

Archived: Tuesday, July 9, 2024 1:52:02 PM

From: [Walker, Dave A.](#)

Sent: Fri, 7 Jun 2024 15:28:04

To: [MacIntosh, Weston \(LARA\)](#)

Subject: Question on Psychology – General Rules

Importance: Normal

Sensitivity: None

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Hi Weston,

I am reviewing the draft Psychology – General Rules rule set and have two clarifying questions.

1. I am a bit confused by the changes in Rule 61. Specifically the difference between (1)(c)(i) and (1)(C)(ii). Is (i) related to the program/supervisor and (ii) related to the applicant? The RIS says “This rule pertains to application requirements for limited license psychologists. The rule revision clarifies the requirements for requesting approval of a post-degree practicum and the required credentials of a practicum supervisor.” So this seems to make sense.
2. Is the elimination of the continued education exemption for the period after initial licensure or pre-licensure? The way I am reading it (likely wrong) is that continued education must be completed before an applicant is even licensed, even if they just completed schooling (unless I missed another provision in the rule that discusses this).

Thank you for any insights you could provide. This was the first time I had read this rule set, so I am unfamiliar. Have a great weekend!

Best,

Dave

David A. Walker, MPA

(He/him/his)

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Archived: Tuesday, July 9, 2024 1:52:08 PM
From: [BPL-BoardSupport](#)
Sent: Mon, 8 Jul 2024 13:42:44
To: [MacIntosh, Weston \(LARA\)](#)
Subject: FW: Psychology – General Rules (MOAHR #2023-052 LR)
Importance: Normal
Sensitivity: None
Attachments:
[MHA Comments_Psychology Proposed Rules_final.pdf](#) 

From: Kelsey Ostergren <kostergren@mha.org>
Sent: Monday, July 8, 2024 8:47 AM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Cc: Lauren LaPine <llapine@mha.org>
Subject: Psychology – General Rules (MOAHR #2023-052 LR)

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Good Morning,

On behalf of the MHA and its members, please see the attached comments on the psychology rule set (*MOAHR #2023-052 LR*).

Best,
Kelsey

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July 8, 2023

Departmental Specialist
Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing- Boards and Committees Section
P.O. Box 30670
Lansing, MI 48909-8170

Re: Psychology - General Rules (MOAHR #2023-052 LR)

Dear Department Specialist:

On behalf of Michigan's 130 community hospitals, the Michigan Health & Hospital Association (MHA) appreciates the opportunity to comment on the Department of Licensing and Regulatory Affairs (LARA) proposed rules for Psychology. The MHA is the statewide membership organization representing all community hospitals in Michigan. Membership ranges from critical access hospitals in rural areas of the Upper Peninsula to large, urban, tertiary care centers in the heart of Detroit - and everything in between. Our mission is to advance the health of individuals and communities.

R 338.2553

Reducing the number of times an educational limited license can be renewed, from 5 to 4, may limit the number of individuals who complete their postdoctoral experience and ultimately become licensed. Allowing an individual to use an educational limited license for less time will limit the hands-on experience obtained and may result in a lower pass rate for the licensure exam. Given ongoing healthcare provider shortages, particularly in behavioral-health related professions coupled with recruitment challenges for psychologists, this modification will inadvertently restrict the number of eligible applicants for a *full licensure*, thereby continuing to perpetuate these shortages. **MHA strongly recommends that LARA does not reduce the number of times an educational limited license can be renewed** to ensure everyone who can become fully licensed, does.

R 338.2561

MHA seeks additional clarity on who is subject to the requirements for board approval of a post-degree practicum. As written, there is conflicting information in the Regulatory Impact Statement (RIS) and the rule revision about whether this language applies to the program supervisor or the applicant. The remaining details to be included in the written submission to the board is appropriate and **MHA supports the alignment of practicum requirements for post-master's degree individuals with those in place for master's degree students.** This ensures that the training and experience of all limited license psychologists is consistent, regardless of when the practicum was completed.

Regarding practicum supervision, MHA would encourage LARA to **provide clarity around whether the practicum must be supervised by the same psychologist for 2 hours per week**, or if it can be split between multiple individuals who meet the requirements. Member hospitals report that supervision of some practicums is split between a licensed psychologist at the graduate school and an on-site psychologist, and are unclear on whether that would be allowed under the new rule.

R 338.2581

The **revision to require continuing education (CE) during the initial license cycle will enhance professional competency** and ensure newly licensed individuals have the knowledge and skills needed to be successful throughout their career. It also provides standardization amongst

Brian Peters, Chief Executive Officer

professionals, requiring all licensed psychologists must complete the same level of CEs, regardless of when licensure was obtained.

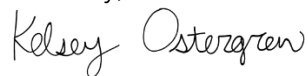
MHA encourages LARA to **revise this language so it is clear that CEs are required during the first two-years after licensure**. As currently written, it was interpreted by hospital staff who thought the rule required obtaining CEs *prior* to applying for licensure, which MHA does not believe is the intent.

[R 338.2583](#)

MHA supports the inclusion of implicit bias training as an acceptable continuing education (CE) activity for psychologists and appreciates the inclusion of the Community Mental Health Association as an eligible CE provider. LARA should also **consider adding a general clause that permits any entity meeting LARA-defined criteria, to offer CEs for psychologists** that can be used towards recertification. Provision of high-quality programming is important to ensure psychologists are apprised of emerging literature and evidence-based practices in the field, and expansion of eligible providers who can offer these opportunities is important.

Thank you for the opportunity to comment. MHA remains committed to expanding access to highly-trained behavioral health professions, recognizing the important role psychologists play in addressing the mental health crisis. MHA is available to discuss any of these comments further and look forward to continued partnership with LARA on the topic. Please contact MHA Director, Health Policy Initiatives, Kelsey Ostergren at kostergren@mha.org, with additional questions.

Sincerely,



Kelsey Ostergren
Director, Health Policy Initiatives
Michigan Health & Hospital Association