

Wisconsin Psychological Association

6737 W Washington St • Suite 4210 • Milwaukee, WI 53214 Phone: 414-488-3933 • Fax: 414-755-1346 • wispsych@wispsych.org

wipsychology.org

2025 Board of Directors

President Vanessa Hintz, PsyD

Vice President
Andrew Schramm, PhD

Treasurer Kate Koenig-Lueck, PsyD

Immediate Past President Mike Zussman, PsyD, LPC

At Large Members
Rebecca Anderson, PhD
Leah J. Featherstone, PsyD
Amy Gurka, PhD
Jenjee T. Sengkhammee, PhD
Leticia Vallejo, PhD
Kavitha Venkateswaran, PhD
Angela L. Zapata, PhD

APA Council Representative Kim Skerven, PhD

APA Federal Advocacy Coordinator Sammi Jo Hurkmans, PsyD

> **Executive Director** Jennifer Rzepka, CAE

To: Wisconsin State Senators

From: Wisconsin Psychological Association

Date: December 3, 2025

RE: Opposition to AB212/SB214 creating registration of out-of-state health care providers to

provide telehealth services.

The Wisconsin Psychological Association is opposed to 2025 SB214 as recently passed by the Senate. We hope that the Assembly amends the bill to exempt professions with existing Interstate Compacts or remove mental health providers from the list of health service providers. We recognize that this bipartisan bill has the noble goal of opening Wisconsin to out-of-state health service providers—including mental health service providers. This legislation is a bad option for providing mental health services in Wisconsin. Although this bill is an improvement over its predecessor bill, 2023 AB541/SB551, it still has significant weaknesses.

- While the bill aims to address the health provider shortage in our state, it has no sunset clause or provision that would enable reconsideration after the crisis is resolved or after a reasonable trial period has passed.
- The legislature previously allowed access to out-of-state providers when it enacted several interstate compact agreements involving psychologists, other mental health professionals, and other health professionals. This bill circumvents and undermines the interstate compact system by creating a psuedo-regulated access to tele-health practice in Wisconsin for providers from any other state by creating a registry.
- Unlike the interstate compact system, this bill has weak provisions to protect Wisconsin citizens from harmful practice.
 - A Wisconsinite complaining to the appropriate part of the DSPS about poor, unethical, or illegal services from an out-of-state provider might result in the practitioner being delisted from our "registry" while receiving no other consequences. Our Psychology Examining Board (PEB) and the Department of Safety and Professional Services (DSPS) could not bring an action against the license of the out-of-state provider.
 - If the Wisconsin consumer complained to the equivalent of our PEB or DSPS in another state, the complaint would likely be ignored for lack of jurisdiction because the complaint would not originate with that state's resident.

The bill creates a registry with detailed information about a registrants status, but provides neither additional funding nor additional staff to support the registration process withing DSPS. Fees would be collected but would go to the general fund instead of being available to DSPS.

Despite its good intention, it is too flawed to be enacted. We would like to work with the legislature to create a workable solution to the mental health provider shortage.

Sincerely,

Bruce R. Erdmann, Ph.D.

Advocacy Cabinet

Wisconsin Psychological Association