

Official Notices

Minnesota Board of Psychology

REQUEST FOR COMMENTS on Possible Amendment to Rules Governing Examination Requirements for Licensure as a Licensed Psychologist (EPPP admission) and Supervised Psychological Employment (Adding Supervision Plans), *Minnesota Rules, 7200.0550 and Minnesota Rules 7200.0820*; Revisor's ID Number RD4329

Subject of Rules. The Minnesota Board of Psychology (Board) requests comments on its possible amendment to rules: (1) governing the admission to the Examination for Professional Practice in Psychology (EPPP); and (2) the way in which postdoctoral students begin and prepare for their postdoctoral supervised psychological employment experience.

The proposed EPPP rule proposes to limit the number of attempts at the EPPP to 4. Issues identified with repeated, unlimited attempts at the EPPP include: (1) concerns regarding competency to practice clinical psychology; (2) the need for additional support and remediation of applicants unable to pass the EPPP following three (3) attempts; (4) concerns related to the protection of the public by ensuring adequately trained and educated psychologists; (5) examination security and access; (6) threats to the continued access by the Board to the national examination; and (7) meeting the national standard for attempts at the EPPP.

The proposed rule related to postdoctoral supervised employment is intended to proactively assist applicants in properly completing the requisite supervised clinical training in accordance with the existing statutes and administrative rules and to provide notice, oversight, and additional regulation of those applicants engaging in unlicensed practice of psychology under supervision in preparation for licensure in the State of Minnesota. In pertinent part, the absence of pre-approved postdoctoral supervision plans raises the following issues: (1) individuals not pursuing licensure practicing psychology without a license; (2) improperly conducted supervision placing clients (Minnesota citizens) at risk including: (a) lack of primary supervision; (b) lack of the requisite number of hours of supervision; (c) lack of the appropriate clinical site for the supervised experience; (d) improperly qualified supervisors or designated supervisors; (e) lack of appropriate clinical responsibility for supervision; (f) denial of licensure based on inadequate supervision; (g) increased investigation and corrective or disciplinary action related to supervision. The proposed rule adds a requirement to submit a supervision plan *prior* to beginning the supervised experience to ensure compliance with the statutory and administrative rule requirements and to save applicants time, money, and work when postdoctoral supervised experiences are conducted improperly. Additionally, prior approval of supervisions plans is intended to save applicants time, money, and effort in completing their experience allowing them to become licensed in a more efficient manner and to ensure the public is adequately protected by appropriate supervisory oversight of applicants preparing for licensure.

Persons Affected. The amendment to the rules would likely affect: (1) applicants for licensure applying for admission to the Examination for Professional Practice in Psychology (EPPP); (2) Applicants for the EPPP who are unable to pass the EPPP in three attempts; (3) Applicants for the EPPP who are unable to pass the EPPP in four attempts; (4) citizens receiving psychological services in the State of Minnesota; (5) applicants for licensure by the Minnesota Board of Psychology wishing to begin a postdoctoral supervised employment experience following the conferral of a graduate degree in psychology; (5) individuals qualified to provide supervision to postdoctoral applicants (primary and designated supervisors); (6) entities employing postdoctoral applicants to provide psychological services prior to licensure (including psychological firms, mental health clinics, hospitals, private licensed providers of mental health services, city, county, state, and federal entities employing postdoctoral applicants prior to licensure.

Statutory Authority. *Minnesota Statutes*, section 148.905, subd. 1(1), authorizes the Board to adopt rules for licensing psychologists...and for regulating their professional conduct. *Minnesota Statutes*, section 148.905, subd. 1(3), requires the Board to "adopt and implement rules for examinations which shall be held at least once a year to assess applicants' knowledge and skills. The examinations may be written or oral or both, and may be administered by the board or by institutions or individuals designated by the board." Additionally, *Minnesota Statutes*, section §148.98, requires the Board to "adopt rules of conduct to govern an applicant's or licensee's practices or behavior."

Public Comment. Interested persons or groups may submit comments or information on these possible rules in **writing or orally until 4:30 p.m. on Thursday, December 17th, 2015**. The Board will not publish a notice of intent to adopt the rules until more than 60 days have elapsed from the date of this request for comments. The Board does not plan to appoint an advisory committee to comment on the possible rules.

Official Notices

Rules Drafts. The Board has drafted the possible rules amendments which will be available before publication of the proposed rule.

Agency Contact Person. Written or oral comments, questions, requests to receive a draft of the rules, and requests for more information on these possible rules should be directed to: Angelina M. Barnes, Executive Director at The Board of Psychology, 2829 University Avenue S.E., Suite 320, Minneapolis, MN 55414, **phone:** (612) 617-2230, **fax:** (612) 617-2240, and/or e-mail: *psychology.board@state.mn.us*.

Alternative Format. Upon request, this information can be made available in an alternative format, such as large print, braille, or audio. To make such a request, please contact the agency contact person at the address or telephone number listed above.

NOTE: Comments received in response to this notice will not necessarily be included in the formal rulemaking record submitted to the administrative law judge if and when a proceeding to adopt rules is started. The agency is required to submit to the judge only those written comments received in response to the rules after they are proposed. If you submitted comments during the development of the rules and you want to ensure that the Administrative Law Judge reviews the comments, you should resubmit the comments after the rules are formally proposed.

Dated: October 19th, 2015

Angelina M. Barnes, Executive Director
Minnesota Board of Psychology