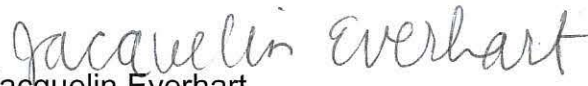


MEMORANDUM

DATE	October 31, 2016
TO	Psychology Board Members
FROM	 Jacquelin Everhart CE/Renewals Coordinator
SUBJECT	Agenda Item 19(a) <i>Discussion of Requests for Extensions to Accrue Continuing Education and Exceptions to the CE Requirements</i>

History:

At its September 19, 2016 meeting, the Licensing Committee discussed requests for extensions to accrue continuing education and exceptions to the CE requirements. After consideration of staff's pros and cons for extensions listed below, the Committee decided not to pursue regulatory change to implement requests for extensions.

Additionally, the Committee members requested staff to compile a list of common reasons why licensees request exceptions to the continuing education requirements; however, the regulations only allow exceptions based on the specific criteria below:

Section 1397.62(b) of the California Code of Regulations (CCR), an exception to the requirements of the Business and Professions Code section 2915(d) may be granted to licensed psychologists who are not engaged in the direct delivery of mental health services for whom there is an absence of available continuing education courses relevant to their specific area of practice.

Extensions

SB 1193 amends Business and Professions Code section 2915 and gives the Board authority to offer extensions to licensees to accrue the required number of CE hours for renewal. Staff compiled a list of pros and cons to offering extensions to meet the renewal requirements below:

Pros	Cons
Gives licensees more time to accrue hours	Could be considered unequal treatment of licensees because it holds psychologists to different standards of professional

	development. Not requiring 36 hours of CE in order to renew and practice defeats the Board's CE requirements upon renewal. This may leave some licensees bearing the full burden of compliance while others are held to a lower standard.
Provides more flexibility for licensees to meet the requirements without penalty.	Lower standard of consumer protection, as licensees with extensions are allowed to practice without restrictions or penalties while not meeting the same level of professional development as other licensees that have met the requirements.
	Difficult to determine objective criteria for granting extensions – may leave some licensees out who believe their circumstances warrant an extension or conversely result in all extension requests be granted.
If a licensee is granted an extension, they will not need to go inactive and then reactivate their license when they have the hours or let the license expire and then renew when they have the hours.	Increase in overall auditing workload, as the extensions will overlap the next licensing cycle. This will add additional complexity and confusion during the audit process and require monitoring of each person who requests an extension.
	No submission deadlines for extensions would allow licensees to request extensions at the last minute. This does not encourage professional responsibility and does not provide staff adequate time to process the request and determine eligibility.
	For licensees who break the terms of the extension, e.g. the licensee does not obtain the hours within the allotted timeframe, they will need to be referred to enforcement. This may increase the number of enforcement cases.
	Adding a third avenue for relieving licenses of the 36 hour CE requirement for renewal sends the message that two years is not enough time to obtain the required hours, which are already lower than the number of hours required of other doctoral level health care providers.

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Action Requested:

This item is for informational purposes only. No action required.