budget and make expenditures; to borrow money; to provide and receive information from, and to cooperate with, law enforcement agencies.

Each Compact State has one vote. The voting member serves as the state's Commissioner. The Board of Psychology (Board) would have to appoint its delegate, who can act on behalf of its Compact State. The delegate must be the Executive Director or Executive Secretary; a current member of the State Psychology Regulatory Authority of a Compact State; or a designee empowered with the appropriate delegate authority to act on behalf of the Compact State. Each Commissioner is entitled to one (1) vote.

The Compact also has an Executive Board, which is comprised of six (6) members. Five voting members are elected from the current membership of the Commission; and one member who is an ex-officio, nonvoting member from the recognized membership organization composed of State and Provincial Psychology Regulatory Authorities. The Executive Board meets annually and has a number of duties. They recommend changes to the Rules or Bylaws, changes to Compact legislation, fees paid by Compact States such as annual dues, and any other applicable fees. They also prepare and recommend the budget and maintain financial records for the Commission. The Commission is financed through an annual assessment paid by each Compact State.

Additionally, The Commission and the Association of State and Provincial Psychology Boards (ASPPB) have entered into a Memorandum of Understanding (MOU). This MOU covers the costs associated with staffing, professional fees such as the contract with the Council of State Governments (CSG), Directors & Officers (D & O) Insurance, travel costs for the Commission, office space and utilities, use of computers, telephone, internet, and other office equipment and services.

PSYPACT does not impact a state's right or ability to issue a license. It is applicable to the interjurisdictional practice of telepsychology and temporary in-person, face-to-face practice and only takes precedence over state laws regarding this type of interjurisdictional practice.

The Compact will only be possible between states that recognize the E.Passport. The E. Passport will allow licensees who are eligible to qualify to practice telepsychology on patients in other states that recognize the E. Passport.

"E. Passport" means: a certificate issued by the Association of State and Provincial Psychology Boards (ASPPB) that promotes the standardization in the criteria of interjurisdictional telepsychology practice and facilitates the process for licensed psychologists to provide telepsychological services across state lines.

"E. Passport" is the credential vetted and issued by ASPPB granting authorization to practice interjurisdictional telepsychology in a "Receiving State" where the psychologist with this credential is not currently licensed. A psychologist must be licensed at the doctoral level to qualify for the E. Passport.

In order for a licensee to obtain an E. Passport, they must meet certain requirements. One of the eligibility requirements states that the degree program that the licensee graduated from must have been accredited by the American Psychological Association/ Canadian Psychological Association or designated by the ASPPB National Register Joint Designation Project at the time their degree was conferred. The requirements allow applicants who have been continuously licensed (active or inactive) to practice psychology independently in one or more ASPPB member jurisdictions prior to January 1, 1985, and based on a doctoral degree from a regionally accredited institutions, to have met the educational requirements.

In addition, any licensed psychologist who obtains an E. Passport to practice telepsychology under the authority of PSYPACT and must have three (3) hours of continuing education training in technology as required by the E. Passport. Should a PSYPACT state not require continuing education, this requirement of PSYPACT would supersede the State's authority.

If California is required to join PSYPACT, the Board would have ability to view which California Licensees hold an E. Passport, however, the Board would not be notified of the number of out-of-state licensees provided services in the state until the end of year when the PSYPACT report is released to the Compact States.

Under the PSYPACT, a Compact State's Psychology Regulatory Authority will be able to issue subpoenas for hearings and investigations which require the attendance and testimony of witnesses and the production of evidence. Subpoenas issued by a Compact State's Psychology Regulatory Authority for attendance and testimony of witnesses, and/or the production of evidence from another Compact State shall be enforced in the latter state by any court of competent jurisdiction, according to that

court's practice and procedure in considering subpoenas issued in its own proceedings. The issuing State Psychology Regulatory Authority shall pay any witness fees, travel expenses, mileage and other fees required by the service statutes of the state where the witnesses and/or evidence are located.

In the event an adverse action must be taken against a psychologist, a Home State (State in which the licensee obtained licensure) has the discretion to impose an action against a psychologist from that Home State. Additionally, the state in which services were provided, known as a Receiving State, has the authority to take an adverse action on a psychologist's Authority to Practice Interjurisdictional Telepsychology within that Receiving State. A Home State's Psychology Regulatory Authority, such as the Board, will be responsible for investigating and taking appropriate action with respect to reported inappropriate conduct engaged in by a licensee which occurred in a Receiving State as it would if such conduct had occurred by a licensee within the Home State. In such cases, the Home State's law will determine any adverse action against a psychologist's license.

The Compact State's Psychology Regulatory Authority can also issue cease and desist and/or injunctive relief orders to revoke a psychologist's Authority to Practice Interjurisdictional Telepsychology and/or Temporary Authorization to Practice. While an investigation is underway, a psychologist may not change their Home State. A Home State Psychology Regulatory Authority is authorized to complete any pending investigations of a psychologist and to take any actions appropriate under its law. The Home State Psychology Regulatory Authority may coordinate with the Receiving State Psychology Regulatory Authority to complete the investigation.

Once the investigation is complete, the Home State Psychology Regulatory Authority shall promptly report the conclusions of the investigations to the Commission. The psychologist may change his/her Home State licensure once an investigation has been completed. The Commission shall promptly notify the new Home State of any such decisions as provided in the Rules of the Commission. All information provided to the Commission or distributed by Compact States pursuant to the psychologist shall be confidential, filed under seal and used for investigatory or disciplinary matters.

The bill would also be required to upload licensure and enforcement information to the Coordinated Database, or PSYPACT Directory. Currently, PSYPACT is not utilizing the Coordinated Database. In order to meet this requirement, the Commission will need access to state's licensure data (which is already available on the Board's website) and for disciplinary data to be entered into the ASPPB Disciplinary Data System, which is currently being done by Board staff.

Board staff has the following concerns about joining PSYPACT:

- (a) Payment of fees for operations of the PSYPACT, as there is no funding for California to become a Compact State. All fees are paid to ASPPB and the

Commission. In the case of enforcement, there is potentially no reimbursement for enforcement actions.

- (b) The promulgation of rules and laws by the Commission which would have the force of law in Compact States, which includes the approval of temporary practice across state lines, adverse actions, criminal history, investigations, and the coordination of the licensure information system/database.
- (c) The requirement of graduation from an APA accredited program in order to obtain the E. Passport.
 - In data reviewed from 2000-2020, approximately 3,841 applicants attended an APA accredited program, and approximately 2,020 applicants attend non-APA accredited programs. For applicants who attended non-APA accredited programs would not be able to participate in the compact, who otherwise meet the criteria, and potential fees paid to Board by these licensees could go to fund the Commission.
- (d) The APA accreditation requirement conflicts with Business and Professions Code 2914 “No educational institution shall be denied recognition as an accredited academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this chapter or in the administration of this chapter shall require the registration with the board by educational institutions of their departments of psychology or their doctoral programs in psychology.”
- (e) Enforcement workload and cost, as there is potentially no reimbursement for enforcement actions for licensees who are licensed in another state.

The Board currently has existing law, as provided in Business and Professions Code (BPC) 2912, which allows any person who is licensed as a psychologist at the doctoral level in another state or territory of the U.S. or in Canada to provide telehealth psychological services in California for a period not to exceed 30 days in any calendar. BPC 2946(b) also allows a psychologist who is licensed in another state, territory, or province who has applied to the Board for licensure to perform activities and services of a psychological nature without a valid California license for a period not to exceed 180 calendar days from the time of submitting their application or from the commencement of residency in California, whichever occurs first.

LEGISLATIVE HISTORY

Not applicable

OTHER STATES' INFORMATION

Currently, there are 41 participating states, and 39 effective which are:

Alabama, Arizona, Arkansas, Colorado, Commonwealth of the Northern Mariana Islands, Connecticut, Delaware, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Maine, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

Vermont and South Dakota have enacted to join PSYPACT, with a tentative effective date of July 1, 2024.

The following states have active PSYPACT legislation, however, not considered PSYPACT participating states:

Massachusetts, New York, Hawaii, Mississippi, and California.

PROGRAM BACKGROUND

The Board regulates psychologists, registered psychological associates, and psychological testing technicians. The Board protects consumers of psychological and associated services, regulates the practice of psychology, and supports the evolution of the profession.

The Board is responsible for reviewing applications, verifying education and experience, determining exam eligibility, as well as issuing licensure, registrations, and renewals.

FISCAL IMPACT

The Commission is financed through an annual assessment paid by each Compact State. Based upon the Revenue Assumptions in the PSYPACT 2023 Annual Budget and Narrative Report, if California were to join PSYPACT, the annual assessment of approximately \$3,765.92. This is based on the following formula: total number of licensees (23,537) multiplied by 1%; this number (235.37) is then multiplied by \$40.00; this figure (\$9,414.80) is then multiplied by 40%. Article X of the Compact has a maximum cap of \$6,000 for the annual assessment.

Joining PSYPACT could potentially increase the Board's Enforcement Division workload and enforcement fees. Since out of state licensees who hold an E. Passport could potentially provide psychological services to California consumers, thus increasing the number of licensees the Enforcement Division would have to monitor.

ECONOMIC IMPACT

Not Applicable

LEGAL IMPACT

Not Applicable

APPOINTMENTS

Not Applicable

SUPPORT/OPPOSITION

Support: None on File

Opposition: None on File

ARGUMENTS

Proponents: None on File

Opponents: None on File

AMENDMENTS

None on File

MEMORANDUM

DATE	February 22, 2024
TO	Board of Psychology, Board Members
FROM	Savanna Koop, Probation Monitor
SUBJECT	Petitioners Exhibit Charnea Crump Case No. 600-2019-001171

Attached you will find an updated exhibit list and letters of support bate stamped (AGO-000439-441) by the Attorney General's Office. Petitioner would like to have these letter be considered by the Board Members for her February 29, 2024 Petition for Early Termination Hearing.

Said letters were received by the Board on February 20, 2024.

Please accept this as the Petitioners Exhibits.

Approved: 
Sandra Monterrubio, Enforcement Program Manager

Date: 2/22/2024

EXHIBIT INDEX

CASE NAME: Charnea M. Crump, Psy.D. a.k.a. Charnea M. Campbell

BOARD: Board of Psychology

BOARD CASE NO.: 600-2019-001171

HEARING DATE: Thursday, February 29, 2024 at 3:30 PM

Exhibit No.	Document Description	Bate Stamp No.
1.	Jurisdictional Documents	AGO-000001-39
	• Certificate of Licensure	AGO-000001
	• Certified Copy of Decision and Order	AGO-000002-36
	• Notice of Hearing	AGO-000037-39
2.	Petition for Early Termination	AGO-000040-49
	• Application	AGO-000040-42
	• Disciplinary Action Information Sheet	AGO-000043
	• Evidence of Rehabilitation Information Sheet	AGO-000044
	• Practice or Billing Monitoring Information Sheet	AGO-000045
	• Authorization to Release Protected Health Information	AGO-000046-48
	• Therapy Information Sheet	AGO-000049
3.	Probation Compliance Report	AGO-000050-53
4.	Probation File	AGO-000054-426
	• Probation Profile	AGO-000055-56
	• Correspondence	AGO-000057-260
	• Intake	AGO-000261-265
	• Coursework	AGO-000266-277
	• Probation Costs	AGO-000278-282
	• Quarterly Reports	AGO-000283-312
	• Psychological Evaluation	AGO-000313-356
	• Practice Monitor Reports	AGO-000357-398
	• Psychotherapy	AGO-000399-426
5.	Additional Probation Documents	AGO-000427-441
	• Initial Notice of Hearing	AGO-000427-430
	• Additional Practice Monitor Report	AGO-000431-433
	• Additional Quarterly Report	AGO-000434
	• Additional Probation Compliance Update	AGO-000438
	• Character Letters (3)	AGO-000439-441



February 19, 2024

I am pleased to take this opportunity to enthusiastically endorse Charnea Crump, who has demonstrated exceptional dedication and professionalism during her tenure with Key Essentials to Behavior Management. Initially joining our team as a Board-Certified Behavior Analyst (BCBA), Charnea has recently transitioned into the role of a Psych Associate, showcasing her adaptability and commitment to personal growth.

Throughout her time with us, Charnea has consistently exhibited a profound understanding of behavioral principles, which has significantly contributed to the effectiveness of the programs under her supervision. Her ability to forge strong connections with clients and their families underscores her genuine passion for making a positive impact in their lives. Furthermore, Charnea's unwavering positivity, diligent work ethic, and exceptional interpersonal skills have undoubtedly enriched our team dynamics and enhanced the quality of our services. She consistently goes above and beyond to ensure the success of our programs and initiatives, earning the admiration and respect of her colleagues and clients alike.

In summary, Charnea Crump is an invaluable asset to our organization, and I have every confidence that she will continue to excel in her role and make significant contributions to our mission of promoting positive behavior management and community engagement.

Sincerely,

Imelda Jazmin Ceja Nunez

Assistant Clinical Director

Working Towards Successful Living
Direct: 909.701.1870
Office: 909.755.5220
Fax: 909.755.5223
[9333 Baseline Rd, Suite 290](mailto:info@keyessentialsbm.com)
[Rancho Cucamonga, CA 91730](mailto:info@keyessentialsbm.com)
www.keyessentialsbm.com
www.thesensorspot.net

AGO-000439

To Whom It May Concern,

I am writing to wholeheartedly recommend Charnea Crump, who has been an exemplary employee at Key Essentials to Behavior Management, Corp. for the past five years. During her tenure with us, Charnea has demonstrated remarkable professional growth, earning three well-deserved promotions due to her outstanding performance and leadership qualities.

Charnea's ability to lead with both compassion and efficiency is a rarity in the workplace. Her kindhearted nature does not just endear her to her colleagues, but also amplifies her effectiveness as a leader. She possesses a unique blend of attentiveness and detail orientation, which ensures that projects not only meet but often exceed our expectations. Her dedication is sometimes so profound that it could be described as loyalty to a fault, yet this trait has consistently worked in favor of our organization's objectives.

One of Charnea's most commendable qualities is her adaptability. In a field as dynamic as behavior management, her ability to adjust to new challenges and take direction is invaluable. This quality, coupled with her intrinsic motivation to learn and grow, has played a significant role in her professional development within our organization.

In addition to her professional competencies, Charnea's kindhearted nature deserves special mention. Her empathy and genuine concern for others have greatly contributed to a positive and supportive work environment. She is always willing to go the extra mile to assist her colleagues, displaying a level of altruism that is both rare and admirable.

In conclusion, Charnea Crump is a remarkable asset to any team or organization. Her blend of professional acumen, leadership skills, and compassionate nature not only make her an outstanding employee but also a valuable contributor to the field of psychology. I am confident that she will continue to excel and inspire in any endeavor she undertakes.

Yours sincerely,



LaKeysha Cobbs-Hayes MA BCBA
CEO/Chief Clinical Director
Key Essentials to Behavior Management, Corp.

AGO-000440



January 31, 2024

I am writing this letter to provide a strong recommendation for Charnea Crump, who has been an exceptional member of our team at Key Essentials to Behavior Management. Charnea started her journey with us as a Board-Certified Behavior Analyst (BCBA) and has recently transitioned into the role of a Psych Associate. Her dedication, work ethic, and contributions have been instrumental in the growth and success of our department. From the outset, Charnea demonstrated a remarkable commitment to her responsibilities as a BCBA. She exhibited a deep understanding of behavioral principles, which significantly contributed to the positive outcomes of the programs she managed. Her ability to form strong connections with clients and their families showcased her passion for making a meaningful impact in their lives. Moreover, Charnea's dedication extends beyond the workplace, as she consistently participates in community events and volunteers her time for our sensory autism fairs. Her involvement in these activities not only reflects her genuine care for the community but also showcases her ability to bring people together for a common cause.

Charnea's positive attitude, strong work ethic, and exceptional interpersonal skills make her an asset to our organization. She has consistently proven herself as a valuable team member who goes above and beyond to ensure the success of our programs and initiatives.

Sincerely,
Lynda Gonzalez

Lynda Gonzalez

Chief Operations Officer

Working Together Towards Successful Living

Direct: 909.701.1873 ext. 416

Office: 909.755.5220

Fax: 951.346.3640

9333 Baseline Rd, Suite 290

Rancho Cucamonga, CA 91730

www.keyessentialsbm.com

AGO-000441