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PENNSYLVANIA PSYCHOLOGICAL ASSOCIATION

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2763

April 7, 2010

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Mr. John Jewett, Regulatory Review Analyst
Independent Regulatory Review Commission
14th Floor
333 Market Street
Harrisburg, PA 17101

RE: Psychology #16A-6315 (#2763)

Dear Mr. Jewett:

Thank you for the opportunity to comment on proposed regulations on supervision (#16A-6315). We appreciate the fact the State Board of Psychology has responded to concerns we had about previous versions. Based on our conversations with representatives of the Board we are not opposing these regulations.

Initially we had two concerns dealing with ambiguity in language. First, in §41.1 (Definitions), the definition of graduate training in psychology was changed to require completing 15 graduate semester hours in a doctoral program in psychology. This section is important because it establishes the minimum threshold by which psychologists can employ unlicensed persons with graduate training in psychology. Currently, we estimate that psychologists employ several hundred persons with graduate training in psychology and we assume that many of these persons received their graduate courses in psychology from terminal masters degree programs.

Because courses in masters programs could be applied to a doctoral degree, it was unclear as to whether a person with 15 hours of graduate work from a terminal masters psychology program would qualify under this provision. However, we have been assured by the State Board of Psychology that their intent was to interpret this section to refer to any graduate coursework which could apply to a doctoral degree, thus including persons who received some or all of their coursework from terminal masters degree programs.

INDEPENDENT REGULATORY
REVIEW COMMISSION

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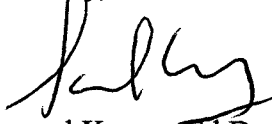
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The related concern deals with the types of experience that may count towards fulfilling the post doctoral supervision requirement. According to the regulations in §41.32 (1) (iii) up to 50% of the experience could be in “teaching in association with an organized psychology program preparing practicing psychologists.”

As we noted in a previous letter we did not know if “teaching in association with an organized psychology program preparing practicing psychologists” refers to teaching in a doctoral program in an applied field of psychology (such as Clinical, Counseling or School Psychology, where almost all of the graduates become licensed psychologists), or teaching in any psychology program which eventually could lead to the student becoming a practicing psychologist, since undergraduate and master’s degrees are stepping stones to the doctorate and eventually a psychology license. Again, we have been assured by the Board that they meant the later interpretation. We also understand that the State Board of Psychology is willing to put their interpretations in writing to us to reduce the likelihood of future misunderstandings.

Thank you again for the opportunity to comment on these proposed regulations. There are many positive aspects to these regulations which we support.

Sincerely,



Samuel Knapp, Ed.D.
Director of Professional Affairs



Rachael Baturin, MPH, J.D.
Professional Affairs Associate

cc: State Board of Psychology