



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 125-20 – Regulations Governing the Practice of Psychology
Department of Health Professions
July 6, 2013

Summary of the Proposed Amendments to Regulation

As part of the regulatory reform initiative, the Board of Psychology (Board) proposes to amend its Regulations Governing the Practice of Psychology to: 1) delete the requirement that a transcript be submitted with each licensure application so long as the transcript submitted for registration of supervision shows all coursework completed, 2) reduce the clinical practice requirement for licensure by endorsement, 3) allow applicants for licensure by examination or endorsement to attest to having read, and having agreed to comply with, current Virginia laws governing the practice of psychology and 4) allow individuals who are completing their educational requirements to be licensed in clinical psychology to substitute two hours of group supervision for one hour or individual supervision for up to half of their required number of individually supervised practice hours.

Result of Analysis

Benefits likely outweigh costs for these proposed regulations.

Estimated Economic Impact

Currently, applicants for licensure by examination must submit “official transcripts documenting the applicant’s completion of the degree program and coursework requirements”. Currently, individuals who are registering whom will be supervising their residency must also submit official transcripts. The Board now proposes to eliminate the need to submit official transcripts when applying for licensure so long as all coursework is reflected on the transcript that was previously submitted for registration of supervision. Individuals who are applying for

licensure will benefit from this change as it will save them the time and expense of submitting some paperwork twice.

Current regulations require applicants for licensure by endorsement to provide evidence of clinical practice during five of the last six years immediately preceding application. The Board proposes to change this requirement so that applicants will only have to provide evidence of clinical practice for 24 of the 60 months before application. This change will benefit applicants as they will qualify for licensure by endorsement with less recent experience (so more interested individuals will likely meet the active practice requirement). Applicants for licensure will still have to show that they have competently practiced their profession in the political jurisdiction they are coming from, so no future clients of these individuals are likely to be harmed on account of this change.

Currently, both applicants for licensure by examination and licensure by endorsement have to submit a notarized affidavit certifying that they have read, and agree to follow, the laws and regulations that govern the practice of psychology in the Commonwealth. Since notaries can't and don't certify that applicants have read what they are saying the read (notaries just certify that the individual listed on the affidavit is the person signing it), the Board proposes to only require that applicants affirm on their application that they have read and will follow all relevant laws. No entity is likely to incur costs on account of this proposed change. Applicants will benefit from this change as they will no longer have to take the time or pay the fee (likely less than \$5) associated with hiring the services of a notary public.

Current regulations require applicants for licensure as clinical psychologists to complete, among other things, a 1,500 hour supervised residency. Individuals who wish to apply pre-doctoral supervised experience to their supervised residency must meet certain requirements. Among these requirements is that individuals must have had a minimum of one hour of individual face-to-face supervision for every 8 hours of total supervision. The Board proposes to allow supervised individuals to substitute 2 hours of group supervision (up to five individuals in a group) for each hour of individual supervision for up to half the required hours of individual supervision. This change will benefit individuals who are working to fulfill licensure requirements as well as the doctoral programs that offer supervision because it will give all parties greater flexibility to structure supervision in the most individually efficient manner. No

individual is likely to incur additional costs on account of this change because it is only an additional option for meeting supervision requirements.

Businesses and Entities Affected

The Department of Health Professions (DHP) reports that there are 2,895 licensed clinical psychologists, 41 licensed applied psychologists, 105 licensed school psychologists and 341 licensed school psychologists-limited in the Commonwealth. All of these entities, as well as any applicants for licensure and individuals completing their supervised experience requirements, will be affected by these proposed regulations.

Localities Particularly Affected

No localities will be particularly affected by these proposed regulations.

Projected Impact on Employment

As this regulatory proposal will likely make it easier for individuals licensed in other political jurisdictions to qualify for licensure in Virginia, the number of individuals working as psychologists in the Commonwealth may increase.

Effects on the Use and Value of Private Property

These proposed regulatory changes are unlikely to affect the use or value of private property in the Commonwealth.

Small Businesses: Costs and Other Effects

No small business is likely to incur and additional expense on account of these regulatory changes.

Small Businesses: Alternative Method that Minimizes Adverse Impact

No small business is likely to incur and additional expense on account of these regulatory changes.

Real Estate Development Costs

This regulatory action will likely have no effect on real estate development costs in the Commonwealth.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.04 of the Administrative Process Act and Executive Order Number 14 (10). Section 2.2-4007.04 requires that such economic impact analyses include, but need not be limited to, a determination of the public benefit, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has an adverse effect on small businesses, Section 2.2-4007.04 requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.