



TO: Sofia Anderson
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FROM: Heidi F. Christianson, Ph.D.
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DATE: November 17th, 2021

RE: Medical College of Wisconsin Support for CR 21-080

I am writing on behalf of the Medical College of Wisconsin (MCW) in support of the Proposed Order of the Psychology Examining Board to update the rules governing the practice of psychology based upon passage of 2021 Wisconsin Act 22 (Clearinghouse Rule 21-080).

The Proposed Order supports the ethical and safe practice of psychology, while also allowing for increased access to quality mental healthcare for the citizens of the State of Wisconsin by streamlining the licensure process for new graduates and psychologists from out of state. The Proposed Order allows for clear and reasonable delineation of the training requirements needed to meet national standards for Health Service Psychology, specifically by adding the minimum training standard of a year-long, full-time clinical internship, which is recognized by the field and all professional organizations within the field, including the American Psychological Association, as well as by the licensing laws of other states. It also allows for streamlined rules for transfer of a license from qualified states and creation of an interim license (analogous to licensure in medical training) that supports specialty psychology training in the state. The Proposed Order clearly outlines the specific steps and requirements for the interim psychology license, which will help with the training and retention of licensed psychologists in Wisconsin by creating a clear and direct route toward licensure for qualified graduates.

There is currently a national movement for state licensing boards to provide for reimbursable practice directly out of doctoral training (e.g., remove the post-doctoral fellowship requirement for licensure and/or allow for interim licensure) and the Proposed Order will better position

Wisconsin-based providers to effectively recruit and retain well-trained psychologists and meet the mental health care needs of our citizens. The Proposed Order as written allows this to occur through three mechanisms. First, high caliber psychologists trained in the state who desire to practice as generalist psychologists will be motivated to stay and practice in the state as they will not be required to seek fellowship for licensure outside of the state. Second, post-doctoral training programs, such as the one that I oversee, that train specialist psychologists will be able to pay for themselves and less vulnerable to the budgetary restrictions of their sponsoring healthcare system. Third, psychology fellowship programs that are well supported will attract psychologists trained from outside of the state to receive specialist training in Wisconsin and improve access to specialty care psychological treatments for Wisconsin citizens.

As a training director of a psychology internship program and psychology fellowship program, I can attest that the Proposed Order by the Psychology Examining Board ensures graduates who are eligible for licensure and interim licensure are well trained in accordance with national standards and professional organizations such as the American Psychological Association. Additionally, the Proposed Order as it is written allows a more streamlined process toward licensure for generalist psychologists and a license that allows for financial support and funding for psychologists seeking specialized training and practice. We believe the Proposed Order, as written, will allow for the highest standard of psychologist training, ensuring public safety and protection, while also streamlining the process to ensure the state is attracting and retaining well trained psychologists from Wisconsin and from outside of the state.

Thank you for your consideration and attention. If you have any questions on the above support and comments, please feel free to contact Nathan Berken, Director of Government Relations at MCW at 414.955.8217 or nberken@mcw.edu.