



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 125-20 – Regulations Governing the Practice of Psychology
Department of Health Professions
April 25, 2014

Summary of the Proposed Amendments to Regulation

The Board of Psychology (Board) proposes to amend its Regulations Governing the Practice of Psychology to 1) allow a certificate of Professional Qualification in Psychology as evidence of education, examination and supervised training for licensure by endorsement, 2) clarify that continuing education requirements in ethics, laws and standards of practice refer to standards of practice in regulation and 3) allow two hours of continuing education for membership on a state Board of Psychology.

Result of Analysis

Benefits likely outweigh costs for these proposed regulatory changes.

Estimated Economic Impact

Current regulations have a list of “further documentation”, one of which must be provided to the Board when applying for licensure by endorsement. Applicants may currently provide: 1) a current listing in the National Register of Health Service Psychologists, 2) current diplomate status in good standing with the American Board of Professional Psychology in a category comparable to the one in which licensure is being sought, 3) documentation of 10 years of active licensure comparable to the one in which licensure is being sought or 4) documentation of less than 10 years of active licensure with further documentation of education, experience and examination completion that is substantially equivalent to Virginia’s and verification of active practice in 24 of the 60 months immediately preceding application. The Board proposes to add “a certificate of Professional Qualification in Psychology (PQP)” to the list of further documentation. This change may make it somewhat easier for individuals who already have

qualifications gained in another state to be licensed as Psychologists in Virginia. Since applicants will still have all options currently available for further documentation, no one is likely to be made worse off on account of this change.

Current regulations require that Board licensees complete 14 hours of continuing education each year; a minimum of 1.5 of these hours have to be for courses that cover “ethics, standards of practice or laws governing the profession of psychology”. Some licensees, however, have been confused about what standards of practice this requirement refers to. The Board now proposes to clarify that the standards of practice that are included in this requirement are in the Board regulation – specifically in 18 VAC 125-20-150. No entity is likely to incur costs on account of this change. To the extent that it makes the regulation less confusing, affected licensees will benefit.

In addition to clarifying ethics and law requirements for continuing education, the Board newly proposes to allow Board members to use the work that they do for the Board as two of their 14 hours of yearly continuing education credit. This change will make it slightly easier for the seven members of the Board to meet their continuing education requirements. No entity is likely to incur costs on account of this change.

Businesses and Entities Affected

Board staff reports that the Board currently licenses 35 applied psychologists, 2,853 clinical psychologists and 93 school psychologists. All of these entities, as well as any individuals who ally for licensure by endorsement in the future, will be affected by these regulatory changes.

Localities Particularly Affected

No locality will be particularly affected by this proposed regulatory action.

Projected Impact on Employment

Allowing one more category of “further documentation” for individuals seeking licensure by endorsement may make it slightly easier to be licensed by endorsement. This may slightly increase the number of psychologists practicing in the Commonwealth.

Effects on the Use and Value of Private Property

By making it slightly easier to be licensed by endorsement, the time and cost to become licensed in Virginia may decrease for some individuals. This may allow them to start seeing patients sooner and increase the total lifetime revenue that can be obtained under their license; thus making the license more valuable.

Small Businesses: Costs and Other Effects

No small businesses will incur costs on account of this regulatory action.

Small Businesses: Alternative Method that Minimizes Adverse Impact

No small businesses will incur costs on account of this regulatory action.

Real Estate Development Costs

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

Legal Mandate

General: The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia and Executive Order Number 14 (2010). Section 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the report should include but not be limited to:

- the projected number of businesses or other entities to whom the proposed 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.

Small Businesses: If the proposed regulation will have an adverse effect on small businesses, § 2.2-4007.04 requires that such economic impact analyses include:

- an identification and estimate of the number of small businesses subject to the proposed regulation,
- the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents,

- a statement of the probable effect of the proposed regulation on affected small businesses, and
- a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

Additionally, pursuant to § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules (JCAR) is notified at the time the proposed regulation is submitted to the *Virginia Register of Regulations* for publication. This analysis shall represent DPB's best estimate for the purposes of public review and comment on the proposed regulation.

AMH

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