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Scott Walker, Governor
Dave Ross, Secretary

PSYCHOLOGY EXAMINING BOARD MEETING
Room 121C, 1400 East Washington Avenue, Madison, WI
Contact: Dan Williams (608) 266-2112
November 19, 2014

Notice: The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a description of the actions and deliberations of the Board.

9:00 A.M.

OPEN SESSION – CALL TO ORDER – ROLL CALL

A. **Adoption of Agenda (1-3)**

B. **Approval of Meeting Minutes of August 27, 2014 (4-9)**

C. **Administrative Matters – Discussion and Consideration**
   1) Staff Update
   2) Appointment of Liaisons and Committee Members
   3) Board member – term expiration date
      a. Rebecca Anderson – 7/1/2018
      b. Marcus Desmonde – 7/1/2017
      c. Daniel Schroeder – 7/1/2015
      d. David Thompson – 7/1/2018
      e. Public Member 1: Vacant since 2011
      f. Public Member 2: Vacant since 2012

D. **Legislation and Administrative Rule Matters – Discussion and Consideration**
   1) Legislative Report and Final Draft Amending PSY 4 Relating to Continuing Education **(10-23)**
   2) Proposals for PSY 2 Relating to Licensure **(24-27)**
      a. WPA proposal **(28-31)**
   3) Proposals for PSY 3 Relating to Practice of School Psychology **(32-33)**
   4) Update on Pending and Possible Rulemaking Projects

E. **Board Goals – Discussion and Consideration**

F. **Informational Items – Discussion and Consideration**

1) ASPPB Taskforce Meeting – LCIOP Report **(34-55)**
2) Interjurisdictional Telepsychology Compact **(56-93)**

G. Items Received After Preparation of the Agenda

1) Introductions, Announcements and Recognition
2) Administrative Matters
3) Presentations of Petition(s) for Summary Suspension
4) Presentation of Proposed Stipulation(s), Final Decision(s) and Order(s)
5) Presentation of Proposed Final Decision and Order(s)
6) Division of Legal Services and Compliance Matters
7) Education and Examination Matters
8) Credentialing Matters
9) Practice Questions/Issues
10) Legislation/Administrative Rule Matters
11) Liaison Report(s)
12) Speaking Engagement(s), Travel, or Public Relation Request(s)

H. Consulting with Legal Counsel

I. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85 (1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85 (1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

J. **Deliberation of Credentialing Matters**

1) Application Review – James Angster, Ph.D. **(94-185)**
2) Application Review – Susan Astary, Ph.D. **(186-229)**
3) Application Review – Stephanie Budge, Ph.D. **(230-353)**
4) Application Review – Cheryl Buechner, Ph.D. **(354-415)**
5) Application Review – Sara Hegerty, Ph.D. **(416-486)**
6) Fitness to Practice Evaluation – Jonathan Easton, Psy.D. **(487-500)**

K. **Deliberation of Division of Legal Services and Compliance Matters**

1) DLSC Attorney Sandra Nowack

a. **Proposed Stipulations, Final Decisions and Orders**

i. 14PSY029 (D.G.N.) **(501-506)**

b. **Administrative Warnings**

i. 14PSY023 (P.B.) **(507-508)**

ii. 14PSY025 (D.R.H.) **(509-510)**

iii. 14PSY026 (R.B.J.) **(511-512)**

iv. 14PSY027 (J.M.M.) **(513-514)**

v. 14PSY028 (B.D.M.) **(515-516)**

vi. 14PSY031 (A.R.M.) **(517-518)**

vii. 14PSY032 (S.K.S.) **(519-520)**

viii. 14PSY033 (M.S.) **(521-522)**

ix. 14PSY036 (S.K.D.) **(523-524)**

2) **Case Status Report and Case Closure Deliberation (525)**

L. Deliberation of Items Received After Preparation of the Agenda

1) Application Issues and/or Reviews
2) Administrative Warnings
3) Orders Fixing Costs/Matters Related to Costs
4) Proposed Final Decisions and Orders
5) Petitions for Summary Suspension
6) Petitions for Re-hearings
7) Education or Examination Matters
8) Review Additional Information Requested of Applicants for Licensure
9) Oral Interviews of Applicants for Licensure – Final Approval for Licensure
10) Review of Applications for Licensure
11) Supervision Reviews
12) Credential Issues
13) Appearances from Requests Received or Renewed

M. Consulting with Legal Counsel

RECONVENE INTO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION
Vote on Items Considered or Deliberated on in Closed Session, If Voting is Appropriate.

ADJOURNMENT

PSYCHOLOGY EXAMINING BOARD
MEETING MINUTES
August 27, 2014

PRESENT: Rebecca Anderson, Ph.D.; Marcus Desmonde, Psy.D.; Daniel Schroeder, Ph.D.; David Thompson, Psy.D.

STAFF: Dan Williams, Executive Director; Sharon Henes, Rules Coordinator; Jelena Gagula, Bureau Assistant; and other Department Staff

CALL TO ORDER

Daniel Schroeder called the meeting to order at 9:15 a.m. A quorum of four (4) members was confirmed.

ADOPTION OF AGENDA

MOTION: Rebecca Anderson moved, seconded by Marcus Desmonde, to adopt the agenda as published. Motion carried unanimously.

9:30 A.M. – PUBLIC HEARING ON CLEARINGHOUSE RULE 13-103

Public Hearing ended at 9:52 a.m. with public comment.

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to adopt the Clearinghouse report and public hearing comments, amending PSY 4.015(2), PSY 4.025(4), PSY 4.06, PSY 4.035(1)(e), PSY 4.035(1)(f), PSY 4.035(3), PSY 4.035(7), PSY 4.04, and PSY 4.05. Motion carried unanimously.

MOTION: David Thompson moved, seconded by Rebecca Anderson, to reject the Clearinghouse report as it pertains to changes to PSY 4.025(3), and amend the paragraph to read "During the time between ***initial Wisconsin licensure***…" for clarifying purposes. Motion carried unanimously.

MOTION: Marcus Desmonde moved, seconded by David Thompson, to reject the Clearinghouse report as it pertains to changes to PSY 4.035(3), and move PSY 4.035(3)(a) through (f) under PSY 4.015 Definitions. Furthermore, the Board amends the professional activity time and peer reviewed publication for clarifying purposes. Motion carried unanimously.

MOTION: Rebecca Anderson moved, seconded by Marcus Desmonde, to clarify the Clearinghouse report as it pertains to changes to PSY 4.035(6), and amend the paragraph to read "…in psychopharmacology from a ***regionally*** accredited college or university" for clarifying purposes. Motion carried unanimously.

DRAFT

APPROVAL OF MEETING MINUTES OF MAY 14, 2014

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to approve the minutes of May 14, 2014 as published. Motion carried unanimously.

ELECTION OF OFFICERS

CHAIR

NOMINATION: Marcus Desmonde nominated Daniel Schroeder for the Office of Chair.

Executive Director Dan Williams called for other nominations three (3) times.

Daniel Schroeder was elected as Chair.

VICE CHAIR

NOMINATION: Rebecca Anderson nominated Marcus Desmonde for the Office of Vice Chair.

Executive Director Dan Williams called for other nominations three (3) times.

Marcus Desmonde was elected as Vice Chair.

2014 OFFICER ELECTION RESULTS	
Board Chair	Daniel Schroeder
Vice Chair	Marcus Desmonde
Secretary	Rebecca Anderson

MOTION: David Thompson moved, seconded by Marcus Desmonde, to acknowledge the election results for the remainder of 2014 as listed above. Motion carried unanimously.

Daniel Schroeder *assumes the role of Chair of the meeting.*
Marcus Desmonde *assumes the role of Vice Chair of the meeting.*

DRAFT

APPOINTMENT OF LIAISONS AND COMMITTEE MEMBERS

The Chair appoints the following members to:

2014 LIAISON APPOINTMENTS	
DLSC Monitoring Liaison(s)	Rebecca Anderson
DLSC Professional Assistance Procedure (PAP) Liaison(s)	Rebecca Anderson
Credentialing Liaison(s)	Marcus Desmonde, Daniel Schroeder
Continuing Education Liaison	Marcus Desmonde
Legislative Liaison	Daniel Schroeder

2014 LIAISON APPOINTMENTS	
August-December 2014	David Thompson, Rebecca Anderson

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to acknowledge the appointments made by the Chair as to the 2014 Liaisons and Screening Panel for the remainder of the year as noted above. Motion carried unanimously.

LEGISLATION AND ADMINISTRATIVE RULE MATTERS

ADMINISTRATIVE RULE PSY 2

MOTION: Marcus Desmonde moved, seconded by David Thompson, to remove Form 2553 "Nature of Intended Practice of Psychology" from the application materials provided to applicants. Motion carried unanimously.

ADMINISTRATIVE RULE PSY 3

MOTION: Marcus Desmonde moved, seconded by David Thompson, to approve the Scope Statement on PSY 3 relating to the Private Practice of School Psychologists for submission to the Governor's Office and publication, and to authorize the Chair to approve the scope for implementation no less than 10 days after publication. Motion carried unanimously.

DRAFT

BOARD GOALS

MOTION: Rebecca Anderson moved, seconded by Marcus Desmonde, to approve the Board Goals as amended. Motion carried unanimously.

2014 ASPPB ANNUAL MEETING – DISCUSSION AND CONSIDERATION

MOTION: Rebecca Anderson moved, seconded by Marcus Desmonde, to endorse the acceptance of Executive Director Dan Williams' invitation to attend the 2014 ASPPB Annual Meeting on October 22-28, 2014, in Rancho Mirage, California. Motion carried unanimously.

CLOSED SESSION

MOTION: David Thompson moved seconded by Marcus Desmonde, to convene to closed session to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85 (1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85 (1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.). Daniel Schroeder read the language of the motion. The vote of each member was ascertained by voice vote. Roll Call Vote: Rebecca Anderson, Ph.D. – yes; Marcus Desmonde, Psy.D. – yes; Daniel Schroeder, Ph.D. – yes; David Thompson, Psy.D. – yes. Motion carried unanimously.

The Board convened into Closed Session at 1:44 p.m.

RECONVENE TO OPEN SESSION

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to reconvene into open session. Motion carried unanimously.

The Board reconvened into Open Session at 3:06 p.m.

VOTING ON ITEMS CONSIDERED OR DELIBERATED ON IN CLOSED SESSION

MOTION: Rebecca Anderson moved, seconded by David Thompson, to affirm all motions made in closed session. Motion carried unanimously.

DRAFT

CREDENTIALING MATTERS

EXAM APPLICANT REVIEW - DANIEL BISHOP, PSY.D.

David Thompson recused himself and left the room from discussion, deliberation, and voting in the matter of Exam Applicant Review – Daniel Bishop, Psy.D.

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to **approve** the application for a license to practice Psychology in the state of Wisconsin of Daniel Bishop, Psy.D. Motion carried unanimously.

COMITY APPLICANT REVIEW – JONATHAN EASTON, PSY.D.

MOTION: David Thompson moved, seconded by Rebecca Anderson, to **intend to deny** the application for a license to practice Psychology in the state of Wisconsin of Jonathan Easton, Psy.D., unless within 45 days the board or its designee receive evidence of a scheduled appointment with a board-approved Clinical or Forensic Psychologist for a Fitness to Practice evaluation. Furthermore, the applicant must complete the evaluation, and a report from the psychologist indicating fitness to practice must be received by the board no later than 120 days from the date of the letter indicating the board's intent to deny the application. **Reason for Denial:** Subject to Wis. Stats. § 455.09(1)(g) and Wis. Admin. Code chapter PSY 5.01(11) – Attempting to Practice with a Physical or Mental Impairment reasonably related to the licensee's ability to adequately undertake the practice of psychology. Motion carried unanimously.

COMITY APPLICANT REVIEW – BETHANY PRICE, PH.D.

MOTION: Marcus Desmonde moved, seconded by David Thompson, to **approve** the application for a license to practice Psychology in the state of Wisconsin of Bethany Price, Ph.D. Motion carried unanimously.

CONTINUING EDUCATION REQUESTS

JANE C. HARRIS – POSTPONEMENT OF CE

MOTION: Marcus Desmonde moved, seconded by David Thompson, to **grant** the request of Jane C. Harris for Postponement of Continuing Education for the 2011-2013 biennium until September 30, 2015. Dr. Harris shall advise the Board when she has completed the required Continuing Education and provide supporting documentation. Motion carried unanimously.

DRAFT

STIPULATIONS, FINAL DECISIONS AND ORDERS

R.J.G. – 12PSY045

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to **adopt** the Findings of Fact, Conclusions of Law, and Proposed Decision and Order in the matter of disciplinary proceedings against R.J.G. – 12PSY045. Motion carried unanimously.

B.D.M. – 14PSY010

MOTION: Rebecca Anderson moved, seconded by Marcus Desmonde, to **adopt** the Findings of Fact, Conclusions of Law and Order in the matter or disciplinary proceedings against B.D.M. – 14PSY010. Motion carried unanimously.

ADMINISTRATIVE WARNINGS

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to **table** the deliberation of Administrative Warning 14PSY031, 14PSY025, 14PSY027, 14PSY034, 14PSY033, 14PSY026, 14PSY032, 14PSY036, and 14PSY023. Motion carried unanimously.

CASE CLOSINGS

R.E. – 13PSY007

MOTION: Marcus Desmonde moved, seconded by Rebecca Anderson, to close DLSC case number 13PSY007 against R.E., for prosecutorial discretion (P6). Motion carried unanimously.

ADJOURNMENT

MOTION: David Thompson moved, seconded by Rebecca Anderson, to adjourn the meeting. Motion carried unanimously.

The meeting adjourned at 3:09 p.m.

DRAFT

State of Wisconsin
Department of Safety & Professional Services

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request:	2) Date When Request Submitted:
Sharon Henes **Administrative Rules Coordinator**	**6 November 2014** Items will be considered late if submitted after 12:00 p.m. on the deadline date: ▪ 8 business days before the meeting

3) Name of Board, Committee, Council, Sections:

Psychology Examining Board

4) Meeting Date:	5) Attachments:	6) How should the item be titled on the agenda page?
19 November 2014	☐ Yes ☐ No	**Legislation and Rule Matters – Discussion and Consideration** **1. Legislative Report & Final Draft amending Psy 4 relating to continuing education.** **2. Proposals for Psy 2 relating to licensure** **3. Proposals for Psy 3 relating to practice of school psychology** **4. Update on pending and possible rulemaking projects**

7) Place Item in:	8) Is an appearance before the Board being scheduled?	9) Name of Case Advisor(s), if required:
☒ Open Session ☐ Closed Session ☐ Both	☐ Yes (Fill out Board Appearance Request) ☐ No	

10) Describe the issue and action that should be addressed:

11) Authorization

Sharon Henes — *6 November 2014*

Signature of person making this request — Date

Supervisor (if required) — Date

Executive Director signature (indicates approval to add post agenda deadline item to agenda) — Date

Directions for including supporting documents:
1. This form should be attached to any documents submitted to the agenda.
2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director.
3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.

Revised 8/13

STATE OF WISCONSIN
PSYCHOLOGY EXAMINING BOARD

IN THE MATTER OF RULEMAKING	**:**	
PROCEEDINGS BEFORE THE	**:**	**REPORT TO THE LEGISLATURE**
PSYCHOLOGY EXAMINING BOARD	**:**	**CR 13-103**

I. THE PROPOSED RULE:

The proposed rule, including the analysis and text, is attached.

II. REFERENCE TO APPLICABLE FORMS:

None

III. FISCAL ESTIMATE AND EIA:

The Fiscal Estimate and EIA is attached.

IV. DETAILED STATEMENT EXPLAINING THE BASIS AND PURPOSE OF THE PROPOSED RULE, INCLUDING HOW THE PROPOSED RULE ADVANCES RELEVANT STATUTORY GOALS OR PURPOSES:

The purpose of the rule is to clarify and update the continuing education requirements to provide licensees with more continuing education opportunities. In addition, specific topic areas of continuing education are addressed by rule as required by statute.

V. SUMMARY OF PUBLIC COMMENTS AND THE BOARD'S RESPONSES, EXPLANATION OF MODIFICATIONS TO PROPOSED RULES PROMPTED BY PUBLIC COMMENTS:

The Psychology Examining Board held a public hearing on January 15, 2014. The following people either testified at the hearing, or submitted written comments:

Sarah Bowen representing the Wisconsin Psychological Association
Bruce Erdmann

The Psychology Examining Board summarizes the comments received either by hearing testimony or by written submission as follows:

The Wisconsin Psychological Association in general strongly supports the proposed changes, but had some questions about some of the features. A concern was raised regarding the weighting of continuing education activities which are less formalized and more easily abused.

Bruce Erdmann requested several changes based upon the Association of State and Provincial Psychology Boards' Guidelines for Continuing Professional Education.

Recommended changes included peer consultation as continuing education; approved providers not included in draft rule; a limitation on self-directed/distance learning; providing supervision as continuing education; and various specified attestation forms for evidence of continuing education activities.

The Psychology Examining Board explains modifications to its rule-making proposal prompted by public comments as follows:

As the Board was discussing making modifications to the rule-making proposal prompted by the public comments, it was determined that the changes were substantial. A decision was made to work on the rule during the next few board meetings and then hold another public hearing.

The Psychology Examining Board held a second public hearing on August 27, 2014. The following people either testified at the hearing, or submitted written comments:

Sarah Bowen representing the Wisconsin Psychological Association (WPA)

The Psychology Examining Board summarizes the comments received either by hearing testimony or by written submission as follows:

The Wisconsin Psychological Association strongly supports the current draft. Highlights which the WPA believes are important improvements are the following: the expansion of the definition of "trainee"; expansion of recognized continuing education providers; increased scope of activities for earning continuing education; and the revised credit weighting of continuing education activities. The WPA believes the proposed revisions represent a valuable improvement to the current continuing education rules. The WPA does want to make it clear that their support is offered despite the fact that implementation of the rules may pose some serious challenges to their own organization's viability as a provider of continuing education. They are committed to doing so in recognition of the broader needs of the state's psychologists, the ongoing development of the profession of psychology and, ultimately, the protection of consumers of psychological services in the state.

The Psychology Examining Board explains modifications to its rule-making proposal prompted by public comments as follows:

The Board did not make any modifications prompted by public comments at the August 27, 2014 public hearing.

VI. RESPONSE TO LEGISLATIVE COUNCIL STAFF RECOMMENDATIONS:

The Legislative Council staff recommendations are from the first version of the rule presented to the Clearinghouse. The vast majority of these comments was either accepted in whole or is no longer relevant due to revisions to the rule draft.

Prior to the second public hearing, the Board resubmitted the draft to the Clearinghouse for an informal report. The changes recommended by Legislative Council staff after that review have been accepted in whole with the exception of the following:

Comment: In Psy 4.025(3), remove the word "Wisconsin".

Response: The Board believes the word "Wisconsin" provides necessary clarity. A licensee could be confused between initial licensure in Wisconsin and initial license obtained earlier in a different state.

VII. REPORT FROM THE SBRRB AND FINAL REGULATORY FLEXIBILITY ANALYSIS:

None. This rule will not affect small businesses.

STATE OF WISCONSIN
PSYCHOLOGY EXAMINING BOARD

IN THE MATTER OF RULEMAKING PROCEEDINGS BEFORE THE PSYCHOLOGY EXAMINING BOARD	: : : :	PROPOSED ORDER OF THE PSYCHOLOGY EXAMINING BOARD ADOPTING RULES CLEARINGHOUSE RULE 13-103

PROPOSED ORDER

An order of the Psychology Examining Board to repeal Psy 4.02; renumber Psy 4.03(intro) and Psy 4.03(2); renumber and amend Psy 4.03(1); amend Chapter Psy 4 (title); repeal Psy 4.02; and create Psy 4.015, 4.025, 4.035, 4.04, and 4.05 relating to psychology continuing education.

Analysis prepared by the Department of Safety and Professional Services.

ANALYSIS

Statutes interpreted: ss. 455.06 and 455.065, Wis. Stats.

Statutory authority: ss. 15.08(5)(b) and 455.065(1) and (3), Wis. Stats.

Explanation of agency authority:

The examining board shall promulgate rules for its own guidance and for the guidance of the profession to which it pertains and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular profession.

Specifically, the board shall promulgate rules establishing the minimum number of hours of continuing education, the topic areas that the continuing education must cover, the criteria for the approval of continuing education programs and courses required for renewal of a license, the criteria for the approval of the sponsors and cosponsors of those continuing education programs and courses, and the criteria for the approval of continuing education programs and courses required for the exemptions from the examination requirements under s. 455.04(1)(e) and (4)(f).

Related statute or rule: N/A

Plain language analysis:

The rule reorganizes and clarifies the continuing education requirements for psychologists.

SECTION 1 inserts the words “continuing education” into the title in order to provide an easy reference for licensees.

SECTION 2 creates a definition section.

SECTION 3 repeals the current continuing education requirements in order to reorganize and create clarity.

SECTION 4 This section is created to include the general continuing education requirements.

SECTIONS 5, 6 and 7 moves the current Psy 4.03 section to the end of the chapter. In addition, the section is amended to specify the number of continuing education hours which must be completed to renew a license which expired less than five years before the application for renewal.

SECTION 8 creates three new sections. The first section specifies approved continuing education. A psychologist may obtain continuing education as follows: completing courses from an organization approved by the American Psychological Association, National Association of School Psychologists or Canadian Psychological Association, courses sponsored by Wisconsin Psychological Association or Wisconsin School Psychologists Association, category I courses approved by the American Medical Association or the American Osteopathic Association, or courses approved in another state in which the licensee holder also holds a license or graduate level courses from an accredited college or university; teaching and presenting programs or courses; serving on a professional board or committee; authorship of a book, book chapter or article in peer reviewed journal; completing board certification; completing a master's or doctoral degree in psychopharmacology; providing supervision to trainees; and evaluation of community outpatient mental health programs. The second section provides postponement, waiver and exemptions to the continuing education requirements based upon hardship or retirement. The third section specifies records of continuing education must be kept for a minimum period of six years. In addition, the third section revises the current requirement for a mandatory audit of compliance with the continuing education requirements to instead allow a general audit to be conducted in the board's discretion.

SECTION 9 states an effective date of October 1, 2015 which is the start of the next biennium.

Summary of, and comparison with, existing or proposed federal regulation:

None

Comparison with rules in adjacent states:

Illinois: Illinois requires each biennial 24 hours of continuing education and of those 24 hours at least 3 hours must be related to the ethics. Continuing education may be earned by participating in a course or program by an approved continuing education sponsor; completing postgraduate training programs; and for teaching in the field of psychology in an accredited college, university, graduate school or as an instructor of a program by approved sponsors. Postgraduate course and teaching courses have maximums as to the number to be counted towards the required 24 hours. Continuing education records are to be maintained for the previous 8 years. Illinois has provisions for waivers of continuing education for hardship.

Iowa: Iowa requires 40 hours of continuing education each biennium. For the second renewal period, licensees' continuing education must include 6 hours in either Iowa mental health laws and regulations or risk management. For all subsequent renewals, licensees' continuing education must include 6 hours in any of the following: ethics, federal mental health laws, Iowa mental health laws or risk management. Board members may obtain continuing education hours based upon attendance and participation at board meetings. Continuing education may be earned as follows: mandatory reporter training; programs sponsored by the American Psychological Association or Iowa Psychological Association; approved workshops, conferences or symposiums; academic coursework; home study or electronically transmitted courses; scholarly research published in recognized professional publication; and preparing and teaching courses or programs. Iowa does not have provisions on hardship waivers.

Michigan: Michigan does not require continuing education for psychologists.

Minnesota: Minnesota requires 40 hours of continuing education each biennium. Continuing education may be earned as follows: developing and teaching an academic course; attending courses or presentations based on scientific, practice or professional standards foundations; graduate level courses in psychology; developing presentation, or taped or computerized materials based on scientific, practice or professional standards foundations; and authoring, editing or reviewing a psychological publication. Continuing education records must be maintained for 8 years after the renewal date. Variances may be granted for completion of continuing education outside the biennium. The board randomly audits a percentage of renewing licensees each month for compliance with continuing education.

Summary of factual data and analytical methodologies:

The Board considered the Association of State and Provincial Psychology Board's recommendations for continuing education and the continuing education requirements of other states. In addition, the Board reviewed recent the audit results to determine what issues required clarification for the credential holders.

Analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis:

This rule was posted for 14 days for economic comments and none were received. The Board determines that the modification of existing rules to clarify continuing education requirements, which does not increase the requirement, does not create an effect on small business nor have an economic impact.

Fiscal Estimate and Economic Impact Analysis:

The Fiscal Estimate and Economic Impact Analysis is attached.

Effect on small business:

These proposed rules do not have an economic impact on small businesses, as defined in s. 227.114 (1), Stats. The Department's Regulatory Review Coordinator may be contacted by email at Tom.Engels@wisconsin.gov, or by calling (608) 266-8608.

Agency contact person:

Sharon Henes, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, 1400 East Washington Avenue, Room 151, P.O. Box 8935, Madison, Wisconsin 53708; telephone 608-261-2377; email at Sharon.Henes@wisconsin.gov.

TEXT OF RULE

SECTION 1. Chapter Psy 4 (title) is amended to read:

REQUIREMENTS FOR RENEWAL AND CONTINUING EDUCATION

SECTION 2. Psy 4.015 is created to read:

Psy 4.015 Definitions. In this chapter:
(1) "Board" means Wisconsin Psychology Examining Board.
(2) "Continuing education hour" means continuing education consisting of not less than 50 minutes.
(3) "Ethics" means content consistent with one or more of the American Psychological Association's ethical principles of psychologists.
(4) "Jurisprudence" means content relating to laws and regulations affecting the practice of psychology.
(5) "Professional activity" means any of the following:
(a) Serving on the American Psychological Association or its affiliated state psychological association committee or board.
(b) Serving on a state Psychology Examining Board.
(c) Serving on the National Association of School Psychologists or its affiliated state association committee or board.
(d) Serving on the American Board of Professional Psychology committee or board.
(e) Serving on the Association of Psychology Postdoctoral Internship Centers committee or board.
(f) Serving on the Association of State and Provincial Psychology Boards committee or board.
(6) "Risk management" means content relating to the reduction of probability of incurring legal, regulatory or malpractice actions in the practice of psychology.
(7) " Trainee" means a person who is obtaining appropriate experience in psychological work under supervision pursuant to s. 455.04(1)(d), Stats.

SECTION 3. Psy 4.02 is repealed

SECTION 4. Psy 4.025 is created to read:

Psy 4.025 Continuing education. (1) Unless granted a postponement or waiver under Psy 4.04, every licensee shall complete at least 40 board approved continuing education hours in each biennial registration period, as specified in s. 455.06, Stats.
(a) A minimum of 6 hours of the required 40 continuing education hours shall be in ethics, risk management or jurisprudence.
(b) Continuing education hours completed in the topics of supervision or suicide prevention shall be calculated as 1.5 times the numbers of continuing education hours obtained.
(2) Continuing education hours may apply only to the registration period in which the hours are acquired. If a license has been allowed to lapse, the board may grant permission to apply continuing education hours acquired after lapse of the license to a previous biennial period of licensure during which required continuing education was not acquired. In no case may continuing education hours be applied to more than one biennial period.
(3) During the time between initial Wisconsin licensure and commencement of a full 2−year licensure period, licensees shall not be required to meet continuing education requirements.
(4) Applicants from other states applying under s. 455.04 (1) (e) or (4) (f), Stats., shall submit proof of completion of at least 40 board approved continuing education hours obtained within 2 years prior to application. An applicant who first obtained licensure as a psychologist or private practice school psychologist less than 2 years prior to submitting the Wisconsin application is not required to meet this subsection

SECTION 5. Psy 4.03(intro) is renumbered to Psy 4.06(intro).

SECTION 6. Psy 4.03(1) is renumbered to Psy 4.06(1) and amended to read:

Psy 4.06(1) If the licensee applies for renewal of the license less than 5 years after its expiration, the license shall be renewed upon payment of the renewal fee and fulfillment of ~~the~~ 40 continuing education hours completed within 2 years prior to renewal.

SECTION 7. Psy 4.03(2) is renumbered to Psy 4.06(2)

SECTION 8. Psy 4.035, 4.04 and 4.05 are created to read:

Psy 4.035 Approved continuing education. (1) The board shall approve all of the following programs and courses, if relevant to the professional practice of psychology:
(a) Continuing education programs and courses sponsored by an organization approved by one of the following:

1. American Psychological Association.
2. National Association of School Psychologists.
3. Canadian Psychological Association.

(b) Continuing education programs and courses sponsored by one of the following:

1. Wisconsin Psychological Association.
2. Wisconsin School Psychologists Association.

(c) Educational programs recognized as approved at the time of attendance as "category I" continuing medical education programs by the council on medical education of the American Medical Association or the American Osteopathic Association.
(d) Continuing education courses approved by the psychology licensing board in another state where the psychologist is also licensed.
(e) Graduate level courses of two semester or three quarter credits, or more, relevant to the professional practice of psychology offered by a regionally accredited college or university in which a person receives a passing grade shall be granted 20 continuing education hours.
(2) No more than eight hours of continuing education hours may be credited per day for courses and programs in par. (1)(a) through (d).
(3) Continuing education hours shall be granted for teaching or presenting any of the programs or courses in sub. (1) but no credit will be granted for any subsequent presentations of the same program or course. A teacher or presenter shall receive 2 continuing education hours for each hour of presentation with a maximum of 20 continuing education hours per biennium.
(4) Continuing education hours shall be granted for professional activity consisting of 1 year of service with a minimum of 6 total contact hours. A licensee shall receive 6 hours of continuing education for each professional activity, with a maximum of 12 continuing education hours per biennium.
(5) Continuing education hours shall be granted for serving as a reviewer for a peer reviewed publication. A licensee shall receive 3 hours per publication, with a maximum of 12 continuing education hours per biennium.
(6) Continuing education hours shall be granted for first or second authorship of a publication relevant to psychology if the publication is contained in an academic or professional book or book chapter or peer-reviewed journal article. A licensee shall receive 10 continuing education hours per authorship, with a maximum of 20 continuing education hours per biennium.
(7) Continuing education hours shall be granted for earning board certification by the American Board of Professional Psychology. A licensee who successfully completes board certification shall receive 40 continuing education hours. The ethics, risk management or jurisprudence requirement may not be met unless the board certification process included at least six hours on those topics.
(8) Continuing education hours shall be granted for completion of a master's or doctoral degree in psychopharmacology from a regionally accredited college or university. Licensees who complete a master's or doctoral degree in psychopharmacology shall receive 40 continuing education hours. The ethics, risk management or jurisprudence requirement may not be met unless the coursework included those topics.
(9) Continuing education hours shall be granted for providing supervision to one or more psychological trainees. The supervisor shall receive 1 continuing education hour for every 4 hours of supervision, with a maximum of 20 continuing education hours.
(10) (a) Continuing education hours shall be granted for the evaluation of a community mental health program, as defined in s. 51.01 (3n), Stats., and approved by the department of health services according to rules promulgated under s. 51.42 (7) (b), Stats. Four hours of assistance, including hours in training required by the department of health services, are equal to one continuing education hour for the purposes of this section.
(b) A licensee wishing to apply for continuing education credit under this subsection shall register in advance with the board, and shall notify the board on a form provided by the board

of the dates and the total number of hours in any biennium for which the applicant will be available to provide assistance. The board shall make referrals to the department of health services in the order applicants are received.

Psy 4.04 Postponement, Waiver and Exemptions (1) A licensee may apply to the board for a postponement or waiver of the requirements of this chapter on grounds of prolonged illness or disability, or on other grounds constituting extreme hardship. The board shall consider each application individually on its merits, and the board may grant a postponement, partial waiver or total waiver as deemed appropriate.
(2) The board may grant an exemption from the requirements of this chapter to a licensee who certifies to the board that the licensee has permanently retired from the practice of psychology or the private practice of school psychology.
(3) A licensee who has been granted an exemption from the requirements of this chapter based on retirement from the practice of psychology or the private practice of school psychology may not return to active practice without submitting evidence satisfactory to the board of having completed 40 credits of continuing education hours obtained within 2 years prior to the return to the practice of psychology.

Psy 4.05 Record Keeping and Audits (1) A licensee shall retain for a minimum period of 6 years and shall make available to the board or its agent upon request all the following proof of continuing education that applies to the licensee:
(a) Certificate of attendance issued by the program sponsor. The certificate shall include the name of the licensee, date of attendance, sponsor name, hours and title of course.
(b) Unofficial transcript for graduate level courses or psychopharmacology degree.
(c) Documentation of publication.
(d) Verification from the organization, on organization letterhead, documenting professional activities including the dates of service.
(e) Documentation of board certification from the American Board of Professional Psychology.
(f) Documentation verifying the dates and number of hours of voluntary, uncompensated services provided in assisting the department of health services using a form provided by the department of safety and professional services.
(g) Attestation form, provided by the department of safety and professional services, documenting supervision including the dates of supervision and total number of hours per day.
(2) The board may conduct a random audit of licensees on a biennial basis for compliance with continuing education requirements. The board may conduct an audit on any licensee who has come under investigation by the board for alleged misconduct.

SECTION 9. EFFECTIVE DATE. The rules adopted in this order shall take effect on October 1, 2015.

(END OF TEXT OF RULE)

This Proposed Order of the Psychology Examining Board is approved for submission to the Governor and Legislature.

Dated _____ Agency _____

Chair
Psychology Examining Board

STATE OF WISCONSIN
DEPARTMENT OF ADMINISTRATION
DOA-2049 (R03/2012)

DIVISION OF EXECUTIVE BUDGET AND FINANCE
101 EAST WILSON STREET, 10TH FLOOR
P.O. BOX 7864
MADISON, WI 53707-7864
FAX: (608) 267-0372

ADMINISTRATIVE RULES
Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis
☒ Original ☐ Updated ☐ Corrected

2. Administrative Rule Chapter, Title and Number
Psy 4

3. Subject
Continuing education

4. Fund Sources Affected
☐ GPR ☐ FED ☒ PRO ☐ PRS ☐ SEG ☐ SEG-S

5. Chapter 20, Stats. Appropriations Affected
20.165(1)(g)

6. Fiscal Effect of Implementing the Rule
☒ No Fiscal Effect ☐ Increase Existing Revenues ☐ Increase Costs
☐ Indeterminate ☐ Decrease Existing Revenues ☐ Could Absorb Within Agency's Budget
☐ Decrease Cost

7. The Rule Will Impact the Following (Check All That Apply)
☐ State's Economy ☐ Specific Businesses/Sectors
☐ Local Government Units ☐ Public Utility Rate Payers
☐ Small Businesses **(if checked, complete Attachment A)**

8. Would Implementation and Compliance Costs Be Greater Than $20 million?
☐ Yes ☒ No

9. Policy Problem Addressed by the Rule
Recent continuing education audits have revealed confusion in the continuing education requirements, including whether specific topic areas, if any, must be addressed by their continuing education.

10. Summary of the businesses, business sectors, associations representing business, local governmental units, and individuals that may be affected by the proposed rule that were contacted for comments.
This rule was posted for 14 days for economic comments and none were received.

11. Identify the local governmental units that participated in the development of this EIA.
None

12. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred)
This rule will not have an economic or fiscal impact on specific businesses, business sectors, public utility rate payers, local governmental units or the state's economy as a whole. The rule addresses the licensee's continuing education.

13. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule
The benefits of implementing the rule is to streamline the approval process for continuing education, reflect current continuing education programs and create clarity in the continuing education requirements.

The alternate is the rule will not be in conformity with the statutory requirements as it relates to required topics.

14. Long Range Implications of Implementing the Rule
The long range implication is to create clarity in the continuing education requirements.

15. Compare With Approaches Being Used by Federal Government
None

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ADMINISTRATIVE RULES
Fiscal Estimate & Economic Impact Analysis

16. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois requires 24 hours of continuing education with 3 hours in ethics. Iowa requires 40 hours of continuing education including designating topics for 6 hours. Minnesota requires 40 hours of continuing education. Michigan does not require continuing education for psychologists.

17. Contact Name	18. Contact Phone Number
Sharon Henes	(608) 261-2377

This document can be made available in alternate formats to individuals with disabilities upon request.

Chapter Psy 2

REQUIREMENTS FOR EXAMINATION AND LICENSURE OF PSYCHOLOGISTS

Psy 2.01 Application procedure.
Psy 2.015 Application abandonment.
Psy 2.02 Scheduling of examinations.
Psy 2.03 Unauthorized assistance.
Psy 2.04 Controls.
Psy 2.05 Passing scores.
Psy 2.06 Failure and review.
Psy 2.07 Claim of examination error.
Psy 2.08 Reexamination.
Psy 2.09 Requirements for licensure for those holding a doctoral degree in psychology.
Psy 2.12 Requirements for persons holding a license to practice psychology in another state.
Psy 2.13 Doctoral degrees in psychology outside the U.S. and Canada.
Psy 2.14 Temporary practice.

Psy 2.01 Application procedure. The board shall act on an application for licensure as a psychologist only after all of the following materials, which shall be documented in English, have been received:

(1) The properly completed and signed application form.

Note: Applications are available upon request to the board office at 1400 East Washington Avenue, P.O. Box 8935, Madison, Wisconsin 53708.

(2) The application fee authorized by s. 440.05 (1), Stats.

(3) Official transcripts of graduate training, properly attested to by the degree granting institution and submitted by the institution directly to the board.

(4) Documentation of any additional relevant education and appropriate experience.

(5) The "Supervised Psychological Experience" form which has been filled out by a psychologist who has firsthand knowledge of the applicant's experience relating to psychology.

(6) The "Nature of Intended Practice of Psychology" form.

(7) Evidence of successful completion of an examination on the practice of psychology approved by the board.

(8) Proof of successful completion of the written examination on the elements of practice essential to the public health, safety or welfare.

(9) For applicants under s. Psy 2.13, as required by the board, documentation of additional supervised experience in the United States and documentation of English proficiency.

(10) Verification of the applicant's licensure in all states or countries in which the applicant has ever held a license.

(11) For applicants who have a pending criminal charge or have been convicted of a crime, all related information necessary for the board to determine whether the circumstances of the pending criminal charge or conviction are substantially related to the duties of the licensed activity.

(12) For applicants licensed in another state, proof of completion of continuing education requirements as specified in s. Psy 4.02.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; am. (intro.), Register, August, 1993, No. 452, eff. 9−1−93; correction in (intro.) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473; am. (3), Register, January, 1997, No. 493, eff. 2−1−97; am. (1), (2) and (7), Register, June, 1999, No. 522, eff. 7−1−99; CR 02−124: am. (12) Register July 2003 No. 571, eff. 8−1−03; correction in (intro.) made under s. 13.93 (2m) (b) 7., Stats., Register July 2004 No. 583.

Psy 2.015 Application abandonment. An applicant who files an application but who does not comply with a request for information related to the application within one year of the date of the board's last request shall file a new application. An applicant who files an application but who does not fully complete the application within 3 years of the date of the application shall file a new application.

History: Cr., Register, January, 1997, No. 493, eff. 2−1−97.

Psy 2.02 Scheduling of examinations. (1) Examinations shall be held at least twice a year at a time and place designated by the board. Notice of the next scheduled examinations may be obtained by contacting the department.

(2) No applicant may be admitted to the examination on the professional practice of psychology unless the requirements stated in s. Psy 2.01 (1) to (3) have been met.

(3) No applicant may be admitted to the examination on the elements of practice essential to the public health, safety or welfare unless the requirements stated in s. Psy 2.01 (1) to (7) and (9) to (12) have been met at least 30 days prior to the board meeting preceding the date of the examination.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; am. (2), Register, June, 1999, No. 522, eff. 7−1−99; CR 02−021: am. (2) and (3) Register August 2002 No. 560, eff. 9−1−02.

Psy 2.03 Unauthorized assistance. The board may withhold the score of an applicant who gives or receives unauthorized assistance during examinations. The board may consider this applicant for retesting at a future time.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 2.04 Controls. The board chairperson or proctor may announce time limits and other necessary controls prior to the examinations.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 2.05 Passing scores. (1) The passing scores set by the board represent the minimum competency required to protect public health and safety.

(2) The examination for professional practice of psychology and the examination on the elements of practice essential to the public health, safety or welfare are scored separately. An applicant shall achieve a passing score on each of the required examinations to qualify for licensure.

(3) The board accepts the recommendations of the association of state and provincial psychology boards for the passing score on the examination for professional practice of psychology.

(4) To pass the examination on the elements of practice essential to the public health, safety or welfare, the applicant shall receive a score determined by the board to represent minimum competence to practice. The board shall make the determination of the passing score after consultation with subject matter experts who have reviewed a representative sample of the examination questions and available candidate performance statistics.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; r. and recr., Register, January, 1997, No. 493, eff. 2−1−97.

Psy 2.06 Failure and review. (1) An applicant who fails the examination on elements essential to health, safety and welfare may request a review of that examination. The applicant must file a written request to the board within 30 days of the date on which examination results were mailed or reported.

(2) The time for review shall be limited to time allowed for examination administration.

(3) The examination shall be reviewed only by the applicant and in the presence of the proctor.

(4) The proctor may not respond to inquiries by the applicant regarding allegations of examination error.

(5) Any comments or claims of error regarding specific questions or procedures in the examination may be placed in writing on the provided form. These comments shall be retained and made available to the applicant for use at a subsequent hearing.

(6) An applicant may review the examination only once.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 2.07 Claim of examination error. (1) An applicant wishing to claim examination error in the examination on elements essential to health, safety and welfare shall file a written request for board review in the board office within 30 days of the date the examination was reviewed. The request shall include all of the following:

(a) The applicant's name and address.

(b) The type of license applied for.

(c) A description of the perceived error, including specific questions or procedures claimed to be in error.

(d) The facts that the applicant intends to prove, including reference text citations or other supporting evidence for the applicant's claim.

(2) The board shall review the claim and notify the applicant in writing of the board's decision and any resulting grade changes.

(3) If the decision does not result in the applicant passing the examination, the applicant may request a hearing under s. SPS 1.05.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; CR 02−124: am. (1) (intro.) Register July 2003 No. 571, eff. 8−1−03; correction in (3) made under s. 13.92 (4) (b) 7., Stats., Register November 2011 No. 671.

Psy 2.08 Reexamination. An applicant who fails to achieve a passing grade in the examinations required under this chapter may apply for reexamination on forms provided by the board and pay the appropriate fee for each reexamination as required in s. 440.05, Stats. An applicant who fails to achieve a passing grade may be reexamined 3 times at not less than 3−month intervals. If the applicant fails to achieve a passing grade on the third reexamination, the applicant may not be admitted to any further examination until the applicant reapplies to the board for permission to be reexamined and presents evidence satisfactory to the board of further professional training or education as the board may prescribe or approve following its evaluation of the applicant's specific case.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; r. and recr., Register, May, 2000, No. 533, eff. 6−1−00.

Psy 2.09 Requirements for licensure for those holding a doctoral degree in psychology. (1) EDUCATIONAL REQUIREMENTS. An applicant for a license under this section shall possess a doctoral degree in psychology. A doctoral degree in psychology is either a degree granted by an accredited college or university as defined in s. 455.04 (1) (c), Stats., that is represented by an official transcript of credits as being a "doctoral degree in psychology," a doctoral degree with a major in psychology from a department of psychology, or a program which is designated by the board to be equivalent to a doctorate in psychology by meeting the following requirements:

(a) Training in professional psychology consisting of doctoral training offered in a regionally accredited institution of higher education.

(b) The program, wherever it may be administratively housed, must be clearly identified and labeled as a psychology program. Such a program must specify in pertinent institutional catalogs and brochures its intent to educate and train professional psychologists.

(c) The psychology program must stand as a recognizable, coherent organizational entity within the institution.

(d) There must be a clear authority and primary responsibility for the core and specialty areas whether or not the program cuts across administrative lines.

(e) The program must be an integrated, organized sequence of study.

(f) There must be an identifiable psychology faculty on site and a psychologist responsible for the program.

(g) The program must have an identifiable body of students who are matriculated in that program for a degree.

(h) The program must include supervised practicum, internship, field or laboratory training appropriate to the practice of psychology.

(i) The curriculum shall encompass a minimum of 3 academic years of full−time graduate study, at least one of which shall be in full−time residence at the site of the institution granting the degree. In addition to the instruction in scientific and professional ethics and standards, research design and methodology, statistics and psychometrics, the core program shall require each student to demonstrate competence in each of the following substantive content areas. This typically will be met by including a minimum of 3 or more graduate semester hours (5 or more graduate quarter hours) in each of these 4 substantive content areas: a) Biological bases of behavior: physiological psychology, comparative psychology, neuropsychology, sensation and perception, psychopharmacology; b) Cognitive−affective bases of behavior: learning, thinking, motivation, emotion; c) Social bases of behavior: social psychology, group processes, organizational and systems theory; and d) Individual differences: personality theory, human development, abnormal psychology, multicultural differences. In addition, all professional education programs in psychology will include course requirements in specialty areas.

(3) SUPERVISED EXPERIENCE REQUIREMENTS. (a) *Conditions of supervised experience.* 1. A psychological trainee shall complete 3,000 hours of supervised experience as a prerequisite to licensure as a psychologist. All 3,000 hours shall follow graduate work in psychology, either a master's in psychology or a minimum of 30 hours of doctoral level course work in psychology. These hours shall be accumulated at not less than 16 hours nor more than 40 hours per week. The 3,000 hours of experience shall be in a training setting and shall include the activities appropriate to the intended area of practice. It shall be the responsibility of the applicant to demonstrate the appropriateness of the setting and the activities to the intended area of practice.

2. The first 1,500 hours of the experience shall be under the direction of one licensed psychologist who satisfies the requirements of pars. (b) and (c) and who shall be responsible for the integrity and the quality of the training. It shall be planned, organized and integrated practice. There shall be a minimum of 2 hours per week of regularly scheduled formal face−to−face individual supervision with the specific intent of dealing with services rendered directly by the trainee. There shall also be at least 2 additional hours per week in learning activities such as: case conferences, seminars addressing practice issues, co−therapy with a staff person including discussion, group supervision or additional individual supervision.

3. The second 1,500 hours of the experience shall be under the direction of a licensed psychologist who satisfies the requirements of pars. (b) and (c) and who shall be responsible for the integrity and the quality of the training. It shall be planned, organized and integrated, and appropriate to the intended area of practice, and include a minimum of one hour per week of regularly scheduled formal face−to−face individual supervision with the specific intent of dealing with the services rendered directly by the trainee. For diversity of training, the supervisor of the pre−doctoral experience shall not continue as the primary supervisor of the post−doctoral experience.

4. A minimum of 1,500 hours must follow completion of all the requirements for the doctoral degree.

5. To obtain a diversity of training, supervised experience may be supervised by other licensed psychologists, with the understanding that the licensed psychologist specified in subds. 2. and 3. will continue to be responsible for the overall integrity and quality of the trainee's psychological work.

6. Hours obtained through practicum, clerkship or externship experiences are considered part of the educational process and may not be used to satisfy this requirement.

7. The supervisor shall have sufficient knowledge of the trainee's clients to ensure effective service. This may include ongoing face−to−face contact with the client. The progress of the work shall be monitored on a regular basis by the supervisor to ensure that legal, ethical, and professional responsibility is assumed by the supervisor for all services rendered, and the supervisor shall be able to intervene.

8. Clients shall be informed that the psychological trainee is receiving supervision and that the client's case will be discussed in the context of required supervision. The trainee must inform potential clients in writing of his or her trainee status, lack of license, and of the possibility that insurance companies may not reimburse services rendered by the nonlicensed trainee. Fees for client services may neither be billed independently nor accepted by the trainee.

9. The experience required shall consist of at least 25% face−to−face client contact and at least 40% direct service for the purpose of providing psychological service. For the purposes of this subsection direct service means those activities a psychologist performs that are directly related to providing psychological services to a client, such as note and report writing, studying test results, case consultation and reviewing published works relating to the client's needs.

10. There shall be multidisciplinary team membership with the trainees being teamed with other professional specialists in serving clients. It is desirable that trainees also be teamed with other psychologists and other trainees. It is the responsibility of the applicant to demonstrate that he or she had a variety of role models within the field of psychology.

11. The trainee should have experience in a range of direct services. The clients served should be consistent with the target population of intended practice addressing a broad spectrum of psychological problems. A variety of other service activities that are appropriate to the intended area of practice include, but are not limited to, those of the following: intake service, administration, case staffings, research activities, inservice program activities, organizational development and consultation.

(b) *Qualifications of supervisor.* The trainee's primary supervisor shall be a licensed psychologist and shall have adequate training, knowledge and skill to render competently any psychological service that a psychological trainee undertakes. The primary supervisor shall have at least 3 years of post−licensure experience and shall have had training or experience in supervision of psychological work. The supervisor may not permit a trainee to engage in any psychological practice that the supervising psychologist cannot competently perform. Supervisors shall not be a relative by blood or marriage nor be involved in any other dual relationship which obliges the supervisor to the trainee.

Note: Prior to October 1, 1999, supervisors were required to be licensed or license eligible. The requirement that the primary supervisor be a licensed psychologist applies to supervised experience commenced after October 1, 1999.

(c) *Responsibility of supervisor.* All supervisors shall be legally and ethically responsible for the activities of the psychological trainee. Supervisors shall be available or make appropriate provision for emergency consultation and intervention. Supervisors shall be able to interrupt or stop the trainee from practicing in given cases and to stop the supervisory relationship if necessary. All supervisors of the trainee shall be required to provide a written evaluation of the supervised experience and the trainee's competence. Prepared evaluations or reports of progress, including strengths and weaknesses, shall be written and discussed with the trainee on at least a quarterly basis and shall be made available to the board upon the board's request.

(d) *Qualifications of psychological trainee.* The psychological trainee shall have the background training and experience that is appropriate preparation for the supervised training activities. The supervisor is responsible for determining the adequacy of the trainee's preparation for the tasks to be performed.

Note: All supervisors of a psychological trainee are encouraged to register with the board to receive information on the supervisory responsibilities to share with a prospective psychological trainee.

(4) APPEARANCE BEFORE THE BOARD. The applicant may be required to appear before the board in person prior to licensure to allow the board to make such inquiry of them as to qualifications and other matters as it considers proper.

Note: An application may be obtained upon request to the board office located at 1400 East Washington Avenue, P.O. Box 8935, Madison, Wisconsin, 53708.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; am. (2) (a) 1., 4. and 5., Register, November, 1992, No. 443, eff. 12−1−92; cr. (4), Register, August, 1993, No. 452, eff. 9−1−93; am. (1) (a), (3) (a) 2., 10., (b), (c) and (4)., r. (1) (j) and (2), Register, June, 1999, No. 522, eff. 7−1−99; correction in (5) made under s. 13.93 (2m) (b) 7., Stats., Register, June, 1999, No. 522; CR 02−124: am. (3) (a) 1. to 3., 5., 7., (b), and (c) Register July 2003 No. 571, eff. 8−1−03; CR 04−021: am. (1) (i), r. (5) Register July 2004 No. 583, eff. 8−1−04; **CR 12−055: am. (4) Register August 2013 No. 692, eff. 9−1−13.**

Psy 2.12 Requirements for persons holding a license to practice psychology in another state. (1) LICENSURE BY COMITY. Applicants who are licensed in another state shall meet the requirements of s. Psy 2.01.

(3) LICENSURE OF HOLDERS OF THE CERTIFICATE OF PROFESSIONAL QUALIFICATION. Applicants who are licensed in another state who hold the certificate of professional qualification in psychology issued by the Association of State and Provincial Psychology Boards shall meet the requirements of s. Psy 2.01 (1), (2), (6), (8), (10), (11) and (12).

(4) LICENSURE OF SENIOR PSYCHOLOGISTS. Applicants who have been licensed for 20 or more years in another licensing jurisdiction of the United States or Canada that had requirements for licensure substantially equivalent to the requirements for licensure in this state at the time of original licensure, and who have never been disciplined by the licensing board of any state or province, shall meet the requirements of s. Psy 2.01 (1), (2), (6), (8), (10), (11) and (12).

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; renum. to be Psy 2.12 (1), cr. (2), (3) and (4), Register, June, 1999, No. 522, eff. 7−1−99; CR 02−124: am. Register July 2003 No. 571, eff. 8−1−03; **CR 12−055: r. (2) Register August 2013 No. 692, eff. 9−1−13.**

Psy 2.13 Doctoral degrees in psychology outside the U.S. and Canada. In addition to the supervised experience requirements set forth in s. Psy 2.09 (3), all applicants with doctoral degrees in psychology from universities outside the United States and Canada may be required to submit documentation of additional supervised experience within the U.S. Applicants for licensure on the basis of degrees from colleges and universities from outside the United States shall also pass the examination for the professional practice of psychology and may also be required to pass an English proficiency examination approved by the board.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91**;** correction made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473.

Psy 2.14 Temporary practice. The following apply to the temporary practice of psychology by a psychologist who is licensed or certified by a similar examining board of another state or territory of the United States or of a foreign country or province who offers services as a psychologist in this state under s. 455.03, Stats.

(1) Any portion of a calendar day in which the psychologist provides services in this state is considered one working day.

(2) A psychologist provides psychological services in this state whenever the patient or client is located in this state, regard-

less of whether the psychologist is temporarily located in this state or is providing services by electronic or telephonic means from the state where the psychologist is licensed.

History: Cr. Register, June, 2001, No. 546, eff. 7−1−01.

Psychology Licensure
DRAFT Proposal

I. To be eligible for Licensure:

A. A minimum of 4500 hours of supervised experience. All 4500 hours shall follow a minimum of 30 hours of doctoral level coursework in psychology.

1. A minimum of 1500 supervised practicum hours, defined as an organized, sequential series of supervised experiences of increasing complexity, serving to prepare a student for predoctoral internship and partially meeting requirements for licensure. These experiences shall be post- masters or follow a minimum of 30 hours of doctoral level coursework and shall be overseen by the graduate training program. The supervised experiences may occur at more than one site. The training must meet the following requirements:

    1) The trainee, the practicum training site, and the graduate training program must develop a written training plan. This plan shall outline the goals and objectives of the practicum, the methods of evaluation of the trainee's performance, and the nature of supervision provided at the site.
    2) At least 50% of the total hours of supervised experience shall be in service-related activities such as treatment/interventions, assessment, interviews, report-writing, case presentations, and consultations.
    3) At least 25% of the supervised experience shall be devoted to face-to-face patient/client contact.
    4) For every 8 hours of time spent in service-related activities, there must be at least 1 hour of regularly scheduled, formal, face-to-face individual supervision.
    5) At least 75% of the individual supervision must be by a licensed psychologist with a minimum of three years post-license experience.
    6) Up to 25% of the individual supervision may be completed by a predoctoral intern, a postdoctoral fellow, or a licensed allied mental health professional. *[Items 5 & 6 above are based on the ASPPB Model Act for Licensure. These percentages may need to be modified as we obtain feedback from training directors.]*

2. Predoctoral internship: Up to 1,500 hours of supervised experience completed as part of a predoctoral internship may be used to meet the 4500 hour requirement. In order to be used for such, the predoctoral internship must:

    a. Be accredited by the American Psychological Association; or
    b. Be a member program of the Association of Psychology Postdoctoral and Internship Centers (APPIC); or
    c. Meet the following requirements:
    (1) The internship must have a written statement or brochure describing the goals and content of the internship that states clear expectations and quality of an intern's work.
    (2) A psychologist licensed by the appropriate state or provincial licensing authority must be clearly designated as responsible for the integrity and quality of the internship program.

(3) At least 50% of the total hours of supervised experience shall be in service-related activities such as treatment/interventions, assessment, interviews, report-writing, case presentations, and consultations.
(4) At least 25% of the supervised experience shall be devoted to face-to-face patient/client contact.
(5) For every 40 hours of time, there must be at least 2 hours of regularly scheduled, formal, face-to-face individual supervision.
(6) For every 40 hours of time spent in service-related activities, there must be at least 2 hours of other learning activities such as case conferences, seminars on applied issues, conducting cotherapy with a staff person including discussion of the case, group supervision, or additional individual supervision.
(7) At least 75% of the individual supervision must be by a licensed psychologist with a minimum of three years post-license experience.
(8) Up to 25% of the individual supervision may be completed by a postdoctoral fellow or a licensed allied mental health professional.

3. A minimum of 1,500 hours Postdoctoral supervised experience. The postdoctoral training experience must:
    a. Be a member program of the Association of Psychology Postdoctoral and Internship Centers; or
    b. Meet the following requirements:
    c. The postdoctoral fellow and the training site must develop a written training plan. This plan shall outline the goals and objectives of the training and the nature of supervision provided at the site. The plan must identify the supervisor(s) providing the required supervision. The plan must be under the direction of a licensed psychologist.
    d. For every 40 hours of time, there must be at least 1 hour of regularly scheduled, formal, face-to-face individual supervision.
    e. At least 75% of the individual supervision must be by a licensed psychologist with a minimum of three years post-license experience.
    f. Up to 25% of the individual supervision may be completed by a licensed allied mental health professional.

B. Completion of Doctoral degree
C. Completion of Ethics and State Law Exam
D. Documentation of a passing score on the EPPP
E. Completion of the Post Doctoral Supervised Experience requirement may be accomplished in one of two ways:
    1. Documentation of the necessary post-doctoral experience
        a. If a predoctoral internship was completed, as in I.A.2., a minimum of 1500 hours of postdoctoral experience is required.
        b. If the applicant has not completed a predoctoral internship, a minimum of 3000 hours of postdoctoral supervised experience is required.
    2. Post Doctoral Supervised Experience Contract (PDSEC). See Section II.
        a. Applicants who have completed a predoctoral internship, as per I.A.2 are eligible for this option.
        b. Applicants who have not completed a predoctoral internship must first complete 1500 hours of postdoctoral supervised experience as defined in II.C. They can then opt use the PDSEC to complete the postdoctoral experience requirement.

II. Post Doctoral Supervised Experience Contract (PDSEC)

A. While under a PDSEC, an applicant may use the title "Psychologist" and practice as a psychologist, with the limitations noted below, for up to 3 years, given that the other above requirements A-D have been completed.

B. The PDSEC will include:

1. A plan for obtaining required supervised experience.
2. Identify the site or sites.
3. Identify the supervisor(s).
4. May not exceed 40 hours per week.
5. If employment is not yet secured, may submit application without the plan, which can be provisionally approved, but not activated until experience plan is provided.
6. Postdoctoral hours obtained after meeting eligibility requirements but prior to the approval of the contact may be used toward the 1500 hour requirement, provided that these hours meet the requirements set forth.
7. These supervised hours must be accumulated within 3 years following initial licensure.

C. Supervision Requirements for Postdoctoral experience

1. The site must be a member program of the Association of Psychology Postdoctoral and Internship Centers (APPIC); or
2. Meet the following requirements:
   a. The postdoctoral fellow and the training site must develop a written training plan. This plan shall outline the goals and objectives of the training and the nature of supervision provided at the site. The plan must identify the supervisor(s) providing the required supervision. The plan must be under the direction of a licensed psychologist.
   b. For every 40 hours of time, there must be at least 1 hour of regularly scheduled, formal, face-to-face individual supervision ..
      1) At least 75% of the individual supervision must be by a licensed psychologist with a minimum of three years post-license experience.
      2) Up to 25% of the individual supervision may be completed by a licensed allied mental health professional.

D. Limitations

1. The psychologist practicing with a PDSEC may practice only at the contracted site or sites.*)*
2. Required supervision, as described above.

E. Upon the approval of the PDSEC by the Examining Board, and documentation of a passing score on the EPPP, the applicant may be granted a license as Psychologist – PDSEC.

1. The maximum length of the PDSEC is 3 years, after which the license will expire.
   a. Process to obtain license after expiration.[*The general principles are provided, the details of the process are yet to be developed.]*
      1) The individual must reapply for licensure. Reapplication will not be automatic.
      2) Documentation of extenuating circumstances.

3) Some minimum amount of the supervised experience must have been completed.

b. On an annual basis, psychologists licensed under a PDSEC must submit an update to the Examining Board demonstrating their progress.

2. At any point within 3 years of application, the applicant may submit to the Board documentation of the completion of 1500 supervised hours. This will constitute successful fulfillment of the PDSEC.

3. While under the PDSEC, applicants are exempt from the biennial renewal process and CE requirements

[Rationale: This process would enable the licensing board to maintain at minimum annual oversight of a newly licensed individual's progress. It also allows flexibility for an individual's career choices, such as part-time work post-licensure].

III. The EPPP

A. In order to sit for the EPPP the individual seeking licensure must first apply to the licensing authority in the state, province, or territory in which they wish to be licensed. Therefore, the applicant may apply to take EPPP immediately after applying for licensure, either with 1500 hours of postdoctoral supervised experienced completed or with a PDSEC (see IE).

B. The applicant must provide documentation of a passing score prior to obtaining a license, including licensure under a PDSEC.

Chapter Psy 3

REQUIREMENTS FOR THE PRIVATE PRACTICE OF SCHOOL PSYCHOLOGY

Psy 3.01	Application procedure.
Psy 3.02	Requirements for a license for the private practice of school psychology.
Psy 3.03	Requirements for persons holding a license for the private practice of school psychology in another state.
Psy 3.04	Scheduling of examinations.
Psy 3.05	Unauthorized assistance.
Psy 3.06	Controls.
Psy 3.07	Passing score.
Psy 3.08	Failure and review.
Psy 3.09	Claim of examination error.
Psy 3.10	Reexamination.

Psy 3.01 Application procedure. The board shall act on an application for licensure for the private practice of school psychology only after all of the following materials, which shall be documented in English, have been received:

(1) The properly completed and signed application form.

Note: Applications are available upon request to the board office at 1400 East Washington Avenue, P.O. Box 8935, Madison, Wisconsin 53708.

(2) The application fee authorized by s. 440.05 (2), Stats.

(3) Official transcripts of graduate training, properly attested to by the degree granting institution and submitted by the institution directly to the board.

(4) Documentation that the applicant holds a license as a school psychologist by the Wisconsin department of public instruction under s. PI 34.31 (3).

(5) Documentation of additional relevant education and appropriate experience.

(6) The "Experience Verification" form that has been filled out by a psychologist who has firsthand knowledge of the applicant's experience related to psychology.

(7) The "Nature of Intended Private Practice of School Psychology" form.

(8) Verification of the applicant's licensure and certification in all states or countries in which the applicant has ever held a license.

(9) For applicants who have a pending criminal charge or have been convicted of a crime, all information necessary for the board to determine whether the circumstances of the pending criminal charge or conviction are substantially related to the duties of the licensed activity.

(10) Proof of successful completion of the written examination on the practice of school psychology.

(11) Proof of completion of the written examination in the elements of practice essential to the public health, safety or welfare.

(12) For applicants licensed in another state wishing to be exempted from the examination in sub. (10), proof of completion of continuing education requirements as specified in s. Psy 3.03.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; am. (3), Register, January, 1997, No. 493, eff. 2−1−97; am. (1) and (2), Register, June, 1999, No. 522, eff. 7−1−99; CR 02−124: am. (4) Register July 2003 No. 571, eff. 8−1−03; **correction in (4) made under s. 13.92 (4) (b) 7., Stats., Register November 2011 No. 671.**

Psy 3.02 Requirements for a license for the private practice of school psychology. (1) LICENSURE BY THE DEPARTMENT OF PUBLIC INSTRUCTION. Only persons holding a regular license as a school psychologist issued by the Wisconsin department of public instruction under s. PI 34.31 (3) may be licensed for the private practice of school psychology.

(2) EXPERIENCE. An applicant for a license for the private practice of school psychology shall complete one of the following:

(a) One year of successful experience as a school psychologist under the supervision of a cooperating school psychologist and a written recommendation from the school system administration; or

(b) One year of internship in school psychology under the supervision of a licensed school psychologist and a written recommendation from the school system administration. The internship shall occur after completion of most or all coursework in a training program. The internship shall be part of an approved program and shall be taken for a maximum of 12 graduate semester credits.

(3) APPEARANCE BEFORE THE BOARD. The applicant may be required to appear before the board in person prior to licensure to allow the board to make such inquiry of them as to qualifications and other matters as it considers proper.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; **correction in (1) made under s. 13.92 (4) (b) 7., Stats., Register November 2011 No. 671.**

Psy 3.03 Requirements for persons holding a license for the private practice of school psychology in another state. Applicants who are licensed in another state must meet the requirements of s. Psy 3.01. However, the examination on the practice of school psychology shall be waived if the standards of the licensing authority of the other state were substantially equivalent to the standards of this state at the time of initial licensure, and if the applicant submits proof of completion of at least 40 contact hours of approved continuing education within 2 years prior to application.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 3.04 Scheduling of examinations. (1) Examinations shall be held at least twice a year at a time and place designated by the board. Notice of the next scheduled examinations may be obtained by contacting the department.

(2) No applicant may be admitted to the examination on the elements of practice essential to the public health, safety and welfare unless the requirements stated in s. Psy 3.01 (1) to (10) have been met before the first day of the month immediately prior to the board meeting preceding the date of the examination.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 3.05 Unauthorized assistance. The board may withhold the score of an applicant who gives or receives unauthorized assistance during examinations. The board may consider this applicant for retesting at a future time.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 3.06 Controls. The board chairperson or proctor may announce time limits and other necessary controls prior to the examinations.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 3.07 Passing score. (1) EXAMINATION ON THE PRACTICE OF SCHOOL PSYCHOLOGY. To pass the examination each applicant shall receive a score determined by the board to represent minimum competence to practice. The board may adopt the passing score recommended by the National Association of School Psychologists.

(2) EXAMINATION ON ELEMENTS ESSENTIAL TO HEALTH, SAFETY AND WELFARE. To pass this examination, each applicant shall receive a score of 75% correct or above.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; CR 02−124: am. (1) Register July 2003 No. 571, eff. 8−1−03.

Psy 3.08 Failure and review. (1) An applicant who fails the examination on elements essential to health, safety and welfare may request a review of that examination. The applicant must file a written request to the board within 30 days of the date on which examination results were mailed or reported.

(2) The time for review shall be limited to time allowed for examination administration.

(3) The examination shall be reviewed only by the applicant and in the presence of the proctor.

(4) The proctor shall not respond to inquiries by the applicant regarding allegations of examination error.

(5) Any comments or claims of error regarding specific questions or procedures in the examination may be placed in writing on the provided form. These comments shall be retained and made available to the applicant for use at a subsequent hearing.

(6) An applicant may review the examination only once.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91.

Psy 3.09 Claim of examination error. (1) An applicant wishing to claim examination error in the examination on elements essential to health, safety and welfare shall file a written request for board review in the board office within 30 days of the date the examination was reviewed. The request shall include all of the following:

(a) The applicant's name and address.

(b) The type of license applied for.

(c) A description of the perceived error, including specific questions or procedures claimed to be in error.

(d) The facts that the applicant intends to prove, including reference text citations or other supporting evidence for the applicant's claim.

(2) The board shall review the claim and notify the applicant in writing of the board's decision and any resulting grade changes.

(3) If the decision does not result in the applicant passing the examination, the applicant may request a hearing under s. SPS 1.05.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; CR 02−124: am. (1) (intro.) Register July 2003 No. 571, eff. 8−1−03; **correction in (3) made under s. 13.92 (4) (b) 7., Stats., Register November 2011 No. 671.**

Psy 3.10 Reexamination. An applicant who fails to achieve a passing grade in the examinations required under this chapter may apply for reexamination on forms provided by the board and pay the appropriate fee for each reexamination as required in s. 440.05, Stats. An applicant who fails to achieve a passing grade may be reexamined 3 times at not less than 3−month intervals. If the applicant fails to achieve a passing grade on the third reexamination, the applicant may not be admitted to any further examination until the applicant reapplies to the board for permission to be reexamined and presents evidence satisfactory to the board of further professional training or education as the board may prescribe or approve following its evaluation of the applicant's specific case.

History: Cr. Register, September, 1991, No. 429, eff. 10−1−91; r. and recr., Register, May, 2000, No. 533, eff. 6−1−00.

ASPPB

Report of the Task Force on Licensure of Consulting and Industrial/Organizational Psychologists

Association of State and Provincial Psychology Boards

September 22, 2014

Licensure of Consulting and Industrial/Organizational Psychologists Task Force

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REPORT OF THE ASPPB TASK FORCE ON LICENSURE OF CONSULTING AND INDUSTRIAL ORGANIZATIONAL PSYCHOLOGISTS

September 2014

This is the first year report to the Association of State and Provincial Psychology Boards (ASPPB) Board of Directors (BOD) from the Task Force on Licensure of Consulting and Industrial Psychologists (LCIOP). The LCI0P Task Force was established to provide guidance to the BOD as the board makes decisions regarding issues of licensure for consulting and industrial organizational psychology.

Introduction

The Development of the LCIOP Task Force

Background Information:

The issue of licensure of consulting and industrial organizational psychologists has been debated for a number of years. However, there appears to have been increased interest in licensure among consulting and industrial organizational psychologist in the Society for Industrial and Organizational Psychology (SIOP - Division 14), the Society of Consulting Psychology (SCP – Division 13), and the Canadian Society of Industrial and Organizational Psychology (CSIOP). In his presidential column in *The Industrial – Organizational Psychologist* (October, 2012), president Doug Reynolds addressed the issue of licensure for psychologists, urging the membership to consider this as one area of "extending our influence" and to build closer ties with ASPPB to explore and monitor further developments in this area. In his outgoing presidential address at the 2013 SIOP Annual Conference (April, 2013), Dr. Reynolds identified ASPPB as "… a key partner helping SIOP navigate licensure issues and to ensure state regulations make sense for I/O psychologists."

R. Blake Jelley, PhD, is Past Chair of the Canadian Society for Industrial and Organizational Psychology. In his article "Advocating for a More Inclusive Licensing Framework" (*Psynopsis, the magazine of the Canadian Psychological Association*, Winter 2013), Dr. Jelley acknowledges that licensure of industrial and organizational psychology has long been a controversial issue, but that Canada's *Agreement on International Trade* (AIT) may provide an "…opportunity to make licensure laws more accepting of and relevant to nonclinical psychologists."

Silzer, Cober, Erickson, and Robinson (2008) report on the Practitioner Needs Survey conducted by the SIOP Professional Practice Committee. Of the 2694 SIOP members, fellows, and associates invited to participate, 1005 completed the survey for a response rate of 36%. Nearly 75% of all respondents were members of APA, and 78% were full-time practitioners. Some of the most relevant findings of that study are as follows:

- 90% of respondents considered themselves psychologists
- 21% of the full-time practitioners were licensed
- 8% of non-practitioners were licensed

- 25% indicated they were not licensed but could be
- 37% indicated they were not licensed but did not know if they were eligible
- 29% thought that their graduate program prepared them to meet licensing requirements
- 32% thought that their graduate programs did not prepare them to meet licensing requirements
- 66% thought harm could be done without adequate training
- 62% would apply for licensure if the requirements were more appropriate for I/O psychologists

A follow-up Future of Practice Survey to SIOP members (Silzer and Cober, 2011) was sent to 6455 members and 1627 were returned (response rate 25%). Although the wording of questions and method of analysis was slightly different, results were similar:

- 60% of the respondents in consulting firms/Independent practice thought it was important to represent themselves as a psychologist in their work setting
- 12% of the respondents were licensed
- 26% of the respondents in consulting firms/Independent practice were licensed
- 61% of the respondents indicated they had little or no knowledge of licensure requirements
- 64% of the respondents thought harm could be done without adequate training
- 50% of the respondents thought having the opportunity to be licensed was important to SIOP and the profession
- 59% of the respondents thought SIOP should develop a process by which individuals have the opportunity to be certified as an IO psychologist

Silzer, Cober, Erickson, and Robinson (2008) made the following recommendations to SIOP regarding licensure:

1. Provide greater support for their members who want to be licensed
2. Educate their members regarding licensure requirements
3. Support those members who want to be licensed by
    a. Developing liaisons with regulatory boards
    b. Advocating for those who want to be licensed
    c. Working to influence regulatory boards
4. Work closely with APA to shape the Model Licensing Act to allow/encourage I/O psychologists to become licensed
5. Initiate an effort to influence I/O graduate programs to modify their programs to better meet state licensure requirements

Based upon a follow-up Future of Practice Survey, Silzer and Cober (2011) identify 15 steps that SIOP can take in shaping the future of the profession. One of these steps is helping SIOP members get licensed by:

- Supporting those members who want to get licensed
- Providing licensing workshops and guidance
- Establishment of several model licensing programs that accommodate I/O psychology specifications with select states

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Establishing a Joint Task Force:

A breakfast meeting was held at the Society of Consulting Psychology Mid-Winter Conference (February 2013) and included representatives of Division 13, Division 14, and ASPPB. While everyone present agreed that there was much work to be done in this area, the general consensus was that we should move forward with a workgroup to further explore and address the issues of licensure of consulting and I/O psychologists.

In June 2013, the ASPPB BOD approved establishing the joint LCIOP Task Force with the understanding that this would be a cooperative effort of ASPPB, Division 13, Division 14, and CSIOP. The LCIOP Task Force was approved to become effective January 2014.

LCIOP Task Force Structure and Membership:

The ASPPB BOD approved the following LCIOP Task Force structure. The ASPPB positions were appointed by the ASPPB BOD and the Division 13, Division 14, and CSIOP positions were appointed by those respective divisions:

- Chair – ASPPB Board of Directors Member - Don Crowder, PhD
- ASPPB Delegate Member – Psychologist - Dan Schroeder, PhD
- ASPPB Delegate Member – Board Administrator - Cindy Juntunen, PhD
- Division 13 (SCP) Representative - Judy Blanton, PhD
- Division 14 (SIOP) Representative - Mark Nagy, PhD
- CSIOP Representative - Blake Jelley, PhD

LCIOP Task Force Charges:

The LCIOP Task Force was given the following charges:

Charge 1: Review and clarify the scope of practice statements of the 64 member jurisdictions as they pertain to the inclusion of consulting and I/O psychology

Charge 2: Educate the membership of Division 13, Division 14, and CSIOP as well as ASPPB member jurisdictions regarding the issues of licensure for consulting and I/O psychologists

Charge 3: Identify barriers to licensure of consulting and I/O psychologists and methods for reducing and eliminating those barriers

Charge 4: Consult with ASPPB Model Act and Regulations Committee (MARC) to understand and include the needs of consulting and I/O psychologists

Charge 5: Consult with ASPPB taskforces (Telepsychology, MOCAL, Supervision Guidelines, etc.) to understand and include the needs of consulting and I/O psychologists

Charge 6: Investigate and make recommendations regarding alternatives to APA accreditation for educational programs and supervision

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Charge 7: Investigate and make recommendations regarding mobility for consulting and I/O psychologists

Charge 8: Make recommendations for ASPPB member jurisdictions and consulting and I/O psychology education programs regarding feasible paths to licensure for consulting and I/O psychologists

The Work of the LCIOP Task Force

The LCIOP Task Force had two in person meetings in 2014. The first meeting took place in San Antonio in February 2014 following the Society of Consulting Psychology Midwinter Meeting. The second meeting took place in Chicago in September 2014. There were also two conference calls, one in April 2014 and a second in May 2014. Following is a summary and current progress on each of the Task Force charges.

Charge 1: Review and clarify the scope of practice statements of the 64 member jurisdictions as they pertain to the inclusion of consulting and I/O psychology

Current Status and Problems:

Initial analysis of the scope of practice statements for the 64 ASPPB member jurisdictions produced the following findings:

- 40 jurisdictions have language suggesting that consulting and/or I/O psychology is included in the definition of the practice of psychology
- 19 jurisdictions have language not including consulting and/or I/O psychology in the definition of the practice of psychology
- 5 jurisdictions could not be determined based upon the information available

Appendix I indicates the jurisdictions including, not including, or questionable in their scope of practice of psychology. Appendix II contains the specific language that suggests inclusion or, in some cases, exclusion of consulting and/or I/O psychology.

DeMers (2013) provides an insightful summary of the current situation.

> "… Most I/O psychologist are not licensed and yet a review of most psychology licensing laws would suggest that they should be if they practice psychology and/or call themselves a psychologist. But the reason why most are not licensed is complicated with many contributing factors. Most I/O and to a lesser extent consulting psychologists have not sought licensure (or felt they needed licensure or could qualify for licensure) and most psychology licensing boards have been quite content to focus on evaluating the qualifications of those seeking licensure and hearing complaints about those who are already licensed, hence an almost exclusive focus on health service providers in psychology. So the neglect and inattention to licensure issues within the I/O and consulting psychology environment has been bi-directional (in my opinion) with the exception of a few individuals who have maintained a running dialogue about the disengagement/disenfranchisement of those non-health service providers of the profession. This separation or disengagement is even more alarming when one travels to international psychology conferences and finds that it is often the work and

organizational psychologists who are most involved in the regulation of the profession and the tools (like assessment) of the profession. The psychology licensing laws in most US states and Canadian provinces are generic and apply to any individual who offers services to the public that fall under the definition of the practice of psychology. And most psychology laws include work and organizational clients, settings and services as part of the practice of psychology. But only a few US states have either completely exempted organizational psychologists from licensure (e.g. Illinois' Clinical Psychology Licensing Act) or made special provisions in the licensure eligibility requirements for non-health service psychologist (e.g. Georgia)."

The ASPPB Common Rules Task Force (CRTF) is in the process of obtaining data that will be helpful in completing this charge. The LCIOP Task Force at the September 2014 meeting reviewed the preliminary findings of CRTF. It must be stressed that the data of the CRTF is still very preliminary and has not yet been verified by the individual jurisdictions. It is also important to keep in mind that the CRTF is, at this point, only reviewing the data on US jurisdictions and Canadian provinces are not included as that is a separate project.

With these restrictions in mind, we were able to use that preliminary data to document that the issue of licensure of consulting and industrial organizational psychologist is still very confusing and there is definitely a need for further clarification and hopefully a move in the direction of greater uniformity. Questions which the LCIOP Task Force is trying to answer include:

- Are consulting and industrial organizational psychologists eligible for licensure in the jurisdiction?
- Are consulting and industrial organizational psychologists excluded from licensure in the jurisdiction? (i.e., Does the jurisdiction only licenses health service psychologists?)
- Does the jurisdiction have a specific license for consulting and industrial organizational psychologists?
- Are consulting and organizational psychologists required to be licensed in the jurisdiction?
- Are consulting and organizational psychologists exempt from licensure in the jurisdiction?
- Does the jurisdiction require that the doctoral degree be from an APA/CPA accredited program, and if so, are there other provisions for consulting and industrial organizational psychologists?

The following preliminary data of the CRTF was reviewed as it pertains to each of the above questions (specific jurisdictional requirements can be found in Appendix III):

Are consulting and industrial organizational psychologists eligible for licensure in the jurisdiction?

- 29% of jurisdictions (15) have a generic license
- 31% of jurisdictions (16) allow licensing of non-health service psychologists

Are consulting and industrial organizational psychologists excluded from licensure in the jurisdiction? (i.e., Does the jurisdiction only licenses health service psychologists?)

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- 13% of jurisdictions (7) restricts licensure to health service psychologists

Does the jurisdiction have a specific license for consulting and industrial organizational psychologists?

- 12% of jurisdictions (6) have specific license for non-health service psychologists

Are consulting and organizational psychologists required to be licensed in the jurisdiction?

- 29% of jurisdictions (15) have a generic license
- 87% of jurisdictions (42) do not exempt non-health service psychologists for licensure

Are consulting and organizational psychologists exempt from licensure in the jurisdiction?

- 13% of jurisdictions (7) exempt non-health service psychologists from licensure

Does the jurisdiction require that the doctoral degree be from an APA/CPA accredited program, and if so, are there other provisions for consulting and industrial organizational psychologists?

- 17% of jurisdictions (12) require APA program accreditation
- 2% of jurisdictions (1) require APA approved internship

Recommendations:

1. Continue to work on clarification of licensure requirements of the 64 member jurisdictions of ASPPB
2. Encourage greater uniformity in licensure requirements of the 64 member jurisdictions of ASPPB
3. Publish a summary of licensure requirements for consulting and industrial organizational psychology of the 64 member jurisdictions of ASPPB on the public section of the ASPPP website

<u>Charge 2: Educate the membership of Division 13, Division 14, and CSIOP as well as ASPPB member jurisdictions regarding the issues of licensure for consulting and I/O psychologists</u>

It is important to educate the membership of Division 13, Division 14, and CSIOP as well as ASPPB member jurisdictions regarding the issues of licensure for consulting and industrial organizational psychologists. The LCIOP Task Force is responsible for continuing awareness and education regarding the issues of licensure to the leadership and membership of their respective organizations and the psychology community as well. The Task Force determined that initial efforts were best focused on publishing articles and papers relevant to the issues as well as presentations at membership meetings and conferences.

During the last year, members of the LCIOP Task Force have prepared and/or published the following articles or papers:

Blanton, Judith S. "Supervision Practices In Consulting and Industrial-Organizational Psychology Doctoral Programs and Consulting Firms." ***Consulting Psychology Journal: Practice and Research***, Vol 66 (1), March 2014, 53-76.

Blanton, Judith S. and Nagy, Mark. "Licensing Issues For Consulting and Industrial-Organizational Psychologists." July 2014 (written for Licensing Boards, currently being reviewed).

Blanton, Judith S. "CA Licensure For Non-Health Service Providers." July 2014 (prepared for California Board of Psychology).

Jelley, R. Blake, Bonaccio, Silvia and Chiocchio, Francois. "Educating IO Psychologists for Science and Practice: A Canadian Perspective." ***Industrial and Organizational Psychology: Perspectives on Science and Practice***, Vol 7 (1), March 2014, 51-54.

During the last year, members of the LCIOP Task Force have submitted, organized, and/or participated in the following presentations:

Crowder, Don; Blanton, Judith; and Nagy, Mark. "Evaluating the Pay-Out of Licensure of Non-Health Care Psychologists." ASPPB 53rd Annual Meeting, October 16-20, 2013, Las Vegas, NV.

Crowder, Don; Blanton, Judith; Brannick, Joan; and Nagy, Mark. "Navigating the Rivers of Licensure, Regulations, and Mobility." Society of Consulting Psychology Midwinter Meeting, February 6-9, 2014, San Antonio, TX.

Crowder, Don, Nordal, Katherine, and Meck, Don. "Generic Licensure vs. Licensure Of Health Service Psychologists (HSP)". ASPPB 29th Midyear Meeting, April 10-13, 2014, San Antonio, TX.

Nagy, Mark and Crowder, Don. "Crucial Developments in the Licensure of I-O Psychologists." 2014 SIOP Annual Conference, May 15-17, Honolulu, HI.

Jelley, R. Blake; Cohen, Karen; Crowder, Don; Tiessen, Melissa; and Yarrow, Catherine. "Building Roads Through Mountains: Licensure, Accreditation, and Industrial-Organizational Psychology." Canadian Psychological Association 75th Annual Convention, June 5-7, 2014, Vancouver, BC.

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The LCIOP Task Force believes it is important to continue these efforts at educating the respective memberships. Proposals for panel presentations have been submitted for the 2015 SCP Midwinter Conference as well as the 2015 SIOP Annual Conference.

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Recommendations:

1. Continue efforts at educating the membership of Division 13, Division 14, and CSIOP as well as ASPPB member jurisdictions regarding the issues of licensure for consulting and I/O psychologists.
2. Include a presentation on licensure of consulting and I/O psychologists at the ASPPB Midyear and/or Annual Meeting in 2015.

<u>Charge 3: Identify barriers to licensure of consulting and I/O psychologists and methods for reducing and eliminating those barriers</u>

Blanton and Nagy (2012) identified five common licensing issues that pertain to members of the Society of Consulting Psychology and members of the Society for Industrial and Organizational Psychology. These issues, along with their implications for consulting and I/O psychologists are as follows:

1. Scope of competence
    a. Additional training or supervision should be required for clinical psychologists to practice appropriately in consulting and I/O areas
    b. Consulting and I/O psychologists who provide mental health related services should be required to obtain additional relevant training and/or supervision in those areas
2. Educational requirements
    a. As APA does not accredit programs in consulting or I/O psychology, alternatives to APA accreditation needs to be developed
    b. The cost and effort required for APA accreditation is prohibitive for many programs in consulting and I/O psychology and the field does not yet have the consensus necessary to apply to CoA as a specialty for the accreditation process
3. Supervision requirements
    a. Most programs in consulting and I/O psychology do not require pre-doctoral internships.
    b. Provisions need to be made for all supervision to be acquired at the postdoctoral level
    c. Licensing boards need to consider flexible models for appropriate supervision of consulting and I/O psychologist
4. Continuing Education Requirements
    a. Licensing boards are encouraged to carefully consider requiring specific courses for license renewal and instead encourage psychologists to obtain continuing education in areas most relevant to their practices
5. Mobility and technology
    a. Regulations for cross-state, short-term practice need to be modified to address realities of consulting and I/O psychologists
    b. Regulations regarding the current and future use of technology should be reviewed to acknowledge the realities of mobility and the state of practice in consulting and I/O psychology

Blanton and Nagy (2012) recommend that state licensing boards consider the following:

- Including consulting and I/O psychologists as Board members

- Contacting Division 13 and/or Division 14 to gain greater insight when deliberating issues that might impact psychologists practice in areas outside of clinical or counseling
- Inviting representatives from Division 13 and/or Division 14 to board meetings to ensure mutual awareness about the work of psychologists outside the clinical or counseling areas, the implications of such work in terms of protecting the public, and the issues Boards face relative to consulting and I/O psychologists
- As ASPPB, APA, and jurisdictions study major licensure issues, begin (or continue) efforts to involve a broad range of psychologists, including those from the Consulting Psychology, I/O Psychology, and other Applied Psychology areas, on key task forces or committees

The LCIOP Task Force recognizes these barriers and has taken initial steps at implementing the recommendations of Blanton and Nagy (2012) as well as developing methods for reducing and/or eliminating the barriers they identified.

Blanton and Nagy have recently revised their 2012 "Licensing Issues for Consulting and Industrial-Organizational Psychologists" into a document that is intended to assist Boards of Psychology that are addressing issues that affect consulting and I/O psychologist or other General Applied Psychologists. That document was reviewed by the LCIOP Task Force at their September meeting, and will be forwarded to the ASPPB Board for consideration as soon as final revisions are complete.

Recommendations:

1. Publish final Board version of "Licensing Issues for Consulting and Industrial-Organizational Psychologists" on ASPPB website and other relevant websites as appropriate.
2. Distribute final Board version of "Licensing Issues for Consulting and Industrial-Organizational Psychologists" to member jurisdictions.

<u>Charge 4: Consult with ASPPB Model Act and Regulations Committee (MARC) to understand and include the needs of consulting and I/O psychologists</u>

The LCIOP Task Force has provided suggestions to MARC in several areas as they relate to the needs of consulting and I/O psychologists.

The ASPPB Guidelines on Supervision were reviewed by the LCIOP Task Force and suggestions provided to MARC for additions and/or changes that could be included in the ASPPB Model Act and Regulations to make them more appropriate for consulting and I/O psychologists.

The LCIOP Task Force reviewed the APA and the ASPPB Model Acts as they apply to consulting and I/O psychologists. While ASPPB has tried to maintain a generic approach to licensure which would benefit consulting and I/O psychologists, some of the other language in the current Model Act/Regulations, if adopted by the jurisdictions, would exclude consulting and I/O psychologist from being licensed. The LCIOP Task Force recognizes that MARC is currently working on revisions to the Model Act/Regulations that would address these issues.

The LCIOP Task Force finds that one advantage of the APA Model Act is their definition of Applied Psychologist which then includes two categories - Health Service Psychologist and General Applied Psychologist. The LCIOP Task Force encourages ASPPB and MARC to

continue to promote generic licensure of psychologist but at the same time consider incorporating the APA definition of Applied Psychologist and the two categories of Health Service psychologist and General Applied Psychologist.

Recommendations:

1. Incorporate suggested changes to the supervision guidelines in ASPPB Model Act/Regulations to make them appropriate for consulting and I/O psychologists.
2. ASPPB and MARC continue to promote licensure of the profession of psychology but at the same time consider incorporating a distinction among Applied Psychologists, similar to that made in the APA (2010) MLA, to recognize the distinct role categories of Health Service Psychologists and General Applied Psychologists.
3. MARC further develop scope of practice statements and exclusions for Health Service Psychologists and General Applied Psychologists similar to that contained in APA (2010) MLA.

Charge 5: Consult with ASPPB taskforces (Telepsychology, MOCAL, Supervision Guidelines, etc.) to understand and include the needs of consulting and I/O psychologists

The ASPPB Guidelines on Supervision were reviewed by the LCIOP Task Force and suggestions provided to MARC for additions and/or changes that could be included in the ASPPB Model Act and Regulations to make them more appropriate for consulting and I/O psychologists.

The LCIOP Task Force is currently reviewing the Coursework Guidelines developed by the ASPPB Mobility Committee and course names/content areas that are relevant to consulting and I/O psychology are being added. Once complete, these suggested additions will be forwarded to the Mobility Committee for their review.

The Telepsychology Compact, Telepsychology Guidelines, and E. Passport were reviewed by the LCIOP Task Force at the September meeting. Members will encourage their respective divisions to review and comment on these issues. The Task Force will also provide their comments as well during the open comment period.

The LCIOP Task Force reviewed the report of the ASPPB Competency Assessment Task Force (CATF) and will provide comments to the ASPPB board as appropriate.

Recommendations:

1. ASPPB continue to explore the feasibility of using the EPPP as the tool for assessing the foundational knowledge for entry to the profession, but further developing other more skills based competency assessments that are role relevant.

Charge 6: Investigate and make recommendations regarding alternatives to APA accreditation for educational programs and supervision

The LCIOP Task Force reviewed ASPPB's Comments on the Commission on Accreditation's new *Standards for Accreditation in Health Service Psychology* as well as ASPPB's letter to the Commission on Accreditation to request that the CoA consider establishing, in the future, *Standards of Accreditation for General Applied Psychology* programs. The LCIOP Task Force appreciates the efforts of ASPPB in this area.

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While the LCIOP Task Force recognizes the importance of program accreditation, we also understand that there is, at this time, much anxiety about and opposition to program accreditation in the areas of consulting and I/O psychology. The Task Force believes that we need to continue to explore mechanisms for assuring quality and greater standardization across programs in consulting and I/O psychology, but we also need to move carefully and deliberately in this area.

Recommendations:

1. Continue to investigate interim and/or alternative methods of program standardization and/or accreditation.
2. Consult with Division 13 and Division 14 with respect to possible interim and/or alternative methods of graduate program development and assurance, recognizing that important differences exist between GAP and HSP graduate programs with respect to experience with program reviews and educational quality assurance standards.

<u>Charge 7: Investigate and make recommendations regarding mobility for consulting and I/O psychologists</u>

The issue of mobility is very significant for consulting and I/O psychologists. Many work with large companies who may have offices in a number of different jurisdictions. They may be required to consult at an office in a different jurisdiction with very little advanced notice. With advances in technology, the practice of consulting and I/O psychologists now often crosses jurisdictional boundaries as consultations may involve telephonic, email, video conferencing, etc. There is a need to provide consumer protection while at the same time not placing overly restrictive barriers to licensure and mobility on the consulting and I/O psychologists.

The LCIOP Task Force will continue to explore solutions to the problem of mobility. One area to be explored is that currently being pursued by the Telepsychology Task Force, using a compact and certification in a specific area. The LCIOP Task Force recognizes the tremendous work that has gone into to the development of the Interjurisdictional Telepsychology Compact, and is not recommending any changes that might slow down or derail further development or implementation. However, if the opportunity should arise to expand the scope of the current Interjurisdictional Telepsychology Compact to a broader Interjurisdictional Psychology Compact that also included specific areas of "in person" practice, then the LCIOP Task Force is ready to work with the necessary parties on further development of this type of compact.

If that opportunity does not present itself, then a separate Interjurisdictional Psychology Compact, which specifically addresses the need for cross jurisdictional practice for consulting and I/O psychology, could be pursued based upon the knowledge gained and success of the Interjurisdictional Telepsychology Compact.

It is possible the ASPPB Interjurisdictional Practice Certificate (IPC), it it's current form, might be a method of increasing mobility for consulting and I/O psychologists if it were accepted by more jurisdictions.

Another alternative to explore might be modification of the current ASPPB Interjurisdictional Practice Certificate (IPC) to include specialty areas such as the following:

1. IPC – Consulting and I/O

    a. Specify time limit/days of consulting and IO in person practice after which need to be licensed in that jurisdiction
    b. Define Telepsychology practice in a way that workable for consulting and IO
    c. Define mechanism for obtaining "expedited license" where necessary
2. IPC – Forensics
    a. Specify time limit/days of forensic in person practice after which need to be licensed in that jurisdiction
    b. Define Telepsychology practice in a way that appropriate for forensic practice
    c. Define mechanism for obtaining "expedited" license where necessary

The LCIOP Task Force also recognizes that while mobility within the 64 ASPPB jurisdictions is important, many consulting and I/O psychologist are also facing the issue of global mobility. The LCIOP Task Force will continue to monitor and work with groups and organizations concerned with global mobility such as the International Project on Competence in Psychology (IPCP).

Recommendations:

1. Further explore options for addressing the problem of mobility for consulting and I/O psychologists such as the following:
    a. Expand the proposed Interjurisdictional Telepsychology Compact to include temporary in person practice for consulting and I/O psychologists.
    b. Develop a separate Interjurisdictional Practice Compact to address both the in person and Telepsychology practice for consulting and I/O psychologists.
    c. Increase efforts at gaining greater jurisdictional acceptance of the Interjurisdictional Practice Certificate (IPC).
2. Explore the feasibility of modifying the existing Certificate of Professional Qualification to incorporate the designations of Health Service Psychologist (HSP) and General Applied Psychologist (GAP).
3. Continue work on the development of a competence model as the basis for licensure and mobility

Charge 8: Make recommendations for ASPPB member jurisdictions and consulting and I/O psychology education programs regarding feasible paths to licensure for consulting and I/O psychologists

The LCIOP Task Force supports the ASPPB position of generic licensure and recognizes that the profession of psychology incorporates various areas. The APA definition of applied psychologist is "…one who provides services to individuals, groups, and/or organizations." The Task Force believes that licensure of applied psychologists not only provides consumer protection but also enhances the profession.

While the LCIOP Task Force recognizes the value of certification and credentialing to document competence, certification and credentialing alone do not provide adequate consumer protection.

The LCIOP Task Force also recognizes that any time new requirements are implemented there are individuals who have been practicing competently in the area for many years, but may not meet the new requirements that are being implemented. In these situations, it may be necessary to consider ways such as a "grandfathering" period to address this problem.

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The LCIOP Task Force requests that the ASPPB Board continue to work with their member jurisdictions as well as consulting and I/O psychology educational programs on developing feasible paths to licensure for consulting and I/O psychologist.

Recommendations:

1. ASPPB continue the position that the practice of applied psychology should be licensed
2. ASPPB Board continue to work with their member jurisdictions as well as consulting and I/O psychology educational programs on developing feasible paths to licensure for consulting and I/O psychologists.
3. Encourage jurisdiction to incorporate "grandfathering" language, where possible, when implementing new requirements for licensure of consulting and I/O psychologists.

Conclusion

The LCIOP Task Force appreciates the cooperative efforts and support of ASPPB, Division 13, Division 14, and CSIOP of the initial efforts of the Task Force at addressing the issues related to the licensing of consulting and industrial psychologists. While we believe we have made significant progress in the first year of the LCIOP Task Force, we also recognize that there is much work to be done in this area and change does not always come quickly. We understand that this issue has been discussed for a number of years. However, we believe that the opportunity to bring about significant change has never been better, and it is important to keep the momentum going. We offer the following recommendations for your consideration and request your continued cooperation and support of the efforts of the LCIOP Task Force.

Summary of Recommendations

1. That the ASPPB Board of Directors as well as the leadership of Division 13, Division 14, and CSIOP continue their involvement in and support of the LCIOP Task Force for the calendar year 2015.
2. Continue to work on clarification of licensure requirements of the 64 member jurisdictions of ASPPB
3. Encourage greater uniformity in licensure requirements of the 64 member jurisdictions of ASPPB
4. Publish a summary of licensure requirements for consulting and industrial organizational psychology of the 64 member jurisdictions of ASPPB on the public section of the ASPPP website
5. Continue efforts at educating the membership of Division 13, Division 14, and CSIOP as well as ASPPB member jurisdictions regarding the issues of licensure for consulting and I/O psychologists.
6. Include a presentation on licensure of consulting and I/O psychologists at the ASPPB Midyear and/or Annual Meeting in 2015.
7. Publish final Board version of "Licensing Issues for Consulting and Industrial-Organizational Psychologists" on ASPPB website and other relevant websites as appropriate.

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8. Distribute final Board version of "Licensing Issues for Consulting and Industrial-Organizational Psychologists" to member jurisdictions.
9. Incorporate suggested changes to the supervision guidelines in ASPPB Model Act/Regulations to make them appropriate for consulting and I/O psychologists.
10. ASPPB and MARC continue to promote licensure of the profession of psychology but at the same time consider incorporating a distinction among Applied Psychologists, similar to that made in the APA (2010) MLA, to recognize the distinct role categories of Health Service Psychologists and General Applied Psychologists.
11. MARC further develop scope of practice statements and exclusions for Health Service Psychologists and General Applied Psychologists similar to that contained in APA (2010) MLA.
12. ASPPB continue to explore the feasibility of using the EPPP as the tool for assessing the foundational knowledge for entry to the profession, but further developing other more skills based competency assessments that are role relevant.
13. Continue to investigate interim and/or alternative methods of program standardization and/or accreditation.
14. Consult with Division 13 and Division 14 with respect to possible interim and/or alternative methods of graduate program development and assurance, recognizing that important differences exist between GAP and HSP graduate programs with respect to experience with program reviews and educational quality assurance standards.
15. Further explore options for addressing the problem of mobility for consulting and I/O psychologists such as the following:
    - **a.** Expand the proposed Interjurisdictional Telepsychology Compact to include temporary in person practice for consulting and I/O psychologists.
    - **b.** Develop a separate Interjurisdictional Practice Compact to address both the in person and Telepsychology practice for consulting and I/O psychologists.
    - **c.** Increase efforts at gaining greater jurisdictional acceptance of the Interjurisdictional Practice Certificate (IPC).
16. Explore the feasibility of modifying the existing Certificate of Professional Qualification to incorporate the designations of Health Service Psychologist (HSP) and General Applied Psychologist (GAP).
17. Continue work on the development of a competence model as the basis for licensure and mobility
18. ASPPB continue the position that the practice of applied psychology should be licensed
19. ASPPB Board continue to work with their member jurisdictions as well as consulting and I/O psychology educational programs on developing feasible paths to licensure for consulting and I/O psychologists.
20. Encourage jurisdiction to incorporate "grandfathering" language, where possible, when implementing new requirements for licensure of consulting and I/O psychologists.

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Appendix I
Jurisdictions Including Consulting and/or I/O Psychology in the Definition of Practice of Psychology

Included	Not Included	Questionable
Alaska	Alabama	Massachusetts
Arkansas	Alberta	Puerto Rico
California	Arizona	Quebec
Colorado	British Columbia	Saskatchewan
Connecticut	Delaware	Wyoming
District of Columbia	Guam	
Florida	Illinois	
Georgia	Iowa	
Hawaii	Kansas	
Idaho	Manitoba	
Indiana	Maryland	
Kentucky	Missouri	
Louisiana	Montana	
Maine	Nevada	
Michigan	New Hampshire	
Minnesota	Newfoundland and Labrador	
Mississippi	Oregon	
Nebraska	Texas	
New Brunswick	Wisconsin	
New Jersey		
New Mexico		
New York		
North Carolina		
North Dakota		
Nova Scotia		
Ohio		
Oklahoma		
Ontario		
Pennsylvania		
Prince Edward Island		
Rhode Island		
South Carolina		
South Dakota		
Tennessee		
Utah		
Vermont		
Virgin Islands		
Virginia		
Washington State		
West Virginia		

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Appendix II
Language That Suggests Inclusion of Consulting and I/O Psychology in the Definition of the Practice of Psychology

- Organizations
- Consultations
- Psychological consultation
- Program or organizational development
- Personnel evaluation
- Coaching
- Consulting
- Group relations
- Personnel selection and management
- Evaluation and management for effective work and learning situations
- Personal and organizational effectiveness
- Organizational effectiveness
- Organizational performance
- Consultation with business and industry
- Direct service to individuals and/or groups for the purpose of enhancing individual and thereby organizational effectiveness
- Enhancing interpersonal relationships, work and life adjustment, personal effectiveness
- Industrial/organizational psychology
- Perform personnel selection, organizational management and evaluation, and advertising and market research
- Assessment or improvement of psychological adjustment or functioning of individuals or groups, whether or not there was a diagnosable pre-existing psychological problem
- Offering services as a psychological consultant
- The maintenance and enhancement of physical, intellectual, emotional, social, vocational, and interpersonal functioning
- Improving individual performance
- Analysis of organizations and organizational functioning
- Case management and utilization review of services and psychological consultations, program planning, and psychological research to individuals, business, and corporate organizations
- Organizational function
- Personnel selection and enhancement
- Individual motivation
- Application of principles, methods, and procedures of understanding, prediction, and influencing behavior
- Application of principles pertaining to learning, perception, motivation, thinking, emotions, and interpersonal relationship

Language That Suggests Exclusion of Consulting and I/O Psychology in the Definition of the Practice of Psychology

- Practice of psychology does not include … the provision of psychological consultation to organizations
- For the purpose of diagnosing or treating behavioral, emotional, or mental disorders

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Appendix III
Jurisdictional Summaries Based Upon ASPPB Common Rules Task Force Preliminary Data

Jurisdictions with Generic License (15)

- Alabama
- Arkansas
- Florida
- Indiana
- Kansas
- Kentucky
- Louisiana
- Mississippi
- Missouri
- North Dakota
- Oregon
- Tennessee
- Texas
- West Virginia
- Wyoming

Allow Licensure of Non-Health Service Psychologists (16)

- Alabama
- Arkansas
- Delaware
- Georgia
- Indiana
- Kentucky
- Missouri
- Nevada
- New Jersey
- North Dakota
- Oklahoma
- Oregon
- Tennessee
- Texas
- West Virginia
- Wyoming

Specific License for Non-Health Service Psychologist (6)

- Alabama
- Georgia
- Missouri

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- North Dakota
- Oklahoma
- Wyoming

Do Not Exempt Non-Health Service Psychologists (42)

- Alabama
- Alaska
- Arizona
- California
- Colorado
- Connecticut
- Delaware
- District of Columbia
- Florida
- Hawaii
- Idaho
- Indiana
- Iowa
- Kansas
- Louisiana
- Maine
- Maryland
- Massachusetts
- Michigan
- Minnesota
- Mississippi
- Missouri
- Montana
- Nebraska
- Nevada
- New Hampshire
- New Jersey
- New Mexico
- New York
- North Dakota
- Ohio
- Oklahoma
- Pennsylvania
- Rhode Island
- Tennessee
- Texas
- Utah
- Virgin Islands
- Virginia

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- Washington
- West Virginia
- Wisconsin

Exempt Non-Health Service Psychologist (7)

- Arkansas
- Illinois
- North Carolina
- Oregon
- South Carolina
- South Dakota
- Wyoming

Require APA Approved Doctoral Program (12)

- Connecticut
- District of Columbia
- Florida
- Georgia
- Mississippi
- Nebraska
- New Mexico
- North Dakota
- Ohio
- Oklahoma
- Pennsylvania
- Utah

Require APA Approved Internship (1)

- Wyoming

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Association of State and Provincial Psychology Boards

Serving member jurisdictions by promoting excellence in regulation and advancing public protection.

September 1, 2014

Attached please find draft language for a proposed **Interjurisdictional Telepsychology Compact** for your review and feedback. We have provided a **90 day open comments and review period that will run from September 1, 2014 through November 31, 2014**. In addition to the attached information we will have formal presentations and feedback sessions on the proposed compact during the ASPPB Annual Meeting to be held from October 22-26, 2014 in Rancho Mirage, CA. We intend to provide sufficient time for you to review the document, speak with relevant stakeholders, attend our formal presentations and engage in open discussions in order to inform your responses.

An interstate compact is an agreement between states to enact legislation and enter into a contract for a specific, limited purpose or address a particular policy issue. Compact agreements are unique in their duality as statute and contract. Once a state ratifies a compact, the provisions of the compact take precedence over conflicting state laws. In order to take effect, compacts must have adoption by at least two states. However, many modern compacts are drafted in a way to not become effective until an established number of states have joined.[i] With over 200 interstate compacts in existence today and each state belonging to an average of 25 compacts there is considerable legal and historical precedence for the development and use of interstate compacts[ii]. The type of compact being proposed by the ASPPB Telepsychology Task Force (ASPPB TTF) would serve as the mechanism to **provide practice across state lines via the use of telecommunications technologies only**, while the state professional practice act still remains as the authority to regulate profession practice in the state.

Background

The compact arises out of the work of the ASPPB TTF that was formed in January 2011 to address our member jurisdictions' concern about the increased use of telecommunications technologies in provision of psychological services and its potential for interjurisdictional practice.

A few months later, several members from the ASPPB TTF also began participation in the APA/ASPPB/APAIT Joint Task Force (JTF) to develop telepsychology guidelines. This collaborative effort is significant in that it can facilitate the agreement and consistency that is useful for the field. These guidelines were published in the December 2013 *American*

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Psychologist and be found on the ASPPB website at http://www.asppb.net/?page=Telepsych.

The ASPPB TTF continued to work on developing a mechanism to regulate interjurisdictional telepsychology practice (IJTP). The initial proposal, as many of you know, was the E.Passport, a free standing agreement that defined specific requirements and which would have required each participating jurisdiction to contract individually with each other to allow IJTP. The E.Passport was published for public comments and the feedback was reviewed. Based on feedback received during the public comment period, the group researched additional ways to proceed. The group considered that the interstate compact model provided a formal structure, enforceability and governmental familiarity that would facilitate the implementation of the E.Passport.

The ASPPB Board of Directors (BOD) approved the convening of an advisory committee to explore the feasibility of an interstate compact to address interjurisdictional telepsychology at its October 2013 meeting. The Advisory Committee was convened in Peachtree City, GA in January 2014. The members of the ASPPB Telepsychology Task Force and ASPPB leadership met with representatives from the following relevant stakeholder groups:

- Federation of Associations of Regulatory Boards (FARB);
- Council of Executives of State, Provincial (& Territorial) Psychological Associations (CESPPA);
- National Governors Association (NGA);
- Canadian Psychological Association (CPA);
- Council of State Governments (CSG);
- National Center for Interstate Compacts (NCIC);
- Association of Canadian Psychology Regulatory Organizations (ACPRO);
- American Telemedicine Association (ATA);
- APA Practice Directorate; APA Insurance Trust;
- APA/ASPPB/APAIT Joint Telepsychology Task Force

The Advisory Committee supported proceeding with an interstate compact solution to IJTP. During the 2014 Midyear Meeting, an update on the progress of the E.Passport and the research being done regarding the compact was presented. The attached draft is the next step in that process.

Current Interstate Compacts Trends in the Healthcare Professions:

At this time, nursing is the only profession with an interstate compact. It allows for in-person practice into any of the 24 states participating. However, many other professions are reviewing its use to facilitate mobility. The differing proposals reflect the flexibility that the compact model affords. The Federation of State Medical Boards (FSMB) is currently proposing an interstate compact for physicians, which will expedite licensure. Emergency Management is currently drafting interstate compact language that will facilitate temporary practice during emergency situations. And Physical Therapy has passed a motion to pursue interstate compacts.

The nursing compact and any other compact from the healthcare profession would be a regulatory compact. Regulatory compacts were developed in the 20th century to cover a wide range of policy topics. The type of compact being proposed by the Telepsychology Task Force would serve as the mechanism to **provide practice across state lines via the use of telecommunications technologies only**, while the state professional practice act still remains as the authority to regulate profession practice in the state.[iii]

Thanks for your consideration in this important matter. Please feel free to contact Janet Orwig at jorwig@asppb.org or myself at fredmillan22@gmail.com.

Sincerely,
Fred Millán, Ph.D., ABPP, NCC
President, ASPPB

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INTERJURISDICTIONAL TELEPSYCHOLOGY COMPACT

ARTICLE I

PURPOSE

Whereas, states license psychologists, in order to protect the public through verification of education, training and experience and ensure accountability for professional practice; and

Whereas, this Compact is intended to regulate the day to day practice of telepsychology (i.e. the provision of psychological services using telecommunication technologies) by psychologists across state boundaries in the performance of their psychological practice as assigned by an appropriate authority; and

Whereas, this Compact is intended to authorize State Psychology Regulatory Bodies to afford legal recognition, in a manner consistent with the terms of the Compact, to psychologists licensed in another state;

Whereas, this Compact recognizes that states have a vested interest in protecting the public's health and safety through their licensing and regulation of psychologists and that such state regulation will best protect public health and safety;

Whereas this compact does not apply when a psychologist is licensed in both the home and receiving jurisdiction; and

Whereas this Compact does not apply to in-person practice.

Consistent with these principles, this Compact is designed to achieve the following purposes and objectives:

1. Increase public access to professional psychological services by allowing for telepsychological practice across state lines;

2. Enhance the states' ability to protect the public's health and safety, especially client/patient safety;

3. Encourage the cooperation of Compact States in the areas of psychology licensure, and regulation;

4. Facilitate the exchange of information between Compact States regarding psychologist licensure and adverse actions and disciplinary history;

5. Promote compliance with the laws governing psychological practice in each Compact State; and

6. Invest all Compact States with the authority to hold licensed psychologists accountable through the mutual recognition of Compact State licenses.

ARTICLE II

DEFINITIONS

A. "Adverse Action" means: Any action taken by a licensing entity which finds a violation of a statute or regulation that is identified by the licensing entity as discipline and is a matter of public record.

B. "Authority to Practice Interjurisdictional Telepsychology" means: a licensed psychologist's authority to practice, within the limits authorized under this Compact, in another Compact State.

C. "By-Laws" means: those bylaws established by the Interjurisdictional Telepsychology Commission pursuant to Section IX for its governance, or for directing and controlling its actions and conduct.

D. **"**Certification Appeals Committee**"** means: The committee appointed to review appeals of applicants who are denied certification or appeals from certificate holders who are denied renewal or revoked for cause.

E. "Client/Patient" means: the recipient of psychological services, whether psychological services are delivered in the context of healthcare, corporate, supervision, and/or consulting services.

F. "Commissioner" means the voting representative appointed by each member board pursuant to Section IX.

G. "Compact State" means: a state, the District of Columbia, or US territory that has enacted this Compact legislation and which has not withdrawn pursuant to Article XII, Section C or been terminated pursuant to Article XI, Section B.

H. "Coordinated Licensure Information System" means: an integrated process for collecting, storing, and sharing information on psychologists licensure and enforcement activities related to psychology licensure laws, which is administered by a non-profit organization composed of and controlled by State Psychology Regulatory Authorities.

I. "Confidentiality" means: the principle that data or information is not made available or disclosed to unauthorized persons and/or processes.

J. "E.Passport" means: a certificate as referenced in sections III-D, IV-E, and VI-B and as further defined by the Rules of the Commission.

K. "Home State" means: a Compact State where a psychologist is licensed to practice psychology. If the psychologist is licensed in more than one compact state, the home state is the compact state where the psychologist was physically present when the services were delivered.

L. "In-Person" means: interactions in which the psychologist and the client/patient are in the same physical space and does not include interactions that may occur through the use of technologies.

M. "Interjurisdictional Telepsychology Compact Commission" also referred to as "Commission" means: the national administration of which all Compact States are members.

N. "License" means: authorization by a State Psychology Regulatory Authority to engage in the independent practice of psychology, which would be unlawful without the authorization.

O. "Non-Compact State" means: any State which is not at the time a Compact State.

P. "Psychologist" means: an individual licensed for independent practice of psychology.

Q. "Receiving State" means: a Compact State where the client/patient is physically located when the services were delivered.

R. "Rule" means: a written statement by the Interjurisdictional Telepsychology Compact Commission promulgated pursuant to Section X of the Compact that is of general applicability, implements, interprets, or prescribes a policy or provision of the Compact, or an organizational, procedural, or practice requirement of the Commission and has the

force and effect of statutory law in a Compact State, and includes the amendment, repeal or suspension of an existing rule.

S. "Significant Investigatory Information" means:

a. investigative information that a State Psychology Licensing Authority, after a preliminary inquiry that includes notification and an opportunity to respond if required by state law, has reason to believe, if proved true, would indicate more than a minor infraction; or

b. investigative information that indicates that the psychologist represents an immediate threat to public health and safety regardless of whether the psychologist has been notified and had an opportunity to respond.

T. "State" means: a state, territory, or possession of the United States, the District of Columbia.

U. "State Psychology Regulatory Authority" means: the Board, office or other agency with the legislative mandate to license and regulate the practice of psychology.

V. "Telepsychology" means: the provision of psychological services using telecommunication technologies.

ARTICLE III

HOME STATE LICENSURE

A. A Compact State where a psychologist is licensed to practice psychology.

B. A psychologist may hold one or more Compact State licenses at a time. If the psychologist is licensed in more than one Compact State, the Home State is the Compact State where the psychologist was physically present when the services were delivered.

C. Any Compact State may require a psychologist to obtain and retain a license to be authorized to practice in the Compact State under circumstances not authorized by the Authority to Practice Interjurisdictional Telepsychology under the terms of this Compact.

D. A Home State's license authorizes a psychologist to practice in a Receiving State under the Authority to Practice Interjurisdictional Telepsychology only if the Compact State:

1. Currently requires the psychologist to hold an active E.Passport Certificate;

2. Has a mechanism in place for receiving and investigating complaints about licensed individuals;

3. Notifies the Commission, in compliance with the terms herein, of any adverse action or significant investigatory information regarding a licensed individual;

4. Requires an Identity History Summary of all applicants at initial licensure, including the use of the results of fingerprints or other biometric data checks compliant with the requirements of the Federal Bureau of Investigation, no later than ten years after activation of the Compact; and

5. Complies with the Bylaws and Rules of the Commission.

ARTICLE IV

COMPACT PRIVILEGE TO PRACTICE

A. Compact States shall recognize the right of a psychologist, licensed in a Compact State in conformance with Article III, to Practice Telepsychology in other Compact States (Receiving States) in which the psychologist is not licensed, under the Authority to Practice Interjurisdictional Telepsychology as provided in the Compact.

B. To exercise the Authority to Practice Interjurisdictional Telepsychology under the terms and provisions of this Compact, a psychologist licensed to practice in a Compact State must:

1. Hold a graduate degree in psychology from an institute of higher education that was, at the time of the degree was awarded:

A. Regionally accredited by an accrediting body recognized by the U.S. Department of Education to grant graduate degrees, OR authorized by Provincial statute or Royal Charter to grant doctoral degrees; OR

B. A foreign college or university deemed to be equivalent to 1 (A) above by a foreign credential evaluation service that is a member of the National Association of Credential Evaluation Services (NACES) or by a recognized foreign credential evaluation service; AND

2. Hold a graduate degree in psychology that meets the following criteria:

a) *The program, wherever it may be administratively housed, must be clearly identified and labeled as a psychology program. Such a program must specify in pertinent institutional catalogues and brochures its intent to educate and train professional psychologists;*

b) *The psychology program must stand as a recognizable, coherent, organizational entity within the institution;*

c) *There must be a clear authority and primary responsibility for the core and specialty areas whether or not the program cuts across administrative lines;*

d) *The program must consist of an integrated, organized sequence of study;*

e) *There must be an identifiable psychology faculty sufficient in size and breadth to carry out its responsibilities;*

f) *The designated director of the program must be a psychologist and a member of the core faculty;*

g) *The program must have an identifiable body of students who are matriculated in that program for a degree;*

h) *The program must include supervised practicum, internship, or field training appropriate to the practice of psychology;*

i) *The curriculum shall encompass a minimum of three academic years of full- time graduate study for doctoral degrees and a minimum of one academic year of full-time graduate study for master's degree;*

j) *The program includes an acceptable residency as defined by the Rules of the Commission.*

3. Possess a current, active E.Passport Certificate;

4. No history of adverse action that violate the Rules of the Commission;

5. No criminal record history that violates the Rules of the Commission;

6. Possess a current, full and unrestricted license to practice psychology in a Home State which is a Compact State;

7. Provide attestations in regard to areas of intended practice, conformity with standards of practice, competence in telepsychology technology; criminal background; and knowledge and adherence to legal requirements in the home and receiving states, and provide a release of information to allow for primary source verification in a manner specified by the Commission; and

8. Meet other criteria as defined by the Rules of the Commission.

C. A psychologist practicing into a Receiving State under the Authority to Practice Interjurisdictional Telepsychology shall practice within the scope of practice authorized by the Home State.

D. A psychologist practicing into a Receiving State under the Authority to Practice Interjurisdictional Telepsychology will be subject to the Receiving State's authority and laws. A Receiving State may, in accordance with that state's due process laws, limit or

revoke a psychologist's Authority to Practice Interjurisdictional Telepsychology in the Receiving State and may take any other necessary actions under the Receiving State's applicable laws to protect the health and safety of the Receiving State's citizens. If a Receiving State takes action, the state shall promptly notify the Home State and the Commission.

E. If a psychologist's license in any Home State, or any Authority to Practice Interjurisdictional Telepsychology in any Receiving State, is restricted, suspended or otherwise limited, the psychologist shall not be eligible to practice in a Compact State under an Authority to Privilege to Interjurisdictional Telepsychology and the E.Passport shall be revoked.

ARTICLE V

CONDITIONS OF PRACTICE IN A RECEIVING STATE

A. A psychologist may practice in a Receiving State under the Authority to Practice Interjurisdictional Telepsychology only in the performance of the scope of practice for psychology as assigned by an appropriate State Psychology Regulatory Authority, as defined in the Rules of the Commission, and under the following circumstances:

1. The psychologist originates a client/patient contact in a Home State via telecommunications technologies with a client/patient in a Receiving State;

2. Other conditions regarding telepsychology as determined by Rules promulgated by the Commission.

ARTICLE VI

ADVERSE ACTIONS

A. A Home State shall have the power to impose adverse action against a psychologist's license issued by the Home State; a Receiving State may take adverse action on a psychologist's Authority to Practice Interjurisdictional Telepsychology within that Receiving State.

B. If a Home State takes adverse action against a psychologist's license, that psychologist's Authority to Practice Interjurisdictional Telepsychology is terminated and the E.Passport is revoked.

   1. All Home State disciplinary orders which impose adverse action should be reported to the Commission in accordance with the Rules promulgated by the Commission. A Compact State shall report adverse actions in accordance with the Rules of the Commission.
   2. In the event discipline is reported on a psychologist, the psychologist will not be eligible for telepsychology practice in accordance with the Rules of the Commission.
   3. Other actions may be imposed as determined by the rules promulgated by the Commission.

C. A Home State's Psychology Regulatory Authority shall investigate and take appropriate action with respect to reported conduct which occurred in a Receiving State as it would if such conduct had occurred within the Home State. In such cases, the Home State's law shall control in determining the appropriate adverse action.

D. If a license granted by a Compact State is revoked, surrendered in lieu of discipline, or suspended following an investigation authorized in Section VII, Authorization to Practice Interjurisdictional Telepsychology in other Compact States shall be terminated upon entry of the final order in the Compact State taking the action.

E. Nothing in this Compact shall override a Compact State's decision that participation in an alternative program may be used in lieu of adverse action and that such participation shall remain non-public if required by the Compact State's laws. Compact States must require psychologists who enter any alternative programs to not provide telepsychology services under the Authority to Practice Interjurisdictional Telepsychology in any other Compact State during the term of the alternative program.

F. No other judicial or administrative remedies shall be available in event of ratification of an adverse action pursuant to subsection B, above.

ARTICLE VII

ADDITIONAL AUTHORITIES INVESTED IN A COMPACT STATE'S PSYCHOLOGY REGULATORY AUTHORITY

A. In addition to any other powers granted under state law, a Compact State's Psychology Regulatory Authority shall have the authority under this Compact to:

1. Issue subpoenas, for both hearings and investigations, which require the attendance and testimony of witnesses and the production of evidence. Subpoenas issued by a Compact State's Psychology Regulatory Authority for the attendance and testimony of witnesses, and/or the production of evidence from another Compact State shall be enforced in the latter state by any court of competent jurisdiction, according to that court's practice and procedure in considering subpoenas issued in its own proceedings. The issuing State Psychology Regulatory Authority shall pay any witness fees, travel expenses, mileage and other fees required by the service statutes of the state where the witnesses and/or evidence are located; and

2. Issue cease and desist and/or injunctive relief orders to revoke a psychologist's Authority to Practice Interjurisdictional Telepsychology.

3. During the course of any investigation, a psychologist may not change his/her Home State affiliation. A Home State Psychology Regulatory Authority is authorized to complete any pending investigations of a psychologist and to take appropriate action(s). The Home State Psychology Regulatory Authority shall promptly report the conclusions of such investigations to the Commission. Once an investigation has been completed, and pending the outcome of said investigation, the psychologist may change his/her Home State affiliation. The Commission shall promptly notify the new Home State of any such actions as provided in the Rules of the Commission. All information provided to the Commission or distributed by Compact States shall be confidential, filed under seal and used for investigatory or disciplinary matters. The Commission may create additional rules for mandated or discretionary sharing of information by Compact States.

ARTICLE VIII

COORDINATED LICENSURE INFORMATION SYSTEM

A. The Commission shall provide for the development and maintenance of a Coordinated Licensure Information System (Coordinated Database) and reporting system containing licensure and disciplinary action information on all licensees of Compact States.

B. Notwithstanding any other provision of state law to the contrary, a Compact State shall submit a uniform data set to the Coordinated Database on all individuals to whom this Compact is applicable as required by the Rules of the Commission, including:

1. Identifying information;
2. Licensure data;
3. Significant investigatory information;
4. Adverse actions against a psychologist's license;
5. An indicator that a psychologist's Authority to Practice Interjurisdictional Telepsychology is revoked;
6. Non-confidential information related to alternative program participation information;
7. Any denial of application for licensure, and the reasons for such denial; and
8. Other information which may facilitate the administration of this Compact, as determined by the Rules of the Commission.

C. The Coordinated Database administrator shall promptly notify all Compact States of any adverse action taken against, or significant investigative information on, any licensee in a Compact State.

D. Compact States contributing information to the Coordinated Database may designate information that may not be shared with the public without the express permission of the contributing state.

E. Any information submitted to the Coordinated Database that is subsequently required to be expunged by the laws of the Compact State contributing the information shall be removed from the Coordinated Database.

ARTICLE IX

ESTABLISHMENT OF THE INTERJURISDICTIONAL TELEPSYCHOLOGY COMPACT COMMISSION

A. The Compact states hereby create and establish a joint public agency known as the Interjurisdictional Telepsychology Compact Commission.

1. The Commission is a body politic and an instrumentality of the Compact states.

2. Venue is proper and judicial proceedings by or against the Commission shall be brought solely and exclusively in a court of competent jurisdiction where the principal office of the Commission is located. The Commission may waive venue and jurisdictional defenses to the extent it adopts or consents to participate in alternative dispute resolution proceedings.

3. Nothing in this Compact shall be construed to be a waiver of sovereign immunity.

B. Membership, Voting, and Meetings

1. The Commission shall consist of one voting representative appointed by each Compact State who shall serve as that state's Commissioner. The Psychology Regulatory Board shall appoint its delegate. This delegate shall be empowered to act on behalf of the Compact State. This delegate shall be limited to:

   A. Executive Director, executive secretary or similar executive;

   B. Current member of the Psychology Licensure Regulatory Authority of a Compact State; OR

   C. Such designee empowered with the appropriate delegate authority to act on behalf of the Compact State

2. Any Commissioner may be removed or suspended from office as provided by the law of the state from which the Commissioner is appointed. Any vacancy occurring in

the Commission shall be filled in accordance with the laws of the Compact State in which the vacancy exists.

3. Each Commissioner shall be entitled to one (1) vote with regard to the promulgation of Rules and creation of Bylaws and shall otherwise have an opportunity to participate in the business and affairs of the Commission. A Commissioner shall vote in person or by such other means as provided in the bylaws. The bylaws may provide for Commissioners' participation in meetings by telephone or other means of communication.

4. The Commission shall meet at least once during each calendar year. Additional meetings shall be held as set forth in the bylaws.

5. All meetings shall be open to the public, and public notice of meetings shall be given in the same manner as required under the rulemaking provisions in Article X.

6. The Commission may convene in a closed, non-public meeting if the Commission must discuss:

    a. Non-compliance of a Compact State with its obligations under the Compact;

    b. The employment, compensation, discipline or other personnel matters, practices or procedures related to specific employees or other matters related to the Commission's internal personnel practices and procedures;

    c. Current, threatened, or reasonably anticipated litigation;

    d. Negotiation of contracts for the purchase or sale of goods, services or real estate;

    e. Accusing any person of a crime or formally censuring any person;

    f. Disclosure of trade secrets or commercial or financial information which is privileged or confidential;

    g. Disclosure of information of a personal nature where disclosure would constitute a clearly unwarranted invasion of personal privacy;

h. Disclosure of investigatory records compiled for law enforcement purposes;

i. Disclosure of information related to any investigatory reports prepared by or on behalf of or for use of the Commission or other committee charged with responsibility of investigation or determination of compliance issues pursuant to the Compact; or

j. Matters specifically exempted from disclosure by federal and state statute.

7. If a meeting, or portion of a meeting, is closed pursuant to this provision, the Commission's legal counsel or designee shall certify that the meeting may be closed and shall reference each relevant exempting provision. The Commission shall keep minutes which fully and clearly describe all matters discussed in a meeting and shall provide a full and accurate summary of actions taken, and the reasons therefore, including a description of the views expressed. All documents considered in connection with an action shall be identified in such minutes. All minutes and documents of a closed meeting shall remain under seal, subject to release by a majority vote of the Commission or order of a court of competent jurisdiction.

C. The Commission shall, by a majority vote of the Commissioners, prescribe Bylaws and/or Rules to govern its conduct as may be necessary or appropriate to carry out the purposes and exercise the powers of the Compact, including but not limited to:

1. Establishing the fiscal year of the Commission;

2. Providing reasonable standards and procedures:

a. for the establishment and meetings of other committees; and

b. governing any general or specific delegation of any authority or function of the Commission;

3. Providing reasonable procedures for calling and conducting meetings of the Commission, ensuring reasonable advance notice of all meetings and providing an opportunity for attendance of such meetings by interested parties, with enumerated

exceptions designed to protect the public's interest, the privacy of individuals, and proprietary information, including trade secrets. The Commission may meet in closed session only after a majority of the Commissioners vote to close a meeting in whole or in part. As soon as practicable, the Commission must make public a copy of the vote to close the meeting revealing the vote of each Commissioner with no proxy votes allowed;

4. Establishing the titles, duties and authority and reasonable procedures for the election of the officers of the Commission;

5. Providing reasonable standards and procedures for the establishment of the personnel policies and programs of the Commission. Notwithstanding any civil service or other similar laws of any Compact State, the bylaws shall exclusively govern the personnel policies and programs of the Commission;

6. Promulgating a code of ethics to address permissible and prohibited activities of Commission members and employees;

7. Providing a mechanism for winding up the operations of the Commission and the equitable disposition of any surplus funds that may exist after the termination of the Compact after the payment and/or reserving of all of its debts and obligations;

8. The Commission shall publish its bylaws in a convenient form and file a copy thereof and a copy of any amendment thereto, with the appropriate agency or officer in each of the Compact States;

9. The Commission shall maintain its financial records in accordance with the Bylaws; and

10. The Commission shall meet and take such actions as are consistent with the provisions of this Compact and the Bylaws.

D. The Commission shall have the following powers:

1. The authority to promulgate uniform rules to facilitate and coordinate implementation and administration of this Compact. The rules shall have the force and effect of law and shall be binding in all Compact States;

2. To bring and prosecute legal proceedings or actions in the name of the Commission, provided that the standing of any State Psychology Regulatory Authority or other regulatory body responsible for psychology licensure to sue or be sued under applicable law shall not be affected;

3. To purchase and maintain insurance and bonds;

4. To borrow, accept or contract for services of personnel, including, but not limited to, employees of a Compact State;

5. To hire employees, elect or appoint officers, fix compensation, define duties, grant such individuals appropriate authority to carry out the purposes of the Compact, and to establish the Commission's personnel policies and programs relating to conflicts of interest, qualifications of personnel, and other related personnel matters;

6. To accept any and all appropriate donations and grants of money, equipment, supplies, materials and services, and to receive, utilize and dispose of the same; provided that at all times the Commission shall strive to avoid any appearance of impropriety and/or conflict of interest;

7. To lease, purchase, accept appropriate gifts or donations of, or otherwise to own, hold, improve or use, any property, real, personal or mixed; provided that at all times the Commission shall strive to avoid any appearance of impropriety;

8. To sell convey, mortgage, pledge, lease, exchange, abandon or otherwise dispose of any property real, personal or mixed;

9. To establish a budget and make expenditures;

10. To borrow money;

11. To appoint committees, including advisory committees comprised of Members, State regulators, State legislators or their representatives, and consumer representatives, and such other interested persons as may be designated in this Compact and the bylaws;

12. To provide and receive information from, and to cooperate with, law enforcement agencies;

13. To adopt and use an official seal; and

14. To perform such other functions as may be necessary or appropriate to achieve the purposes of this Compact consistent with the state regulation of psychology licensure and telepsychology practice.

E. Financing of the Commission

1. The Commission shall pay, or provide for the payment of the reasonable expenses of its establishment, organization and ongoing activities.

2. The Commission may accept any and all appropriate revenue sources, donations and grants of money, equipment, supplies, materials and services.

3. The Commission may levy on and collect an annual assessment from each Compact State or impose fees on other parties to cover the cost of the operations and activities of the Commission and its staff which must be in a total amount sufficient to cover its annual budget as approved each year for which revenue is not provided by other sources. The aggregate annual assessment amount shall be allocated based upon a formula to be determined by the Commission which shall promulgate a rule binding upon all Compact States.

4. The Commission shall not incur obligations of any kind prior to securing the funds adequate to meet the same; nor shall the Commission pledge the credit of any of Compact States, except by and with the authority of the Compact State.

5. The Commission shall keep accurate accounts of all receipts and disbursements. The receipts and disbursements of the Commission shall be subject to the audit and accounting procedures established under its bylaws. However, all receipts and disbursements of funds handled by the Commission shall be audited yearly by a certified or licensed public accountant and the report of the audit shall be included in and become part of the annual report of the Commission.

F. Qualified Immunity, Defense, and Indemnification

1. The members, officers, Executive Director, employees and representatives of the Commission shall be immune from suit and liability, either personally or in their official capacity, for any claim for damage to or loss of property or personal injury or other civil liability caused by or arising out of any actual or alleged act, error or omission that occurred, or that the person against whom the claim is made had a reasonable basis for believing occurred within the scope of Commission employment, duties or responsibilities; provided that nothing in this paragraph shall be construed to protect any such person from suit and/or liability for any damage, loss, injury or liability caused by the intentional or willful or wanton misconduct of that person.

2. The Commission shall defend any member, officer, Executive Director, employee or representative of the Commission in any civil action seeking to impose liability arising out of any actual or alleged act, error or omission that occurred within the scope of Commission employment, duties or responsibilities, or that the person against whom the claim is made had a reasonable basis for believing occurred within the scope of Commission employment, duties or responsibilities; provided that nothing herein shall be construed to prohibit that person from retaining his or her own counsel; and provided further, that the actual or alleged act, error or omission did not result from that person's intentional or willful or wanton misconduct.

3. The Commission shall indemnify and hold harmless any member, officer, Executive Director, employee or representative of the Commission for the amount of any settlement or judgment obtained against that person arising out of any actual or alleged act, error or omission that occurred within the scope of Commission

employment, duties or responsibilities, or that such person had a reasonable basis for believing occurred within the scope of Commission employment, duties or responsibilities, provided that the actual or alleged act, error or omission did not result from the intentional or willful or wanton misconduct of that person.

ARTICLE X

RULEMAKING

A. The Commission shall exercise its rulemaking powers pursuant to the criteria set forth in this Article and the rules adopted thereunder. Rules and amendments shall become binding as of the date specified in each rule or amendment.

B. If a majority of the legislatures of the Compact States rejects a rule, by enactment of a statute or resolution in the same manner used to adopt the Compact, then such rule shall have no further force and effect in any Compact State.

C. Rules or amendments to the rules shall be adopted at a regular or special meeting of the Commission.

D. Prior to promulgation and adoption of a final rule or rules by the Commission, and at least sixty (60) days in advance of the meeting at which the rule will be considered and voted upon, the Commission shall file a Notice of Proposed Rulemaking:

1. On the website of the Commission; and

2. On the website of each Compact State psychology licensing or the publication in which each state would otherwise publish proposed rules.

E. The Notice of Proposed Rulemaking shall include:

1. The proposed time, date, and location of the meeting in which the rule will be considered and voted upon;

2. The text of the proposed rule or amendment and the reason for the proposed rule;

3. A request for comments on the proposed rule from any interested person; and

4. The manner in which interested persons may submit notice to the Commission of their intention to attend the public hearing and any written comments.

F. Prior to adoption of a proposed rule, the Commission shall allow persons to submit written data, facts, opinions and arguments, which shall be made available to the public.

G. The Commission shall grant an opportunity for a public hearing before it adopts a rule or amendment if a hearing is requested by:

1. At least twenty-five (25) independent persons;

2. A governmental subdivision or agency; or

3. An association having at least twenty-five (25) members.

H. If a hearing is held on the proposed rule or amendment, the Commission shall publish the place, time, and date of the scheduled public hearing.

1. All persons wishing to be heard at the hearing shall notify the Executive Director of the Commission or other designated member in writing of their desire to appear and testify at the hearing not less than five (5) business days before the scheduled date of the hearing.

2. Hearings shall be conducted in a manner providing each person who wishes to comment a fair and reasonable opportunity to comment orally or in writing.

3. No transcript of the hearing is required, unless a written request for a transcript is made, in which case the person requesting the transcript shall bear the cost of producing the transcript. A recording may be made in lieu of a transcript under the same terms and conditions as a transcript. This subsection shall not preclude the Commission from making a transcript or recording of the hearing if it so chooses.

4. Nothing in this section shall be construed as requiring a separate hearing on each rule. Rules may be grouped for the convenience of the Commission at hearings required by this section.

I. Following the scheduled hearing date, or by the close of business on the scheduled hearing date if the hearing was not held, the Commission shall consider all written and oral comments received.

J. The Commission shall, by majority vote of all members, take final action on the proposed rule and shall determine the effective date of the rule, if any, based on the rulemaking record and the full text of the rule.

K. If no written notice of intent to attend the public hearing by interested parties is received, the Commission may proceed with promulgation of the proposed rule without a public hearing.

L. Upon determination that an emergency exists, the Commission may consider and adopt an emergency rule without prior notice, opportunity for comment, or hearing, provided that the usual rulemaking procedures provided in the Compact and in this section shall be retroactively applied to the rule as soon as reasonably possible, in no event later than ninety (90) days after the effective date of the rule. For the purposes of this provision, an emergency rule is one that must be adopted immediately in order to:

1. Meet an imminent threat to public health, safety, or welfare;

2. Prevent a loss of Commission or Compact State funds;

3. Meet a deadline for the promulgation of an administrative rule that is established by federal law or rule; or

4. Protect public health and safety.

M. The Commission or an authorized committee of the Commission may direct revisions to a previously adopted rule or amendment for purposes of correcting typographical errors, errors in format, errors in consistency, or grammatical errors. Public notice of any revisions shall be posted on the website of the Commission. The revision shall be subject to challenge by any person for a period of thirty (30) days after posting. The revision may be challenged only on grounds that the revision results in a material change to a rule.

A challenge shall be made in writing, and delivered to the Chair of the Commission prior to the end of the notice period. If no challenge is made, the revision will take effect without further action. If the revision is challenged, the revision may not take effect without the approval of the Commission.

ARTICLE XI

OVERSIGHT, DISPUTE RESOLUTION AND ENFORCEMENT

A. Oversight

1. The executive, legislative and judicial branches of state government in each Compact State shall enforce this Compact and take all actions necessary and appropriate to effectuate the Compact's purposes and intent. The provisions of this Compact and the rules promulgated hereunder shall have standing as statutory law.
2. All courts shall take judicial notice of the Compact and the rules in any judicial or administrative proceeding in a Compact State pertaining to the subject matter of this Compact which may affect the powers, responsibilities or actions of the Commission.
3. The Commission shall be entitled to receive service of process in any such proceeding, and shall have standing to intervene in such a proceeding for all purposes. Failure to provide service of process to the Commission shall render a judgment or order void as to the Commission, this Compact or promulgated rules.

B. Default, Technical Assistance, and Termination

1. If the Commission determines that a Compact State has defaulted in the performance of its obligations or responsibilities under this Compact or the promulgated rules, the Commission shall:
   A. Provide written notice to the defaulting state and other Compact States of the nature of the default, the proposed means of curing the default and/or any other action to be taken by the Commission; and
   B. Provide remedial training and specific technical assistance regarding the default.

2. If a state in default fails to cure the default, the defaulting state may be terminated from the Compact upon an affirmative vote of a majority of the Compact States, and all rights, privileges and benefits conferred by this Compact may be terminated on the effective date of termination. A cure of the default does not relieve the offending state of obligations or liabilities incurred during the period of default.
3. Termination of membership in the Compact shall be imposed only after all other means of securing compliance have been exhausted. Notice of intent to suspend or terminate shall be given by the Commission to the Governor, the majority and minority leaders of the defaulting state's legislature, and each of the Compact States.
4. A Compact State which has been terminated is responsible for all assessments, obligations and liabilities incurred through the effective date of termination, including obligations which extend beyond the effective date of termination.
5. The Commission shall not bear any costs related to a state which is found to be in default or which has been terminated from the Compact, unless agreed upon in writing between the Commission and the defaulting state.
6. The defaulting state may appeal the action of the Commission by petitioning the U.S. District Court for the state of Georgia or the federal district where the Compact has its principal offices. The prevailing member shall be awarded all costs of such litigation, including reasonable attorney’s fees.

C. Dispute Resolution

1. Upon request by a Compact State, the Commission shall attempt to resolve disputes related to the Compact which arise among Compact States and between Compact and Non-Compact States.

2. The Commission shall promulgate a rule providing for both mediation and binding dispute resolution for disputes as appropriate.

D. Enforcement

1. The Commission, in the reasonable exercise of its discretion, shall enforce the provisions and rules of this Compact.
2. By majority vote, the Commission may initiate legal action in the United States District Court for the State of Georgia or the federal district where the Compact has its principal offices against a Compact State in default to enforce compliance with the provisions of the Compact and its promulgated rules and bylaws. The relief sought may include both injunctive relief and damages. In the event judicial enforcement is necessary, the prevailing member shall be awarded all costs of such litigation, including reasonable attorney's fees.
3. The remedies herein shall not be the exclusive remedies of the Commission. The Commission may pursue any other remedies available under federal or state law.

ARTICLE XII

DATE OF IMPLEMENTATION OF INTERSTATE COMMISSION FOR TELEPSCYHOLOGY PRACTICE AND ASSOCIATED RULES, WITHDRAWAL, AND AMENDMENT

A. The Compact shall come into effect on the date on which the Compact is enacted into law in the seventh Compact State. The provisions which become effective at that time shall be limited to the powers granted to the Commission relating to assembly and the promulgation of rules. Thereafter, the Commission shall meet and exercise rulemaking powers necessary to the implementation and administration of the Compact.

B. Any state which joins the Compact subsequent to the Commission's initial adoption of the rules shall be subject to the rules as they exist on the date on which the Compact becomes law in that state. Any rule which has been previously adopted by the Commission shall have the full force and effect of law on the day the Compact becomes law in that state.

C. Any Compact State may withdraw from this Compact by enacting a statute repealing the same.

   1. A Compact State's withdrawal shall not take effect until six (6) months after enactment of the repealing statute.

   2. Withdrawal shall not affect the continuing requirement of the withdrawing State's Psychology Regulatory Authority to comply with the investigative and adverse action reporting requirements of this act prior to the effective date of withdrawal.

D. Nothing contained in this Compact shall be construed to invalidate or prevent any psychology licensure agreement or other cooperative arrangement between a Compact State and a Non-Compact State which does not conflict with the provisions of this Compact.

E. This Compact may be amended by the Compact States. No amendment to this Compact shall become effective and binding upon any Compact State until it is enacted into the laws of all Compact States.

ARTICLE XIII

CONSTRUCTION AND SEVERABILITY

This Compact shall be liberally construed so as to effectuate the purposes thereof. If this Compact shall be held contrary to the constitution of any state member thereto, the Compact shall remain in full force and effect as to the remaining Compact States.

Overview of Interstate Compacts

Background Information: Interstate Compacts

An interstate compact is an agreement between states to enact legislation and enter into a contract for a specific, limited purpose or address a particular policy issue. Compact agreements are unique in their duality as statute and contract. Once a state ratifies a compact, the provisions of the compact take precedence over conflicting state laws. In order to take effect, compacts must have adoption by at least two states. However, many modern compacts are drafted in a way to not become effective until an established number of states have joined.[1]

There are more than 200 interstate compacts currently in existence today and any one state is on average a member of 25 interstate compacts[2].

Healthcare Professions: Interstate Compacts

At this time, nursing is the only profession with an interstate compact. However, many other professions are reviewing its use to facilitate mobility. The Federation of State Medical Boards (FSMB) has reallocated a portion of its Licensure Portability Grant (the same grant ASPPB was awarded) to pursue an interstate compact for physicians. Emergency Management is currently finalizing its interstate compact language. Physical Therapy has passed a motion to pursue interstate compacts.

The nursing compact and any other compact from the healthcare profession would be a regulatory compact. Regulatory compacts were developed in the 20th century to cover a wide range of policy topics. The type of compact being proposed by the ASPPB Telepsychology Task Force (ASPPB TTF) would serve as the mechanism to provide practice across state lines, while the state professional practice act still remains as the authority to regulate profession practice in the state.[3]

Why a Compact for Telepsychology?

A properly drafted compact facilitates the practice of telepsychology by offering legal recognition to individuals properly licensed in their jurisdiction of origin to practice telepsychology across jurisdictional lines. It is important to note that the interstate compact would not circumvent licensure within jurisdictions for the in-person practice of psychology based upon licensure in one home jurisdiction. It is specific to the provision of telepsychological services across jurisdictions, not within the boundaries of the home jurisdictions.

Many issues surrounding regulating telepsychology revolve around complaints and disciplinary sanctions. A compact can be drafted to include specific criteria regarding the handling of

complaints. The compact can grant the authority to the remote state to take action against a psychologist for an infraction in that state. The compact can also be drafted to require all parties of the compact to share significant information relevant to any current investigations and report all disciplinary actions to the ASPPB Disciplinary Data System. Many states do not currently have the authority to share investigation information and in some cases may not have the authority to discipline unlicensed psychologists within their state. Since the compact is a legal document, the criteria becomes legally binding on the parties to the compact.

Although ASPPB could promote the E.Passport much as it did the CPQ, a contract between jurisdictions would be needed for the E.Passport. A contract lends itself to being modified by each jurisdiction allowing for variation in content. While a compact has established language and would provide consistent language across the participating jurisdictions.

Feasibility of ASPPB as the Facilitator of an Interstate Compact

Many of ASPPB's current initiatives would work well with the management of a compact. First, the ASPPB Disciplinary Data System would provide information to compact members regarding disciplined psychologists. Also, the PLUS is working to get licensure information standardized and to expedite the licensure process. Since the E.Passport will be added as criteria to the compact, being able to manage a certification program will be essential. The CPQ program has successfully existed since 1998, and the E.Passport could be housed within the ASPPB Mobility Program.

Conclusion

Interstate compacts are not a new idea. Compacts can be drafted in such a way as to promote the profession while protecting the public. Unfortunately, due to the Nursing Compact, many people have a negative reaction to interstate compacts. It needs to be noted that the Nursing Compact currently has 24 members and is expecting several new members within the next two years. It should also be noted that ASPPB TTF is not recommending following the Nursing Compact model but has drafted a telepsychology compact that works to meet the needs of the psychology profession.

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[1] The Council of State Governments. Best Practices in Compact Development. http://knowledgecenter.csg.org/kc/content/best-practices-compact-development Accessed September 20, 2013.
[2] The Council of State Governments. 10 Frequently Asked Questions. http://www/csg.org/knowledgecenter/docs/ncic/CompactFAQ.pdf. Accessed October 3, 2013.
[3] The Council of State Governments. Best Practices in Compact Development. http://knowledgecenter.csg.org/kc/content/best-practices-compact-development Accessed September 20, 2013.