

September 22, 2017

The Honorable Edmund G. Brown Jr.
Governor
State Capitol, 1st Floor
Sacramento, CA 95814

RE: SB 547 (Hill) – Professions and Vocations – Request for Signature

Dear Governor Brown:

The Board of Psychology (Board) requests your signature on SB 547 (Hill). Among other things, this bill would change who can pay the application fee for Psychological Assistant registrations and would increase the delinquency fee for Psychologists to be in conformity with the majority of other Department of Consumer Affairs (DCA) Boards and Bureaus using the rate methodology specified in Business and Professions Code (BPC) Section 163.5.

Pursuant to the Board's Sunset Bill, SB 1193 (Chapter 484, Statutes of 2016), Psychological Assistants now have one consolidated registration regardless of the number of locations at which they are employed or supervised and applicants are allowed to submit their own registration application instead of requiring their employer to submit an application to employ and supervise them. Current law specifies that the Psychological Assistant's supervisor must pay the application fee for registration and supervision. SB 547 would change this provision to conform to the Board's Sunset Bill and would only specify the registration fee for Psychological Assistants, therefore allowing the Psychological Assistant or their employer/supervisor to pay the registration fee. The Board agreed that since not all Psychological Assistants are paid for their work while accruing supervised hours as a Psychological Assistant in some training settings, it would be reasonable to allow either the Psychological Assistant or their employer/supervisor to pay the application fee based on their individual arrangement.

An additional problem that the Board identified in current law is the artificially low and outdated delinquency fee for Psychologists, which has not been reviewed or adjusted since 1978. The Board found multiple concerns with the current delinquency fee rate and methodology, including the following:

- The current \$25 delinquency fee for Psychologists established in BPC 2987(h) is disproportionately low for Psychologists as compared with Psychological Assistants. The fee for Psychologists equates to six (6) percent of the \$420 renewal fee for an active license but the \$20 delinquency fee for Psychological Assistants equates to 50 percent of the \$40 renewal fee for Psychological Assistants, placing a disproportionately larger penalty for late renewal on the training category than that of the licensed professional.
- The extremely low delinquency fee does not serve as an effective deterrent to renewing late, leaving the Board with a total delinquency rate ranging from 4.4 percent to 5.4 percent for calendar years 2014 through 2016; where it costs the Board \$15 to process each \$25 check for delinquency fees paid via check. While this delinquency rate may seem trivial, Psychologists are often still practicing without a license when they fail to renew on time and sometimes fail to notice their license has expired for months, necessitating additional enforcement review in some cases. A more substantial delinquency fee is more likely to incentivize earlier action by licensees.
- In comparison to other boards, the Board's \$25 delinquency fee is the lowest of all DCA entity license types as a percentage of the total renewal fee.

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- The Board's low delinquency fee for Psychologists and its methodology for establishing that rate are not aligned with the majority of other DCA entities that use the rate methodology of 50 percent of the renewal fee, with a maximum of \$150, as specified in BPC Section 163.5.

SB 547 would remedy these issues with the Board's delinquency fee by setting the Board's delinquency fee for all license and registration types to 50 percent of the renewal fee for each license type, not to exceed \$150. This methodology is in conformity with BPC section 163.5 and aligned with the majority of DCA entities.

By changing who can submit the Psychological Assistant registration fee and remedying the issues with the Board's delinquency fee for Psychologists, SB 547 would make the submission of Psychological Assistant fees more flexible, fair and aligned with the Board's Sunset Bill, and would make the Board's delinquency fee structure more equitable, reasonable, and consistent with other DCA entities.

For these reasons, the Board respectfully requests your signature on SB 547. If you have any questions or concerns, please feel free to contact the Board's Executive Officer, Antonette Sorrick, at (916) 574-7113. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SC Phillips', written over a horizontal line.

STEPHEN C. PHILLIPS, JD, PsyD
President, Board of Psychology

cc: Camille Wagner, Secretary, Legal Affairs
Senator Jerry Hill