

Statute Feedback

1. Should there be an exempt status? If so, who would that apply to and what would they be doing? (§ 2909)

- ▶ Yes, multiple individuals supporting the changes.
 - ▶ Statements made that clinical researchers do not need to be licensed, however those people supervising, managing, and training should be licensed.
 - ▶ This exemption refers to the work that is of psychological nature, but not work that requires a license, for example, research. The delivery of psychological services in certain settings that do not require licensure.
 - ▶ Key word, “provide services”. Researchers aren’t providing services, they are conducting research. So why the need for a licensed supervisor?

2. What would be an alternate term for “registered psychologist”? (§ 2909.5)

- ▶ Psychology associate is also a confusing term to use. There should be a differentiation to the degree, referring to BBS.
- ▶ Recommended terms are:
 - ▶ Psychology fellow
 - ▶ Psychology fellow has a particular meaning and seems not to be very descriptive to what it’s being covered here.
 - ▶ Pre-licensed psychologists
 - ▶ Favored choice
- ▶ Questions for staff to research:
 - ▶ What do other states do?
 - ▶ Do we know what other states call this position?

3. Should board-certified psychiatrists be allowed to be primary supervisors for psychological assistants since they are not required to take the 6-hour course in supervision, are not subject to any other of the psychology regs., and they do not promote the kind of socialization into the field of psychology that might be more applicable to psychologists? (§ 2913(c)(1))

- ▶ Consensus was split on this issue.
 - ▶ Some are not opposed to psychiatrists to be supervisors. There is the perception that they are an integral part of other’s training to receive training from a psychiatrist.
 - MD’s are not supervised by the board. The Board only has jurisdiction over psychologists.
 - The board does not have authority over the license of MD thus limited enforcement power makes it ineffective.
 - Hold the psychiatrists to same standards and psychologists.
- ▶ Those opposed to psychiatrists being primary supervisors mentioned that there exist differences in the scope of practice and completion of required hours.

- ▶ There exists a difference in the way of thinking. Doctoral candidates are early psychologists and are vulnerable, because they are still learning about their identity.
- ▶ Another difference is the ethical code. Who will enforce the distinct ethic codes and reconcile that? Difference between structure and ethics.

4. What would be the ramifications to remove board-certified psychiatrists as primary supervisors? Would the Board be limiting supervision opportunities in some settings such as institutions? (§ 2913(c)(1))

- ▶ Limit opportunities in the field of primary supervisors.
- ▶ Effect is on a small population
- ▶ Access to resources will decline. In a medical setting, they are not going to hire a psychologist to hire a psychologist.
 - ▶ Sometimes psychology is in that dilemma since there is none available.

5. Should a psychological assistant be allowed to advertise considering they are not allowed to practice independently? If so, should there be restrictions in how a psychological assistant can advertise? What are the restrictions? Can a psychological assistant have a website? (§ 2913(d)(1))

- ▶ Consensus was in favor of permitting the assistant to advertise.
 - ▶ Voiced complaints regarding marketing disadvantages for doctoral students.
 - ▶ Suggested there be standardized language be included to define what a psychological assistant can do.
 - ▶ Suggestion to differentiate the post doctorate as necessary. Differentiation is with post-doctoral versus pre-doctoral. We are trying to help move the post-doctoral forward. Use the correct role.
 - ▶ Suggestion to have a listing which was supported by many.
 - ▶ Suggestion to create a template and expressly state supervisory role on part of psychologist to supervise that website.
 - Stakeholder less concerned about overseeing advertising than they are about other supervisory duties. Psychology assistants cannot be independent contractors.
 - ▶ Suggestion made that the Board develop a clear definition and parameters for advertisement.
 - Assistants are employed by someone, part of it is the relationship and employee contract if there is one. It comes down to the employer and what they will allow. A psychology assistant is an employee, it is up to the psychologist to determine if the employee can have website.
 - ▶ It should be made clear whether they can or cannot have a website. How far will it go if assistants can advertise in certain manners for example, business cards, will that blur into other advertisement channels.
- ▶ Concerns
 - ▶ Psychologists have concerns with the work of psychological assistant. Participant expressed uncomfortability in not having the power or authority to monitor or regulate the advertisement. Not right, should advertisement they are able to practice.

- ▶ How would the Board monitor if the assistant has more than one supervisor?
 - Suggestion to provide contact information from each supervisor, however can get confusing on who is supposed to approve website content if there are multiple supervisors.
- ▶ Website open to social media. There is confusion and concern. Favor moving away from assistants having all the rights as a psychologist. Should be careful with the title of psychologists. This will open various hazards.
- ▶ Concern regarding the wording of the advertisement and whether website advertisement will be excluded.
 - Other stakeholders referring back to the practice of psychology within practice settings only. If allowing website advertisement, then it will interfere with such.
- ▶ Client Production Related Concerns
 - ▶ Assistants are expected to bring in client, so in that case not being able to advertise or have a website will be a disadvantage. Always disclose they are under the supervision of so and so. There is a business element that we need to think about. People are assistants for a long time.
- ▶ MFT (BBS) are allowed to advertise.
- ▶ Board of Psychology role is consumer protection. There exists general confusion, between psychologists and psychiatrist. This does nothing to clarify things for the consumer and creates burden regarding the enforcement of advertisements specifically as it relates to the risk for exploitation in the employer-employee relationship by having the assistant bring in customers and the employer signing off on hours.

6. By listing the fields of emphasis in psychology, would potential applicants be excluded for licensure and what qualifying degrees would be left out? How would this impact the field?

- ▶ Yes, those in nonapplied psychology programs.
 - ▶ Some expressed that they are unsure of the benefit obtained from this proposal.
 - ▶ Graduate in psychology, can gain supervised experience to meet requirements and pass exams, then why can't they be licensed? What is the argument to limiting the number of people who can meet the licensure requirements? Students are interested in a program during college, and decide they want to license. What would be the rationale from limiting someone who has a doctorate in psychology?
 - If they are meeting all other requirements, hours, why is the board limiting them to licensure.
- ▶ Majority in favor of the change.
 - ▶ Suggestion that the qualifying degrees be even more limited to clinical counseling and schooling.
 - ▶ Suggestion to use General Applied Psychology
 - ▶ Suggestion that it include experimental, research, and applied psychology.

7. Are the listed fields of emphasis adequate to ensure consumer protection and access to care?

- ▶ Fewer specializations serve as a gatekeeper.
- ▶ Is there instances where if this loophole was not there then certain people wouldn't be licensed?
- ▶ Dangerously close to being prescriptive on the course work that a good psychologist needs to have. Not sure the board wants to go down that road. There are people who naturally would be a good psychologist, it seems restrictive. Just doesn't feel quite right.
- ▶ From consumer protection, the board feels that fields need to be emphasized.

Regulations Question feedback

1. Are the topics listed still necessary?

a. Are 6 hours adequate exposure to each of these issues?

- ▶ Participants continuously asked about the necessity of these courses and if they are included in the current curriculum. Consensus wanted to find out whether there is added value in having these courses separate as opposed to including them in the curriculum.
 - ▶ Participants also inquired as to how this would be evaluated if students are taking these subjects as part of their regular curriculum?
 - ▶ Who has determined that these courses are necessary?

- ▶ Statements were made that these courses are required for those who did not complete an APA program.

- ▶ Verification of hours/receiving credit
 - ▶ What is the burden of proof that applicant received such training?
 - Suggestion that education programs certify that they include those topics into the curriculum.
 - Suggestion that the applicant demonstrates successful completion of the required hours.
 - Comment that asking for verification of hours is not relevant.
 - Suggestion to require each educational administration to adjust curriculum to include the subject matters in the curriculum.
 - Having the supervisor prove that the applicant has had training in such areas.
 - Test these subjects on the licensing exam.
 - Discussion took place looking at whether verification of hours suggests competency. Suggestion made that if consumer protection is the core then verification of hours would be difficult to measure consumer protection success.

- ▶ Course/Subject inclusion suggestions
 - ▶ Human trafficking
 - ▶ Bullying
 - ▶ LGBT
 - ▶ Multicultural
 - ▶ Have continuing education requirements

- ▶ Staff research:
 - ▶ What are other states doing regarding pre-licensure courses?
 - How do these pre-licensure courses impact out of state applicants?
 - ▶ How many applicants have incomplete applications as a result of failure to meet required courses?

- ▶ Concern:
 - ▶ Licensees may endorse such trainings and advertise themselves as being experts in such areas.

- 2. Currently a maximum of 44 hours per week can be credited toward SPE. What is your experience regarding the maximum SPE hours claimed per week? (§1387.1(b)(3))**
- a. Should the maximum hours of SPE that include the additional ten (10) percent of supervision be capped at 40 or 44 hours per week? (§1387.1(b)(3))**
 - b. Would a 45 hour per week maximum including supervision be a better option?**

- ▶ Suggestion to assign percentage of hours to supervision.
- ▶ Consensus not a fan of 44 hours, should be 40 hours with supervising hours included within the 40 to maintain consistency with employment/labor laws.
- ▶ Many expressed confusion with the percentage of supervision hours required.