

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request: Sharon Henes Administrative Rules Coordinator		2) Date When Request Submitted: <div style="border: 1px solid black; padding: 2px;"> Items will be considered late if submitted after 4:30 p.m. and less than: <ul style="list-style-type: none"> ▪ 10 work days before the meeting for Medical Board ▪ 14 work days before the meeting for all others </div>	
3) Name of Board, Committee, Council, Sections: Psychology Examining Board			
4) Meeting Date: February 5, 2014	5) Attachments: <input type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page?	
7) Place Item in: <input type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? If yes, who is appearing? <input type="checkbox"/> Yes by _____ (name) <input type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: <p style="text-align: center;">Attached are the public hearing comments from Bruce Erdman and the Wisconsin Psychological Association for Consideration.</p>			
11) Authorization			
<i>Sharon Henes</i>			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Bureau 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 Board Services Bureau Director. 3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

email at Sharon.Henes@wisconsin.gov.

TEXT OF RULE

The following additions and changes to the proposed rule are recommended by Dr. Bruce R. Erdmann.

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:

(5) “Trainee” means a person enrolled in a formal internship program accredited by the American Psychological Association, or who holds a doctoral degree in psychology, and is obtaining appropriate experience in psychological work under supervision per s. 455.04, Wis. Stats.

(6) “Peer consultation” means research groups, journal clubs, and case consultation groups that have a structured, organized format, meet three or more times per year, focus on psychological activities related to one’s practice, and have a minimum of three and a maximum of eight attendees.

SECTION 3. Psy 4.02 is repealed and recreated to read:

Psy 4.02 Continuing education.

(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 within 2 years prior to application. The board may waive this requirement if a comity applicant was licensed fewer than 24 months before the application is complete.
[alternate: A comity applicant licensed in another state for fewer than 24 months before the application is complete may petition the board to waive this ceh requirement.

SECTION 5. Psy 4.03, 4.04 and 4.05 are created to read:

Psy 4.03 Approved continuing education. (1) The board shall approve all of the following programs and courses, if relevant to the professional practice of psychology:

(a) COMMENT: ASPPB list includes:

- a. those offered by the American Psychological Association or any of its sponsors approved through the American Psychological Association Sponsor Approval System (APA, 2005),
- b. the Canadian Psychological Association Approval of Sponsors of Continuing Education for Canadian Psychologists (CPA, 2005),
- c. the Academies of the Specialty Boards of the American Board of Professional Psychology,

- d. the Association for Psychological Science,
- e. the National Association of School Psychologists,
- f. Association of State and Provincial Psychology Boards,
- g. regionally accredited educational institutions that offer graduate training in psychology or related fields,
- h. accredited medical schools,
- i. Category I Continuing Medical Education (CME) of the American Medical Association,
- j. the Canadian Medical Association,
- k. the American Bar Association, and
- l. the Canadian Bar Association.

Courses offered by non-psychology organizations must be relevant to the practice of psychology.

(d) Graduate level courses of three semester or ~~six-five~~ quarter credits or more relevant to the professional practice of psychology offered by accredited colleges and universities.

(e) For courses and programs in par. (a) through (c),

1. No more than eight-ten hours of continuing education hours may be credited per day-for courses and programs in par. (a) through (c).

2. No more than 20 hours of ceh may be accrued through self-directed learning, which includes pre-recorded material, books, and articles presented through off-site providers,

Comment on P. (3): I believe we said they could only earn 6 in the biennium, to address Dr. Jurenics concern that people will serve on boards in name only and not "earn" the credit. We also discussed recognizing professional activity through case consultation and those who want to be on activities get some reward as well.

(3) Professional activity shall be awarded six hours of continuing education for each professional activity, however, no more than a total of 20 continuing education hours may be granted for professional activity. Continuing education hours shall be granted for the following professional activities:

(g) Participating in an organized regular and ongoing peer consultation. This activity requires a minimum of 6 hours participation, in order to be creditable, with one hour of peer consultation equal to one hour of credit, with a maximum of 6 credits per two-year period.

(h) Providing supervision of a psychological trainee (e.g., psychology intern or psychology resident). Continuing education hours for providing supervision shall be calculated as .25 times the number of hours of supervision. Up to 10 ceh may be obtained for supervision.

(4) Continuing education hours shall be granted for first or second authorship of ~~a publication~~publications relevant to psychology if the publications ~~are-is~~ contained in a peer-reviewed book, book chapter or journal article. Authors shall receive ten continuing education hours per authorship, but not more than a total of 20 continuing education hours may be granted for authorship.

(5) Continuing education hours shall be granted for earning board certification recognized by the American Board of Professional Psychology. Licensees who successfully complete 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 those topics.

[COMMENT: The ASPPB guidelines use this language: “A maximum of 40 credits in a two-year period shall be recognized for the successful completion of the board examination of the American Board of Professional Psychology.”

(6) Continuing education hours shall be granted for completion of a master’s or doctoral degree in psychopharmacology. 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.

~~(7) Continuing education hours shall be granted for providing supervision to one or more psychological trainees. Continuing education hours for providing supervision shall be calculated as .25 times the number of hours of supervision. No more than 20 continuing education hours may be obtained for supervision. [could be considered a professional activity].~~

Psy 4.04 Postponement, Waiver and Exemptions

(3) A licensee who has been granted an exemption from the requirements of this section based on retirement from the active practice of psychology may not return to the active practice of psychology without submitting evidence satisfactory to the board of having completed at least 40 credits of continuing education for each of the biennia during which the licensee was granted an exemption. [I recommend reconsidering the phrase: “for each of the biennia during which the licensee was granted an exemption”. Consider leaving it at 40 ceh.]

[COMMENT on 4.05: The form of the certification could go in the section where each item is discussed, and DSPS/ PEB should provide a template for most professional activities.]

Psy 4.05 Record Keeping and Audits (1) A credential holder shall retain for a minimum period of six years and shall make available to the board or its agent upon request the following proof of continuing education:

(a) Certificate of attendance issued by the program sponsor. The certificate shall include the name of credential holder, date, provider name, hours and title of course.

(b) Unofficial transcript for graduate level courses or psychopharmacology degree.

(c) Documentation of publication.

(d) Attestation form ~~issued provided~~ by the ~~organization department~~ documenting professional activities including the dates of attendance.

(e) Documentation of ~~board~~ certification from ABPP; must be submitted to the Board.

(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.

(g) Attestation form documenting supervision including the dates of supervision and total number of hours per day using a form provided by the department.

(h) Attestation form documenting participation in peer consultation using a form provided by the department.

(2) The board may conduct a random audit of 10 percent of all licensees on a biennial basis for compliance with continuing education requirements and shall audit any licensee who is under investigation by the board for alleged misconduct.

SECTION 6. EFFECTIVE DATE. The rules adopted in this order shall take effect on the first day of the month following publication in the Wisconsin administrative register, pursuant to s. 227.22 (2) (intro.), Stats.

(END OF TEXT OF RULE)

Dated 11/21/2013

Agency e-signature Bruce R. Erdmann, Ph.D.
Member of the Board
Psychology Examining Board

WISCONSIN PSYCHOLOGICAL ASSOCIATION

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January, 2014

TO: Bruce Erdmann, Ph.D., Chair
and Members of the Psychology Examining Board

FROM: WPA Advocacy Cabinet
Gregory Jurenc, Ph.D., Advocacy Cabinet Director (414-464-9777 or gjurenc@wspp.edu)
Sarah Bowen, Executive Director (608-251-1450 or wispsych@execpc.com)

RE: Proposed revision of Psy4

The proposed revisions to Psy4, the Continuing Education and Requirements for Renewal section of the Administrative Code, are most welcome. As you know, we previously reviewed the recommendations of ASPPB regarding changes in such requirements and met with the Psychology Examining Board regarding our view of these recommendations. While we still have questions about some features of the proposed revision, in general we strongly support the proposed changes.

In regard to the Definitions (4.015), we have 2 general comments. We appreciate the expansion of “Trainee” to include students enrolled in predoctoral internships. However, we question whether these should be limited to those that are APA accredited. We would suggest that this definition be taken slightly further to include post-masters (or equivalent) students who are enrolled in doctoral programs in psychology.

We also applaud the addition of “Peer Consultation” as an avenue of continuing education. This addresses one of the important risk factors for poor professional practice identified by ASPPB, namely professional isolation, and also encourages the consultation that is consistently stressed as a way to address ethical and risk management issues. However, the definition would benefit from further specification of “who is a peer.” We would suggest “Peer” be defined as other doctoral level, independently licensed psychologists.

We are very pleased with the expansion of recognized CE provider organizations as suggested by Dr. Erdmann. This provides for consistency across professional and regulatory bodies (APA, ASPPB, state examining boards) as well as the opportunity for a greater diversity of high quality offerings.

Another significant strength of the proposed Psy4 revision is the increased scope of activities by which CE credit can be earned. The list of options provides the flexibility needed to enable psychologists to design their professional development in a manner most appropriate to their professional needs. The changes also encourage valued activities such as supervision, consultation, volunteer service in professional organizations, and educational initiatives to expand and/or enhance practice.

We also concur with the revised credit weighting of CE activities. We agree that major undertakings, such as a graduate degree in psychopharmacology or earning diplomate status from ABPP, should be allowed to account for the entire CE requirement for a biennium. On the other hand, activities that are less formalized and thus more easily abused, such as self-directed learning or peer consultation, should be limited to 6 hours of credit per biennium. Similarly, while we had expressed concerns about the appearance of favoritism in granting CE credit for service on professional boards, the limitation to 6 credits, or the equivalent of most one-day CE events, addresses that concern.

Attached is a list of additional comments and suggestions for your consideration. We hope that you will find these comments, opinions and recommendations useful.

Overall, we believe the proposed revisions, plus some of the additional suggestions by Dr. Erdmann, represent a valuable improvement. We want to make it clear that our support is offered **DESPITE THE FACT THAT IMPLEMENTING THESE RULES MAY POSE SERIOUS CHALLENGES TO OUR OWN VIABILITY AS A PROVIDER OF CONTINUING EDUCATION**. We are 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 our state.

Please feel free to contact us if we can be of further assistance.

COMMENTS ON PROPOSED REVISION OF PSY4

Psy 4.015

Definition of “Trainee” — Must internships be APA accredited? While we recognize APA accreditation is the best standard, we are concerned about whether this requirement could impose undue hardship for students.

Definition of “Peer Consultation” — We have concerns about the lack of definition of “Peer”. Who are the peers? A licensee may be the only psychologist in a clinic, school, hospital unit or industrial firm. OTs, elementary school teachers, nutritionists and engineers should not be considered peers for purposes of this section. Many employment situations require such groups in which the agenda is not related to psychological issues but, rather, to a variety of industrial, educational or employment issues. The definition of peer should be limited to doctorally trained, independently licensed psychologists.

Psy 4.02

(4) Clarify whether “board approved” means approved by WI standards or as established by the other state.

Psy 4.03

(1)(a) Dr. Erdmann has provided a comprehensive list of organizations as suggested by ASPPB. Some of these are logical and commendable, while others may prove to be problematic.

g. delete “or related fields”

h. delete. First, because it is too broadly stated. Second, because it may be redundant since any ceh provided by a medical school should be certified/certifiable for CME credit

k-l. delete. If Psy4 includes Bar associations, it should also include SHRM, OT and nursing associations, etc, etc.

➤ Consider drafting language that would permit licensees to submit requests for recognition from non-psychology organizations that may provide relevant ceh.

(d) We agree that no more than 6 hours of ceh should be accrued through self-directed learning. However, the description of “self-directed” learning is somewhat confusing. For example, the lack of definition of “off-site providers” could be especially problematic.

(e) 1. We believe the standard number of ceh hours per day should NOT be 10 hours. It should be limited to 8 hours.

2. Self-directed learning should be limited to 6 hours per biennium, particularly since this is a category potentially open to significant abuse.

(2) This section should specify how “updates” of presentations will be handled. Is an update a new presentation (qualifying for credit) or is it a “subsequent” presentation?

(3) We believe licensees should be limited to 6 professional activity ceh per biennium

- (g) We reiterate our concern that the parameters of “peer consultation” need to be further defined.
- (h) Psychology “intern” and “resident” need to be defined as in the “Trainee” definition, or simply replaced with the term Trainee. As written, it is also unclear whether ceh for supervision would include students in undergraduate or masters degree programs. Supervision should be limited to post-masters and post-doctoral supervisees. We agree that licensees should be limited to 10 ceh per biennium for this activity.

Do NOT use ASPPB language regarding ceh for obtaining ABPP diplomate status. Note that ABPP has established a new route to diplomate status for psychologists with 15 or more years of experience. This option does not require an examination but relies more heavily on work samples.

(8) This option should NOT be available for private practice school psychologists.

(also note typo in second-to-last sentence of (b): “...and shall notify the board on a **form** provided ...”)

We believe the following should be ADDED to the list of professional activities qualifying for ceh.

- (9) Service on a governmental (federal, state or local) task force, study committee or commission designed to address psychosocial issues drawing directly from areas of psychological expertise. Examples would be appointment to a Legislative Council study committee on cyberbullying, a community task force on supported employment for persons with serious mental illness, a federal commission on implementation of the ADA.

Psy 4.04

no comments

Psy 4.05

For consistency and clarity, “credential holder” should be changed to “licensee”

- (d) Add language to clarify that “The organization may impose additional requirements on the licensee before issuing such documentation.”
- (h) If this option is retained, it should include a requirement that documentation of the agenda/discussion for each group meeting be provided.

(2) We are not familiar enough with the ASPPB credentials bank to know whether to be comfortable about it or nervous about it. Could the CPD potentially accept “documentation” that would not be accepted in our state?

Psy 4.06

no comments