California Board of
PSYCHOLOGY

1625 North Market Blvd., Suite N-215, Sacramento, CA 95834
T (916) 574-7720 F (916) 574-8672 Toll-Free (866) 503-3221
www.psychology.ca.gov

MEMORANDUM

DATE	June 15, 2016
TO	Licensing Committee Members
FROM	Jacquelin Everhart Jacquelin Everhart CE/Renewals Coordinator
SUBJECT	**Agenda Item 12** *Discussion, Review and Consideration of the Proposed Revisions to Title 16 of the California Code of Regulations; Sections 1397.60, 1397.61, 1397.62, 1397.67, 1397.69, 1397.70 (CE/CPD); Recommendation to Full Board*

Discussion, Review and Consideration of the Proposed Revisions to Title 16 of the California Code of Regulations; Sections 1397.60, 1397.61, 1397.62, 1397.67, 1397.69, 1397.70 (CE/CPD); Recommendation to Full Board

Please find the attached:

A. Proposed CE/CPD regulations. The most recent revisions were made at the Licensing Committee's February 7, 2016 meeting.
B. CE/CPD Summary Verification Form
C. Public Comments

Action Requested:

Review and revise the proposed CE/CPD regulations.

§ 1397.60. Definitions. [Effective ~~January 1, 2013~~ until December 31, 2018.]

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2013, and becomes inoperative on **December 31, 2018**.

As used in this article:

(a) "Conference" means a course consisting of multiple concurrent or sequential free-standing presentations. Acceptable presentations must meet the requirements of section 1397.61(c).

(b) "Continuing education" (CE) means the variety of forms of learning experiences, including, but not limited to, lectures, conferences, seminars, workshops, grand rounds, in-service training programs, video conferencing, and independent learning technologies.

(c) "Course" or "presentation" means an approved systematic learning experience of at least one hour in length. One hour shall consist of 60 minutes of actual instruction. Courses or presentations less than one hour in duration shall not be acceptable.

(d) "Grand rounds" or "in-service training program" means a course consisting of sequential, free-standing presentations designed to meet the internal educational needs of the staff or members of an organization and is not marketed, advertised or promoted to professionals outside of the organization. Acceptable presentations must meet the requirements of section 1397.61(c).

(e) "Independent learning" means the variety of forms of organized and directed learning experiences that occur when the instructor and the student are not in direct visual or auditory contact. These include, but are not limited to, courses delivered via the Internet, CD-ROM, satellite downlink, correspondence and home study. Self-initiated, independent study programs that do not meet the requirements of section 1397.61(c) are not acceptable for continuing education. Except for qualified individuals with a disability who apply to and are approved by the Board pursuant to section 1397.62(c), independent learning can be used to meet no more than 75% (27 hours) of the continuing education required in each renewal cycle. Independent learning courses must meet the requirements of section 1397.61(c).

(f) "Provider" means an organization, institution, association, university, or other person or entity assuming full responsibility for the course offered, whose courses are accepted for credit pursuant to section 1397.61(c)(1).

Note: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Sections 29 and 2915, Business and Professions Code.

§ 1397.60. Definitions. [Effective January 1, 2019.]

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2019.

Continuing Professional Development (CPD) means required learning activities approved for the purpose of license renewal. CPD can be met in the following four categories: Professional Activities; Academic; Sponsored Continuing Education; and Board Certification.

(a) Acceptable CPD learning activities under "Professional Activities" include:

(1) "Peer Consultation"

(A) "Peer Consultation" means structured and organized interaction, in person or electronically mediated, with professional colleagues designed to broaden professional knowledge and expertise, reduce professional isolation and directly inform the work of the psychologist. CPD pursuant to this section may be obtained through individual or group case consultation, reading groups, or research groups. These activities should be focused on maintaining, developing, or increasing conceptual and applied competencies that are relevant to psychological practice, education, or science.

(B) "Peer Consultation" does not include "Supervision" as defined in section (b)(3).

Comment [D1]: Add "professional" to colleague throughout document.

(2) "Practice Outcome Monitoring" (POM)

"Practice Outcome Monitoring" (POM) means the application of outcome assessment protocols with clients/patients, in order to monitor one's own practice process and outcomes, with the goal of assessing effectiveness. All outcome measures must be sensitive to cultural and diversity issues.

Comment [D2]: Delete letter if there is only one section

(3) "Professional Services"

"Professional Services" means ongoing participation in services related to the field of psychology, or other related disciplines, including but not limited to, serving on psychological association boards or committees, editorial boards of peer reviewed journals related to psychology or other related disciplines, scientific grant review teams, boards of regulatory bodies, program development and/or evaluation activities separate and apart from a fee for service arrangement. This role supports the public service work of the profession, and reduces professional isolation.

(4) "Conference/Convention Attendance"

"Conference/Convention Attendance" means attending a professional gathering that consists of multiple concurrent or sequential free-standing presentations related to the practice of psychology where the licensee interacts with professional colleagues and participates in the social, interpersonal, professional, and scientific activities that are part of the environment of those gatherings. CPD credit can be accrued for "Conference/Convention Attendance" in addition to credit earned for completing sponsored CE coursework or sessions at the same conference/convention.

(5) "Examination Functions"

"Examination Functions" means serving in any examination development-related function for the Board or for the development of the EPPP.

(6) "Expert Review/Consultation"

"Expert Review/Consultation" means serving in any expert capacity for the Board.

(7) "Attendance at a California Board of Psychology Meeting"

"Attendance at a California Board of Psychology Meeting" means physical attendance at a full day Board meeting or physical attendance at a separately noticed Committee meeting of the Board. This activity is designed to promote knowledge of current issues before the Board and encourages public participation in the regulatory process.

(b) Acceptable CPD learning activities under "Academic" include:

(1) "Academic Coursework"

(A) "Academic Coursework" means completing and earning academic credit for a graduate-level course related to psychology from an institution whose degree meets the requirements of section 2914 of the Code.

(2) "Academic/Sponsored CE Instruction"

(A) "Academic Instruction" means: teaching a graduate-level course related to psychology in an institution that meets the requirements of section 2914 of the Code or

(B) "Sponsored CE Instruction" means: teaching a sponsored CE course that relates to the practice of psychology. (1397.61 (ii))

Comment [D3]: Remove 2914 and define?

Comment [D4]: Staff and legal to review where the course was taught to see if it would count.

(3) "Supervision"

(A) "Supervision" means overseeing the professional experience of a trainee who is accruing hours toward licensure as a Psychologist, Marriage and Family Therapist, Licensed Clinical Social Worker,

Licensed Professional Clinical Counselor, Licensed Educational Psychologist, or Physician and Surgeon.

Comment [D5]: Ensure list is comprehensive and spell out acronyms.

(4) "Publications"

(A) "Publications" means authoring or co-authoring peer-reviewed journal articles, book chapters, book(s), or editing or co-editing a book related to psychology or related discipline.

(c) Acceptable CPD learning activities under "Sponsored Continuing Education" include: any approved structured, sequenced learning activity, whether conducted in-person, online, or self-directed (e.g. home-study) pursuant to section 1397.61(f). "Course" or "presentation" means an approved systematic learning experience. "Provider" means an organization, institution, association, university, or other person or entity assuming full responsibility for the CE program offered, and whose courses are accepted for credit pursuant to section 1397.61(f)(1).

Comment [D6]: Check all references to code

(d) Acceptable CPD learning activities under "Board Certification" are defined as earning a specialty certification from the American Board of Professional Psychology (ABPP) in one of the following categories:

(1) ABPP Board Certification

(2) "Senior Option" ABPP Board Certification

Note: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Sections 29 and 2915, Business and Professions Code.

§ 1397.61. Continuing Education Requirements. [Effective ~~January 1, 2013~~ until December 31, 2018.]

Comment [D7]: Make global changes of dates of implementation

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2013, and becomes inoperative on December 31, 2018.

(a) Except as provided in section 2915(e) of the Business and Professions Code and section 1397.62 of these regulations, each licensed psychologist shall certify on the application for license renewal that he or she has completed the continuing education requirements set forth in section 2915 of the Code. A licensee who renews his or her license for the first time after the initial issuance of the license is only required to accrue continuing education for the number of months that the license was in effect, including the month the license was issued, at the rate of 1.5 hours of approved continuing education per month. Continuing education earned via independent learning pursuant to section 1397.60(e) shall be accrued at no more than 75% of the continuing education required for the first time renewal. The required hours of continuing education may not be accrued prior to the effective date of the initial issuance of the license. A licensee who

falsifies or makes a material misrepresentation of fact on a renewal application or who cannot verify completion of continuing education by producing verification of attendance certificates, whenever requested to do so by the Board, is subject to disciplinary action under section 2960 of the Code.

(b) Any person renewing or reactivating his or her license shall certify under penalty of perjury to the Board of Psychology as requested on the application for license renewal, that he or she has obtained training in the subject of laws and ethics as they apply to the practice of psychology in California. The training shall include recent changes/updates on the laws and regulations related to the practice of psychology; recent changes/updates in the Ethical Principles of Psychologists and Code of Conduct published by the American Psychological Association; accepted standards of practice; and other applications of laws and ethics as they affect the licensee's ability to practice psychology with safety to the public. Training pursuant to this section may be obtained in one or more of the following ways:

(1) Formal coursework in laws and ethics taken from an accredited educational institution;
(2) Approved continuing education course in laws and ethics;
(3) Workshops in laws and ethics;
(4) Other experience which provide direction and education in laws and ethics including, but not limited to, grand rounds or professional association presentation.

If the licensee chooses to apply a specific continuing education course on the topic of laws and ethics to meet the foregoing requirement, such a course must meet the content requirements named above, must comply with section 1397.60(c), and may be applied to the 36 hours of approved continuing education required in Business and Professions Code section 2915(a).

(c) The Board recognizes and accepts for continuing education credit courses pursuant to this section. A licensee will earn one hour continuing education credit for each hour of approved instruction.

(1) Continuing education courses shall be:

(A) provided by American Psychological Association (APA), or its approved sponsors;
(B) Continuing Medical Education (CME) courses specifically applicable and pertinent to the practice of psychology and that are accredited by the California Medical Association (CMA) or the Accreditation Council for Continuing Medical Education (ACCME); or
(C) provided by the California Psychological Association, or its approved sponsors.
(D) approved by an accrediting agency for continuing education courses taken prior to January 1, 2013, pursuant to this section as it existed prior to January 1, 2013.

(2) Topics and subject matter for all continuing education shall be pertinent to the practice of psychology. Course or learning material must have a relevance or direct application to a consumer of psychological services.
(3) No course may be taken and claimed more than once during a renewal period, nor during any twelve (12) month period, for continuing education credit.
(4) An instructor may claim the course for his/her own credit only one time that he/she teaches the acceptable course during a renewal cycle, or during any twelve (12) month period, receiving the same credit hours as the participant.

(d) Examination Functions. A licensee who serves the Board as a selected participant in any examination development related function will receive one hour of continuing education credit for each hour served. Selected Board experts will receive one hour of continuing education credit for each hour attending Board sponsored Expert Training Seminars. A licensee who receives approved continuing education credit as set forth in this paragraph shall maintain a record of hours served for submission to the Board pursuant to section 1397.61(e).

(e) A licensee shall maintain documentation of completion of continuing education requirements for four (4) years following the renewal period, and shall submit verification of completion to the Board upon request. Documentation shall contain the minimum information for review by the Board: name of provider and evidence that provider meets the requirements of section 1397.61(c)(1); topic and subject matter; number of hours or units; and a syllabus or course description. The Board shall make the final determination as to whether the continuing education submitted for credit meets the requirements of this article.

(f) Failure to provide all of the information required by this section renders any application for renewal incomplete and not eligible for renewal.

Note: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Sections 29, 32, 2915 and 2915.7, Business and Professions Code.

§ 1397.61. Continuing Professional Development Requirements. [Effective January 1, 2019.]

Comment [D8]: Global change

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2019.

(a) Except as provided in Section 2915(e) of the Business and Professions Code and Section 1397.62 of these regulations, a psychologist shall certify under

Comment [D9]: Global check, capitalization of "section"

penalty of perjury to the Board on the application for license renewal that he or she has completed the CPD requirements set forth in this Article and Section 2915 of the Code. A psychologist who falsifies or makes a material misrepresentation of fact on a renewal application, or who cannot verify the hours in which he or she engaged in the CPD activities by producing the documentation required by this Article whenever requested to do so by the Board, is subject to citation or to disciplinary action under Section 2960 of the Code.

(b) A psychologist renewing or reactivating his or her license shall certify under penalty of perjury on the application for license renewal or reactivation that he or she has engaged in a minimum of four (4) hours of training in the subject of laws and ethics, for each renewal period, as they apply to the practice of psychology in California. This includes recent changes or updates on the laws and regulations related to the practice of psychology; recent changes or updates in the Ethical Principles of Psychologists and Code of Conduct published by the American Psychological Association; accepted standards of practice; and other applications of laws and ethics as they affect the licensee's ability to practice psychology safely. This requirement can be met using any combination of the four (4) CPD categories and the licensee shall indicate on his or her documentation which of their CPD activities are being used to fulfill this requirement. The four (4) hours shall be considered part of the 36 hour CPD requirement.

(c) A psychologist renewing or reactivating his or her license shall certify under penalty of perjury on the application for license renewal or reactivation that he or she has engaged in a minimum of four (4) hours of training, for each renewal period, pertinent to Cultural Diversity and/or Social Justice Issues as they apply to the practice of psychology in California. Cultural Diversity pertains to differences in age, race, culture, ethnicity, nationality, immigration status, gender, gender identity, sexual orientation, socioeconomic status, religion/spirituality, and physical ability. Social Justice pertains to the historical, social and political inequities in the treatment of people from non-dominant groups, while addressing the various injustices and different types of oppression that contribute to individual, family and community psychological concerns. This requirement can be met using any combination of the four (4) CPD categories and the licensee shall indicate on his or her documentation which of their CPD activities are being used to fulfill this requirement. The four (4) hours shall be considered part of the 36 hour CPD requirement.

(d) Topics and subject matter for all CPD activities shall be pertinent to the practice of psychology.

(e) The Board recognizes and accepts CPD hours that meet the description of the activities set forth in Section 1397.60. With the exception of 100% ABPP Board Certification, a licensee shall accrue hours during each renewal period from at least two (2) of the four (4) CPD activity categories: Professional

Activities; Academic; Sponsored Continuing Education; and Board Certification. A licensee shall receive no more credit than the maximum number of hours allowed per renewal period specified for each activity as set forth in this section.

(f) Acceptable CPD learning activities under "Professional Activities" include:

(1) "Peer Consultation"

(A) A minimum of one (1) hour and a maximum of 18 hours can be used in "Peer Consultation".

(B) One (1) hour of activity in "Peer Consultation" equals one (1) hour of credit.

(C) The licensee shall maintain a record of this activity for submission to the Board. The record shall include: date(s), type of activity, and total number of hours.

(2) "Practice Outcome Monitoring" (POM)

(A) A maximum of nine (9) hours can be used in "POM".

(B) One (1) patient/client of "POM" equals one (1) hour credited.

(C) The licensee shall maintain a record of this activity for submission to the Board. The record shall include: date(s) of monitoring, client identifier, and how outcomes were measured.

(3) "Professional Service"

(A) A minimum of 4.5 hours and a maximum of 12 hours can be used in "Professional Service".

(B) One (1) year of "Professional Service" for a particular activity equals nine (9) hours credited and six (6) months equals 4.5 hours credited.

(C) The licensee shall maintain a record this activity for submission to the Board. The record shall include: board or program name, role of licensee, dates of service, and term of service (six months or one year).

(4) "Conference/Convention Attendance"

(A) A maximum of six (6) hours can be used in "Conference/Convention Attendance".

(B) One (1) full conference/convention day attendance equals one (1) hour credited.

(C) The licensee shall maintain a record of this activity for submission to the Board. The record shall include: name of conference/convention attended, proof of registration, and date(s) of conference/convention attended.

(5) "Examination Functions"

(A) A maximum of 12 hours can be used in "Examination Functions".

(B) One (1) hour of service equals one (1) hour of credit.

Comment [D10]: Globally make consistent ✓

(C) The licensee shall maintain a record of this activity for submission to the Board. This record shall include: name of exam, dates of service, and number of hours.

(6) "Expert Review/Consultation"

(A) A maximum of 12 hours can be used in "Expert Review/Consultation".

(B) One (1) hour of service in an expert capacity equals one (1) hour of credit.

(C) The licensee shall maintain a record of dates of service and number of hours for submission to the Board.

Comment [D11]: Globally make consistent "This record shall include:"

Comment [D12]: Globally delete "submission to the Board"

(7) "Attendance at a California Board of Psychology Meeting"

(A) A maximum of eight (8) hours can be used in "Attendance at a California Board of Psychology Meeting".

(B) Attendance for one (1) day Board or Committee meeting equals six (6) hours of credit. For Board or Committee meetings that are three (3) hours or less, one (1) hour of attendance equals one (1) hour of credit.

(C) The licensee shall maintain a record of hours for submission to the Board. This record shall include: date of meeting, name of meeting, and number of hours attended. A psychologist requesting CPD credit pursuant to this subdivision must sign in and out on an attendance sheet at the Board or Committee meeting that requires the individual to provide his or her first and last name, license number, time of arrival and time of departure from the meeting.

(g) Acceptable CPD learning activities under "Academic" include:

Comment [D13]: Review F G and H to ensure the language is similar

(1) "Academic Coursework"

(A) A maximum of 18 hours can be used in "Academic Coursework".

(B) Each course taken counts only once for each renewal period and may only be submitted for credit once the course is completed.

(C) Each one (1) semester unit earned equals six (6) hours of credit and each one (1) quarter unit earned equals 4.5 hours of credit.

(D) The licensee shall maintain a record of this activity. This record shall include a transcript with evidence of a passing grade (C or higher or "pass").

(2) "Academic/Sponsored CE Instruction"

(A) "Academic Instruction"

(i) A maximum of 18 hours can be used in "Academic Instruction".

(ii) Each course taught counts only once for each renewal period and may only be submitted for credit once the course is completed

(iii) A term-long (quarter or semester) academic course equals 18 hours of credit.

(iv) The licensee shall maintain a record of this activity. This record shall include: course syllabus, title of course, name of institution, and dates of instruction.

(B) "Sponsored CE Instruction"
(i) A maximum of 18 hours can be used in "Sponsored CE Instruction".
(ii) Each course taught counts only once for each renewal period and may only be submitted for credit once the course is completed
(iii) One (1) hour of instruction equals 1.5 hours of credit.
(iv) The licensee shall maintain a record of this activity. This record shall include: course syllabus, title of course, dates of instruction, name of sponsoring entity, and number of hours taught.

(3) "Supervision"
(A) A minimum of one (1) hour and a maximum of 18 hours can be used in "Supervision".
(B) One (1) hour of supervision equals one (1) hour of credit.
(C) The licensee shall maintain a record of hours for submission to the Board. The record shall include: dates of supervision and a trainee identifier.

(4) "Publications"
(A) A maximum of nine (9) hours can be used in "Publications".
(B) One (1) publication equals nine (9) hours of credit.
(C) A publication may only be counted once.
(D) The licensee shall maintain a record of this activity for submission to the Board. The record shall include: either a letter of acceptance for publication, or proof of publication with publication date in the renewal period for which it is being submitted.

(h) Acceptable "Sponsored Continuing Education" includes:
(1) A maximum of 27 hours can be used in "Sponsored Continuing Education".
(2) Credit may be granted only once during a renewal cycle for each course taken.
(3) One (1) hour of sponsored continuing education equals one (1) hour of credit.
(4) The licensee shall maintain proof of attendance provided by the sponsor of the continuing education for submission to the Board.

(i) Acceptable CPD learning activities under "Board Certification" include:
(1) ABPP Board Certification
(A) ABPP Board Certification can count for 100% (36 hours) of required CPD in the renewal cycle in which the certification is awarded.

Comment [D14]: Ensure numbering and lettering is correct.

(B) The licensee shall maintain proof of specialty certification for submission to the Board.

(2) "Senior Option" ABPP Board Certification

(A) "Senior Option" ABPP Board Certification can count for 50% (18 hours) of required CPD in the renewal cycle in which the certification is awarded.

(B) The licensee shall maintain proof of specialty certification for submission to the Board.

(i) To satisfy the requirements of Section 2915 of the Code, sponsored continuing education courses shall meet the following requirements. An organization previously approved by the Board to provide or approve CE is deemed approved under this section.

Comment [D15]: START NEXT MEETING HERE

(1) Sponsored CE courses must have been approved by a private, non-profit organization that has demonstrated to the Board (who is going to be reviewing and approving "approving organizations"?), in writing, that it:

(A) has a 10-year history of providing educational programming for psychologists,

(B) has documented procedures for maintaining a continuing education approval program, including, but not limited to:

(i) maintaining and managing records and data related to approved CE programs, and

(ii) monitoring and approving CE providers and courses

(C) has policies in place to avoid a conflict of interest between any provider and approval functions,

(D) evaluates each CE provider seeking approval, including itself, according to current evidence as to what constitutes an appropriate program in terms of content and level of presentation, as set out in Section 1397.61(f)(2),

(E) conducts periodic reviews of courses offered by providers approved by the organization, as well as its own courses, to determine compliance with the organization's requirements and the requirements of the Board,

(F) establishes a procedure for determining if an approved provider meets regulatory criteria as established in Section 1397.60, and

(G) has a process to respond to complaints from the Board, providers, or from licensees concerning activities of any of its approved providers or their courses.

(2) Approving organizations shall ensure that approved providers:

(A) offer content at post-licensure level in psychology that is designed to maintain, develop, broaden and/or increase professional competencies,

(B) demonstrate that the information and programs presented are intended to maintain, develop, and increase conceptual and applied

competencies that are relevant to psychological practice, education, or science, and have a direct consumer application in at least one of the following ways:

(i) programs include content related to well-established psychological principles,

(ii) programs are based on content that extends current theory, methods or research, or informs current practice,

(iii) programs provide information related to ethical, legal, statutory, or regulatory guidelines and standards that impact the practice of psychology, and/or

(iv) programs whose content focuses on non-traditional or emerging practice or theory and can demonstrate relevance to practice.

(C) Use a formal (written) evaluation tool to assess program effectiveness (what was learned) and assess how well each of the educational goals was achieved (this is separate from assessing attendee satisfaction with the CE program),

(D) Use results of the evaluation process to improve and plan future programs,

(E) Provide CE credit on the basis of one hour of credit will be earned for each hour of approved instruction,

(F) Provide attendance verification to CE attendees that includes the name of the licensee, the name of the course, the date of the course, the number of credit hours earned, and the approving agency,

(G)Provide services to all licensees without discrimination, and

(H) Ensure that advertisements for CE courses include language that accurately reflects the approval status of the provider.

(3) Approval may be revoked by the Board for good cause.

(k) A licensee shall document completion of CPD activities on CPD Verification Logs provided by the Board (Form "CPD Verification Log", rev. 09/2014). (Let's consider not having the form in regulation). Documentation shall contain sufficient information for review and verification by the Board: activity category and a description of the activity, date of activity, number of hours engaged in activity, name of consultant (if any), type of outcome monitoring (if any), professional association served (if any), name and place of publication (if any), name and place of course taken or taught (if any), name of provider (if any) and evidence that provider meets the requirements of Section 1397.61(c)(1); topic and subject matter; number of hours or units; a syllabus or course description (if any). The Board shall make the final determination as to whether the documentation submitted meets the requirements of this article. A licensee shall retain Verification Logs and supporting documentation for a minimum of four (4) years following the renewal, and shall submit documentation to the Board upon request. (Does this need to be broken down into categories and learning activities to make it clear?)

(l) No approved sponsored CPD coursework may be taken and claimed more than once during a renewal period, for continuing education credit. (This is explained in the definition under 1397.60. Do we need to say it again?)

(l) Failure to provide all of the information required by this section renders any application for renewal incomplete and not eligible for renewal.

(m) For a license that expires between January 1, 2018, and December 31, 2019, the licensee may accrue some or all CPD consistent with this section as it existed prior to January 1, 2018.

Note: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Sections 29, 32, 2915 and 2915.7, Business and Professions Code.

§ 1397.62. Continuing Education Exemptions and Exceptions. [Effective ~~January 1, 2013~~ until December 31, 2017.]

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2013, and becomes inoperative on December 31, 2017.

At the time of making application for renewal of a license, a psychologist may as provided in this section request an exemption or an exception from all or part of the continuing education requirements.

(a) The Board shall grant an exemption only if the psychologist verifies in writing that, during the two year period immediately prior to the expiration date of the license, he or she:

(1) Has been engaged in active military service reasonably preventing completion of the continuing education requirements, except that a licensee granted an exemption pursuant to this section shall still be required to fulfill the laws and ethics requirement set forth in section 1397.61(b); or

(2) Has been prevented from completing the continuing education requirements for reasons of health or other good cause which includes:

(A) Total physical and/or mental disability of the psychologist for at least one year; or

(B) Total physical and/or mental disability of an immediate family member for at least one year where the psychologist has total responsibility for the care of that family member.

Verification of a physical disability under subsection (a)(2) shall be by a licensed physician and surgeon or, in the case of a mental disability, by a licensed psychologist or a board certified or board eligible psychiatrist.

(b) An exception to the requirements of Business and Professions Code Section 2915(d) may be granted to licensed psychologists who are not engaged in the direct delivery of mental health services for whom there is an absence of available continuing education courses relevant to their specific area of practice.

(1) An exception granted pursuant to this subsection means that the Board will accept continuing education courses that are not acceptable pursuant to Section 1397.61(c) provided that they are directly related to the licensee's specific area of practice and offered by recognized professional organizations. The Board will review the licensee's area of practice, the subject matter of the course, and the provider on a case-by-case basis. This exception does not mean the licensee is exempt from completing the continuing education required by Business and Professions Code Section 2915 and this article. (2) Licensees seeking this exception shall provide all necessary information to enable the Board to determine the lack of available approved continuing education and the relevance of each course to the continuing competence of the licensee.

Such a request shall be submitted in writing and must include a clear statement as to the relevance of the course to the practice of psychology and the following information:

(A) Information describing, in detail, the depth and breadth of the content covered (e.g., a course syllabus and the goals and objectives of the course), particularly as it relates to the practice of psychology.

(B) Information that shows the course instructor's qualifications to teach the content being taught (e.g., his or her education, training, experience, scope of practice, licenses held and length of experience and expertise in the relevant subject matter), particularly as it relates to the practice of psychology.

(C) Information that shows the course provider's qualifications to offer the type of course being offered (e.g., the provider's background, history, experience and similar courses previously offered by the provider), particularly as it relates to the practice of psychology.

(3) This subsection does not apply to licensees engaged in the direct delivery of mental health services.

(c) Psychologists requiring reasonable accommodation according to the Americans with Disabilities Act may be granted an exemption from the on-site participation requirement and may substitute all or part of their continuing education requirement with an American Psychological Association or

accreditation agency approved independent learning continuing education program. A qualified individual with a disability must apply to the Board to receive this exemption.

(d) Any licensee who submits a request for an exemption or exception that is denied by the Board shall complete any continuing education requirements within 120 days of the notification that the request was denied.

NOTE: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Section 2915, Business and Professions Code.

§ 1397.62. Continuing Education Exemptions. [Effective January 1, 2018.]

This section shall be applicable to a license that expires on or after, or is reinstated or reissued on or after, January 1, 2018.

At the time of, or prior to, renewal of a license, a psychologist may, as provided in this section, be granted an exemption from all or part of the CPD requirements if he or she verifies in writing, under penalty of perjury (can we require this under penalty of perjury?), that during the two year period immediately preceding the expiration of the license, he or she:

(a) Has met the requirement of Section 114.3 of the Code, for the first renewal after discharge from active military service, he or she shall be exempt from the CPD renewal requirements, except that he or she must accrue, as a condition of renewal, 1.5 hours per month (or portion of month) remaining in the renewal cycle post-discharge, calculated 60 days after discharge date. The licensee shall, at a minimum, fulfill the Laws and Ethics requirement set out in Section 1397.61(b), and the Cultural Diversity/Social Justice requirement set out in Section 1397.61(c).

(b) Has been prevented from completing the CPD requirements for reasons of health or other good cause, which includes:

(1) Total physical and/or mental disability of the psychologist for at least one year; or

(2) Total physical and/or mental disability of an immediate family member for at least one year where the psychologist has total responsibility for the care of that family member.

Verification of a physical disability under subsection (b)(1) and/or (b)(2) shall be by a licensed physician and surgeon or, in the case of a mental disability, by a licensed psychologist or a board certified or board eligible psychiatrist.

(c) Any licensee who submits a request for an exemption that is denied by the Board shall complete any CPD requirements within 120 days of the notification that the request was denied.

NOTE: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Section 2915, Business and Professions Code.

§ 1397.67. Renewal After Inactive or ~~Delinquent~~ Expired Status. [Effective ~~January 1, 2013~~ until December 31, 2017.]

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2013, and becomes inoperative on December 31, 2017.

(a) To activate a license which has been placed on inactive status pursuant to Section 2988 of the Code, the licensee must submit evidence of completion of the requisite 36 hours of qualifying continuing education courses for the two-year period prior to establishing the license as active.

(b) For the renewal of a ~~delinquent~~ expired psychologist license within three years of the date of expiration, the applicant for renewal shall provide evidence of completion of 36 hours of qualifying continuing education courses for the two-year period prior to renewing the license.

After a license has been ~~delinquent~~ expired for three years, the license is automatically cancelled and the applicant must submit a complete licensing application, meet all current licensing requirements, and successfully pass the licensing examination just as for the initial licensing application unless the board grants a waiver of the examination pursuant to Section 2946 of the Code.

NOTE: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Section 2915, 2984, and 2988, Business and Professions Code.

§ 1397.67. Renewal After Inactive or Expired Status. [Effective January 1, 2018.] (LEGAL: do we need a new 1397.67?)

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2018.

(a) To activate a license that has been placed on inactive status pursuant to Section 2988 of the Code, the licensee must submit evidence of completion of the requisite 36 hours of qualifying CPD for the two-year period prior to establishing the license as active.

(b) For the renewal of an expired psychologist license within three years of the date of expiration, the applicant for renewal shall provide evidence of completion

of 36 hours of qualifying CPD for the two-year period prior to renewing the license.

After a license has been expired for three years, the license is automatically cancelled and the applicant must submit a complete licensing application, meet all current licensing requirements, and successfully pass the licensing examination just as for the initial licensing application unless the Board grants a waiver of the examination pursuant to Section 2946 of the Code.

NOTE: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Section 2915, 2984, and 2988, Business and Professions Code.

§ 1397.69. License Fees. [Effective January 1, 2013.]

This section shall be applicable to a license that expires on or after, or is reinstated or issued on or after, January 1, 2013.

For the administration of this article, in addition to any other fees due the Board and as a condition of renewal or reinstatement, a $10 fee is to be paid to the Board by a licensee renewing an inactive status or after inactive or ~~delinquent~~ expired status.

NOTE: Authority cited: Sections 2915(g) and 2930, Business and Professions Code. Reference: Section 2915(j), Business and Professions Code.

(LEGAL: do we need to include 1397.70?)
Is this a section 100 change?

CONTINUING EDUCATION (CE)/aka CONTINUING PROFESSIONAL DEVELOPMENT (CPD) SUMMARY VERIFICATION FORM

Please do not submit any CE documentation with your renewal

If you are selected for an audit, you will be notified; at that time, you will submit these logs and documentation to the Board.

CPD Category	Max Hours Allowed	Description of Activity(ies) Completed	Date Completed	# of Hours Awarded (Not to exceed max allowed)	Check if applicable to:	
					Laws & Ethics Requirement	Cultural Diversity Requirement
Peer Consultation	18					
Practice Outcome Monitoring	9					
Professional Activities	12					
Conferences / Conventions	6					
Board Meeting Attendance (Full Board or Committee)	12					
Examination Functions	12					
Academic Courses	18					
Academic Instruction	18					
Supervision	18					
Publications	9					
Sponsored Continuing Education Coursework	18					
ABPP Certification	36					
"Senior" ABPP Certification	18					

Total Hours Earned for Renewal Period: _____

CONTINUING EDUCATION (CE)/aka CONTINUING PROFESSIONAL DEVELOPMENT (CPD) DETAILED VERIFICATION FORM

Name: _____

Address: _____

Telephone #: _____

e-mail: _____

Identify below the activities completed for fulfilling the CE/CPD requirements.
Retain all verifying documentation in your records. You may be asked to provide this documentation at a later date (e.g. in the event you are selected for an audit).

Peer Consultation

*Check if Applicable to: Laws & Ethics Requirements (L&E): ☐ Cultural Diversity/Social Justice Requirement (CD/SJ): ☐

Date(s) of Meeting(s): _____

Brief Description _____

# of Hours: _____

Person Attesting to Meetings (retain in your records a signed attendance log attesting to your presence)

Applicability to Practice: _____

Practice Outcome Monitoring *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Date(s) of Session(s): _____

Client/Patient ID (Please be mindful of confidentiality): _____

# of Hours: _____

Applicability to Practice: _____

*Retain in your records a log including dates, # of hours, details of activities/discussions

Professional Activities *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name of Association/Regulatory Body: _____

Date of Appointment: _____

Duties: _____

Applicability to Practice: _____

*Retain in your records verification documentation from organization

CONTINUING EDUCATION (CE)/aka CONTINUING PROFESSIONAL DEVELOPMENT (CPD) DETAILED VERIFICATION FORM

Conferences / Conventions *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Date(s) of Meeting(s): _____

Nature of Conference / Convention: _____

# of Hours: _____

Applicability to Practice: _____

*Retain in your records documentation attesting to your presence / participation

Board Meeting Attendance *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Date(s) of Meeting(s): _____

# of Hours: _____

Examination Functions *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name of Association/Regulatory Body: _____

Date of Appointment: _____

Duties: _____

Applicability to Practice: _____

*Retain in your records verification documentation from organization

Academic Courses *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name(s) of Course(s): _____

Mode(s) of Delivery (in person, online, video, etc.): _____

Academic Institution: _____

# of Hours (per course): _____

Applicability to Practice: _____

*Retain in your records verification documentation from provider/academic institution (including course description / syllabus)

Academic Instruction *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name(s) of Course(s): _____

Mode(s) of Delivery (in person, online, video, etc.): _____

Provider / Academic Institution: _____

# of Hours (per course): _____

Applicability to Practice: _____

*Retain in your records verification documentation from provider/academic institution (including course description / syllabus)

CONTINUING EDUCATION (CE)/aka CONTINUING PROFESSIONAL DEVELOPMENT (CPD) DETAILED VERIFICATION FORM

Supervision *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name(s) of Supervisee(s): _____

# of Hours: _____

Applicability to Practice: _____

*Retain in your records a log including dates, # of hours, details of activities/discussions

Publications *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Title(s) of Publication(s): _____

Title(s) of Journal Article(s): _____

# of Hours: _____

Applicability to Practice: _____

Sponsored Continuing Education Coursework *Check if Applicable to: L&E: ☐ CD/SJ: ☐

Name(s) of Course(s): _____

Mode(s) of Delivery (in person, online, video, etc.): _____

Provider: _____

# of Hours (per course): _____

Applicability to Practice: _____

*Retain in your records copies of certificates

Describe how you have complied with the Cultural Diversity/Social Justice Requirement (4 hour minimum):

Name(s) of CPD Activity(ies): _____

Mode(s) of Delivery (in person, online, video, etc.): _____

Applicability to Practice: _____

Describe how you have complied with the Law & Ethics Requirement (4 hour minimum):

Name(s) of CPD Activity(ies): _____

Mode(s) of Delivery (in person, online, video, etc.): _____

Applicability to Practice: _____

Requests regarding CDP/CE
List Only – Rationales not included in this document

DATE: January 31, 2016
TO: Members of the Licensing Committee and CA Board of Psychology
RE: Requests regarding CPD/CE
FROM: Karen Shore, PhD, ABPP, CGP

INTRODUCTION

ASPPB's GOALS FOR CDP: Main goals for change to a CDP model as stated in ASPPB's *Maintenance of Competence for Licensure (MOCL) White Paper* and their *Guidelines for Continuing Professional Development* include:

1. Promote thoughtfully planned life-long learning for maximal competence in one's area of practice
2. Protect the public by ensuring that psychologists remain current with new information and developments
3. Reduce psychologist isolation

ASPPB's ACKNOWLEDGEMENTS: According to their *Guidelines for Continuing Professional Development*, ASPPB acknowledges or states:

1. The *Guidelines* themselves are not evidence-based, as the evidence for what actually works in CPD is not robust (Page 9).
2. "Although the research is limited, we know that people have different learning styles, that reducing isolation contributes to the likelihood of changes in practice and to keeping current, and that content conveyed by various methods is more likely to be retained."
3. Task Force members determined that flexibility was key in terms of helping ensure that psychologists are able to take advantage of the variety of ways that people learn and thus how CPD credits can be earned.

REASONS FOR WRITING TO YOU: I agree that all the CPD categories and activities are wonderful activities for psychologists, and excellent recommendations for what psychologists can do outside of their regular work. Many of these are activities I suggest to early career psychologists when they seek mentoring and advice. My reasons for writing are that since there is a firm desire to move from a CE model to a CPD model, that you a) add categories that are not yet, or not clear that they are, included that further reflect what psychologists do to reach the stated goals, b) consider that CE is undervalued by the proposed model based on lack of research and misapplication of the research as it currently exists, and c) trim the documentation requirements slightly.

ABOUT ME: I am outlining my professional history so that you can feel assured that these suggestions are being made by someone who values and has demonstrated responsibility to life-long learning, service to the profession of psychology, and to protection of the public. There is no intent in these suggestions to avoid responsibilities.

- I am 68 years old, licensed in NY in 1990; in CA in 2002. I maintain both licenses.
- I have served continuously on Committees and Boards since 1982: Long Island Crisis Center, APA, NY State Psychological Association, two County Psychological Associations, and four interdisciplinary organizations. In addition to current Board service for the L.A. Center for Emotionally Focused Couples Therapy (I will become President in 2016 or 2017) and service as Leader of the Couples Therapy Special Interest Group for LACPA, I just joined the American Board of Group Psychology, an ABPP-affiliated Board. I am Past-President of three organizations (including LACPA).
- I won 5 awards for advocacy on behalf of mental health consumers and our profession (APA Presidential Citation, Division 42 Psychologist of the Year (1997), NY State Psychological Association, American Psychoanalytic Association, and Suffolk County (NY) Psychological Association Distinguished Psychologist of the Year, 1997), plus an award for service to LACPA.
- The advocacy work within APA and a few of its organizations and with a national independent organization was designed to bring the problems of managed mental health care and how it was harming patients into the public view and to legislators. This involved creating and growing a national organization of professionals and consumers; lobbying and teaching others how to lobby; TV, newspaper, magazine, and

radio interviews; speaking engagements; presenting issues to APA's Council; and writing articles for APA Division newsletters to increase psychologist awareness and activism.

- I have developed specialties in Intensive Psychotherapy and Psychoanalysis, Group Psychotherapy, and Couples Therapy, and continue to learn in these models. I completed three accredited post-doctoral programs (Adelphi University's Derner Institute (NY), 1991-2002; Psychoanalysis, Group Therapy, Couples Therapy) involving a total of 8 years of weekly classes and 11 years of weekly supervision). I later trained in Emotionally Focused Couples Therapy and am a Certified Supervisor in this model. I developed the specialties by taking the post-doctoral programs and later taking very large amounts of multi-modal CE courses. I took 79 CE hours in 2013-2014 (had to cancel 20 more CE hours I had signed up for when my father died) and took 67 CE hours in 2015 alone.
- I hold am ABPP in Group Psychology
- I taught in three different accredited training institutes and presented dozens of CE programs

There are many psychologists as dedicated to their development as I have been, and many who have done more. Please consider adding the additional goal and the activities listed on the next two pages as CPD activities, as these help us maximize our development, knowledge, competence and expertise as professionals.

(Please see next two pages for the list of requests)

LIST OF REQUESTS REGARDING CPD/CE

NOTE: Rationale for each request will be submitted in a separate document once editing is finished, which may not be until after the Licensing Committee's meeting in February, 2016. This document contains only the list of requests.

Please consider the following items:

1. Add as a Goal: "Encourage psychologists to study their field in depth, developing specialties as appropriate."

2. Please add a fifth separate Category (not subsumed under "Continuing Education") called "Self-Directed Learning." Allow up to 9 hours. This would include activities for which no CE is provided:
   a) Reading articles, books, and chapters in peer-reviewed journals or books;
   b) Reading articles in professional newsletters, magazines, and listserve discussions on research, clinical, legal, and ethical issues;
   c) Contributing to listserve discussions on research, clinical, legal, and ethical issues;
   d) Watching DVDs or other videos and listening to podcasts that apply to practice, etc.

3. <u>In the "Academic" Category</u>:

   a) Please add an activity called "Formal Post-Licensure Training Programs." This refers to matriculation in an accredited post-licensure Institute (psychoanalytic or otherwise) or Training Program. Such programs include 3 – 4 hours of weekly classes plus weekly clinical consultation (usually called "supervision" by tradition, though it is "consultation" since the students are licensed) for at least one academic year, and might also include a required personal therapy for at least one academic year. Allow up to 36 hours if one attends "full-time," defined as 3-4 hours of classes per week plus at least one hour of weekly consultation with a faculty member or someone approved by the Institute.
   b) Please add or clarify that you are including CPD hours for the provision of consultation (individual or group) to licensed doctoral and masters level clinicians for a fee, as well as obtaining consultation (individual or group) from a more advanced psychologist/clinician for a fee. Allow up to 18 hours.
   c) Please add, or clarify that these are included, allowing up to 18 hours, pro-rating hours credited depending on the number of weeks of the course if less than a semester-long course:
      i. Teaching an undergraduate level psychology course.
      ii. Teaching at an accredited Formal Post-Licensure Institute or Training Program.
   d) Please add serving as a Chair or Reader for a PhD dissertation or PsyD final project for a student in an accredited graduate program or an accredited Formal Post-Licensure Training Program, as defined above. Allow up to 12 hours if a Reader, up to 18 hours if a Chair.
   e) In "Publications," please add, or clarify that it is included: Writing a psychology- or mental health-related article for a psychology or multidisciplinary organization's newsletter, newspaper or magazine; or a magazine or newspaper sold to the public; or a blog related to psychological issues. Allow up to 4 hours.

4. <u>Under "Professional Activities:"</u>

   a) Please add or clarify that this is included: CPD for serving on a Committee or Board of Directors of any psychology, mental health, or health related non-profit organization, including interdisciplinary organizations. Allow up to 12 hours, with minimum of 4.5 hours if used.
   b) Please add or clarify that this is included: CPD for serving on a Committee or a Board of Directors of any social justice or civil rights related non-profit organization. Allow up to 12 hours, with minimum of 4.5 hours if used.
   c) Under "Peer Consultation" please add or clarify that this includes the book clubs, film clubs, and Special Interest Groups (SIGs) sponsored by our state or county psychological associations and any interdisciplinary mental health related organization. Allow up to 18 hours.
   d) Under "Peer Consultation" please include telephone calls made on an as-needed basis to colleagues, attorneys, professional insurance carriers, and the Board of Psychology for consultation and advice on

clinical, legal, and/or ethical issues. Include 0.25 credits for each 15 minutes spent in such consultation up to 9 hours.

5. Allow an option to obtain all CPD through CE credits with the proviso that for those choosing "CE Only," the CPD requirement is raised to 40, 45, 50 or even 55 CE units per licensing cycle.

6. On Page 4 (i), the *Third Modified Text of Regulations*, please delete the language in the text and future revisions that states (in regard to service on committees and boards): "A licensee must explain the role(s) he or she has assumed and must demonstrate how this role supports the public service work of the profession and reduces professional isolation."

7. Consider modifications and exemptions to all or some of the regulations for situations less serious than total disability for one year of the psychologist or having total responsibility for one year for someone who is totally disabled. See Page 16 in the *Third Modified Text of Regulations*.

8. Requests related to the *Detailed Verification Form*:

   a) Sponsored CE documentation: Please use only the CE certificates from approved sponsors as verification, description and proof of relevance; delete the other requested verification information. Delete paragraph (g) on p 12 of the *Third Modified Text of Regulations*, which spells out forms of verification that are being requested of the licensee.
   b) Please eliminate the "Applicability to Practice" on the *Detailed Verification Logs* for all categories and activities.

Thank you very much for your consideration.

Respectfully submitted,

Karen Shore, PhD, ABPP, CGP

LIST OF REQUESTS – WITH RATIONALES

Please consider these requests to further increase flexibility for psychologists with additional meaningful CPD activities that might not have been considered as yet, and consider one additional goal, supporting it in meaningful ways:

1. **Add as a Goal: "Encourage psychologists to study their field in depth, developing specialties as appropriate.**

   RATIONALE:
   a) Mental health issues are complex
   b) The public is best protected when psychologists seek first competence and then expertise and excellence by studying their fields in depth and by adding specialties to their general practice.
   c) Examples of "general practice" are Clinical Psychology, Psychotherapy. Specialties are CBT, Psychoanalysis, Forensics, PTSD/Trauma, Neuropsychology, Personality Assessment, each requiring years of post-degree training.
   d) Subspecialties involve learning particular modes of treatment, study, or assessment requiring even more years, even decades of learning, study and practice. For PTSD, therapists could seek subspecialty training in treatment methods such as EMDR, Somatic Experiencing, Trauma Resiliency Model, Hypnosis, or Neurofeedback. A specialty in Psychotherapy could be child therapy, group therapy, couples therapy, etc. Subspecialties in couples therapy would be Emotionally Focused Couples Therapy, Imago Therapy, Gottman, and others.
   e) Excellence in specialty and subspecialty training is obtained through:
      i. huge amounts of multi-modal CE courses on the specialty and subspecialty (theory, research and practice). Modes of delivery in CE courses can include: didactic instruction, small group practice with coaching, small group discussion, watching videos of experts working and discussion after viewing, experiential exercises.
      ii. paying for consultation from experts.
      iii. peer consultation.
      iv. watching videos of experts doing the work.
      v. reading books, chapters, articles, and listserve discussions.

2. **Please add a fifth separate Category (not subsumed under "Continuing Education") called "Self-Directed Learning," where no CE is provided. Allow up to 9 hours:**
   a) **Reading articles, books, and chapters in peer-reviewed journals or books;**
   b) **Reading articles in professional newsletters, magazines, and listserve discussions on research, clinical, legal, and ethical issues;**
   c) **Contributing to listserve discussions on research, clinical, legal, and ethical issues;**
   d) **Watching DVDs and listening to podcasts that apply to practice, etc.**

   RATIONALE:
      i. These activities help psychologists gain both breadth and depth of knowledge, keep current, and develop and refine specialties and subspecialties.
      ii. Listserve members provide information, opinions, suggestions for reading, clinical ideas; information about treatment, practice, research, theory, ethics, legal issues, etc.
      iii. Listserves reduce isolation because colleagues who live in different cities or states, colleagues of differing ages and experience, all share information and ideas.
      iv. Personally, next to well-chosen CE and watching videos of experts working with clients, reading and participating on listserves is my third best way of learning, keeping current, and exploring ethical issues.

v. Medical licensing boards of many states allow physicians to include Self-Directed Learning separate from formal CE as part of their licensure renewal qualifications. It is reasonable that BOP's do similarly.

3. **In the "Academic" Category:**

a) **Please add an activity called "Formal Post-Licensure Training Programs." This refers to matriculation in an accredited post-licensure Institute (psychoanalytic or otherwise) or Training Program. Such programs include 3 – 4 hours of weekly classes plus weekly clinical consultation (often called "supervision" by tradition, but the students are licensed) for at least one academic year; might also include required personal therapy for at least one year. Allow up to 36 hours for "full-time" (3-4 hours of classes/week plus one hour/week of consultation with a faculty member or someone approved by the Institute.**

RATIONALE:

i. Such programs require intense studying of combined weekly classes, supervision and assigned readings, for one to four years, with consultation sometimes lasting longer.
ii. This training fulfills all goals of CPD and helps psychologists develop a specialty.
iii. Faculty members and supervisors are usually the most highly trained and respected local people in their fields.
iv. I graduated from three Institute post-doctoral programs (Psychoanalysis, Group Therapy, and Couples Therapy, comprising 8 years of weekly classes, 11 years of weekly consultation, plus required personal therapy and assigned readings). I also achieved ABPP in Group Psychology. I found the Training Programs to be far more time-intensive, and intensive over a longer period of time, than achieving ABPP, which itself is quite difficult. While the ABPP process helps us consolidate material and learn some new material, the Formal Post-Licensure Training Programs introduced significantly more new learning.
v. Thus, since 36 hours is allowed for ABPP, it seems 36 hours should also be allowed for each year of full-time attendance in a Formal Post-Licensure Training Program.

b) **Please add or clarify that you are including CPD hours for the provision of consultation (individual or group) to licensed doctoral and masters level clinicians for a fee, as well as obtaining consultation (individual or group) from a more advanced psychologist or other licensed clinician for a fee. Allow up to 18 hours.**

i. Up to 18 hours is allowed for providing supervision to a pre-licensed trainees.
ii. Providing and obtaining post-licensure consultation, like supervising trainees, provides a service to the profession. Obtaining it helps psychologists increase their knowledge, skill and competence under the direction of a seasoned licensed psychologist.
iii. Some psychologists prefer paying for consultation from experts over peer consultation.
iv. Allowing CPD for providing and obtaining post-licensure consultation would further increase flexibility and would recognize and support the contributions and strivings of psychologists.

c) **Please add, or clarify that these are included, allowing up to 18 hours, pro-rating hours credited depending on the number of weeks of the course if less than a semester-long course:**

i. Teaching an undergraduate level psychology course.
ii. Teaching at an accredited Formal Post-Licensure Institute or Training Program.

RATIONALE:

a. Teaching a graduate school class for one semester is included for CPD.
b. Teaching undergraduates has the potential to inspire students and attract the best and brightest to professional psychology.
c. Teaching at an accredited Formal Post-Licensure Institute or Training Program, as defined above, is as valuable for the continuing growth and development of licensed clinicians, and for protection of the public, as teaching a graduate school class is for graduate students.
d. Including this in CPD would increase flexibility by supporting what some advanced psychologists do to contribute to the training of others.

d) **Please add serving as a Chair or Reader for a PhD dissertation or PsyD final project for a student in an accredited graduate program or an accredited Formal Post-Licensure Training Program, as defined above. Allow up to 12 hours if a Reader, up to 18 hours if a Chair.**

RATIONALE:

i. Readers and Chairs for Dissertation and Final Project Committees provide mentorship, guidance, knowledge, resources, advice, and critiques to students throughout the process.
ii. Serving as a Reader or Chair requires a very large investment of time.
iii. Including this in CPD would recognize, reflect, and support what some advanced psychologists do to contribute to learners in the professions, increasing the flexibility in CPD.

e) **In "Publications," please add, or clarify that it is included: Writing a psychology or mental health related article for a psychology or multidisciplinary organization's newsletter, newspaper or magazine; or a magazine or newspaper sold to the public; or a blog related to psychological issues. Allow up to 4 hours.**

i. Some psychologists share their expertise and experience by writing for these kinds of publications and blogs.
ii. Such articles provide a service to the profession and/or the public.

4. **Under "Professional Activities:"**

a) **Please add, or clarify that this is included, CPD for serving on a Committee or Board of Directors of any psychology, mental health, or health related non-profit organization, including interdisciplinary organizations. Allow up to 12 hours, with minimum of 4.5 hours if used.**
b) **Please add, or clarify that this is included, CPD for serving on a Committee or Board of Directors of any social justice or civil rights related non-profit organization. Allow up to 12 hours, with minimum of 4.5 hours if used.**

RATIONALE:

i. *ASPPB Guidelines* recommends CPD for Committee and Board work to overcome isolation and ensure that the public service work of the profession is furthered.
ii. As written, the CPD regulations seem to say that credit is only given for service in a psychology organization.
iii. Many psychologists serve in interdisciplinary and/or consumer organizations that address mental health (e.g., National Alliance of the Mentally, American Group Psychotherapy Association, etc.).
iv. Many psychologists volunteer on Committees and Boards related to other health issues

(American Cancer Society, American Heart Association, Doctors Without Borders) or within social justice or civil rights organizations (Food Banks and Homeless Shelters, Anti-Defamation League, Museum of Tolerance, Southern Poverty Law Center), reducing isolation and serving the public good beyond psychology.

v. Service in organizations beyond psychology familiarizes other professionals and the public with psychologists and potentially increases respect for psychology.

vi. Many psychologists only have time to serve on one Committee or Board. If CPD is only given for service to a psychology organization, some psychologists would have to quit meaningful volunteer work that lies outside of psychology. This seems counter to the goal of overcoming isolation and seems to undervalue service to the public at large.

vii. Expanding this as above increases flexibility for psychologists devoted to the public good and/or to the good of the professions.

c) **Under "Peer Consultation" please add or clarify that this includes the Book Clubs, Film Clubs, and Special Interest Groups (SIGs) sponsored by our state or county psychological associations and any interdisciplinary mental health related organization. Allow up to 18 hours.**

RATIONALE:

i. The L.A. County Psychological Association provides a Book Club, a Film Club, and SIG's. Other organizations in psychology or in an interdisciplinary organization might as well.

ii. Book Clubs might include novels, biographies, or clinical books, all discussed from psychological perspectives. The Film Club might view non-clinical films that have psychological themes. The SIGs include such SIGs as those related to various psychological topics, such as Assessment, Forensics, Eating Disorders, Couples Therapy, CBT, Divorce/Separation, Addictions, etc.

iii. These clubs and SIGs do not provide CE.

iv. These clubs and SIGs serve to provide new knowledge/understandings through didactic learning, reading, viewing, and/or peer discussion.

v. The clubs and SIGs reduce isolation.

d) **Under "Peer Consultation" please include telephone calls or visits made on an as-needed basis to colleagues, attorneys, professional insurance carriers, and the Board of Psychology for consultation and advice on clinical, legal, and/or ethical issues. Include 0.25 credits for each 15 minutes spent in such consultation up to 9 hours.**

RATIONALE:

i. Many psychologists do consult with peers, experts, and other professionals on an as-needed basis for particular problems or issues that arise in their work.

ii. Focused calls or visits to particular peers or experts for particular problems may be more beneficial to some than an ongoing peer group.

iii. Awarding CPD for as-needed calls or visits gives encouragement and support to a psychologist who finds him/herself with a difficult problem or ethical dilemma.

iv. Encouraging such phone calls protects the public.

5. **Allow an option to obtain all CPD through CE credits with the proviso that for those choosing "CE Only," the CPD requirement is raised to 45, 50 or even 55 CE units per licensing cycle.**

RATIONALE:

a) I believe there is a misapplication of the research on CE that has led to the limitation on how

much formal CE can be applied to CPD.

i. The *MOCL White Paper*, Page 2, quoting ASPPB, 2012: "CE, as it is generally practiced, refers to educational activities in psychology that are offered in one-time-only workshop formats." This is not how CE is generally practiced by many psychologists who seek depth and specialization in specific areas.
ii. Many psychologists take dozens and dozens – even hundreds of hours of CE in focused areas over decades to develop depth and specialization in one or more areas, as well as to keep up-to-date and to explore new and unfamiliar topics. This is part of a thoughtfully planned individualized path to competence, excellence, and expertise.
iii. Many of the Formal CE courses chosen by those seeking depth and specialization are multi-modal. As above, modes of delivery in CE courses can include: didactic instruction, small group practice with coaching, small group discussion, watching videos of experts working and discussion after viewing, experiential exercises.
iv. Research cannot fully study how CE impacts competence if it only looks at CE as a "one-time-only" workshop.
v. The effect of very large amounts of CE over years and decades hasn't been studied much yet in medicine, though there are some research findings supporting the benefit of multiple learning events (see below). I don't think it has been studied in psychology at all.
vi. Experienced psychologists with specialties see taking massive amounts of well-chosen CE as meeting all the goals of CPD.
vii. If it is ever studied, it might turn out that taking very large amounts of CE over decades proves to be the most important CPD activity, fulfilling all CPD goals.

b) Research findings to support this request:

i. Marinopoulos et al (2007) explored 68,000 citations and 145 reviews and articles in medicine and found that CME appears to be effective in enhancing knowledge, attitudes, skills, behavior in practice and clinical outcomes. They concluded: a) live media is more effective than print, b) multimedia is more effective than single media interventions, c) multiple exposures are more effective than a single exposure, d) interactive techniques are more effective than didactic techniques, and e) simulation methods are effective for improving psychomotor and procedural skills.
ii. Cervero & Gaines (Effectiveness of Continuing Medical Education: Updated Synthesis of Systematic Reviews, 2014): "The reviews buttress previous research showing that CME leads to improvement in physician performance and positive patient health outcomes if it is more interactive, uses more methods, involves multiple exposures, is longer, and is focused on outcomes that are considered important by physicians."
iii. Greg Neimeyer, PhD, is Association Executive Director of APA's Education Directorate, Continuing Education in Psychology Committee. Jennifer Taylor, PhD, is a member of APA's Continuing Education Committee. They have done the bulk of the research on CE in Psychology. See citations that follow.
iv. Neimeyer, Taylor & Cox (2012) review article: In a survey of over 6000 licensed psychologists, 81% reported that their CE in the prior year helped them become more effective in their work.
v. Neimeyer, Taylor & Cox (2012): A study of 1606 psychologists where 40% were ABPP (in general only 3-4% of psychologists achieve ABPP, so this was an advanced group) reported that in the previous 12 months, the CPD activities rated highest were self-directed learning, peer consultation, and formal CE. The two activities seen as making little contribution to professional development were performing outcome assessments and serving on professional boards.

vi. Taylor & Neimeyer (2015): A survey of 742 potential consumers of psychological services showed that formal CE and ABPP are perceived as contributing significantly more to the fulfillment of the three objectives of CPD (competence, enhance service delivery, ensure public trust) as compared with other forms of CPD. Teaching classes and serving on professional boards were the two activities perceived as contributing the least, not reaching the mid-point of a 5-point scale for any of the three objectives.

vii. Greg Niemeyer (personal communication, March 5, 2015): "The crucial aspect of it (CE) is that the experience places the psychologist in the role of a learner and is verified and evaluated. It is the only CPD activity that does all this, and thus is the one activity of all the CPDs that should not have a limit on it."

viii. Multi-modal learning has been shown to enhance learning better than single mode presentations.

ix. *MOCL White Paper*, page 21: In a nationwide study of more than 1000 psychologists, 63% reported that their formal CE participation frequently translated into their professional practice (Neimeyer, Taylor, & Philip, 2010), a finding consistent with other allied health fields (Young & Willie, 1984).

x. Transfer of learning outcomes into the workplace is particularly strong if there is a high similarity between the training and the jobs to be performed (*ASPPB Guidelines*, page 41). Those choosing CE carefully and thoughtfully choose a lot of CE that directly relates to their work.

xi. In 2015 I conducted a Survey of California Psychologists who took more CE than required; 218 licensed psychologists responded over one week:
    1. 55% took 50 or more CE hours in their last renewal cycle or previous 2 years. The other 45% took between 36 and 50 hours over two years.
    2. "Why did you take more CE hours than required?"
        a. 83% endorsed "I want to keep improving in my specialty area(s) or in topics most relevant to my daily work."
        b. 66% endorsed "I find formal CE an excellent way to keep up-to-date."
        c. 80% endorsed "I am self-motivated to keep learning."
        d. 59% endorsed "I choose my CE carefully to get the most out of it."
        e. 66% endorsed "I often choose CE given by known experts in the field so that I can learn from the best people."
        f. 52% endorsed "I prefer to learn from people who have a lot more knowledge about something than I do."
        g. 44% endorsed "I wanted to take several CE in unfamiliar content areas to improve the breadth of my knowledge."
        h. 80% endorsed they were taking more CE than required to improve in a specialty area or to develop a new specialty area.
        i. 71% said that taking CE courses had a "large" or "huge" impact on their continuing improvement and refinement of their skills.

xii. Advanced CE courses are usually taught by known experts and are often are multi-modal, and usually include didactic learning, viewing an expert working with a client live or via a recorded DVD, experiential exercises; breaking into small groups where each attendee practices skills and is coached by a more advanced clinician; and/or breaking into small group discussions.

c) Providing this option increases flexibility for those who have found through decades of experience that focused, thoughtfully chosen, advanced CE courses are their best way of learning, of developing specialties, and of learning new information both in and outside of their

areas of focus. Providing this option honors their experience.

d) Reductions in isolation comes from attending very large amounts of CE because psychologists meet and get to talk with colleagues frequently – once or twice/month for those taking very large amounts of CE.

e) Psychologists who are taking huge amounts (upwards of 80, 100, 110 and more CE hours or more per two years), are living the ideals of ASPPB and the BOP, and going beyond the goal of competence to achieve expertise and strive for excellence.

f) Some psychologists have periods in their life when they are exceedingly stressed due to health or other problems in their own life and/or in one or more generations in their family. Finding time for meetings may be more of a challenge and difficult due to needing to meet colleagues' schedules, traffic, and distance.

   i. Requiring a psychologist to do CPD activities they do not find as helpful as well-chosen CE could mean that they would be forced to take less CE than they wish, and they will actually be impeded in their development having to spend time doing something that for them does not teach them as much. The flexibility of allowing a "CE Only" option, even if it would require 45, 50, or 55 hours, allows a psychologist under stress to continue learning in the best and/or most efficient way possible and maintain their license.

   ii. Meaningful CE courses can be had at many different times and formats (in person, online, through a DVD or reading particular articles, etc.) and does not require the psychologist to match schedules with other psychologists who are at a similar level, which can be exceedingly difficult and just adds stress to a very difficult life.

g) If we ever do perform relevant research, based on the minimal research we have so far it is likely we will find that massive amounts of well-chosen, multi-modal Formal CE, Self-Directed learning, paying for consultation, and peer consultation as needed or in an ongoing group will prove to be the best ways to meet ASPPB's goals. And research is likely to find that the benefit of any particular combination of such activities will vary from psychologist to psychologist. Without empirical support, it seems premature to limit the amount of CE hours that can be applied to CPD, and better to increase required hours toward CPD for a "CE Only" option than to cap it.

h) If my figuring is correct, one's license will be able to be renewed by just taking the two required CE courses in ethics and diversity/social justice (total of 8 CE hours), and no more CE than that. Yet those who take 100 CE hours would not be renewed without other categories. I would hope that psychologists who take very large amounts of CE will be supported as much as those who will now take very little.

i) One person on the CPA listserve wrote when CPD was announced: "Great! Now I don't have to take so much CE!" I think taking <u>less</u> CE than before CPD is more dangerous to the profession and the public than taking far more CE than is required without doing the other categories.

j) The Survey of psychologists I did last year (mentioned above) showed that many psychologists will accept having a CPD requirement of more hours than others if they can take CE only.

k) I understand a concern has been mentioned that some psychologists play video games during CE courses and this, in addition to CE mainly only being studied as a "one-time only" learning event, might be influencing the BOP members against CE. I have only witnessed this behavior during CE that is given at a convention's plenary session where that presentation is the only event offered at that time, or where there are a few choices but it is possible that none of the choices are of interest to that psychologist. I have <u>never</u> seen anyone playing video games during the hundreds and hundreds of specifically chosen advanced CE courses I have taken, and I take 70 – 120 CE hours every two years. The attendees in these courses deliberately take these courses for the same reasons I am: Attaining competence, excellence, and expertise, and they do so at a tremendous cost in time and money because of their motivation to learn and do well.

6. **On Page 4 (i), the *Third Modified Text of Regulations*, please delete the language in the text and future revisions that states (in regard to service on committees and boards): "A licensee must explain the role(s) he or she has assumed and must demonstrate how this role supports the public service work of the profession and reduces professional isolation."**

   RATIONALE:
   a) Explaining how committee and board work reduces isolation is obvious. I can only imagine writing "I was with other colleagues at the meeting" or "met new colleagues," which seems meaningless.
   b) In regard to demonstrating how the role supports the public service work of the profession:
      (1) What if we enjoy serving, but we don't feel it supports the public service work of the profession? Should we no longer take those roles? If we honestly write "It doesn't" on that line, will the CPD credit be invalidated? Will psychologists start to make up justifications out of fear?
      (2) For example: Membership Committee and my role is to do the Costco run for food and paper goods for the Fall and the Spring Membership Parties. Should I write: "I go to Costco to support membership spirit." Should I worry that this won't seem significant enough? Should I not take that role? Would I have to be on some other Committee as well in order to qualify? I know this activity helps the organization survive and thrive, but that is all I could write. Even if the BOP sees it as supporting the public good of the profession, it doesn't seem worthy of licensure to me.
      (3) Such a requirement for documentation makes me feel as if I am under a microscope and am not seen as trusted or as a mature professional. We want to feel we are being respected as conscientious, thoughtful, highly educated adults.
   c) To be honest, I would not want my physicians to get licensing credit for being on committees. I want them to be learning. Doesn't the public want that of us?
   d) Being on Boards and Committees does reduce isolation and might mature us, but having served for 34 consecutive years (and counting) on Committees and Boards, being the President of 3 and soon to be of a 4th, I don't think it has actually contributed to me being more clinically competent. Some of it has been part of supporting an organizations public service, but not all of it.
   e) If documentation makes us feel paternalistically controlled and treated like children, it potentially sets up a negative attitude again between the BOP and psychologists, when what most of us want is a cooperative attitude where we respect each other and help each other to better serve the consumer of mental health services.

7. **Consider modifications and exemptions to all or some of the regulations for situations less serious than total disability for one year of the psychologist or having total responsibility for one year for someone who is totally disabled. See Page 16 in the *Third Modified Text of Regulations*.**

   RATIONALE:
   a) This is a very high bar. Many, many psychologists have extremely difficult lives – sometimes for many years. For example, they may have one or more special needs children and are a single parent. They may be being treated for a serious health problem (chemo that lasts many months or years) at the same time they are trying to keep working at least part-time, caring for an elderly parent, and/or tending to an adult child who also is being treated for a serious health problem, and who in turn may also need help from the psychologist with babysitting or driving their child (the psychologist's grandchild).

b) Neimeyer & Taylor (2014): Research shows that more than half of psychologists report feeling overworked or burnt out.
c) My own difficult four years, just as an example: In 2011 – 2013, I had one daughter and her two pre-school children, one special needs, living with me and needing my help. Then in 2013, my father died. A month later, my other daughter was diagnosed with a serious breast cancer (major surgery, chemo, radiation, follow-up surgeries over two years), and they needed my help. A month after she was diagnosed, my breast cancer recurred. And, my widowed 91-year old mother now needed my help, plus I now had executor duties for their finances. At the same time, my daughter who had moved out moved two or three hours away (depending on traffic) and needed my help. And I needed to continue working full-time. Through all this, I did continue some CPD activities beyond CE, though I did not contribute much to the Board I was on for those years.
d) If I get sick again and need more extensive treatment than I did in 2013, and/or if my daughter living a few hours away gets cancer and needs my help, I will want to stop extra activities, keep working and do the CPD activity that teaches me the most, which for me is formal CE. I would not want to reduce the amount of CE I take in order to make room for other CPD activities if for me, personally, they do not feel as valuable.
e) I am sure there are others whose lives are far more difficult and complicated than mine was and is, and that they would also be grateful for maximal flexibility regarding CPD. Many of us work into our 70s, 80s, and a few into their 90s. We feel so fortunate that we can and that we enjoy our work. But health and energy decline; problems can increase. Yet, we still want to work. Having a CE only option provides maximal flexibility for psychologists to continue working and renew their license, and still tend to overwhelming family and personal needs.
f) I am requesting that you trust that almost all psychologists are conscientious, thoughtful, and do as much as they can to be competent and protect the public. A "CE Only" option provides maximal flexibility, along with the other options, both for those who strive for expertise through massive CE as well as for psychologists experiencing overwhelming stress.

8. **Requests related to the *Detailed Verification Form*:**

a) **Sponsored CE documentation: Please use only the CE certificates from approved sponsors as verification, description and proof of relevance. Delete the other requested verification information. Delete paragraph (g) on p 12 of the *Third Modified Text of Regulations*, which lists forms of verification that would be required.**

RATIONALE:
i. Almost always, the title of the program supports a brief description and proof of relevance.
ii. All listed forms of documentation are required for CE courses to be approved by sponsoring organizations. All the information listed in the *Regulations* (syllabus, course description, etc.) is held by the sponsoring organization and could be provided by the Sponsor if needed.
iii. It would be very unwieldy and burdensome for a licensee to gather and retain all requested documentation as described in paragraph (g), page 12, of the *Third Modified Text of Regulations*.

b) **Please eliminate the "Applicability to Practice" on the *Detailed Verification Logs* for all categories and activities.**

RATIONALE
a) Given the advanced level of psychology training and practice post-licensure, there is little that could be written in two lines about relevancy to practice that would be meaningful.

b) Please consider what I might write about taking a CE course or being with colleagues for consultation regarding emotional re-regulation of couple partners, as an example: "Will help me re-regulate partners better." "Will help me in couples work." "Learned more about nervous system." These statements would be true, but seem simplistic and relatively meaningless. Consider someone taking a course or consulting in neurobiology: "Helped me better understand the amygdala." These answers provide little or nothing meaningful.
c) What if a particular activity did not turn out to be all that relevant? What if I honestly wrote "None" or "Not much" for applicability to practice? Would this activity not count toward CPD, even though I signed up for it in good faith? Will psychologists start to make up things out of fear?
d) Please extend to us the trust that we were involved in the reported activity as a mature psychologist seeking a relevant experience that we hope to and plan to apply to practice if possible without having to write one or two sentences to explain the relevance. It feels bad to be asked this, as if our every move and motivation must be monitored and judged.

9. Concluding comments:

a) Most psychologists are motivated for life-long learning and go about their professional development and learning with thoughtfulness and seriousness.
b) Most of us, as we move from being Early Career Psychologists to mid-career to seasoned psychologists with 30 or 40 years of learning, practice, and contributions to the field, have found ways to reduce isolation and have found what ways they learn best.
c) *MOCL White Paper*, page 14: "For the most part, then, it seems that psychologists themselves recognize the importance of remaining current and up-o-date, even if their local regulatory bodies have no requirements for them to do so."
d) *MOCL White Paper*, Page 21: "...it will be extremely important that all stakeholders have confidence that the MOCL model is one that works (i.e., it is valid, reliable, credible, and meaningful) and the public is better protected through its use." Many of us do not feel that confidence in the MOCL model because it will renew a license for someone who has taken only 8 CE hours in two years yet sees someone who routinely takes 100 hours of carefully chosen, focused CE as not having done enough.
e) Because many of us choose to (or have to for financial reasons) work into our 70s and 80s, while we may still be capable of working competently, our energy wanes, our health wanes, and our desire to spend our last years with family as much as possible grows. We may no longer want to or have the energy to be on committees and boards after having spent 20, 30 or 40 years doing so. We may no longer wish to write intricate articles. Yet, we may still want to learn in the ways that work best for us.
f) All CPD categories are wonderful activities and are to be encouraged, and can be by offering CPD for them. In doing so, please allow maximal flexibility as described by these requests so that we may live the ASPPB's and the BOP's goals and ideals in ways that fit each of us best.

Thank you very much for your consideration.

Respectfully submitted,

Karen Shore, PhD, ABPP, CGP

Everhart, Jacquelin@DCA

From:
Sent: Thursday, May 19, 2016 4:05 PM
To:
Cc:
Subject: Proposed CE/CPD

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Pending

Dear Jacquelin,
It was a pleasure to speak with you today.
I appreciate the opportunity to send my questions and feedback to the Licensing Committee about the proposed CE/CPD regulations.

I would like to begin with some general feedback or questions:

- I would like to understand the rationale behind so dramatically changing the CE requirements for renewing a license. Do you think that the previous requirements were inadequate?
- While I appreciate the opportunity to meet the CE/CPD requirements by doing a variety of activities, I do not think that a psychologist needs to complete activities in more than one activity category to remain competent practicing as a psychologist.
- As professionals, I think that psychologists can be trusted to know what they need to maintain their ability to practice effectively. I understand the need to maintain current on legal and ethical issues. I also understand that it is valuable to have some training regarding cultural diversity/social justice. However, I do not think that it is necessary to continue to require training in certain areas of practice. Psychologists need to have the freedom to choose training that maintains their expertise in their area of practice.
- These CE/CPD regulations will be particularly onerous for psychologists in private practice, in rural areas of the state, or have retired and want to keep their license active.

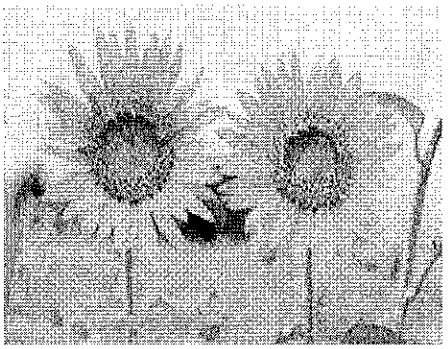
Next, I would like to share more specific feedback or questions:

- It is not clear in the proposal when the new regulations take effect. That is, starting on what date of renewal?
- Is it a new requirement that CE courses must be provided by an organization that has a 10-year history of providing educational programming to psychologists? How can a new organization provide the first 9 years of educational programming to psychologists, when it is not approved by the BOP? No one would take these courses.
- The text states that the maximum hours allowed for CE is 27, yet the verification chart states 18.
- Is there a limit to the maximum hours allowed for Full Board Meetings per year or per renewal period?
- Is there a limit to the maximum hours allowed for Committee Meetings per year or per renewal period?
- The text states that the maximum hours allowed for attendance at Board Meetings is 8, yet the verification chart states 12.
- What is the minimum number of psychologists to constitute a "peer consultation" group?
- Why is only 1 hour credited for attending a full day at a conference/convention, when hours for every other activity are credited 1 hour per 1 hour of attendance?

- In the text, 1397.61(e), reference is made to "...maximum number of hours allowed per renewal period specified for each activity as set forth in section 1397.60", yet I cannot find this information in the referenced section.
- It seems that training in law and ethics as well as cultural diversity/social justice may be accrued in multiple ways. For instance, I would like to be able to accrue these hours by participation in a "peer consultation" group.

Thank you very much in advance for taking my feedback and questions into consideration.
I would like to mention that I have been a practicing, licensed psychologist in the state of California for 18 years. I was the founding director of the Postdoctoral Training Program at Kaiser Permanente, Union City, California, and served in this capacity for 10 years. During my tenure, the Postdoctoral Training Program was approved by CAPIC and the APA. I retired from this position 2 years ago.

Yours Truly,
Kate Lenhardt, Ph.D.



Kate Lenhardt, Ph. D

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