

POMA



PENNSYLVANIA
OSTEOPATHIC
MEDICAL
ASSOCIATION

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May 19, 2009

Judith Pachter Schuler, Counsel
State Board of Psychology
Penn Center
2601 North Third Street
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Schuler:

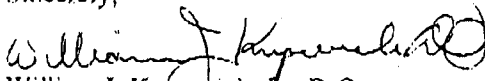
The Pennsylvania Osteopathic Medical Association has reviewed the State Board of Psychology's proposed rulemaking relating to procedures and requirements for examination, supervision and graduate programs. We agree that reorganizing the examination, education and experience provisions into three separate sections helps clarify the regulations; however, our physicians have expressed concern regarding the following items:

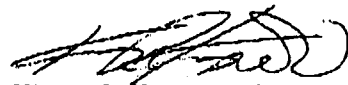
- Increasing the number of hours required in the second year of supervised training from 1,500 to 1,750 hours is appropriate (41.32(1)(i)); however, we believe more hours should be allotted to supervised clinical practice. The proposed regulations only require that 50 percent of hours be obtained in clinical practice, with the remaining hours in either clinical practice or research. We would suggest 75 percent of hours be required in supervised clinical practice in order to ensure the necessary skills for patient care. (41.32(1)(iii))
- According to the proposed rulemaking, applicants may take the licensing examination immediately upon graduation; however, they are allowed to complete their 12 months of experience within 10 calendar years of the application for licensure, with half being obtained within the most recent five years. We feel that unless there is a specific yearly CME requirement to show that they have kept up in their field, 10 years is a long time. Many changes can occur within that time frame. (41.32(1)(iv))

Thank you again for the opportunity to express our concerns regarding the proposed State Board of Psychology regulations. As an organization, POMA's primary concern is for the health, care and well-being of the patients we serve.

If you have any questions, please feel free to contact us at the number listed above.

Sincerely,


William J. Kuprewich, Jr., D.O.
President


Kieren P. Knapp, D.O.
Co-chairman, Legislative Committee

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INDEPENDENT REGULATORY
REVIEW COMMISSION

To: Judith Pachter Schuller Counsel
State Board of Psychology
Fax # 717-787-7769
From: Marce Monroe-Ward
Pennsylvania Osteopathic Medical Association
Date: 6/1/09

of pages: 2

NOTE: Please see attached letter

JUN 1 2009



Have a great day!