

MEMORANDUM

DATE	August 22, 2025
то	Psychology Board Members
FROM	Jacklyn Mancilla, Legislative and Regulatory Affairs Analyst
SUBJECT	Agenda Item 10 – Budget Report

Background

The current projections below are based on Fiscal Month (FM) 12 totals for the 2024-25 fiscal year.

As for revenue, the Board was projected to collect \$9.314 million in Fiscal Year 2024-25. As of June of 2025, the Board collected \$9.991 million in revenue.

For Fiscal Year 2024-25, the Board's budgeted expenditures were \$7.831 million, and currently the Board has expended \$7.284 million, leaving a balance of approximately \$546 thousand.

Action Requested

This item is for informational purposes only. There is no action required at this time.

Attachment #1: Budget Report: FY 2024-25 through Fiscal Month 12.

Attachment #2: Fund Condition

Attachment #3: Revenue Projection Report FY 2024-25 through Fiscal Month 12

Attachment #4: Expenditure and Revenue Comparison

Department of Consumer Affairs

Expenditure Projection Report

Board of Psychology Reporting Structure(s): 11112100 Support Fiscal Month: 12

Fiscal Year: 2024 - 2025

PERSONAL SERVICES

Fiscal Code	PY Budget	PY FM13	Budget	Current Month	YTD	Encumbrance	YTD + Encumbrance	Projections to Year End	Balance
5100 PERMANENT POSITIONS	\$1,830,000	\$1,884,630	\$1,980,000	\$153,464	\$1,827,530	\$0	\$1,827,530	\$1,827,550	\$152,450
5100 TEMPORARY POSITIONS	\$47,000	\$68,674	\$47,000	\$2,566	\$32,155	\$0	\$32,155	\$32,785	\$14,215
5105-5108 PER DIEM, OVERTIME, & LUMP SUM	\$22,000	\$33,068	\$22,000	\$7,676	\$58,792	\$0	\$58,792	\$62,337	-\$40,337
5150 STAFF BENEFITS	\$1,272,000	\$1,212,828	\$1,202,000	\$92,623	\$1,098,178	\$0	\$1,098,178	\$1,098,562	\$103,438
PERSONAL SERVICES	\$3,171,000	\$3,199,200	\$3,251,000	\$256,329	\$3,016,654	\$0	\$3,016,654	\$3,021,234	\$229,766

OPERATING EXPENSES & EQUIPMENT

Fiscal Code	PY Budget	PY FM13	Budget	Current Month	YTD	Encumbrance	YTD + Encumbrance	Projections to Year End	Balance
5302 PRINTING	\$55,000	\$22,781	\$53,000	\$8,210	\$30,838	\$15,207	\$46,046	\$46,046	\$6,954
5304 COMMUNICATIONS	\$31,000	\$4,320	\$29,000	\$212	\$3,875	\$0	\$3,875	\$4,212	\$24,788
5306 POSTAGE	\$19,000	\$6,905	\$17,000	\$0	\$8,092	\$0	\$8,092	\$9,710	\$7,290
5308 INSURANCE	\$0	\$50	\$0	\$0	\$0	\$0	\$0	\$0	\$0
53202-204 IN STATE TRAVEL	\$25,000	\$28,650	\$23,000	\$533	\$17,831	\$0	\$17,831	\$18,831	\$4,169
5322 TRAINING	\$18,000	\$1,000	\$15,000	\$0	\$0	\$0	\$0	\$0	\$15,000
5324 FACILITIES	\$153,000	\$245,263	\$203,000	\$20,304	\$233,252	\$254	\$233,506	\$240,439	-\$37,439
53402-53403 C/P SERVICES (INTERNAL)	\$1,426,000	\$1,204,618	\$1,274,000	\$99,667	\$1,090,465	\$7,933	\$1,098,397	\$1,185,827	\$88,173
53404-53405 C/P SERVICES (EXTERNAL)	\$781,000	\$468,201	\$636,000	\$18,213	\$389,080	\$17,697	\$406,777	\$481,005	\$154,995
5342 DEPARTMENT PRORATA	\$2,581,000	\$2,134,610	\$2,174,000	\$175,077	\$2,096,744	\$0	\$2,096,744	\$1,996,163	\$177,837
5342 DEPARTMENTAL SERVICES	\$54,000	\$49,499	\$53,000	\$3,688	\$48,203	\$0	\$48,203	\$50,003	\$2,997
5344 CONSOLIDATED DATA CENTERS	\$15,000	\$17,718	\$15,000	\$18,732	\$18,732	\$0	\$18,732	\$18,732	-\$3,732
5346 INFORMATION TECHNOLOGY	\$7,000	\$1,823	\$7,000	\$596	\$3,278	\$298	\$3,576	\$3,576	\$3,424
5362-5368 EQUIPMENT	\$38,000	\$23,010	\$0	\$1,008	\$6,929	\$128	\$7,057	\$7,057	-\$7,057
5390 OTHER ITEMS OF EXPENSE	\$0	\$3,757	\$0	\$0	\$974	\$0	\$974	\$4,594	-\$4,594
54 SPECIAL ITEMS OF EXPENSE	\$0	\$4,125	\$0	\$759	\$115,449	\$0	\$115,449	\$115,449	-\$115,449
OPERATING EXPENSES & EQUIPMENT	\$5,310,000	\$4,305,837	\$4,580,000	\$359,835	\$4,112,326	\$69,852	\$4,182,178	\$4,263,070	\$316,930
OVERALL TOTALS	\$8,481,000	\$7,505,037	\$7,831,000	\$616,164	\$7,128,980	\$69,852	\$7,198,833	\$7,284,304	\$546,696
REIMBURSMENTS	-\$51,000	-\$191,000	-\$51,000					-\$51,000	
OVERALL NET TOTALS	\$8,430,000	\$7,314,037	\$7,780,000	\$616,164	\$7,128,980	\$69,852	\$7,198,833	\$7,233,304	\$546,696

Prepared 08.13.2025

2025 Budget Act With FM 12 projection	2	PY 024-25	CY 2025-26		2	BY 2026-27		BY +1 027-28
BEGINNING BALANCE Prior Year Adjustment	\$ \$	5,405 -	\$ \$	7,676 -	\$ \$	8,147 -	\$ \$	8,301 -
Adjusted Beginning Balance	\$	5,405	\$	7,676	\$	8,147	\$	8,301
REVENUES, TRANSFERS AND OTHER ADJUSTMENTS Revenues								
4121200 - Delinquent fees	\$	114	\$	95	\$	95	\$	95
4127400 - Renewal fees	\$	8,302	\$	7,715	\$	7,715	\$	7,715
4129200 - Other regulatory fees 4129400 - Other regulatory licenses and permits	\$	261 1,043	\$ \$	207 1,038	\$ \$	207 1,038	\$	207 1,038
4163000 - Income from surplus money investments	\$ \$	259	\$ \$	263	\$ \$	1,036	\$ \$	1,036
4171400 - Escheat of unclaimed checks and warrants	\$	11	\$	-	\$	-	\$	-
4172500 - Miscellaneous revenues	\$	1	\$	-	\$	-	\$	-
Totals, Revenues	\$	9,991	\$	9,318	\$	9,178	\$	9,176
Totals, Transfers and Other Adjustments	\$	-	\$	-	\$	-	\$	
TOTALS, REVENUES, TRANSFERS AND OTHER ADJUSTMENTS	\$	9,991	\$	9,318	\$	9,178	\$	9,176
TOTAL RESOURCES	\$	15,396	\$	16,994	\$	17,325	\$	17,477
Expenditures:								
1111 Department of Consumer Affairs (State Operations)	\$	7,108	\$	8,137	\$	8,381	\$	8,633
9892 Supplemental Pension Payments (State Operations)	\$	67	\$	67	\$	-	\$	-
9900 Statewide General Administrative Expenditures (Pro Rata) (State Operations)	\$	545	\$	643	\$	643	\$	643
TOTALS, EXPENDITURES AND EXPENDITURE ADJUSTMENTS	\$	7,720	\$	8,847	\$	9,024	\$	9,276
FUND BALANCE								
Reserve for economic uncertainties	\$	7,676	\$	8,147	\$	8,301	\$	8,201
Months in Reserve		10.4		10.8		10.7		10.3

- Assumes workload and revenue projections are realized in CY and ongoing.
 Expenditure growth projected at 3% beginning BY.

Department of Consumer Affairs Revenue Projection Report

Reporting Structure(s): 11112100 Support

Fiscal Month: 12 Fiscal Year: 2024 - 2025

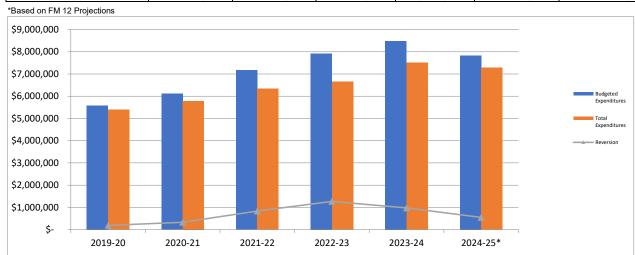
Revenue

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Fiscal Code	Budget	July	August	September	October	November	December	January	February	March	April	May	June	Year to Date	Projection To Year End
Delinquent Fees	\$98,000	\$8,992	\$8,377	\$13,632	\$8,420	\$10,806	\$10,889	\$11,822	\$8,948	\$10,711	\$9,629	\$5,959	\$6,055	\$114,237	\$114,237
Other Regulatory Fees	\$292,000	\$26,030	\$29,743	\$26,835	\$25,815	\$18,800	\$22,215	\$15,415	\$17,210	\$18,429	\$27,970	\$18,750	\$13,345	\$260,557	\$260,557
Other Regulatory License and Permits	\$1,005,000	\$123,374	\$108,004	\$107,264	\$96,710	\$68,311	\$75,438	\$70,483	\$63,038	\$74,361	\$90,539	\$84,592	\$80,777	\$1,042,890	\$1,042,890
Other Revenue	\$256,000	\$8,902	\$235	\$150	\$82,207	\$126	\$1,880	\$86,487	\$537	\$1,500	\$88,838	(\$340)	\$624	\$271,146	\$271,146
Renewal Fees	\$7,663,000	\$884,691	\$1,142,591	\$1,268,002	\$740,115	\$658,972	\$612,619	\$694,166	\$619,171	\$700,895	\$527,379	\$356,318	\$97,475	\$8,302,394	\$8,302,394
Revenue	\$9,314,000	\$1,051,990	\$1,288,949	\$1,415,883	\$953,267	\$757,015	\$723,041	\$878,373	\$708,904	\$805,895	\$744,355	\$465,278	\$198,276	\$9,991,225	\$9,991,225

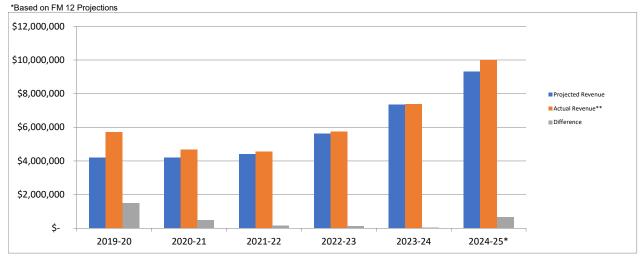
Reimbursements

Tronnibaroomonto																
Fiscal Code		Budget	July	August	September	October	November	December	January	February	March	April	May	June	Year to Date	Projection To Year End
Scheduled Reimbursement	ts S	\$51,000	\$882	\$490	\$882	\$539	\$294	\$637	\$539	\$392	\$392	\$784	\$392	\$686	\$6,909	\$6,909
Unscheduled Reimburseme	ents	\$0	\$19,262	\$13,157	\$7,618	\$17,271	\$9,729	\$8,052	\$24,268	\$3,979	\$10,658	\$21,243	\$12,989	\$21,345	\$169,571	\$169,571
Reimbursements		\$51,000	\$20,144	\$13,647	\$8,500	\$17,810	\$10,023	\$8,689	\$24,807	\$4,371	\$11,050	\$22,027	\$13,381	\$22,031	\$176,480	\$176,480

Psycho						
	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25*
Budgeted Expenditures	\$ 5,586,000	\$ 6,111,000	\$ 7,171,000	\$ 7,919,000	\$ 8,481,000	\$ 7,831,000
Total Expenditures	\$ 5,396,000	\$ 5,783,000	\$ 6,334,000	\$ 6,651,000	\$ 7,505,000	\$ 7,284,000
Reversion	\$ 190,000	\$ 328,000	\$ 837,000	\$ 1,268,000	\$ 976,000	\$ 547,000



Psycl						
	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25*
Projected Revenue	\$ 4,219,000	\$ 4,201,689	\$ 4,411,000	\$ 5,623,000	\$ 7,344,000	\$ 9,314,000
Actual Revenue**	\$ 5,716,000	\$ 4,690,000	\$ 4,565,000	\$ 5,742,000	\$ 7,378,000	\$ 9,991,000
Difference	\$ 1,497,000	\$ 488,311	\$ 154,000	\$ 119,000	\$ 34,000	\$ 677,000



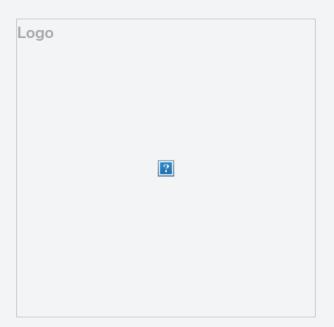
From: To: Subject:

Date:

no reply@dca.ca.gov bopmail@DCA

Board of Psychology - Contact Form - General Information

Friday, August 8, 2025 8:28:57 AM



Hello,

A contact form was submitted with the following details:

Reason for Inquiry

General Information

Name

Marti Peck, Ph.D.

Email Address

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Message

 To whom it may concern; At the suggestion of Elizabeth Winkelman, Director of Professional Affairs of CPA, I would like to submit/attach two "Handouts", which would accompany two Public Comments anticipated to be presented at the 8/22/25 Board Meeting in San Diego. I kindly request that they be included in the meeting materials for the Regulatory Update item on the Disciplinary Guidelines and Uniform Standards Related to Substance Abusing Licensees. Can you please advise how I can upload the attachments to be considered for the "Handcarry" documents for Board Members? Thank you for your assistance. Marti Peck, Ph.D.

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

Handout #1 for 8/22/25 BoP Board Meeting/San Diego, CA

(to accompany Public Comment RE: Revision of BoP Disciplinary Guidelines):

Recommendation to introduce "Moderate" Category to current Maximum and Minimum Categories

PROPOSED REVISIONS OF BOARD OF PSYCHOLOGY DISCIPLINARY

GUIDELINES - 8/22/2025 (note current language to be revised is indicated by "strikethrough" lines, and new/added language by <u>underlines</u>).

B. PENALTY GUIDELINES FOR DISCIPLINARY ACTIONS

The general bases for discipline are listed by statute number in the Business & Professions Code. An accusation, statement of issues, or other charging document may also allege violations of other related statutes or regulations. The bases are followed by the Board-determined penalty, including the names and numbers for the optional terms and conditions. The standard terms of probation as stated shall be included in all decisions and orders. **Except where there is a finding that respondent is a substance-abusing licensee**, the Board recognizes that the penalties and conditions of probation listed are merely guidelines and that individual cases will necessitate variations that take into account unique circumstances. If there are deviations or omissions from the guidelines in formulating a Proposed Decision, the

Board requires that the Administrative Law Judge hearing the case include an explanation of the deviations or omissions in the Proposed Decision so that the circumstances can be better understood by the Board during its review and consideration of the Proposed Decision for final action.

Business and Professions Code § 2960 2960 GENERAL UNPROFESSIONAL CONDUCT

MAXIMUM: Revocation; denial of license or registration.

<u>MINIMUM</u>: <u>MODERATE</u> Revocation stayed, depending upon the circumstances, up to 5-year probation, psychological evaluation and/or therapy if appropriate (2) and (6), California Psychology Law and Ethics Examination (CPLEE) (7), and

standard terms and conditions (14-31)

MINIMUM: Letter of Education

2960(a) CONVICTION OF A CRIME SUBSTANTIALLY RELATED TO THE PRACTICE OF PSYCHOLOGY

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE Revocation stayed, 5-year probation, billing monitor (if financial crime)(4), therapy (6), CPLEE (7), restitution (if appropriate) (8), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

2960(b) USE OF CONTROLLED SUBSTANCE OR ALCOHOL IN A DANGEROUS MANNER

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: Revocation stayed, 5-year probation, physical examination (if appropriate) (3), practice monitor (4), psychological evaluation and ongoing therapy (if appropriate) (2) and (6), clinical diagnostic evaluation (9), participation in an alcohol/drug abuse treatment program (10) and ongoing support group (11), abstain from all non-prescribed, controlled drugs and alcohol/biological fluid and specimen testing [required for substance-abusing licensees] (12), and standard terms and conditions (14-31).

2960(c) FRAUDULENTLY OR NEGLECTFULLY MISREPRESENTING THE TYPE OR STATUS OF LICENSE OR REGISTRATION ACTUALLY HELD

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, 5-year probation, and standard terms and

conditions(14-31).

MINIMUM: Letter of Education

2960(d) IMPERSONATING ANOTHER PERSON HOLDING A PSYCHOLOGY LICENSE OR ALLOWING ANOTHER PERSON TO USE HIS OR HER LICENSE OR REGISTRATION

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: Revocation stayed, 5-year probation, psychological evaluation (2), CPLEE (7), and standard terms and conditions (14-31).

2960(e) PROCURING A LICENSE BY FRAUD OR DECEPTION

Penalty: Revocation is the only suitable penalty inasmuch as the license would not have been issued but for the fraud or deception. If the fraud is substantiated prior to issuance of the license or registration, then denial of the application is the only suitable penalty.

2960(f) ACCEPTING REMUNERATION OR PAYING FOR REFERRALS TO OTHER PROFESSIONALS

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, 1-5-year probation, billing monitor (4), CPLEE

(7), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

2960(g) VIOLATING SECTION 17500 OF THE BUSINESS AND PROFESSIONS CODE REGARDING ADVERTISING

Penalty: <u>MAXIMUM</u>:Revocation stayed, 5-year probation, and standard terms and conditions (14-31).

MODERATE: 1-3 years probation, standard terms and conditions

MINIMUM: Letter of Education

2960(h) VIOLATION OF CONFIDENTIALITY

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, 1-5-year probation, practice monitor (4),

CPLEE (7), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

2960(i) VIOLATION OF RULES OF PROFESSIONAL CONDUCT

MAXIMUM: Revocation; denial of license or registration.2960(j) 2960(k) 2960(l) 2960(m) 2960(n) 2960(o); 726

MINIMUM: MODERATE: Revocation stayed, depending upon the circumstances, up to 5 year probation, psychological evaluation and/or therapy if appropriate (2) and (6), CPLEE (7), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

GROSS NEGLIGENCE IN THE PRACTICE OF PSYCHOLOGY

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, <u>1-</u>5-year probation, psychological evaluation prior to resumption of practice (condition precedent) (2), practice monitor/billing monitor (4), patient population restriction (if appropriate) (5), therapy (6), CPLEE (7), and standard terms and conditions (14-31).

VIOLATING ANY PROVISION OF THIS CHAPTER OR REGULATIONS DULY ADOPTED THEREUNDER

Refer to underlying statute or regulation.

AIDING OR ABETTING UNLICENSED PRACTICE

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, <u>1-</u>5-year probation, CPLEE (7), and standard terms and conditions (14-31).

DISCIPLINARY ACTION BY ANOTHER STATE AGAINST A LICENSE OR REGISTRATION

In evaluating the appropriate penalty, identify the comparable California statute(s) and corresponding penalty(s).

DISHONEST, CORRUPT OR FRAUDULENT ACT

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, 5-year probation, psychological evaluation and ongoing therapy if appropriate (2), billing monitor (4), CPLEE (7), full restitution (8), and standard terms and conditions (14-31).

ANY ACT OF SEXUAL ABUSE, OR SEXUAL RELATIONS WITH A PATIENT OR FORMER PATIENT WITHIN TWO YEARS FOLLOWING TERMINATION OF THERAPY, OR SEXUAL MISCONDUCT THAT IS SUBSTANTIALLY RELATED TO THE QUALIFICATIONS,

FUNCTIONS OR DUTIES OF A PSYCHOLOGIST OR PSYCHOLOGICAL ASSISTANT OR REGISTERED PSYCHOLOGIST.

Penalty: When a finding of sexual misconduct occurs, revocation or surrender of license/registration and/or denial of license or registration MUST be the penalty ordered by the Administrative Law Judge.

NO MINIMUM PENALTY.

NOTE: Business and Professions Code Section 2960.1 states: "Notwithstanding Section 2960, any proposed decision or decision issued under this chapter in accordance with the procedures set forth in Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, that contains any finding of fact that the licensee or registrant engaged in any acts of sexual contact, as defined in Section 728, when that act is with a patient, or with a former patient within two years following termination of therapy, shall contain an order of revocation. The revocation shall not be stayed by the Administrative Law Judge."

2960(p) FUNCTIONING OUTSIDE FIELD(S) OF COMPETENCE

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, 5-year probation, practice monitor (4), patient population restriction (5), CPLEE (7), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

2960(q) WILLFUL FAILURE TO VERIFY AN APPLICANT'S SUPERVISED EXPERIENCE

Penalty: Revocation stayed, 5-year probation and standard terms and conditions (14-31).

2960(r) REPEATED NEGLIGENT ACTS

MAXIMUM: Revocation; denial of license or registration.

MINIMUM: MODERATE: Revocation stayed, depending on the circumstances, up to 5-year probation, psychological evaluation prior to resumption of practice

(condition precedent) (2), practice monitor (4), CPLEE (7), and standard terms and conditions (14-31).

MINIMUM: Letter of Education

Handout #2 for 8/22/25 BoP Board Meeting/San Diego, CA

(to accompany Public Comment RE: Revision of BoP Disciplinary Guidelines): Recommendation to Publish Definitions of Minor, Moderate and Major Deviations from the Standard of Care, with Examples for Each Category

Definitions of Minor, Moderate and Major Deviations from the Standard of Care and Examples of Each Category.

The current Disciplinary Guidelines and Uniform Standards Related To Substance Abusing Licensees take under consideration eleven factors in determining whether revocation, suspension, or probation is to be invoked in a given case (e.g., nature and severity of the act(s), offense(s), or crime (s), and prior record of discipline or citations). And here, for any given licensee, the Board can and does use its discretion in making its final determination of disciplinary action. Nevertheless, there exists a need to improve the current guidelines to more precisely differentiate among levels of deviation from the standard of care.

In theory, the current spectrum of disciplinary actions appears to take explicit gradations of severity into account—with non-public actions, such as a Letter of Education, being reserved for relatively minor violations, and public actions, such as Probation, reserved for more serious infractions. Despite this extant structure, the problem continues to exist of overly harsh discipline administered for minor and major violations alike. In an effort to provide for a more precise decision-making process, we suggest following the graphic below:

Minor Deviations	> Moderate Deviations	> Major Deviations

Minor Deviations

The goal of protecting the consumer should include correcting and guiding licensees when they have made mistakes, particularly in anticipating certain patients' reactions to interventions that, despite being well-meaning, may turn out to have been misguided or short-sighted—or at least not *knowingly* exploitative. Regardless of errors that virtually all therapists are at times, prone to make, independent of their overall competence and conscientiousness, we would assume that the BOP would not willingly want to reduce to the public the number of basically qualified and dedicated practitioners available to them—especially in the present era where qualified or specialized mental health professionals are needed and are in relatively short supply.

Concern exists that some of the ways the BOP has operated has culminated in this undesirable outcome. Many of the conditions that currently accompany probation are so complex and demanding that we know of quite a few therapists (particularly older and more experienced ones) that have felt forced to leave the profession because it wasn't tenable for them to comply with all the constrictions their probationary stay imposed on them.

The public's having more availability to such therapists increases their options, protecting them by not needlessly restricting their choices as they search for a professional best suited to their unique needs. Both urban and rural areas of California are significantly underserved, which mars the profession and hardly accords with the Board's concerns for the consumer, or its

mission in general. Minor deviations from the standard of care would include violations of the Business and Professions Code in which, upon investigation, what was decided was that no harm, or

evidence of only slight harm, to the complainant had occurred.

Moderate Deviations

It is recommended that this new category of differentiation for two reasons. The first is to highlight the fact that departures from the standard of care exist along a continuum; they are not dichotomous or binary. Secondly, this category allows focus on the psychologist whose action(s) might indeed have led the patient to feel extremely offended or caused substantial harm to them, but such damage hadn't at all transpired because of practitioner incompetence or any narcissistically-driven self-interest.

That is, their clinical work up to this point could be shown to be reputable, and their decision-making in this particular instance was based on judgment similar to what had served them well with patients in the past and not caused any of them harm.

Thus, these practitioners could be understood as having acted honorably, not having any reason to suspect that their action could have been anywhere as detrimental as it turned out. As the renowned physicist Neils Bohr famously, though half-comically, opined: "Prediction is very difficult, especially if it's about the future!"

There are also times that an intervention can remind a patient (however unconsciously) of a trauma never resolved and so still be psychoactive—such that the psychologist's unpredictable "violations" actually compromised their daily ability to function.

The Board's determining that because the psychologist's action eventuated in a significant setback for the patient they should be deemed blameworthy—as negligent or insufficient cautious—would be unduly harsh. For that therapist could not realistically have foreseen the adverse consequences of their behavior.

Empathy for the patient—and protection of patients in general—should, of course, be paramount in the Board's considerations and mission. Concern for the psychologist's welfare should also be considered. After all, the great majority of psychologists are conscientious and dedicated to their profession; and, moreover, their practice may be crucial to their livelihood and sense of personal identity.

Admittedly, there are a few practitioners whose conduct is such that they need to be removed from the profession. But in a case similar to that just described, where the therapist whose thinking was in no way outrageous, exploitative, or deceptive, such a mistake hardly warrants onerous penalties. BOP would do well to consider whether its reformist efforts will really make the psychologist a better therapist (vs. a much less confident and fearful one).

Major deviations

By contrast, in defining what constitutes a major deviation from the standard of care, the following examples can reasonably be viewed as major departures from any acceptable norm:

Malicious intent toward patients, other professionals, or the general public; Conviction of a felony or attempted felony toward patients or others; Intentional injury of patients, colleagues or the public; Gross negligence—including sex with a patient, profit-motivated dual relationships, buying/selling/using drugs or alcohol with patients, attempting to induce patients to break the law, and a history of convictions for driving while intoxicated.

While all mistakes might be viewed as including negligence, minor infractions need to be responded to with relatively mild, non-public disciplinary actions, which is not currently the case. For a licensee may have violated a regulation due to a misunderstanding or oversight, possibly because, for example, needing to prioritize health issues and therefore forgetting to check their post office box within the 60-day notice of a continuing education audit.

The BOP is urged to limit its most punitive disciplinary measures to exceptional cases involving deviations such as those above.

To employ a vehicular analogy, a person who drives 30 mph in a 25 mph school zone at 7 pm when school is no longer in session and no people are present has technically committed a speeding violation, yet without causing any harm. So we'd assess their act as comprising a relatively minor infraction. In a second scenario, another person, driving 20 miles over the speed limit on a freeway, is responsible for a minor fender-bender and has also committed a speeding violation.

In a third, infinitely more dangerous speeding scenario, someone driving drunk at 100 mph on a freeway in a high-speed police chase who crashes into another car, killing its driver, ought to be dealt with in a vastly different way. For in this instance common sense would dictate that these three situations—representing mild, moderate, and severe/major examples of speeding—be considered as depicting markedly disparate points on our continuum, with only the third demanding that the driver's license be revoked.

Yet since the early 2000s, this indiscriminate "sledgehammer" approach to minor and moderate deviations from the standard of care has seemed to many psychologists to be an all-too-common BOP response to licensee infractions.

In sum, it is recommended that a more nuanced stance be taken toward licensees who, upon more extensive investigation, are best understood as committing minor or moderate—vs. major—violations of the standard of care.



August 14, 2025

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

RE: Opposition to Proposed Disciplinary Guidelines: Request for Amendments to Avoid Overly Punitive Impact on Licensees

Dear Executive Officer Burke and Members of the Board of Psychology:

The California Psychological Association (CPA) respectfully submits this letter to express our ongoing and serious concerns regarding the proposed revisions to the Board's Disciplinary Guidelines and Uniform Standards Related to Substance-Abusing Licensees, which are scheduled to be reviewed at the August 22, 2025, Board meeting. While we support a strong and fair regulatory framework that protects the public and upholds professional standards, we believe several provisions in the current draft would result in excessively punitive and inflexible outcomes, particularly for minor, administrative, or first-time violations.

We raised similar concerns during the August 2023 Board meeting during public comment, and are reaffirming our comments at that time. We respectfully request the Board consider the following critical amendments:

1. Allow Probation Terms of "Up to Five Years" Rather Than a Fixed Minimum of Five Years Many violations, including general unprofessional conduct under Business and Professions Code § 2960, list five years of probation as a **minimum** penalty. We urge the Board to revise the language to reflect a more flexible range—for example, "up to five years of probation"—so that the Board retains discretion to tailor probation periods based on the severity of the violation and mitigating factors.

Under the current proposal, a psychologist who fails to renew their license timely or inadvertently omits a supervision log may be subject to a mandatory five-year probation period, despite the lack of intent to harm and no impact on client care. A five-year probation term in such cases is not only disproportionate but also inconsistent with how comparable boards handle similar infractions.

The Board of Behavioral Sciences (BBS), which regulates masters' level professionals, has lower minimum probation terms as short as two or three years for first-time or documentation-related

violations. This reflects an approach based on actual risk to public safety, and we urge the BOP to align closer to this standard to ensure fairness.

2. Remove Psychological Evaluations as a Standard Condition of Probation

We are particularly concerned that psychological evaluations remain embedded as a standard term of probation in the revised guidelines. While appropriate in certain cases, such as those involving suspected cognitive impairment, substance misuse, or gross negligence, the routine imposition of psychological evaluations for infractions that do not raise concerns about fitness to practice is inappropriate and counterproductive.

A psychologist disciplined for recordkeeping deficiencies or billing errors unrelated to client harm should not be subject to a psychological evaluation as a matter of course. Such requirements carry significant financial costs, delay the licensee's return to practice, and may inadvertently suggest to clients and colleagues that the licensee has a mental health condition.

Psychological evaluations should be categorized as an **optional** term to be applied only where facts suggest impaired judgment, emotional instability, or risk to patient safety. The proposed broad application is neither clinically justified nor administratively useful.

3. Maintain Reasonable Compliance Deadlines: Retain 90-Day Requirement to Secure Monitors or a Psychotherapist

The revised guidelines propose shortening the compliance period for obtaining a practice or billing monitor and finding a psychotherapist from 90 days to 30 days. While we appreciate the intent to encourage timely compliance, a 30-day deadline is unrealistic and unnecessarily punitive, especially for psychologists in rural areas.

A psychologist who is required to obtain a monitor may need several weeks just to locate a peer with the necessary qualifications and no conflicts of interest. Under the proposed 30-day timeframe, even diligent compliance efforts may result in technical probation violations, which then trigger costly and time-consuming enforcement actions. We have heard cases of difficulties in locating an appropriate monitor from our members within the existing 90 day period.

Again, the Board of Behavioral Sciences allows up to 90 days for similar compliance measures, recognizing the logistical barriers licensees may face. We urge the BOP to retain the existing 90-day period as a reasonable and achievable standard.

4. Incorporate reference to the Spectrum of Administrative Actions

CPA also urges the Board to include a reference to its *Spectrum of Administrative Actions* within the Disciplinary Guidelines. This document outlines both disciplinary and non-disciplinary tools, such as educational letters and citations, that allow for proportionate responses to minor violations. Including it in the guidelines would reinforce the Board's practice of using a range of actions based on severity and context and ensure that lower-level infractions can be resolved without defaulting to overly punitive measures.

The cumulative effect of these changes—mandatory five-year probation terms, burdensome evaluations, and impractical timelines may exacerbate workforce shortages by driving early

retirements or deterring psychologists from entering the profession altogether. CPA urges the Board to take a more proportional and flexible approach to discipline that reflects both the facts of individual cases and how these practices differ from the Board of Behavioral Sciences. These changes will not weaken public protection. Rather, they will support a disciplinary system that is fair and sustainable.

We thank the Board for its commitment to the profession and welcome the opportunity to engage further as these important revisions are finalized. If you have any questions, please do not hesitate to reach out to me at trinde@cpapsych.org.

Sincerely,



Tyler Rinde
Director of Government Affairs

From: Heather LaFace
To: bopmail@DCA

Cc: Subject:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:11:34 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Heather LaFace, PhD

PSY26437

Los Angeles

 From:
 Fara Ehsan

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:17:43 AM

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Dear Members of the Board of Psychology,

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter regarding the proposed Disciplinary Guidelines.

Like the CPA, I believe the Board should uphold a fair and proportionate disciplinary framework—one that protects the public while taking into account the unique facts and circumstances of each case. I am especially concerned about the following provisions:

Mandatory minimum five-year probation terms, rather than allowing the flexibility of "up to five years" based on the severity of the violation.

Automatic inclusion of psychological evaluations as a probation condition, even in matters unrelated to fitness to practice.

Shortened compliance timelines, reducing the deadline from 90 to 30 days to secure monitors or therapists—a standard that is both unrealistic and unduly punitive.

Omission of an explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I respectfully urge the Board to revise the proposed guidelines to ensure they are proportionate, flexible, and consistent with comparable boards, such as the Board of Behavioral Sciences. These changes will maintain public safety while preventing unnecessary harm to the psychology workforce and preserving access to care.

Thank you for your attention to this important matter.

--

Regards,

Farzaneh Ehsan Psy,D.

Clinical Psychologist PSY28121

Lifeline 1.800.273.TALK (8255) TRANS LIFELINE 877.565.8860 Crisis Text Line Text TALK to 741741

L.A. County Dept. Mental Health 1.800.854.7771 Trevor Project Lifeline for LGBTQ Youth 1.866.488.7386

Address: 15315 Magnolia Blvd. Ste 400 Sherman Oaks ,CA 91403

Phone: Fax:

Email: therapy@amhcenter.com

Website: https://advancedmentalhealthcenter.com/

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Thank you.

From: Lynn Foerster
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:19:22 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Lynn Foerster PhD

License # PSY9496

Lynn Foerster PhD

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From: Chuck Lepkowsky
To: bopmail@DCA

Cc: Subiect:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:21:22 AM

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- -The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- -The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- -The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Charles M. Lepkowsky, Ph.D. PSY9118 Solvang, CA
 From:
 Mary Jane Alumbaugh

 To:
 bopmail@DCA

 Subject:
 proposed changes

Date: Friday, August 15, 2025 8:25:14 AM

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.

The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.

The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

These proposals are truly draconian and unfairly punitive. This will do harm to the profession overall.

Thank you for your attention to this important matter.

Respectfully,

Mary Jane Alumbaugh, Psy 10031

Santa Maria CA 93454

--

Mary Jane Alumbaugh, Ph.D.

Website <a href="https://urldefense.com/v3/__https://mjalumbaugh-phd.com__;!!Em4Sr2!!MAM8kqj1co9pTWs5SoopK0bDjEu0B-BhZ-Sk_PmAW6HmN8WXCSQZgzrxYry8JKX01Gavv6eqgrXccjZoqQ\$CONFIDENTIAL EMAIL

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From: Abraham Loebenstein
To: bopmail@DCA

Cc:

Subject:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:26:08 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I would like for the Board to amend the guidelines to make sure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Abraham Loebenstein, Ph.D.

Psychologist PSY 15631 San Diego, CA
 From:
 Colin Baptie

 To:
 bopmail@DCA

 Subject:
 Disciplinary Guidelines

Date: Friday, August 15, 2025 8:32:04 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Colin A. Baptie, Psy.D. Clinical Psychology Psychological Assessment

Website: drbaptie.com

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From: Martha Gilmore
To: bopmail@DCA

Subject: Re proposed disciplinary guidelines
Date: Friday, August 15, 2025 8:37:59 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Martha Gilmore, PhD, CGP

PSY 10451

Sacramento & Davis, CA

Martha Gilmore, PhD, CGP, FAGPA

Sent from my iPhone. Please excuse brevity and typographical errors.

 From:
 Sharon Ben-Meir

 To:
 bopmail@DCA

Subject: Comments on proposed revisions **Date:** Friday, August 15, 2025 8:37:38 AM

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https://cdn.ymaws.com/www.cpapsych.org/resource/resmgr/action_alert/250814_CPA_Concerns_Discipli.pdf

 From:
 Thea Palencia

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:43:09 AM

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Dear Members of the Board of Psychology:

I am writing as a doctoral candidate and soon-to-be psychological associate in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Thea Palencia Doctoral Candidate Santa Barbara, CA

.....

Thea A. Palencia, B.F.A., M.S.

(Pronouns: she/her/hers)

Doctoral Candidate

Psy.D. Counseling Psychology

Pacifica Graduate Institute

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From: <u>Dustin Weissman</u>
To: <u>bopmail@DCA</u>

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:45:40 AM

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Dear Members of the Board of Psychology:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Dustin Weissman, Psy.D. Licensed Clinical Psychologist PSY 32130 Westlake Village, CA



Dr. Weissman Psychology 5706 Corsa Ave. #200-I

Westlake Village, CA 91362 www.drweissmanpsychology.com ? **President-Elect California Psychological Association** ? **Member-at-Large California Psychological Association Division VI Media Technology and Communication** ? President **Ventura County Psychological Association** www.venturacountypsych.com

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From: Dr. Megan Rhoads, PsyD

To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:46:57 AM

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Megan Rhoads, PsyD Licensed Psychologist PSY 29761 2377 Gold Meadow Way, Ste 101 Gold River, CA 95670

From: Cathie Gum

To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 8:57:09 AM

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Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Cathie Gum, Psy.D.

PSY 22467

Cathie Gum, Psy.D.

Pronouns: she/her California PSY 22467 Oregon PSY 3567 Certified IFS Therapist & Approved IFS Clinical Consultant Los Angeles, CA

www.drcathiegum.net

 From:
 Susan Sharma

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:09:47 AM

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Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Dr. Susan Sharma Clinical Psychologist, Ca Lic # PSY22787 260 Maple Court, Suite 223 Ventura, CA 93003

Website: www.drsharma.org



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From: Anna Karas Guerin
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:15:09 AM

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I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

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- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

--

Anna Karas Guerin, Psy.D

PSY26022

Thousand Oaks, CA

 From:
 R Hill, PhD

 To:
 bopmail@DCA

 Subject:
 Disciplinary guidelines

Date: Friday, August 15, 2025 9:15:49 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

__

Richard Hill, PhD PSY20326Clinical Psychology
Walnut Creek, CA

www.c4hl.org





Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

To: bopmail@dca.ca.gov

Dear Members of the Board of Psychology:

I am sorry to be traveling and therefore miss your next public meeting to contribute to the discussion in San Diego. I am providing public comment as a licensed psychologist and group practice owner in Pasadena, California to express my strong support for the California Psychological Association's August 14, 2025, excellent letter outlining concerns with the proposed Disciplinary Guidelines. CPA has done a lot of work to gather information from the members and reflect the opinions of our large organization in their thoughtful letter.

I personally have observed workforce shortages and crisis-level lack of access to care will be increased in psychology if our Board is uniquely or unfairly punitive. Early retirement or licensing through a different Board is becoming increasingly attractive to many who formerly practiced psychology. It has become gradually more difficult and even impossible to fill the open positions for psychologists in our group practice. Lengthy urgent wait lists of clients who wish to receive assessments or psychotherapy by psychologists in our group practice are continually disappointed and find nowhere else to turn to find available psychologists contracted with their insurance. We do find it much easier to find and hire mental health providers licensed by the Board of Behavioral Sciences. The profession of psychology in California is threatened by the costs and now more unreasonable proposed disciplinary guidelines.

I share CPA's position that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

• The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation. This leads to impossible situations of the Board either applying a probation that is overly punitive and inconsistent with the nature or severity of the offense or applying no probation at all. This inflexible probation would have the Board acting entirely inconsistent with the way psychologists are trained to think and act – flexibly, thoughtfully, and intentionally about the particularity of each person's situation.

- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice. This is punitive, unnecessary, costly, and would have the Board acting in a way that is inconsistent with the practice of psychology which is flexible, thoughtful, and intentional about the particularity of each person's unique situation.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive. Licensees are having trouble accessing proper professionals even within 90 days, especially those in non-urban areas.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations. These should be formalized within the guidelines for consistent and fair decisions in the future.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Andrea Davis, Ph.D. Licensed Psychologist PSY 12296

Owner/Founder, Greenhouse Therapy Center Pasadena, California 91106

 From:
 Dr. Danielle Sires

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:23:31 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a
 proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Danielle A. Sires, PsyD Clinical Psychologist, PSY 25616

870 Market Street, Suite 915 San Francisco, CA 94102

www.drdaniellesires.com

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From: <u>Dr. Monica Ellis-Blied</u>

To: <u>bopmail@DCA</u>;

Subject: Concerns with proposed disciplinary guidelines- Please Do better

Date: Friday, August 15, 2025 9:32:16 AM

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Kind regards, Dr. Blied (she)

Monica Ellis-Blied, PhD, MACL, BSP

California Licensed Psychologist #30328
Certified Brainspotting Practitioner
Founder of "Faces of Health" - a mental health skills-training app
Adjunct Professor of Psychology at Pepperdine University

Private Practice info: www.drblied.com
ADHD & Adult Autism Evaluations: www.drblied.com/adhd
Resources:

*Join 8.2k others & DOWNLOAD the free "Faces of Health" app: https://facesofhealth.net

Google play: https://play.google.com/store/apps/details?id=com.app.facesofhealth Apple iOS: https://apps.apple.com/us/app/faces-of-health/id1629137213

- *ENROLL in my new online education options (buy one get one free through 4/17):
- Adult ADHD and Autism Level 1 Self-Management modules: https://learn.facesofhealth.net/course/adhd-autism
- Beat Stress Using Neuroscience & Mindfulness course: https://learn.facesofhealth.net/course/stress-management

 From:
 Melinda Garabedian

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:34:19 AM

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 proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Melinda Garabedian, PhD PSY14322 Agoura Hills, CA

Melinda Garabedian, Ph.D.

28348 Roadside Dr. Ste. 201 Agoura Hills, CA 91301

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Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

To: bopmail@dca.ca.gov

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Respectfully,
So Gilbert, PhD
Licensed Psychologist Ps47471
Younbrite, CA.

 From:
 Goldie VanHeel

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:54:08 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist of California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Dr. Goldie VanHeel PSY 30845 Moses Lake

Dr. Goldie VanHeel Clinical Psychologist in Private Practice CA License# PSY30845 WA License# PY61326773

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Mirjana Kelava, Ph.D. From: bopmail@DCA To:

Cc:

Subject: Support for CPA's recommendations to amend the Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 9:56:27 AM

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Dear Members of the Board of Psychology:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Mirjana Kelava, Ph.D.

PSY14490 Berkeley, CA

Mirjana Kelava, Ph.D. Licensed Psychologist 2340 Ward Street Ste 202

Berkeley, CA 94705

http://www.drkelava.com

CA license #PSY14490

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From: rmcglenn@san.rr.com
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 10:05:20 AM

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Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Robert L. McGlenn, Ph.D. PSY5209 San Diego From: <u>Lisa Schenitzki</u>
To: <u>bopmail@DCA</u>

Subject: Support for CPA Letter- Concerns about Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 10:06:13 AM

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Sincerely, Lisa Schenitzki PSY 22859 Santa Ana, CA

Lisa Schenitzki, Psy.D. www.talk2drlisa.com

 From:
 Katherine Kildore

 To:
 bopmail@DCA

 Subject:
 Support for CPA Letter

Date: Friday, August 15, 2025 10:08:53 AM

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15 August 2025

Dear Members of the Board of Psychology:

As a licensed psychologist in California I want to express my strong support for the California Psychological Association's 14 August, 2025 letter outlining several concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based
 on the severity of the violation. Having been disciplined myself I know first hand the emotional and financial costs of
 an error.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic
 and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Katherine M Kilgore, PhD Lic. # PSY 14094 13405 Folsom Blvd, Suite 220 Folsom, CA 95630

www.drkkilgore.com

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From: 10

To: bopmail@DCA

Date: Friday, August 15, 2025 10:13:32 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Jacqui Lewis, PhD

__

UCI Cognitive Sciences Licensed CA Psychologist PSY 14269
 From:
 Menije Boduryan

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 10:31:09 AM

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Menije Boduryan-Turner, Psy.D.

Licensed Clinical Psychologist (PSY26351)

21031 Ventura Boulevard, Suite 316, Woodland Hills, CA 91364. https://embracingvoutherapy.com/

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From: <u>Barbara Peterson, Ph.D.</u>

To: bopmail@DCA

Subject: Opposition to proposed Disciplinary Guidelines
Date: Friday, August 15, 2025 10:46:37 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Barbara Peterson, Ph.D. Clinical Psychologist

Pronouns: she/her (Why I do this)

Secretary, Collaborative Assessment Association of the Bay Area (CAABA)

PSY 9319 1910 Olympic Blvd., #230 Walnut Creek, CA 94596

Website: Www.barbarapetersonphd.com

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From: dr.drecun a4ct.com To: bopmail@DCA

Subject: **RE:** Disciplinary Guidelines

Friday, August 15, 2025 10:56:58 AM Date:

Attachments: image.png Importance: High

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Sincerely, Aleksandra Drecun, PsyD. PSY 21778 San Diego

Warmest regards,

Dr. Aleksandra Drecun, Psy.D.



Association for Compassionate Transformation

Dr. Aleksandra Drecun, Psy.D. (she, her, hers)

Licensed Clinical Psychologist & Coach

Associate Professor of Psychologist



*For cancellations or rescheduling, please provide two full business days in advance of your appointment time to avoid being charged for the full session.

"The most authentic thing about us is our capacity to create, to overcome, to endure, to transform, to love and to be greater than our suffering.
-Ben Okri

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From: Becca Thompson
To: bopmail@DCA

Subject: Concerns with proposed disciplinary guidelines

Date: Friday, August 15, 2025 10:57:16 AM

This Message Is From an Untrusted Sender

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Rebecca Thompson, Ph.D.

Licensed Psychologist (PSY 27184)

Sacramento and Davis, CA

From: Mary Malik
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 10:57:23 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Mary L Malik, PhD PSY19861 San Luis Obispo, CA Notice: Please be aware that email contact cannot be guaranteed to be confidential. This communication is only for the use of the intended recipient(s) and may contain confidential and privileged information. If you received this email in error, please notify the sender immediately and then permanently delete this email from your system. If you are not the intended recipient, you are notified that disclosing, printing, copying, distributing, or taking any action on the contents of this information is strictly prohibited.

 From:
 Lynn Warner

 To:
 bopmail@DCA

 Subject:
 Disciplinary Framework

Date: Friday, August 15, 2025 11:05:35 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Reducing flexibility and treating all situations as identical in terms of punishment is insensitive at best and unfair and potentially damaging at worst. Context, repetition of inappropriate behaviors, attitude of the psychologist, other situational factors should all be considered in determining a response. The world is harsh enough without our Board becoming harsh.

Thank you for your attention to this important matter.

Sincerely, Lynn Warner, Ph.D. CA30310 San Diego
 From:
 Marcel Soriano

 To:
 bopmail@DCA

 Subject:
 Disciplinary Plan

Date: Friday, August 15, 2025 11:07:29 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am a licensed psychologist in California who works with underserved Latino/Hispanic and other ethnic minority clients. I am writing to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Marcel Soriano, Ph.D.

(PSY11559) Rancho Cucamonga, California From: Danielle Schlichter
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 11:20:19 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Danielle Schlichter, PsyD PSY 25720 Glendale, CA

Danielle Schlichter, Psy.D. Clinical Psychologist, PSY 25720

Conscious Connections Psychological Services, Inc.

1250 W. Glenoaks Blvd. #112 Glendale, CA 91201 www.dr-dani.com hello@dr-dani.com The information in this email, and any attachments, may contain confidential information and is intended solely for the attention and use of the named addressee(s). It must not be disclosed to any person(s) without authorization. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are not authorized to , and must not, disclose, copy, distribute, or retain this message or any part of it. If you have received this communication in error, please notify the sender immediately.

From: <u>Luli Emmons</u>
To: <u>bopmail@DCA</u>

Subject: Board of Psychology Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 11:44:05 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines. in addition to my support for the position articulated by California Psychological Association, as a CA psychologist licensed since 1994, I ask what purpose do these disproportionate disciplinary rules serve?

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Luli Emmons, Ph.D. License #PSY13879 Berkeley, CA From: Ellen K. Weissman, PsyD She, Her

To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 11:48:22 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Ellen K. Weissman, Psy.D. (She/Her) Licensed Psychologist, PSY 24880 Westlake Village, CA Dr. Weissman Psychology

www.DrWeissmanPsychology.com

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communication in error, please notify the sender immediately by replying to this message and deleting the

message and any accompanying files from your system.

From: Susan Raeburn
To: bopmail@DCA

Subject: Support for CPA"s Position on Psychologist Disciplinary Rules

Date: Friday, August 15, 2025 11:49:07 AM

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Dear Board of Psychology People:

I have been a licensed psychologist in California since 1987 and am writing to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Susan D. Raeburn. PhD CA PSY 9891 Oakland, CA 94618
 From:
 Colleen Warnesky

 To:
 bopmail@DCA

 Subject:
 Support for CPA Letter

Date: Friday, August 15, 2025 11:51:58 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Colleen Warnesky, PsyD PSY22352 33 S. Catalina Ave. #204 Pasadena, CA 91106 From: <u>Dr. Jordyn Trockman</u>
To: <u>bopmail@DCA</u>

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 11:55:01 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

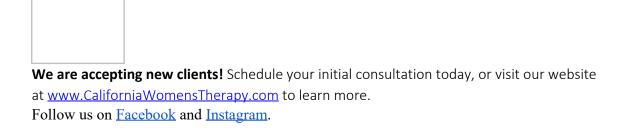
Respectfully, Dr. Jordyn Trockman PSY #28433 Santa Clarita, CA

Dr. Jordyn Trockman

Owner & Founder

California Women's Therapy

www.CaliforniaWomensTherapy.com



 From:
 Yahoo Mail

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 12:19:46 PM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Angela E. Moskovis, Ph.D. Clinical Psychologist CAPSY12113

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From: Wendy Stock

To: bopmail@DCA

Subject: OPPOSE IMPOSITION OF FIXED MINIMUM OF 5 YRS PROBATION - DISCIPLINARY GUIDELINES

Date: Friday, August 15, 2025 12:23:19 PM

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Report Suspicious

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

To: bopmail@dca.ca.gov

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Wendy Stock, Ph.D.

CA Lic# 13947

Berkeley, CA

 From:
 Susan Newton

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 12:26:59 PM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Susan J. Newton, PhD

PSY 16136

From: Rochelle Perper
To: bopmail@DCA

Cc:

Subject: Concerns Regarding Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 12:45:48 PM

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Dear Members of the Board,

I am a licensed psychologist in California, and have the privilege of serving the psychology community through my role as Chair of the San Diego Psychological Association (SDPA) Ethics and Standards Committee, provide Expert Reviewer services for the California Board of Psychology, and I am the Founder and Principal Psychologist of Therapy Changes, a multispecialty group practice in San Diego. I also provide expert witness testimony, and offer Continuing Professional Development (CPD) courses on law, ethics, and other topics.

In my work as an Expert Reviewer, I have gained a unique perspective on the critical role the Board plays in protecting the public while supporting the professional practice of psychology. I have serious concerns that the proposed changes to the Disciplinary Guidelines will have a significant negative impact on psychologists - particularly those in private practice, at a time when private practitioners are already scarce and desperately needed. This will, in turn, affect access to care across California, especially when the demand for highly trained mental health providers such as psychologists is at an all-time high.

I share the California Psychological Association's position, outlined in its August 14, 2025 letter, that the Board should maintain a fair and proportionate disciplinary framework that protects the public while allowing for consideration of individual facts and circumstances. In particular, I am concerned about:

- The imposition of fixed minimum five-year probation terms, rather than flexible terms "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even when unrelated to fitness to practice.
- The reduction of compliance timelines from 90 to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports proportionate responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and consistent with comparable boards such as the Board of Behavioral Sciences. These changes will safeguard public safety while avoiding unnecessary harm to the psychology workforce and ensuring continued access to mental health care in California.

Thank you for your time, attention, and commitment to these important issues.

Warmest Wishes,

Rochelle Perper, Ph.D. Licensed Psychologist, PSY23090 Therapy Changes 2221 Camino del Rio S, Ste 200 San Diego, CA 92108





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 From:
 Daniel Taube

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 12:56:16 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Daniel O. Taube, J.D., Ph.D.

Lic: Psy11182

Professor Emeritus, CSPP-San Francisco

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 From:
 Dr. Katie Strang

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 12:59:45 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I support appropriate disciplinary actions, especially for those licensees who pose a risk of harm to clients and to the reputation and trustworthiness of our profession. However, I believe that overly strict and harsh consequences will place undue burden on licensees and will contribute to a shortage of psychologists in California.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Katie Strang, PsyD (PSY32133) Encino, California, 91436

__

Katie Strang, Psy.D. she/her/hers (<u>what's this?</u>) Licensed Clinical Psychologist (California & Indiana)

DBT-Linehan Board of Certification, Certified Clinician $^{\text{\tiny TM}}$ www.drkatiestrang.com



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 From:
 Kelly Anderson

 To:
 bopmail@DCA

 Subject:
 Disciplinary Guidelines

Date: Friday, August 15, 2025 1:22:41 PM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,



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From: <u>Katy Trotta</u>

To: <u>bopmail@DCA</u>

Subject: Proposed Disciplinary Guidelines. **Date:** Friday, August 15, 2025 1:24:04 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive. As a psychologist in a more rural county where I know almost every provider within 75 miles, this is of grave concern to me. Getting a community member into care within 30 days is challenging here, let alone a fellow psychologist.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

I am also concerned about why these changes are coming about and more transparency on the need for these changes should be discussed more at length publically.

Thank you for your attention to this important matter.

Sincerely, Kathleen Trotta, Psy.D. License #31956 Paso Robles, CA --

Clinical and Forensic Psychologist Lamplighter Wellness & Consulting APA Division 44 Public Policy Co-chair APA Advocacy Coordinating Committee Member

"Happiness can be found, even in the darkest of times, if one only remembers to turn on the light."

From: Cortney Warren
To: bopmail@DCA

Subject: Concern Over Proposed Changes to Disciplinary Guidelines

Date: Friday, August 15, 2025 2:02:52 PM

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Thank you for your attention to this important matter.

Sincerely, Cortney S. Warren, Ph.D., A.B.P.P. Santa Barbara, CA

Dr. Cortney S. Warren, PhD, ABPP

Board Certified Clinical Psychologist
Adjunct Clinical Professor, Department of Psychiatry and Behavioral Health
Kirk Kerkorian School of Medicine at UNLV
Author of <u>Letting Go of Your Ex</u>
DrCortnev.com

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From: Claude Ruffalo
To: bopmail@DCA
Subject: Changes to rules

Date: Friday, August 15, 2025 2:14:30 PM

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Thank you for your attention to this important matter.

Sincerely, Claude A. Ruffalo, Ph.D. PSY5072 Topanga, CA
 From:
 K Wortman

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 3:06:45 PM

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LDear Members of the Board of Psychology:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Best,

K Wortman, PhD (they/she) Clinical Neuropsychologist

California Licensed Psychologist PSY 31275

Next Steps Neuropsychology

55 Santa Clara Avenue, Suite 200, Oakland, CA 94610

www.nextstepsnp.com | Client Portal

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 From:
 Dr. Romi Mann

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 3:20:05 PM

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Thank you for your attention to this important matter.

Sincerely,

Romi Mann, Psy.D.

Clinical Psychologist (CA: PSY25226, NY: 025332-01)

Offices in San Francisco & Walnut Creek

www.drromimann.com

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 From:
 Dr. Cohen

 To:
 bopmail@DCA

 Subject:
 Letter of concern

Date: Friday, August 15, 2025 3:25:50 PM

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To: bopmail@dca.ca.gov

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Thank you for your attention to this important matter.

Sincerely,

Dr. Catherine Cohen

Dr. Catherine Cohen

Private practice and Consultation
Dr. Catherine C. Cohen, Psy.D., A professional Corporation
Clinical Psychologist PSY16313
3010 I St. Sacramento, CA 95816

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From: ronbale@aol.com
To: bopmail@DCA

Subject: Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 3:33:05 PM

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Thank you for your attention to this important matter.

Sincerely,

Ronald Bale, PhD PSY 5955 Ventura, CA
 From:
 Jill Moland

 To:
 bopmail@DCA

Subject: Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 3:59:28 PM

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Thank you for your attention to this important matter.

Sincerely, Jill Moland PsyD PSY 25496 Camarillo, CA

Jill Moland

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 From:
 Noel Cooper

 To:
 bopmail@DCA;

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 4:12:57 PM

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Thank you for your attention to this important matter.

Sincerely, Noel Cooper, PsyD PSY27664 Riverside, CA

Director, Psychological Services of Riverside Assistant Professor of Psychology College of Behavioral and Social Sciences CA License PSY27664



www.calbaptist.edu

California Baptist University, 2900 Adams St., Suite C-10, Riverside, CA 92504

From: Brian Dow
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 4:52:05 PM

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Sincerely, Brian Dow, Ph.D. PSY24975 Los Angeles From: Joseph Ortiz
To: bopmail@DCA

Date: Friday, August 15, 2025 5:10:28 PM

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Thank you for your attention to this important matter.

Sincerely,

Joseph Ralph Ortiz, PhD, LMFT, LPCC, NCC Licensed Psychologist. PSY 25127

From: Holly Anton

To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 5:59:30 PM

Attachments: <u>dr hollyanton.vcf</u>

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California for over 23 years and current member of California Psychological Association to express my strong support for the CPA's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

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Thank you for your attention to this important matter.

Sincerely,

Holly Anton, PSY18114

Holly Anton, PhD
105 Morris Street, Ste 200 Sebastopol, CA 95472
Santa Rosa, CA, 95401

https://www.psychologytoday.com/profile/96294

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From: Mickey Suozzo
To: bopmail@DCA

Subject: changes to disciplinary guidelines

Date: Friday, August 15, 2025 6:22:25 PM

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August 15, 2025

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Thank you for your attention to this important matter.

Sincerely,

Joseph M. Suozzo, Jr., J.D., Psy.D. PSY 18393 San Marcos, CA 92078
 From:
 Amber Blews

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 7:56:27 PM

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Thank you for your attention to this important matter.

Sincerely, Dr. Amber Blews

Amber E. Blews, Ph.D., M.A., M.A., M.Ed.

Licensed Psychologist CA PSY#30438 Healthy Relationships California (HRC) - Certified Instructor 405 N Indian Hill Blvd. Claremont, CA 91711
 From:
 Chris Fulton

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Friday, August 15, 2025 11:05:11 PM

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The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

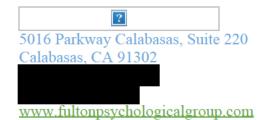
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Thank you for your attention to this important matter.

Sincerely,

Christopher Fulton, Ph.D. Licensed Psychologist PSY 14741

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From: Jim J

To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 8:58:03 AM

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Thank you for your attention to this important matter.

Sincerely, James Jones Ph.D. PSY15128 Los Angeles
 From:
 Vickie Dowling

 To:
 bopmail@DCA

 Subject:
 Disciplinary Guidelines

Date: Saturday, August 16, 2025 11:45:24 AM

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Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Vickie Dowling, PsyD PSY 21983 Carlsbad, CA
 From:
 Jane R

 To:
 bopmail@DCA

Subject: Support for CPA letter re:Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 12:16:53 PM

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Report Suspicious

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Thank you for your attention to this important matter.

Sincerely, Jane Rubin

PSY14820

Berkeley, CA

Jane Rubin, PhD, PhD, PsyD Licensed Clinical Psychologist Berkeley, California

www.janerubinphd.com

From: Leah Rosenthal
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 12:23:40 PM

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Thank you for your attention to this important matter.

Sincerely,

Leah Rosenthal, Ph.D.

From: Mark Dombeck
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 12:52:10 PM

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Thank you for your attention to this important matter.

Sincerely,

Mark Dombeck, Ph.D Licensed Psychologist (PSY25695) Alameda, CA

--

Mark Dombeck, Ph.D Licensed Psychologist https://psychtools.com

 From:
 Amanda Cassil

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 1:17:25 PM

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Report Suspicious

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Thank you for your attention to this important matter.

Sincerely,

--

Amanda Cassil, PhD Licensed Clinical Psychologist (PSY26549) Pasadena, CA

Founder, STEM Psychological Services PC
Author, The Empowered Highly Sensitive Person & The Self-Care Plan for the Highly Sensitive Person



From: <u>Jessica Lipkind</u>
To: <u>bopmail@DCA</u>

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 2:18:23 PM

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Thank you for your attention to this important matter.

Sincerely, Jessica Lipkind, Psy.D. #PSY21623 Berkeley, CA

--

she/her/hers Why is this important?

www.drjessicalipkind.com

*Please be aware, I do not read and respond to emails on weekends. I am generally available by email during business hours only.

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From: Rick Maisel

To: bopmail@DCA

Subject: Support fir CPA's objection to punitive and inflexible disciplinary quidelines

Date: Saturday, August 16, 2025 3:20:10 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Richard Maisel PhD

License PSY13594

Sent from my iPhone

From: Russell Lemle
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 4:59:31 PM

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Dear Members of the CA Board of Psychology,

As a long term California licensed psychologist, I am writing to express my strong support for the California Psychological Association's August 14, 2025, letter regarding concerns with the proposed Disciplinary Guidelines. I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while considering the unique facts and circumstances of individual cases.

I am particularly troubled by several aspects of the proposed guidelines. The imposition of fixed minimum five-year probation terms eliminates necessary flexibility that would allow the Board to tailor consequences based on violation severity, replacing the current "up to five years" standard that enables appropriate case-by-case determinations. Additionally, requiring psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice, appears excessive and inappropriate.

The reduction of compliance timelines from 90 to 30 days for securing monitors or therapists creates an unrealistic and unduly punitive burden on licensees. This shortened timeframe fails to account for the practical challenges of finding qualified professionals and may inadvertently compromise the quality of supervision arrangements. Furthermore, the guidelines lack explicit reference to the Spectrum of Administrative Actions, which has traditionally supported proportionate responses that match the severity of violations.

I urge the Board to amend these guidelines to ensure they remain proportional, flexible, and consistent with comparable regulatory bodies such as the Board of Behavioral Sciences. Such revisions will preserve public safety while avoiding unnecessary disruption to California's psychology workforce and the communities we serve.

Thank you for your consideration of this important matter.

Sincerely,

Russell Lemle, PhD

PSY6720 (California)

Mill Valley, CA

 From:
 nancy doi

 To:
 bopmail@DCA

Cc:

Subject:

CPA support for fair and proportionate disciplinary framework

Date: Saturday, August 16, 2025 5:37:14 PM

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The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Nancy N. Doi PSY 16553 Kingsburg, California From: drtaniadavidson@hushmail.com

To: bopmail@DCA

Subject: Proposed Changes to Disciplinary Guidelines
Date: Saturday, August 16, 2025 8:20:02 PM
Attachments: Letter to the Board Aug 2025.pdf

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Greetings Board Members:

I am including my letter to express my views on the proposed changes as a California Psychological Association psychologist member, and a practicing licensed psychologist in California for decades. I have also had the privilege of having been an Expert Evaluator for the Board of Psychology reviewing disciplinary cases brought before you, and rendering my opinions over the years, as well as being an adjunct professor instructing Clinical Psychology doctoral students in a Law and Ethics course at Pacifica Graduate Institute in Santa Barbara in the past, and am aware of the statistics on compliance with the laws and ethics that govern our profession. In general, I see psychologists in California doing an outstanding job of self-governing/peermonitoring each other as a first line with regard to "policing" our ranks. The vast majority of us are already highly ethical, dedicated and competent mental health practitioners. When one of us runs into trouble, we support each other and offer what is needed to see to clients' welfare/wellbeing and the psychologist's wellbeing next, and that is typically the solution, not a punitive set of restrictions. In particular, the local Psychological Associations (of which I am also a member, Ventura County Psychological Association), are the best sources for this support, offering Committees for psychologists to participate in, reducing isolation, fostering community within the profession, consultation and professional development utilizing the existing expertise within the membership. I trust that the Board recognizes the things that I have just highlighted, and would understand that it would be better to, instead, encourage psychologists to be a part of professional associations for these reasons.

I hope that my letter is received in the spirit in which it is intended. Be well and take care. We must all project more kindness outward these days.

Kindest Regards, Dr. Tania Davidson

Tania Davidson, PhD. 90-07683 NZ PSY16510 California USA

Licensed and Registered Clinical Psychologist \ Kaimātai Whakatau Hauora Hinengaro

Pronouns: "She, her, hers"

1/175 Mitchell Street

Brooklyn, Wellington, NZ 6021

http://www.psychologyofstrength.com

"An awake heart is like a sky that pours light."

— Hafiz

August 18, 2025

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely

Tania Davidson, Psy.D. PSY16510 Licensed Clinical Psychologist Oxnard, California
 From:
 Jacob Kaminker

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 8:24:44 PM

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Thank you for your attention to this important matter.

Sincerely,

Jacob Kaminker, PhD

Licensed Clinical Psychologist, PSY 26445 www.iacobkaminker.com

Professor, Counseling Psychology John F. Kennedy School of Psychology National University

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privileged. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, use, or taking of any action on reliance of the contents of this email is strictly prohibited. If you have received this email in error, please notify me by telephone at and delete this email and destroy/ shred any copies. Thank you. To my clients: Please be aware that email is not guaranteed to be **confidential**. Generally, I will only respond to emails regarding scheduling, paperwork, and appointments. If you ask to communicate more extensively with me by email, please understand that you are both accepting the security limitations of email and also are giving permission for me to respond using email.

 From:
 Michael Grubb PhD

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 9:15:46 PM

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Subject: Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

To: bopmail@dca.ca.gov

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Thank you for your attention to this important matter.

Sincerely,

Michael Grubb, PhD

Psychologist PSY29430

San Francisco, CA

Michael Grubb, PhD Psychologist PSY29430 459 Fulton Street, Suite 102, San Francisco CA 94102

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From: Dr Anthony F
To: bopmail@DCA

Date: Saturday, August 16, 2025 9:33:44 PM

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Thank you for your attention to this important matter.

Anthony Francisco, Ph.D.

psy6247

California

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From: Bayla Travis
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Saturday, August 16, 2025 9:45:00 PM

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Thank you for your attention to this important matter.

Sincerely, Bayla Travis PSY CA 27316 Berkeley From: Karin Nilsson, PhD
To: bopmail@DCA

Subject: Concerns with Proposed Disciplinary Guidelines
Date: Sunday, August 17, 2025 9:59:21 AM

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Thank you for your attention to this important matter.

Sincerely, Karin E. Nilsson, Ph.D. PSY15136 Sacramento, CA

Karin E. Nilsson, PhD

Office Address: 1116 - 22nd St.

Sacramento, CA 95816

Mailing Address: P.O. Box 1436

From: <u>Talya Stein</u>
To: <u>bopmail@DCA</u>

Subject: Proposed Disciplinary Guidelines

Date: Sunday, August 17, 2025 11:14:42 AM

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Sincerely, Dr. Talya Stein

PSY27573

Los Angeles

From: <u>ecainephd</u>
To: <u>bopmail@DCA</u>

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Sunday, August 17, 2025 12:34:26 PM

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Thank you for your attention to this important matter.

Sincerely,

Liz A. Caine, Ph.D.

Liz A. Caine, Ph.D. they/them California Licensed Psychologist PSY27477

http://www.therapywithdrcaine.com/ President of the San Francisco Psychological Association Ketamine Assisted Psychotherapy Practitioner Mental Health Crisis Support: text or call 988

Crisis Text Line: 741-741

LGBTQI+ Crisis Support: Phone: 866-488-7386 Text: 678-678 (Trevor Project)

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Sent with Proton Mail secure email.

 From:
 Kelley Gin

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Sunday, August 17, 2025 1:12:27 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Kelley Bryan Gin, PsyD, PSY 20624 2711 Alcatraz Avenue, Suite 2 Berkeley CA 94705 Drkelleygin.com

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use or distribution of the information attached may subject discloser to civil or criminal penalties under State and Federal Privacy Laws. If you are the intended recipient, you must secure the contents in accordance with all applicable State or Federal requirements related to the privacy and confidentiality of information, including the HIPAA Privacy guidelines.

From: Mary Montaldo
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Sunday, August 17, 2025 2:39:55 PM

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Report Suspicious

Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Mary Montaldo, Ph.D.

PSY29809

Roseville, CA

Markley S. Sutton, Ph.D.

P.O. Box 5342

Napa, CA . 94581

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

To: bopmail@dca.ca.gov

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Markley S. Sutton, Ph.D. Psy 5529 Napa, California From: Neuro-Rehab Psychological Consultation, Inc.

To: <u>bopmail@DCA</u>

Cc: Subiect:

Date:

BOP"s Disciplinary Framework Sunday, August 17, 2025 5:02:36 PM

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cc:

To The Hard Working Board of Psychology:

Writing to support the CPA's 8/14/25 letter outlining concerns with the proposed Disciplinary Guidelines. I am licensed psychologist in Pasadena, CA and hoping to safeguard the integrity of our profession and also the integrity of our earnest work being supported by your board. We work hard, for low wage at the level of education and training we invested in. We hold the highest ethics and legal guideline of most professions, which I regard with the highest importance.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Mona Mikael, Psy.D. Neuro-Rehabilitation Psychologist

www.neurorehabTLC.com

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From: Shirley Liao, Ph.D.
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Sunday, August 17, 2025 11:45:45 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
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- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Shirley Liao, PhD

PSY22273

Shirley Liao, Ph.D., FIPA Psychologist•Psychoanalyst PSY22273

she-her

*Please note that email is not completely secure. If this is a life threatening emergency, please contact 911 immediately and/or call 988 Suicide and Crisis Lifeline. I will respond to your emails during normal business hours Mondays to Fridays.

From: Rebecca MurrayMetzger
To: bopmail@DCA

Cc:

Subject: Concerns with Proposed Disciplinary Guidelines/Support for CPA Letter

Date: Monday, August 18, 2025 6:13:45 AM

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Dear Members of the Board of Psychology:

As a licensed psychologist in California and owner of a group practice, I want to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive, given the shortage of mental health providers in our state.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Rebecca MurrayMetzger Psy.D., Licensed Psychologist PSY20929 San Francisco, CA

www.sfmindmatters.com

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From: Rebecca Good
To: bopmail@DCA

Subject: Support for CPA letter - concerns with proposed disciplinary guidelines

Date: Monday, August 18, 2025 9:54:01 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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Thank you for your attention to this important matter.

Sincerely, Rebecca Good PSY32018 Palo Alto

__

Rebecca Good, PsyD Breaking Ground Therapy Licensed Psychologist PSY-32018 Pronouns: She, Her, Hers website breakinggroundtherapy.com

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From: Louise Kindell, Psy.D.

To: bopmail@DCA

Subject: Support for CPA Letter- Support for Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 10:42:40 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Louise Olivia Kindell, Psy.D. Califomia Licensed Psychologist PSY21733

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From: Scott Young
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 11:10:39 AM

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Dear Members of the Board of Psychology:

I am writing as a registered psychological assistant in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

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Thank you for your atter
Sincerely,
Scott Taney Young, MA
Santa Barbara, CA

Scott Taney Young, MA

Registration #: PSB 94025552

Practicing under the license of and supervised by Dr. Daniel P. Schwartz, PhD (License #: PSY 31352)

Doctoral Candidate

Clinical Psychology Program (PsyD)

Antioch University, Santa Barbara

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 From:
 Rachel Kavanauqh

 To:
 bopmail@DCA

 Cc:
 Cc:

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 12:52:09 PM

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Dear Members of the Board of Psychology:

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Thank you for your attention to this important matter.

Sincerely,

Rachel Kavanaugh, PsyD (PSY30499), Sherman Oaks, CA

--

*** I honor and respect boundaries around personal time, well-being, caretaking, and rest. Should you receive an email from me during a time you are engaging in your time away from work, please feel no pressure to respond immediately. I will gladly receive your response when I am working. ***

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From: DEBORAH SCHILLER
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 1:20:11 PM

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Dear Members of the Board of Psychology:

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I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Deborah C. Schiller, Ph.D. PSY19411 Santa Barbara, CA 93105



 From:
 Dr. John E. Kincaid

 To:
 bopmail@DCA

Cc: Subiect:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 6:02:42 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California (licensed in 1982) to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you so much for your attention to this important matter.

Sincerely,

John E. Kincaid, Ph.D. PSY 7489 Clinical and Forensic Psychology Danville, CA

Mailing address: 1701 El Nido #73

Diablo, CA 94528

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 From:
 Zoe Benoit

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 4:57:06 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

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Thank you for your attention to this important matter.

Sincerely,

Zoe Benoit PSY24678 Sebastopol, California

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permanently delete this message and any attachments.

From: <u>Elizabeth Rauch Leftik</u>
To: <u>bopmail@DCA</u>

Cc:

Subject:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 5:42:42 PM

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Dear Members of the Board of Psychology:

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I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Elizabeth Leftik, PsyD

Elizabeth Rauch Leftik, PsyD [she/hers] Lic. No. PSY20066 Co-founder | Mt. Diablo Psychological Services

www.mtdiablopsychologicalservices.com

 From:
 Trisha Wallis

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 7:21:28 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

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Thank you for your attention to this important matter.

Sincerely,

Trisha Wallis, PSY 29917, Sacramento, CA

Trisha D. Wallis, PsyD, LCSW, CCHP-MH

pronouns: she/her (what's this?)

Licensed Psychologist & Licensed Clinical Social Worker

Gender Specialist; WPATH GEI SOC 8 Certified Member & Mentor

Member of Mind the Gap, a consortium of gender care providers in community partnership

with the UCSF Child and Adolescent Gender Center (CAGC)

https://drtrishawallis.com

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 From:
 Jill Gover

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 9:06:45 PM

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Report Suspicious

August 18, 2025

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025 letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Fredrica Gover, Ph.D. PSY13880

San Luis Obispo, CA.

From: Cathy Neuhauser
To: bopmail@DCA

Subject: Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Monday, August 18, 2025 9:20:51 PM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Cathy G. Neuhauser, Ph.D. (she/her) 523 G Street, Suite 3, Davis, CA 95616-3860

CA Licensed Psychologist PSY8049

http://www.cathyneuhauserphd.com/

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From: Alex Wong
To: bopmail@DCA

Subject: Response to Proposed Disciplinary Guidelines Changes

Date: Tuesday, August 19, 2025 8:15:48 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.

The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.

The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.

The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

I believe that the profession of psychology is already difficult enough without the imposition of unnecessarily harsh punishments for various violations. I wonder if the harsh guidelines are rooted in a desire to reduce the overall number of practitioners rather than actually protect the public. In my opinion, society already devalues mental health and mental health professionals, failing to see the value we bring to the table. We don't need our Board of Psychology doing the same.

Thank you for your attention to this important matter.

Sincerely, Alex Wong, PsyD PSY33369 Monrovia, CA From: Dr. Lauren Guy
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 9:36:42 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Lauren Guy, Psy.D. PSY24189 Santa Barbara, CA

--

Lauren Guy Riley, Psy.D Licensed Clinical Psychologist (PSY 24189)

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 From:
 Emily Maynard, PhD

 To:
 bopmail@DCA

 Cc:
 Cc:

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 9:36:48 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.

The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.

The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.

The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,
Emily Maynard, Ph.D. (she/ella/ela)
Licensed Clinical Psychologist (English, Spanish, Portuguese)
Santa Barbara, CA
CA PSY #29682
DC PSY #200001508

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From: Avery Voos
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 9:37:29 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025 letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice. I see this as a financial barrier.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Avery Voos, Ph.D. PSY30702

Santa Barbara, California

Avery Voos, Ph.D. Licensed Psychologist CA PSY30702 she/her/hers



Therapy Office: 1515 State Street, Suite 22 Santa Barbara, CA 93101

Assessment Office: 925 De La Vina Street, Suite 100 Santa Barbara, CA 93101

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From: Lynne Steinman
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 9:46:01 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Lynne A. Steinman, Ph.D. PSY8923 Valencia, CA
 From:
 Darren Del Castillo

 To:
 bopmail@DCA

 Subject:
 CPA support

Date: Tuesday, August 19, 2025 10:09:53 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Darren Del Castillo, Ph.D. PSY 24526 Santa Barbara, CA. 93101
 From:
 Emily Eccles

 To:
 bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 10:39:02 AM

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Dear Members of the Board of Psychology,

I am a licensed psychologist in California, and I am writing to express my strong support for the California Psychological Association's August 14, 2025 letter regarding the proposed revisions to the Disciplinary Guidelines.

Like CPA, I believe that the Board must uphold a disciplinary process that is fair, proportional, and reflective of individual circumstances, while continuing to safeguard the public. My specific concerns include:

- The requirement of a fixed minimum five-year probation term instead of allowing discretion for probation of "up to five years," depending on case severity.
- The automatic use of psychological evaluations as a probation condition, even in cases that are unrelated to professional fitness.
- The reduction of compliance deadlines from 90 to 30 days to secure monitors or therapists, an unrealistic and unnecessarily punitive timeframe.
- The omission of explicit acknowledgment of the Spectrum of Administrative Actions, which provides a more balanced set of options for handling minor violations.

I strongly urge the Board to revise the proposed guidelines to ensure they remain reasonable, adaptable, and aligned with comparable boards such as the Board of Behavioral Sciences. Doing so will protect public safety while also safeguarding the psychology workforce and ensuring continued access to care for Californians.

Thank you for your thoughtful consideration of this matter.

Sincerely,

Emily Eccles, Ph.D.

CA#PSY33571 Santa Barbara, CA Pronouns: She/Her/Hers use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this electronic message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this electronic message in error, please notify the sender immediately, and purge the electronic message immediately without making any copy or distribution. Thank you.

From: doctorgalante@gmail.com

To: <u>bopmail@DCA</u>

Cc: Subject:

Support for CPA Letter - Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 10:49:00 AM

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Dear Members of the Board of Psychology:

I am writing as a retired psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for the opportunity to provide input into this important issue.

Sincerely,

Mercedes Galante, Ph.D.

Retired Psychologist Fullerton CA
 From:
 Terry Eakin

 To:
 bopmail@DCA

Cc:

Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 10:54:59 AM

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Dear Members of the Board of Psychology:

I am writing as a retired psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Terry L. Eakin, Ph.D. Retired Psychologist Fullerton, CA From: Michael Seabaugh
To: bopmail@DCA

Subject: Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 11:10:00 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Michael Seabaugh, Ph.D

Psy10200

Santa Barbara, CA

Michael Seabaugh

From: melissa.cordero@hr.ucsb.edu

To: <u>bopmail@DCA</u>

Cc: Subject:

Support for CPA Letter – Concerns with Proposed Disciplinary Guidelines

Date: Tuesday, August 19, 2025 11:13:50 AM

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Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely,

Melissa Cordero, PsyD (she/her/ella) Licensed Clinical Psychologist #27545 Manager of Academic and Staff Assistance Program (ASAP) (Available Hours: Mon-Thur 7:30-6pm)

University of California, Santa Barbara Academic & Staff Assistance Program

Human Resources

I acknowledge the traditional custodians of the land upon which the University of California, Santa Barbara is located, and pay my respect to the Chumash Elders past, present and future for they hold the memories, the traditions, and the culture of this area, which has become a place of learning for people from all over the world.

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 From:
 Karen Lehman

 To:
 bopmail@DCA

Subject: response to proposed changes in disciplinary guidelines

Date: Tuesday, August 19, 2025 11:37:59 AM

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Report Suspicious

Dear Members of the Board of Psychology:

I am writing as a licensed psychologist in California to express my strong support for the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. I am particularly concerned about:

- The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.
- The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.
- The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.
- The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Karen Lehman, Ph.D.

PSY18094

Santa Barbara, CA.

Karen Lehman, Ph.D.
(she/her/hers)
California Licensed Clinical Psychologist (PSY18094)

www.drkarenlehman.com
(text or voice)
(fax)

Office Location: 925 De la Vina, Suite 100 Santa Barbara, CA. 93101

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From: Dean Given
To: bopmail@DCA

Subject: Support the CPA letter regarding new disciplinary guidelines

Date: Tuesday, August 19, 2025 11:46:26 AM

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Dear Members of the Board of Psychology:

I am a licensed psychologist in Santa Barbara, California and am writing in support of the California Psychological Association's August 14, 2025, letter outlining concerns with the proposed Disciplinary Guidelines.

I share CPA's belief that the Board should maintain a fair and proportionate disciplinary framework that protects the public while recognizing the facts and circumstances of individual cases. The proposed punitive and unduly harsh restrictive consequences for minor offenses is simply poor public policy - which will further restrict access to urgently needed care.

As the CPA letter listed, these problems are:

The imposition of fixed minimum five-year probation terms rather than allowing flexibility "up to five years" based on the severity of the violation.

The inclusion of psychological evaluations as a standard probation condition, even for cases unrelated to fitness to practice.

The reduction of compliance timelines from 90 days to 30 days to secure monitors or therapists, which is unrealistic and unduly punitive.

The lack of explicit reference to the Spectrum of Administrative Actions, which supports a proportionate range of responses for minor violations.

I urge the Board to amend the guidelines to ensure they are proportional, flexible, and in line with comparable boards such as the Board of Behavioral Sciences. Such changes will preserve public safety while avoiding unnecessary harm to the psychology workforce and access to care.

Thank you for your attention to this important matter.

Sincerely, Dean Given, Ph.D. Psy8529 Santa Barbara, CA