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Senate Bill 1315 (as enacted)  
Sponsor: Senator Gilda Z. Jacobs  
Senate Committee: Economic Development and Regulatory Reform  
House Committee: Health Policy

**PUBLIC ACT 121 of 2010**

Date Completed: 8-11-10

**RATIONALE**

The Public Health Code establishes requirements for an individual to receive a license from the Michigan Board of Psychology. Except as provided for a limited license, an individual must have been granted a doctoral degree in psychology or a closely related field from a regionally accredited or other college, university, or institution approved by the Board. Under an administrative rule that will take effect on August 1, 2011 (R 388.2511(4)), the doctoral program must have been accredited by the American Psychological Association (APA) or the Canadian Psychological Association, or have obtained designation by the National Register of Health Service Providers in Psychology and the Association of State and Provincial Psychology Boards (ASPPB). (The National Register and the ASPPB participate in a shared designation.)

In Michigan, 10 programs have been accredited by the APA or obtained the National Register/ASPPB designation, or both. These programs do not include the Michigan School of Professional Psychology in Farmington Hills, which is regionally accredited and is preparing to apply for APA accreditation. Although the rule requiring national accreditation or designation will not take effect for approximately 12 months, the APA accreditation process takes on average 18 months, according to the association's website. Some people raised a concern that, in the meantime, prospective students would apply elsewhere. It was suggested that this situation be addressed in statute.

**CONTENT**

The bill amended the Public Health Code to require that, beginning August 1, 2011, a doctoral degree in psychology be from a program that has obtained the Association of State and Provincial Psychology Boards' National Register designation or has been accredited by the American Psychological Association or the Canadian Psychological Association, or has obtained a similar designation from or been accredited by an entity approved by the Michigan Board of Psychology. A program that is in the process of obtaining the designation or becoming accredited before August 1, 2011, and that obtains the designation or becomes accredited by August 31, 2015, will meet these requirements.

Under the Code, the Michigan Board of Psychology must promulgate rules requiring an individual granted a psychology license to meet specific criteria. These include a requirement that, except as provided for limited licensure, the individual has been granted a doctoral degree in psychology, or a doctoral degree in a closely related field, from a regionally accredited or other college, university, or institution approved by the Board, which included education and training appropriate to the practice of psychology.

Under the bill, the rules also must to include the requirement that the program obtain accreditation or designation by August 1, 2011, subject to the provision for a program that obtains accreditation or designation by August 31, 2015, as described above.

In addition, the rules must require that an individual have at least one year of postdoctoral experience in the practice of psychology in an organized health setting or other arrangement, as established by the Board. Previously, the Code required at least two years of postdoctoral experience.

The bill took effect on July 13, 2010.

MCL 333.18223

## **ARGUMENTS**

*(Please note: The arguments contained in this analysis originate from sources outside the Senate Fiscal Agency. The Senate Fiscal Agency neither supports nor opposes legislation.)*

### **Supporting Argument**

Originally named the Center for Humanistic Studies, the Michigan School of Professional Psychology was founded in the 1980-1981 academic year. The school was granted accreditation by the North Central Association the following year, and the accreditation was extended to the school's doctoral program when it began in 2000. According to the school's president, after the Michigan Board of Psychology promulgated its rule requiring a program to have national accreditation or designation, with a June 2009 implementation date, the school began the process of preparing to apply for APA accreditation. When it became evident that the school could not meet the original implementation date, it sought an extension until July 2012. Although the Board extended the implementation date to August 1, 2011, the school still is preparing to apply for accreditation.

The APA accreditation process is very complex, and begins when a program submits a "self-study". The self-study will undergo an initial review, which can lead to approval of a site visit by a team of professional colleagues. After the site visit, the team submits a report to the APA's Commission on Accreditation, and the program is placed in the Commission's next program review agenda. According to the APA website, the accreditation process takes on average about 18 months after a program submits a self-study until the Commission makes a decision. The process may take longer, as the Commission can defer making a decision in order to request additional information from the program.

A program may submit a self-study at one of three times during the year. If the Michigan School of Professional Psychology is able to meet the fall 2010 deadline, the earliest that its program would be accredited is the spring of 2012, based on the 18-month average timeline. This makes it virtually impossible for the school to meet the August 1, 2011, deadline in the administrative rule.

The bill remedies this situation by codifying the rule's requirement for national accreditation or designation by August 1, 2011, but also providing for a school to be considered in compliance if it is in the process of becoming accredited by that date, and becomes accredited within the following four years. As a result, students who receive a doctoral degree from the school after August 1, 2011, and before accreditation is granted will qualify for a license from the Michigan Board of Psychology.

### **Supporting Argument**

Reducing the postdoctoral experience requirement from two years to one is consistent with an administrative rule that requires license applicants to have at least 2,000 hours of postdoctoral experience completed within two consecutive years (R 388.2506). If a person worked 40 hours a week (the maximum permitted under the rule), 2,000 hours would be completed in 50 weeks.

Legislative Analyst: Suzanne Lowe

## **FISCAL IMPACT**

The bill will have no fiscal impact on State or local government.

Fiscal Analyst: Steve Angelotti

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This analysis was prepared by nonpartisan Senate staff for use by the Senate in its deliberations and does not constitute an official statement of legislative intent.