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MARY S. WYATTE, CHIEF COUNSEL



PHONE: (717) 783-5417  
FAX: (717) 783-2664  
irrc@irrc.state.pa.us  
<http://www.irrc.state.pa.us>

**INDEPENDENT REGULATORY REVIEW COMMISSION**  
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

November 3, 2004

Alex M. Seigel, J.D., Ph.D., Chairman  
State Board of Psychology  
2601 North 3rd Street  
Harrisburg, PA 17110

Re: Regulation #16A-6313 (IRRC #2422)  
State Board of Psychology  
Education Requirements

Dear Chairman Seigel:

Enclosed are the Commission's comments for consideration when you prepare the final version of this regulation. These comments are not a formal approval or disapproval of the regulation. However, they specify the regulation review criteria that have not been met.

The comments will be available on our website at [www.irrc.state.pa.us](http://www.irrc.state.pa.us). If you would like to discuss them, please contact my office at 783-5417.

Sincerely,

Robert E. Nyce  
Executive Director

evp

Enclosure

cc: Honorable Thomas P. Gannon, Majority Chairman, House Professional Licensure Committee  
Honorable William W. Rieger, Democratic Chairman, House Professional Licensure Committee  
Honorable Robert M. Tomlinson, Chairman, Senate Consumer Protection and Professional Licensure Committee  
Honorable Lisa M. Boscola, Minority Chairman, Senate Consumer Protection and Professional Licensure Committee  
Honorable Pedro A. Cortes, Secretary, Department of State

# **Comments of the Independent Regulatory Review Commission**

**on**

## **State Board of Psychology Regulation #16A-6313 (IRRC #2422)**

### **Education Requirements**

**November 3, 2004**

We submit for your consideration the following comments that include references to the criteria in the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The State Board of Psychology (Board) must respond to these comments when it submits the final-form regulation. The public comment period for this regulation closed on October 4, 2004. If the final-form regulation is not delivered within two years of the close of the public comment period, the regulation will be deemed withdrawn.

#### **1. General. – Reasonableness; Clarity.**

Commentators have indicated that requiring an applicant to graduate from a program accredited by the American Psychological Association or the Canadian Psychological Association or designated by the Association of State and Provincial Psychology Boards/National Register might impede colleges and universities from starting new doctoral programs in the field of psychology. Does the Board anticipate any negative effect on the development of new programs as a result of this regulation? How would a college or university that desires to start a new program be able to do so, given the requirements of this regulation?

#### **2. Section 41.1. Definitions. – Clarity.**

We have three concerns with the definition of “Doctoral degree in a field related to psychology.”

First, Subsection (iii)(A), which deals with foreign universities, adds the phrase, “. . . accredited by a recognized accrediting body in the jurisdiction where the college or university is located.”

Who is responsible for “recognizing” accrediting bodies in foreign jurisdictions? Do all foreign jurisdictions have a “recognized accrediting body”?

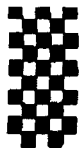
Second, Subsection (iii)(D)(IV) contains the phrase, “. . . appropriate to the practice of psychology.” Who is responsible for determining if the internship, practicum or other training is “appropriate”?

Finally, Subsection (iii)(E) requires that the student complete a dissertation prior to the awarding of the doctoral degree by the foreign college or university. However, some doctoral programs require a doctoral project, rather than a dissertation. Will the Board accept doctoral projects when determining if a foreign student has met this criterion? The same concern applies to Subsection (iii)(H) in the definition of “Doctoral degree in psychology.”

**3. Section 41.31. Qualifications for taking licensing examination. – Clarity.**

Subsection (b)(2) contains the phrase, “. . . foreign education credential evaluator acceptable to the Board . . . .” What criteria does the Board use to determine whether a foreign education credential evaluator is “acceptable”? Does the Board maintain a list of acceptable foreign education credential evaluators?

Subsection (b)(4) sets forth the effective date of the regulation. The House Professional Licensure Committee and others questioned how this provision will be applied. In the final-form regulation, the Board should amend this provision to clearly state the Board’s intent and give current students the opportunity to complete their degrees.



### Facsimile Cover Sheet

**Kristine M. Shomper**  
Administrative Officer



Phone: (717) 783-5419  
Fax #: (717) 783-2664  
E-mail: [kriss@irrc.state.pa.us](mailto:kriss@irrc.state.pa.us)  
Website: [www.irrc.state.pa.us](http://www.irrc.state.pa.us)

**INDEPENDENT REGULATORY REVIEW COMMISSION**  
333 MARKET STREET, 14<sup>TH</sup> FLOOR, HARRISBURG, PA 17101

**To:** Suzanne Hoy  
**Agency:** Department of State  
Licensing Boards and Commissions  
**Phone:** 7-2628  
**Fax:** 7-0251  
**Date:** November 3  
**Pages:** 4

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Comments:** We are submitting the Independent Regulatory Review Commission's comments on the State Board of Psychology regulation #16A-6313 (IRRC #2422). Upon receipt, please sign below and return to me immediately at our fax number 783-2664. We have sent the original through interdepartmental mail. You should expect delivery in a few days. Thank you.

**Accepted by:** *Suzanne Hoy* **Date:** 11/3/04