

Office of Regulatory Management  
Economic Review Form

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| <b>Agency name</b>   | Board of Psychology, Department of Health Professions  |
| <b>Virginia Administrative Code (VAC) Chapter citation(s)</b><br><b>Guidance Document Citation</b> | 18VAC125<br>125-3  |
| <b>Guidance Document title(s)</b>  | Education for Psychological Practitioner Applicants  |
| <b>Action title</b>  | New guidance document 125-3 regarding education for psychological practitioner applicants (master's level psychologists) |
| <b>Date this document prepared</b>   | December 5, 2024   |
| <b>Regulatory Stage (including Issuance of Guidance Documents)</b>                                 | Issue  |

**Cost Benefit Analysis**

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

**Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)**

|  |  |  |
|--|--|--|
| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>During the 2024 General Assembly session, the Board was instructed to license Psychological Practitioners, a new, mid-level licensure type. In regulation, the Board states that an applicant must have obtained their education from an APA-accredited school or from a program equivalent as determined by the Board. This guidance document outlines the expectations for programs equivalent to APA-accredited schools.</p> <p>A key thing to note, these guidelines are loosely based on APA accreditation requirements but are more flexible to allow more programs to be approved. There are presently very few programs accredited by APA, so these more flexible standards will allow programs who want to be approved to do so while still offering a high quality educational experience as determined by the Board. This will likely minimize cost to applicants who would not need to seek out a very limited selection of schools but could get their education at a closer and possibly cheaper institution. As there are very few programs approved at this point, that is only a hypothetical statement, however it seems plausible.</p> |  |
| (2) Present Monetized Values                       | Direct & Indirect Costs  | Direct & Indirect Benefits   |
|  | (a) None   | (b) Reduced cost of tuition if more school choice is offered by these more flexible approval standards |
| (3) Net Monetized Benefit                          | Positive   |  |
| (4) Other Costs & Benefits (Non-Monetized)         | Cost of tuition will always be a cost for any DHP licensee.  |  |
| (5) Information Sources                            |  |  |

**Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)**

|  |  |                            |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is currently no status quo, thus none to consider. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                                  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |

|  |     |
|--|-----|
| (3) Net Monetized Benefit                  | N/A |
| (4) Other Costs & Benefits (Non-Monetized) | N/A |
| (5) Information Sources                    |     |

**Table 1c: Costs and Benefits under Alternative Approach(es)**

|  |  |                            |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no alternative approach to consider. The only way to issue a guidance document is through board action. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A  |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A  |                            |
| (5) Information Sources                            |  |                            |

**Impact on Local Partners**

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 2: Impact on Local Partners**

|  |                                       |                            |
|--|---------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on local partners. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs               | Direct & Indirect Benefits |
|  | (a) N/A                               | (b) N/A                    |

|  |     |
|--|-----|
| (3) Other Costs & Benefits (Non-Monetized) | N/A |
| (4) Assistance                             |     |
| (5) Information Sources                    |     |

**Impacts on Families**

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 3: Impact on Families**

|  |                                 |                            |
|--|---------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on families. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs         | Direct & Indirect Benefits |
|  | (a) N/A                         | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                             |                            |
| (4) Information Sources                            |                                 |                            |

**Impacts on Small Businesses**

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 4: Impact on Small Businesses**

|  |   |                            |
|--|---|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on small businesses. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                 | Direct & Indirect Benefits |

|  |         |         |
|--|---------|---------|
|  | (a) N/A | (b) N/A |
| (3) Other Costs & Benefits (Non-Monetized) | N/A     |         |
| (4) Alternatives                           | N/A     |         |
| (5) Information Sources                    |         |         |

**Changes to Number of Regulatory Requirements**

**Table 5: Regulatory Reduction** \*There are no requirements in Guidance Documents\*

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

*Change in Regulatory Requirements*

| VAC Section(s) Involved* | Authority of Change | Initial Count | Additions | Subtractions                                   | Total Net Change in Requirements |
|--------------------------|---------------------|---------------|-----------|--|----------------------------------|
|                          | (M/A):              |               |           |  |                                  |
|                          | (D/A):              |               |           |  |                                  |
|                          | (M/R):              |               |           |  |                                  |
|                          | (D/R):              |               |           |  |                                  |
|                          |                     |               |           | <b>Grand Total of Changes in Requirements:</b> | (M/A):                           |
|                          |                     |               |           |  | (D/A):                           |
|                          |                     |               |           |  | (M/R):                           |
|                          |                     |               |           |  | (D/R):                           |

**Key:**

*Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:*

**(M/A):** Mandatory requirements mandated by federal and/or state statute affecting the agency itself

**(D/A):** Discretionary requirements affecting agency itself

**(M/R):** Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

**(D/R):** Discretionary requirements affecting external parties, including other agencies

*Cost Reductions or Increases (if applicable)*

| <b>VAC Section(s) Involved*</b> | <b>Description of Regulatory Requirement</b> | <b>Initial Cost</b> | <b>New Cost</b> | <b>Overall Cost Savings/Increases</b> |
|---------------------------------|--|---------------------|-----------------|---------------------------------------|
|                                 |  |                     |                 |                                       |
|                                 |  |                     |                 |                                       |

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

| <b>VAC Section(s) Involved*</b> | <b>Description of Regulatory Change</b> | <b>Overview of How It Reduces or Increases Regulatory Burden</b> |
|---------------------------------|---|--|
|                                 |   |  |
|                                 |   |  |

*Length of Guidance Documents (only applicable if guidance document is being revised)*

| <b>Title of Guidance Document</b> | <b>Original Word Count</b> | <b>New Word Count</b> | <b>Net Change in Word Count</b> |
|-----------------------------------|----------------------------|-----------------------|---------------------------------|
| 125-3                             | 0                          | 636                   | +636                            |
|                                   |                            |                       |                                 |

\*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).