

**TITLE 16. CALIFORNIA BOARD OF PSYCHOLOGY  
DEPARTMENT OF CONSUMER AFFAIRS**

**HEARING DATE:** February 17, 2022

**SUBJECT MATTER OF PROPOSED REGULATION:** Fees

**SECTIONS AFFECTED:**

Amend 16 CCR, Section 1392 and 1392.1

**UPDATED INFORMATION:**

The Initial Statement of Reasons is included in the file. The information contained therein is updated as follows:

This package was in the Notice Register on December 17, 2021. The 45-day comment period began on December 17, 2021 and ended on January 31, 2022.

The Board amended language in the instant regulations by a section 100 change to incorporate the term change “psychological assistant” to “registered psychological associate” required by statute. This change became effective January 1, 2022. These non-substantive changes, reflected in the order of adoption, do not affect the substantive proposal herein.

During the 45-day comment period, the Board received comments on December 17, 2021, and January 14, 2022.

The regulatory hearing was held on February 17, 2022 during the regularly noticed Board meeting. No comments were received at the hearing.

As more fully detailed below, the Board considered all the comments received at its meeting on February 17-18, 2022 and voted to adopt the regulation as noticed.

**LOCAL MANDATE:** A mandate is not imposed on local agencies or school districts.

**SMALL BUSINESS IMPACT:**

The Board has determined that the proposed regulations may affect small businesses because this proposal will increase fees for individual licensees, which only impacts individuals, not businesses but some small businesses may pay for the licenses of individual employees.

**CONSIDERATION OF ALTERNATIVES:**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulation or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

**SUMMARY OF OBJECTIONS OR RECOMMENDATIONS / RESPONSES:**

During the 45-day public comment period from December 17, 2021, to January 31, 2022, the Board received three comments, all generally opposed to any increase in fees. All comments were provided in the meeting materials for the February 17-18, 2022, Board meeting, and were reviewed and considered by the Board. After consideration of the comments, the Board adopted the text as noticed.

<b>Comments to the Board of Psychology on Fee Regulations</b>				
<b>Commenters</b>	<b>Company / Organization / Lic. #</b>	<b>Comments</b>	<b>Date Submitted</b>	<b>Response</b>
Melanie Ropelato	Unknown	Oppose fee increases for psychologists across the board. What you are proposing is ludicrous, harmful, and frankly unethical. I would like to see a breakdown of what the license re-certification fee really pays for. Overall, I encourage the board to not place this undue burden of psychologists, apparently as many folks are struggling over the current ridiculous circumstances that we have been placed in, living in CA. Why make everything harder for everyone, especially now?	December 17, 2021	Thank you for your comment.  Fees proposed are necessary for the reasons publicized in the Initial Statement of Reasons and as discussed over the various board meetings over the last five years.

**Comments to the Board of Psychology on Fee Regulations**

Commenters	Company / Organization / Lic. #	Comments	Date Submitted	Response
Lauren Prichard	PSY 28212	<p>I vehemently oppose raising any and all fees to be a Psychologist and to join the field. The Board of Psychology is here to regulate psychologists and make sure we do not harm the public. Yet we are at risk of losing this to Coaching which is unregulated and many times earns much more money than better trained clinical therapists.</p> <p>To raise the fees increases the chances of people no longer being interested in the field in favor of coaching.</p> <p>I believe we need to make the field more approachable, help well trained clinicians be more successful, and help them be more accessible to the public.</p> <p>Raising fees obstructs clinicians from doing their services.</p>	December 17, 2022	<p>Same response as above.</p> <p>Also, the unregulated field of “coaching” is unrelated to the scope of this rulemaking.</p>
Adam Vogel	PSY 26956	<p>I have read and considered the proposed regulatory action to raise fees for both psychologists and psychologist applicants. I strongly disagree with both. The proposed regulation does not lay out how increasing fees improves the status quo of the current backlogs of applications for licensure and processing of new licenses. Additionally, I do not support an increase in fees when the board has been taking recent inaction by not moving forward with considering joining Psypact, which limits psychologists’ scope of practice to be not in line with other helping professions.</p>	January 14, 2022	<p>Same response as above.</p> <p>Also, Psypact is unrelated to the scope of this rulemaking.</p>