

## AGENCY REPORT TO THE JOINT COMMITTEE ON ADMINISTRATIVE RULES (JCAR)

Under the Administrative Procedures Act (APA), 1969 PA 306, the agency that has the statutory authority to promulgate the rules must complete and submit this form electronically to the Michigan Office of Administrative Hearings and Rules (MOAHR) at [MOAHR-Rules@michigan.gov](mailto:MOAHR-Rules@michigan.gov).

**1. Agency Information:**

Agency name:	Licensing and Regulatory Affairs	
Division/Bureau/Office:	Bureau of Professional Licensing	
Name, title, phone number, and e-mail of person completing this form:	Weston J. MacIntosh Senior Policy Analyst (517) 241-9269 <a href="mailto:macintoshw1@michigan.gov">macintoshw1@michigan.gov</a>	
Name of Departmental Regulatory Affairs Officer reviewing this form:	Liz Arasim	

**2. Rule Set Information:**

MOAHR assigned rule set number:	2018 – 107 LR
Title of proposed rule set:	Psychology – General Rules

**3. Purpose for the proposed rules and background:**

The general purpose of these rules is to supply educational, licensure, and continuing education requirements.
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**4. Summary of proposed rules:**

<p>R 338.2521. This rule pertains to definitions. It sets forth an explanation of specific terms used throughout the set. Clarification of the terms used in the rule set have been made, including the meaning of the term “extreme hardship” and what types of entities qualify as an “organized health care setting.”</p> <p>R 338.2523. This rule pertains to an English language requirement. It sets forth the requirement for English language proficiency. Typographical revisions have been made.</p> <p>R 338.2525. This rule pertains to identifying human trafficking. It sets forth the requirements for training on human trafficking. The current rule does not clearly specify information as to when this training must be obtained. The proposed human trafficking rule indicates the renewal cycle year that applicants for license renewal will have to obtain the training, as well as the date after which applicants for initial licensure will have to obtain the training. The proposed rule will supply notice of the timelines for obtaining the required training.</p> <p>R 338.2527. This rule pertains to prohibited conduct. It sets forth conduct that can result in discipline. This rule is being rescinded because it is duplicative of statute.</p> <p>R 338.2529. This rule pertains to accreditation standards. It sets forth the requirements that must be met for accredited programs. This rule will be amended to supply updated accreditation standards for educational programs, which are adopted by reference.</p> <p>R 338.2541. This rule pertains to accreditation standards for doctoral level educational programs. It sets forth the requirements that must be met for accredited programs. This rule will be amended to</p>
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supply updated accreditation standards for educational programs, which are adopted by reference. It also adds the standards of the Psychological Clinical Science Accreditation System (PCSAS) as another approved accrediting body.

R 338.2543. This rule pertains to the application for a doctoral level trained psychology license. It sets forth the requirements that must be met to receive a license. The amendment to this rule sets forth the criteria that an applicant must provide to the board, so that the board can evaluate a postdoctoral internship.

R 338.2545. This rule pertains to examination scores for applicants. It sets forth the requirements that must be met to receive a passing score. The acronyms for the examination developer have been capitalized, to be consistent with other typographical changes made throughout the rules set.

R 338.2547. This rule pertains to examination eligibility. It sets forth the requirements that must be met to sit for the examination. Grammatical changes have been made to the rule, to make it more consistent with the rest of the rule set.

R 338.2549. This rule pertains to foreign graduates of non-accredited schools. It sets forth the requirements that must be met to qualify for a psychology license. Citations to other applicable rules have been updated to reflect corresponding revisions.

R 338.2551. This rule pertains to licensure by endorsement. It sets forth the requirements that must be met to qualify for a license through endorsement. It modifies the qualification for licensure by endorsement to require at least 10 years of licensed independent practice and the holding of a current license in the independent practice of psychology, as opposed to simply holding a current health service provider credential issued by the National Register of Health Service Psychologists.

R 338.2553. This rule pertains to an educational limited license for postdoctoral experience. It sets forth the requirements that must be met to qualify for a postdoctoral educational limited license, as well as the required setting and circumstances of the experience. It also adds criteria that must be included by the applicant for the board to consider an alternative supervision arrangement.

R 338.2555. This rule pertains to relicensure for a postdoctoral educational limited license. It sets forth the requirements that must be met for relicensure to be granted. It adds the requirements that the applicant must supply fingerprints and evidence of good moral character in support of the application for relicensure.

R 338.2561. This rule pertains to applications for limited license psychologists. It sets forth the requirements that must be met to qualify for licensure. It adds criteria that must be included by the applicant for the board to consider approval of a post-degree practicum, in lieu of a practicum that was an integrated part of a master's degree program.

R 338.2563. This rule pertains to examination scores for applicants seeking a limited license. It sets forth the requirements that must be met to receive a passing score. The acronyms for the examination developer have been capitalized, to be consistent with other typographical changes made throughout the rules set.

R 338.2565. This rule pertains to examination eligibility for applicants seeking a limited license. It sets forth the requirements that must be met to sit for the examination. Grammatical changes have been made to the rule, to make it more consistent with the rest of the rules set.

R 338.2567. This rule pertains to foreign graduates of non-accredited schools seeking a limited license. It sets forth the requirements that must be met to qualify for a psychology license. Citations to other applicable rules have been updated, to reflect corresponding revisions.

R 338.2569. This rule pertains to applications for a temporary limited license. It sets forth the requirements that must be met to qualify for a temporary limited license. Recent statutory changes have been incorporated into the rule, including allowing temporary limited licenses to be issued not only for applicants seeking to fulfill their required post-master's degree experience, but also for students who are currently enrolled in an eligible doctoral degree program. The rule adds requirements related to accreditation of eligible educational programs. The post-master's degree experience requirements on minimum and maximum hours per week have been removed. Amendment to the rule also adds criteria that must be included by the applicant for the board to consider approval of an alternative supervision arrangement.

R 338.2571. This rule pertains to limited license supervision requirements. It sets forth the requirements that must be met for proper supervision of licensees holding limited licenses. The rule adds criteria that must be included by a licensee for the board to consider approval of an alternative supervision arrangement.

R 338.2573. This rule pertains to relicensure for limited licenses. It sets forth the requirements that must be met for a former limited licensee to be relicensed. It adds the requirements that the applicant must supply fingerprints and evidence of good moral character in support of the application for relicensure.

R 338.2581. This rule pertains to license renewals. It sets forth the requirements that must be met for renewal of a license. It clarifies the requirement that proof of continuing education must be kept for a minimum of 4 years from the date of applying for license renewal.

R 338.2583. This rule pertains to acceptable continuing education. It sets forth the requirements that must be met for a continuing education program to be considered in satisfaction of continuing education requirements. Clarification is added that there are no restrictions related to earning continuing education credits through online means. The revised rule expands the list of providers that are eligible for both approving or offering continuing education programs. The rule clarifies requirements related to supplying proof of the acquired continuing education credits, includes other means of acquiring continuing education credits, and updates citations to other applicable rules, reflecting the corresponding revisions to the rules set.

R 338.2585. This rule pertains to approval of continuing education providers. It sets forth the requirements that must be met for the board to consider granting approval of a continuing education program offered by a potential provider. It sets forth the criteria that a provider must provide to the board, so the board can consider whether the proposed continuing education program is proper.

**5. List names of newspapers in which the notice of public hearing was published and publication dates (attach copies of affidavits from each newspaper as proof of publication).**

The Grand Rapids Press, April 4, 2019  
The Mining Journal, March 18, 2019  
The Flint Journal, April 4, 2019

**6. Date of publication of rules and notice of public hearing in *Michigan Register*:**

Issue No. 5 – 2019 (Published April 1, 2019)

**7. Time, date, location, and duration of public hearing:**

1:00 p.m., April 22, 2019, G. Mennen Williams Building Auditorium, 525 W. Ottawa Street, Lansing, Michigan. The hearing lasted for 45 minutes.

**8. Provide the link the agency used to post the regulatory impact statement and cost-benefit analysis on its website:**

[https://dtmb.state.mi.us/ORRDocs/RIS/1886\\_2018-107LR\\_ris.pdf](https://dtmb.state.mi.us/ORRDocs/RIS/1886_2018-107LR_ris.pdf)

**9. List of the name and title of agency representative(s) attending public hearing:**

Weston MacIntosh, Dena Marks, and Rick Roselle, Department Analysts for the Bureau of Professional Licensing.

**10. Persons submitting comments of support:**

Frances Brown, PsyD, Michigan School of Psychology; Lauren Levinson; Jason Moser, PhD, Michigan State University.

**11. Persons submitting comments of opposition:**

Dennis Kayes, JD  
Eric Ozkan, PhD

**Michigan Office of Administrative Hearings and Rules**  
 611 West Ottawa Street; 2nd Floor, Ottawa Building  
 Lansing, MI 48933  
 Phone: (517) 335-8658 FAX: (517) 335-9512

**12. Identify any changes made to the proposed rules based on comments received during the public comment period:**

	<b>Name &amp; Organization</b>	<b>Comments Made at Public Hearing</b>	<b>Written Comments</b>	<b>Agency Rationale for Change</b>	<b>Rule Number &amp; Citation Changed</b>
<b>1.</b>	Frances Brown, PsyD, Michigan School of Psychology	The commenter requested that the rule language of R 338.2561(1)(b)(iv) be changed to require the applicant to meet in person with his or her supervisor for a minimum of 2 hours a week during the practicum, rather than 8 hours a month during the practicum, as academic semesters do not coincide with the beginning and end of the month.	The commenter requested that the rule language at R 338.2561(1)(b)(iv) be changed to require the applicant to meet in person with his or her supervisor for a minimum of 2 hours a week during the practicum, rather than 8 hours a month during the practicum, as academic semesters do not coincide with the beginning and end of the month.	Because academic semesters do not coincide with the beginning and end of the month, the requirement of a minimum of 2 hours a week during the practicum, rather than 8 hours a month during the practicum, makes more sense.	R 338.2561(1)(b)(iv)
<b>2.</b>	Lauren Levinson		The commenter requested an update to the examination part of the rule, R 338.2561(1)(d), to reflect recent language changes to MCL 333.18223(2) by 2018 PA 24.	The language added to MCL 333.18223(2) by 2018 PA 24 made this language void.	R 338.2561(1)(d)
<b>3.</b>					
<b>4.</b>					

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**13. Date report completed:**

<u>June 27, 2019</u>
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STATE OF MICHIGAN )

County of Kent  
and County of Ottawa

ss Shawn Sutton

Being duly sworn deposes and say he/she is Principal Clerk of



# THE GRAND RAPIDS PRESS

DAILY EDITION

a newspaper published and circulated in the County of Kent and the County of Ottawa and otherwise qualified according to Supreme Court Rule; and that the annexed notice, taken from said paper, has been duly published in said paper on the following day(days)

April 4 A.D. 20 19

Sworn to and subscribed before me this 4th day of April 2019

*Janice M. DeGraaf*  
JANICE M. DEGRAAF  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF KENT  
MY COMMISSION EXPIRES Oct 3, 2020  
ACTING IN COUNTY OF Kent

## Department of Licensing and Regulatory Affairs Bureau of Professional Licensing NOTICE OF PUBLIC HEARING April 22, 2019 1:00 p.m.

Location: G. Mennen Williams Building Auditorium  
525 W. Ottawa Street, Lansing, Michigan

The hearing is held to receive public comments on the following administrative rules:

- Athletic Trainers – General Rules (ORR 2018-062 LR)**  
Authority: MCL 333.16145; MCL 333.16148; MCL 333.16178; MCL 333.16186; MCL 333.16204; MCL 333.16205; MCL 333.16215; MCL 333.17904; MCL 333.17905; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.  
Overview: The proposed revisions to the rules will clarify the licensure requirements for first aid, cardio pulmonary resuscitation (CPR), and automated external defibrillator (AED) training; advise when an applicant for licensure or renewal must have completed the training for identifying victims of human trafficking; clarify the first aid, CPR, and AED training required for licensure by endorsement, renewal, and relicensure; add a new rule that will advise a foreign-trained applicant that he or she must demonstrate a working knowledge of the English language; update accreditation standards; revise the rule approving first aid, CPR, and AED training and certification programs; revise the rules pertaining to continuing education; and adopt by reference the updated Standards of Professional Practice of the Board of Certification Inc.
- Barbers (ORR 2018-065 LR)**  
Authority: MCL 339.205; MCL 339.308; MCL 339.1110; MCL 339.1112; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2025; MCL 445.2030.  
Overview: The proposed revisions to the rules will amend the sanitation requirements for barber premises by updating standards for maintaining waste containers, washbasins, tools, and equipment; updating the equipment standards for a barber college by modernizing the requirements for maintaining toilet facilities and removing the requirements to possess a chalkboard, dictionary, and skin and hair charts; updating the barber training requirements to add a new training topic covering state board examination preparation and clarifying that the total minimum hours in theory instruction is 225 hours and the total minimum hours in practical training is 1,575 hours.
- Psychology – General Rules (ORR 2018-107 LR)**  
Authority: MCL 333.16145; MCL 333.16148; MCL 333.18201; MCL 333.18223; MCL 333.18233; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.  
Overview: The proposed revisions to the rules will revise the definitions for the rule set; revise the human trafficking rule to include a date of promulgation; rescind the rule related to prohibited conduct; update accreditation and psychological training program standards; provide criteria for consideration of possible variances for a postdoctoral internship, supervision for postdoctoral experience; a post-degree practicum; alternative supervision for a temporary limited licensee; and alternative supervision for a limited-license psychologist in private practice; clarify the criteria for licensure by endorsement; add criteria related to good moral character and fingerprinting as conditions for relicensure; update requirements for a temporary limited license; update the continuing education documentation retention requirement; include clarification regarding the number of continuing education credit hours that may be obtained online; provide a list of acceptable continuing education providers; clarify qualifying continuing education activities; and add a new rule that allows other potential continuing education providers to petition the board for approval of a program.

The rules will take effect immediately upon filing with the Secretary of State, unless specified otherwise in the rules. Comments on the proposed rules may be presented in person at the public hearing. Written comments will also be accepted from date of publication until 5:00 p.m. on April 22, 2019, at the following address or e-mail address:

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing— Boards and Committees Section  
P.O. Box 30670, Lansing, MI 48909-8170  
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

A copy of the proposed rules may be obtained by contacting Board Support at (517) 241-7500 or the email address noted above. Electronic copies also may be obtained at the following link:

[http://dmbinternet.state.mi.us/DMB/DTMBORR/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level\\_1=Bureau+of+Professional+Licensing](http://dmbinternet.state.mi.us/DMB/DTMBORR/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level_1=Bureau+of+Professional+Licensing)

The meeting site and parking are accessible to people with disabilities. Individuals attending the meeting are requested to refrain from using heavily scented personal care products, in order to enhance

# The Mining Journal

Upper Michigan's Largest Daily Newspaper

249 W. Washington St., P.O. Box 430, Marquette, Michigan 49855. Phone (906)228-2500. Fax (906)228-3273.

AFFIDAVIT OF PUBLICATION

STATE OF MICHIGAN

AFFIDAVIT OF PUBLICATION

For the County of **MARQUETTE**

In the matter of: Notice of Public Hearing  
April 22, 2019  
Bureau of Professional Licensing  
Athletic Trainers – General Rules  
Barbers  
Psychology - General Rules

Size: 3 x 11

State of **MICHIGAN**, County of Marquette ss.

**JAMES A. REEVS**

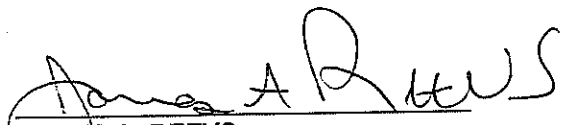
being duly sworn, says that he is

**PUBLISHER**

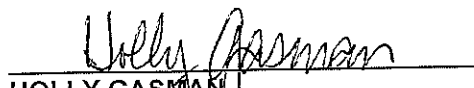
of **THE MINING JOURNAL**

a newspaper published and circulated in said county and otherwise qualified according to Supreme Court Rule; that annexed hereto is a printed copy of a notice which was published in said newspaper on the following date, or dates, to-wit

March 18, 2019

  
\_\_\_\_\_  
**JAMES A. REEVS**

Subscribed and sworn to before me this 18th day of March 2019.

  
\_\_\_\_\_  
**HOLLY GASMAN**  
Notary Public for **MARQUETTE** County, Michigan  
Acting in the County of Marquette  
My commission expires: May 25, 2025



## NOTICE OF PUBLIC HEARING

April 22, 2019

1:00 p.m.

Location: G. Mennen Williams Building Auditorium  
525 W. Ottawa Street, Lansing, Michigan

The hearing is held to receive public comments on the following administrative rules:

### Athletic Trainers – General Rules (ORR 2018-062 LR)

**Authority:** MCL 333.16145; MCL 333.16148; MCL 333.16178; MCL 333.16186; MCL 333.16204; MCL 333.16205; MCL 333.16215; MCL 333.17904; MCL 333.17905; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.

**Overview:** The proposed revisions to the rules will clarify the licensure requirements for first aid, cardio pulmonary resuscitation (CPR), and automated external defibrillator (AED) training; advise when an applicant for licensure or renewal must have completed the training for identifying victims of human trafficking; clarify the first aid, CPR, and AED training required for licensure by endorsement, renewal, and relicensure; add a new rule that will advise a foreign-trained applicant that he or she must demonstrate a working knowledge of the English language; update accreditation standards; revise the rule approving first aid, CPR, and AED training and certification programs; revise the rules pertaining to continuing education; and adopt by reference the updated Standards of Professional Practice of the Board of Certification Inc.

### Barbers (ORR 2018-065 LR)

**Authority:** MCL 339.205; MCL 339.308; MCL 339.1110; MCL 339.1112; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2025; MCL 445.2030.

**Overview:** The proposed revisions to the rules will amend the sanitation requirements for barber premises by updating standards for maintaining waste containers, washbasins, tools, and equipment; updating the equipment standards for a barber college by modernizing the requirements for maintaining toilet facilities and removing the requirements to possess a chalkboard, dictionary, and skin and hair charts; updating the barber training requirements to add a new training topic covering state board examination preparation and clarifying that the total minimum hours in theory instruction is 225 hours and the total minimum hours in practical training is 1,575 hours.

### Psychology – General Rules (ORR 2018-107 LR)

**Authority:** MCL 333.16145; MCL 333.16148; MCL 333.18201; MCL 333.18223; MCL 333.18233; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.

**Overview:** The proposed revisions to the rules will revise the definitions for the rule set; revise the human trafficking rule to include a date of promulgation; rescind the rule related to prohibited conduct; update accreditation and psychological training program standards; provide criteria for consideration of possible variances for a postdoctoral internship, supervision for postdoctoral experience, a post-degree practicum, alternative supervision for a temporary limited licensee, and alternative supervision for a limited license psychologist in private practice; clarify the criteria for licensure by endorsement; add criteria related to good moral character and fingerprinting as conditions for relicensure; update requirements for a temporary limited license; update the continuing education documentation retention requirement; include clarification regarding the number of continuing education credit hours that may be obtained online; provide a list of acceptable continuing education providers; clarify qualifying continuing education activities; and add a new rule that allows other potential continuing education providers to petition the board for approval of a program.

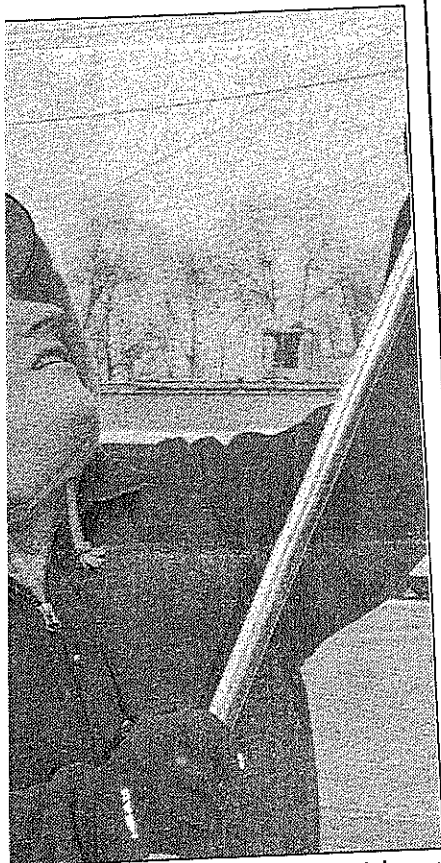
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Bureau of Professional Licensing— Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
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Mr. Don, owner of Mr. Don's Restaurant, hangs a new sign in front of his business in downtown Lansing, Michigan. Top: photo shows Mr. Don's Restaurant in Lansing. (Nick Buckley/Battle Creek Enquirer)

**Family Friendly**

**WEDNESDAY**  
Fish Fry  
Can-Eat  
DAY!

**THURSDAY**  
Lunch  
4:00 pm  
Take-Out

**Anderson's**  
CLASSIC GRILL

2433 US 41 West,  
Marquette  
225-5119

## PUBLIC TOWNSHIP PLANNING COMMISSION MEETING OF PUBLIC HEARING

Notified that on April 8, 2019 at 7:00 p.m. the Township Planning Commission will hold a public hearing at their regular scheduled meeting at the Republic Township, 279 Kroman Ave., Republic, MI.

The Township is requesting public input and comment on the Township's proposed Amendments to the Zoning Ordinance definitions permitting Hobby Farms and Homebased Businesses, in the R-1, R-2, RR, WR-1, WR-2, and MR Districts.

The proposed amendments may be reviewed at the Republic Township from 9:00 a.m. to 4:00 p.m. Monday thru Friday. Written comments will be received until the date of the meeting. The one wishing to give testimony will be given an opportunity to be heard.

This notice is posted in compliance with Public Act 267 of 2011, as amended, the Open Meetings Act, MCLA 41.72A and the Americans with Disabilities Act (ADA).

Being duly sworn deposes and say he/she is Principal Clerk of



# THE FLINT JOURNAL

## DAILY EDITION

a newspaper published and circulated in the County of Genesee and otherwise qualified according to Supreme Court Rule; and that the annexed notice, taken from said paper, has been duly published in said paper on the following day(days) \_\_\_\_\_

\_\_\_\_\_ April 4 A.D. 2019

Sworn to and subscribed before me this 4<sup>th</sup> day of April 2019

*Janice M. DeGraaf*  
JANICE M. DEGRAAF  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF KENT  
MY COMMISSION EXPIRES Oct 3, 2020  
ACTING IN COUNTY OF Kent

**Department of Licensing and Regulatory Affairs**  
**Bureau of Professional Licensing**

### NOTICE OF PUBLIC HEARING

**April 22, 2019 1:00 p.m.**

Location: G. Mennen Williams Building Auditorium  
525 W. Ottawa Street, Lansing, Michigan

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**Authority:** MCL 333.16145; MCL 333.16148; MCL 333.16178; MCL 333.16186; MCL 333.16204; MCL 333.16205; MCL 333.16215; MCL 333.17904; MCL 333.17905; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.

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**Barbers (ORR 2018-065 LR)**

**Authority:** MCL 339.205; MCL 339.308; MCL 339.1110; MCL 339.1112; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2025; MCL 445.2030.

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**Psychology – General Rules (ORR 2018-107 LR)**

**Authority:** MCL 333.16145; MCL 333.16148; MCL 333.18201; MCL 333.18223; MCL 333.18233; MCL 338.3501; MCL 445.2001; MCL 445.2011; MCL 445.2030.

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Bureau of Professional Licensing—Boards and Committees Section  
P.O. Box 30670, Lansing, MI 48909-8170  
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

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STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF PROFESSIONAL LICENSING

- - -

PUBLIC HEARING

MONDAY, APRIL 22, 2019

AT ABOUT 1:00 P.M.

- - -

G. MENNEN WILLIAMS BUILDING AUDITORIUM

525 W. OTTAWA STREET

LANSING, MICHIGAN

- - -

RE: Athletic Trainers - General Rules (ORR 2018-062 LR)  
Barbers - General Rules (ORR 2018-065 LR)  
Psychology - General Rules (ORR 2018-107 LR)

- - -

HEARING FACILITATOR:

WESTON MacINTOSH  
Bureau of Professional Licensing  
611 W. Ottawa Street  
Lansing, Michigan 48909

ALSO PRESENT: Dena Marks  
Kerry Przybylo  
Rick Roselle  
Stephanie Wysack

REPORTED BY: Lori Anne Penn, CSR-1315  
33231 Grand River Avenue  
Farmington, Michigan 48336

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I N D E X

Opening Statement - Weston MacIntosh 3

- - -

COMMENTS: PAGE

Tracey Covassin - Athletic Trainers 5

Frances Brown - Psychology 6

Dennis Kayes - Psychology 9

Jason Moser - Psychology 12

Eric Ozkan - Psychology 14

- - -

Closing Statement - Weston MacIntosh 20

1                   Lansing, Michigan

2                   Monday, April 22, 2019

3                   At 1:00 p.m.

4                   - - -

5                   MR. MacINTOSH: My name is Weston  
6                   MacIntosh and I'm an analyst for the Bureau of  
7                   Professional Licensing in the Department of Licensing and  
8                   Regulatory Affairs, and I will be facilitating the  
9                   hearing today.

10                  This is a public hearing on proposed  
11                  administrative rules entitled "Athletic Trainers-General  
12                  Rules", "Barbers-General Rules", and "Psychology-General  
13                  Rules". The hearing is being conducted under the  
14                  authority of the Administrative Procedures Act, Public  
15                  Act 306 of 1969, on behalf of the Department of Licensing  
16                  and Regulatory Affairs, Bureau of Professional Licensing.

17                  The hearing is being called to order at  
18                  1:00 o'clock p.m. on April 22, 2019, at the G. Mennen  
19                  Williams Building Auditorium located at 525 West Ottawa  
20                  Street in Lansing, Michigan. The notice of public  
21                  hearing was published in three newspapers of general  
22                  circulation, as well as the Michigan Register, Issue No.  
23                  5, published on April 1, 2019.

24                  We are here today to receive your  
25                  comments on the proposed rules. If you wish to speak,  
                    Metro Court Reporters, Inc.   248.360.8865

1 please make sure you have signed in and indicated your  
2 willingness to speak. You may use the cards provided in  
3 the lobby for this purpose. I will organize the cards by  
4 rule set so that the comments for that profession will be  
5 grouped together in the transcript. If you would like to  
6 testify and have not signed in, please do so now. For  
7 those of you who do not wish to sign with a card, you may  
8 speak at the microphone once we have exhausted the stack  
9 of cards submitted to me.

10 If you have comments, please make sure  
11 that they relate directly to the proposed rules. If you  
12 have questions regarding the rules, please submit your  
13 questions as part of your testimony for the Department's  
14 review. If you have suggested changes to the proposed  
15 rules, please include the specific reasons why the  
16 changes would be in the public interest.

17 For the record, when you testify, please  
18 identify yourself by spelling your name and organization,  
19 if any, that you may be speaking for today. This will  
20 help the Department preparing the hearing record that  
21 will go before the Boards. Written statements can be  
22 submitted directly to me at the table. The Department  
23 will also accept written statements e-mailed or  
24 postmarked until 5:00 o'clock p.m. today.

25 The Department staff from the Bureau of  
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1 Professional Licensing includes myself, Kerry Przybylo,  
2 Dena Marks, Rick Roselle, and Stephanie Wysack.

3 So do we have cards? Okay. So the first  
4 set we will take comments for is Athletic Trainers. The  
5 first card I have is from Tracy Covassin. So if you'd  
6 like to come down and speak.

7 TRACEY COVASSIN: I just got these, I  
8 haven't really read it. Can I ask a question?

9 MR. MacINTOSH: Yeah, it will be part of  
10 your -- the transcript, but I mean we can't clarify --

11 TRACEY COVASSIN: Okay. So where it says  
12 Board here under Rule 1(a), it originally had said:  
13 "Board" means Michigan board of athletic trainer, and now  
14 it says Michigan trainer board. Do you mean athletic  
15 trainer, because you crossed off athletic and you listed  
16 us as a trainer, and we're not trainers, we're athletic  
17 trainers?

18 MS. MARKS: I don't have that on my copy;  
19 is it on that copy?

20 TRACEY COVASSIN: Yes.

21 MS. MARKS: I'll double check that.

22 TRACEY COVASSIN: So yeah, if you could  
23 just double check that everything should say athletic  
24 trainer, not trainer.

25 MS. MARKS: Correct. Trainers was marked  
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1 off because the Board is called Athletic Trainer Board in  
2 the statute, so it should still include the Athletic.

3 TRACEY COVASSIN: Okay. It was crossed  
4 off on whatever I just picked up outside.

5 MS. MARKS: All right. I will double  
6 check that. Thank you.

7 TRACEY COVASSIN: Thank you.

8 MR. MacINTOSH: Okay. Do we have any  
9 other comments for Athletic Trainers? (No response.)

10 Any other comments for Barbers? (No  
11 response.)

12 Okay. So we'll go next to Psychology,  
13 and I'll just go alphabetically from what I have up here  
14 so far. So I have Dr. Brown from the Michigan School of  
15 Psychology.

16 FRANCES BROWN: Thank you, Wes. So I'm  
17 Frances Brown, F-r-a-n-c-e-s, Brown, B-r-o-w-n, from the  
18 Michigan School of Psychology. Okay. So I have a  
19 statement to read, and this is about a differentiation in  
20 training of psychologists for doctoral students and  
21 post-doctoral graduates. And Wes, would you please,  
22 there's multiple copies in there.

23 (Documents provided to Mr. MacIntosh.)

24 MR. MacINTOSH: Thank you.

25 FRANCES BROWN: You're welcome.



1                   Okay. So respectfully submitted for  
2                   consideration: On behalf of the Michigan School of  
3                   Psychology, and in consideration of other institutions of  
4                   higher education, we request greater clarity in the  
5                   language pertaining to monthly hours of supervision as  
6                   outlined in Part 3, Limited Licensed Psychologists,  
7                   R 338.2561, Rule 61(1)(b)(iv). Training:

8                   (ii) The practicum must require not less  
9                   than 500 clock hours of psychological work. The  
10                  applicant shall be supervised by a psychologist who is  
11                  licensed in this state, eligible for licensure in this  
12                  state, or licensed or certified at the independent  
13                  practice level in the state where the practicum takes  
14                  place. That's not of issue.

15                  The second point, (iv) The applicant  
16                  shall meet in person with his or her supervisor for a  
17                  minimum of eight hours a month during the practicum. So  
18                  we have had difficulty enacting this practice and this is  
19                  why.

20                  The beginning and end of an academic  
21                  semester does not coincide with the beginning and end of  
22                  a month. For your consideration, a student in a graduate  
23                  program will fulfill the 500-hour practicum requirement  
24                  over multiple semesters of enrollment, which may also  
25                  span multiple years. A semester, and consequently,

1 practicum work, often will begin and/or end mid-month or  
2 with partial months of active practicum work due to  
3 semester breaks or training site schedules.

4 Clarification is sought as to the intent  
5 of the language of eight hours per month. During this  
6 important time in a student's training, supervision is  
7 provided weekly, with at least two hours per week spent  
8 in supervision. In certain months, December for example,  
9 students are typically enrolled for only a two-week  
10 period at the beginning of the month with a winter break  
11 after that. Additionally, in months that contain more  
12 than four weeks, in a five-week month, the student may  
13 have more than eight hours of supervision that month if  
14 they're getting their two hours every week.

15 Below is proposed language for your  
16 consideration, intended to provide clarity and maintain  
17 the required hours and function of supervision. The  
18 proposed language is: .

19 Eight hours of supervision per month, to  
20 be pro-rated during the training experience to no less  
21 than two hours per week while in practicum.

22 In contrast to the language pertaining to  
23 limited licensed psychologists, the following is the  
24 language for those with a doctoral degree. So what I was  
25 just speaking about was for the masters level clinicians.

1 For doctoral students, it says:

2 Training: The applicant shall have  
3 successfully completed an internship that was an  
4 integrated part of a doctoral degree that satisfies the  
5 requirements in subdivision (a)(i) and (a)(ii) of this  
6 rule, or an equivalent postdoctoral internship as  
7 determined by the Board.

8 This section does not specify hours per  
9 month or week, nor is it specified in the Psychology  
10 Supervision Evaluation form for doctoral applicants.

11 We thank you for your consideration.

12 MR. MacINTOSH: Thank you. So next I  
13 have Dennis Kayes.

14 DENNIS KAYES: I have only one copy. My  
15 name is Dennis Kayes, K-a-y-e-s. Do you need my address?

16 MR. MacINTOSH: No.

17 DENNIS KAYES: Good afternoon. My name  
18 is Dennis Kayes, and I live in Huntington Woods. I'm a  
19 retired attorney, but more importantly, for eight years  
20 (ending this past December), I was a public member of the  
21 Michigan Board of Psychology. While serving on the  
22 Board, I was a member of the Disciplinary Subcommittee,  
23 and twice I was on an ad hoc subcommittee working on  
24 revisions to the rules. The amendments to the rules  
25 being discussed today are amendments I worked on. One of

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1 the amendments, the deletion of Rule 27 (formerly known  
2 as R 338.2527), is one of the rules -- is one that the  
3 Rules Subcommittee opposed and which the whole Board, by  
4 a large majority, voted to oppose. At both levels I was  
5 one of the principal opponents of the deletion, and I am  
6 here today to continue that opposition and to urge you  
7 not to delete the rule.

8 Here is why:

9 To begin, the push to delete the rule did  
10 not come from any member of the Board; it came solely  
11 from the Department of Licensing and Regulatory Affairs.  
12 When I asked the Department's representative, Weston  
13 MacIntosh, why the Department wanted the rule deleted, he  
14 responded that the Department believed the rule was not  
15 authorized under the Public Health Code. I then asked  
16 him whether there was any case in which the court had  
17 opined that the rule was not authorized. He did not  
18 respond then or numerous times thereafter when I repeated  
19 the question. It's obvious that the answer is no, there  
20 is no such opinion. This despite the fact that during my  
21 eight years on the disciplinary subcommittee there were  
22 numerous times when the Department filed complaints  
23 against psychologists alleging violations of the rule.  
24 In fact, I went further and asked Mr. Weston whether  
25 there was any time when a psychologist, in defending

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1 against a complaint, even alleged that the rule was not  
2 authorized. Again, he never answered me. I am sure that  
3 the answer again is no, there are no opinions; in fact,  
4 no one ever objected.

5 But just as importantly, the rule is in  
6 fact authorized under the Code. First, MCL 333.16145(2)  
7 provides that, "A Board or task force may promulgate  
8 rules necessary or appropriate to fulfill its functions  
9 as prescribed in this article." Second, MCL 333.16221  
10 provides that a Board, through its Disciplinary  
11 Subcommittee, shall punish certain behavior, including,  
12 as set forth in Clause (a), "A violation of general duty,  
13 consisting of negligence or failure to exercise due  
14 care,... or any conduct...that impairs or may impair the  
15 ability to...skillfully practice the health profession."  
16 It seems to me (and must have seemed to every  
17 psychologist who was ever charged with a violation of  
18 Rule 27) that Rule 27 is appropriate for the Board in  
19 fulfilling its functions under Section 16221. I simply  
20 cannot understand why the Department not only feels  
21 otherwise, but feels otherwise so strongly that it is  
22 pushing to delete a rule to which nobody has ever  
23 objected and which has helped make the psychology  
24 profession a very respected one.

25 One further point I'd like to make.

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1 Because the rule is not -- because deleting the rule is  
2 not being proposed by the Board, I tried to find in the  
3 statutes and regulations some authority for this to be  
4 forced upon the Board, and I could find none. The Public  
5 Health Code provides that rules governing psychologists  
6 are adopted by the Board, not by some other entity.

7 Thank you for allowing me to speak to  
8 you.

9 MR. MacINTOSH: Next we have Jason Moser.

10 JASON MOSER: Good afternoon. My name is  
11 Jason Moser, J-a-s-o-n M-o-s-e-r, I'm Associate Professor  
12 and Associate Director of Clinical Training at the  
13 Michigan State University. I'm here representing my  
14 clinical psychology doctoral program, as well as the  
15 clinical psychology doctoral program at the University of  
16 Michigan headed by the Director of Clinical Training  
17 there, Patricia Deldin.

18 I'm here today to provide additional  
19 support and thanks for the addition under Rule 41  
20 pertaining to the standards for doctoral-level psychology  
21 programs that are adopted by reference in the rules, the  
22 approved programs that now appear as -- under 41(1)(d),  
23 the accreditation standards of the Psychological Clinical  
24 Science Accreditation System, or (PCSAS). Our two  
25 Universities, our two programs are very supportive of

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1 this addition to the rules that the PCSAS is a program  
2 that's recognized by the Board for licensure in Michigan,  
3 and we continue that support and are very happy to see  
4 that addition on there, and that we wanted to just add a  
5 couple of things since we first submitted our white paper  
6 in support of PCSAS to being an option for clinical  
7 licensure in Michigan in 2016, we also appeared before  
8 the Board in 2018, and we appreciate the time that the  
9 Board took to read over those materials and to have us  
10 comment.

11 Since those meetings and since those  
12 times, PCSAS, as an alternative accrediting body, has  
13 also been approved by APPIC, the major internship system  
14 for students in clinical psychology. It has also been  
15 recognized by the Department of Veterans Affairs, and has  
16 also been recognized by a number of other states so far,  
17 including Delaware, Missouri, Illinois, New Mexico,  
18 Arizona, as well as other states that don't require any  
19 changes but are recognizing obviously PCSAS, California  
20 and New York, two states that don't require any  
21 additional changes to their rules, but many states are  
22 already allowing PCSAS graduates to be licensed in their  
23 state, and we fully support Michigan adopting that  
24 alternative as well so that graduates from our program,  
25 Michigan State, as well as University of Michigan and

1 others, can seek licensure here in the State of Michigan.

2 Thank you for your time.

3 MR. MacINTOSH: Next I have Eric Ozkan.

4 ERIC OZKAN: My name is Eric Ozkan, it's  
5 E-r-i-c, last name is O-z-k-a-n. My name is Dr. Eric  
6 Ozkan, and I am appearing today as both a concerned  
7 citizen and as a professional psychologist who has  
8 practiced in Michigan for the past 16 years. While I  
9 feel it is relevant to mention that I currently serve as  
10 Chair of the Michigan Board of Psychology and have had  
11 significant responsibility in drafting today's proposed  
12 rule set, I must emphasize that the following statement  
13 is my personal view and should not be seen as reflecting  
14 the view of the Board of Psychology as whole. I am  
15 speaking only for myself on this matter.

16 I believe the overall revision to our  
17 rule set is an outstanding piece of collaboration between  
18 Licensing and Regulatory Affairs (LARA) and the Michigan  
19 Board of Psychology. It significantly improves upon our  
20 last update in 2015, but does contain one change that I  
21 strongly disagree with.

22 The change is the removal of an entire  
23 section of the rules entitled R 338.2527, Prohibited  
24 Conduct, or simply, Rule 27. This section clearly and  
25 specifically enumerates seven groups of unacceptable

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1       conduct that all competent psychologists view as  
2       potentially damaging to their clients.  Examples of such  
3       prohibited conduct include:  Engaging in unfair  
4       discrimination against clients; engaging in sexual  
5       relationships with clients, their family members,  
6       supervisees, or students; engaging in other multiple  
7       relationships, such as business relationships, with  
8       clients or their family members; exploiting clients in  
9       other ways that use the therapeutic relationship to  
10      directly benefit the licensee, and; neglecting to provide  
11      continuity of care to clients.

12                       While I'm confident that nobody disagrees  
13      with the necessity of having these prohibitions applied  
14      to psychologists, the entire section comprising Rule 27  
15      was rescinded from the current proposed revision.  The  
16      reasoning, as I understand it, falls along two lines:

17      (1) It is suggested that Michigan's Public Health Code  
18      does not actually provide any statutory authority to the  
19      Board of Psychology allowing them to promulgate rules  
20      regarding prohibited conduct, even though these rules  
21      have existed for decades, and (2) It is suggested that  
22      even if the Board of Psychology had such authority,  
23      explicitly stating specific examples of prohibited  
24      conduct in the rules is unnecessary as it merely  
25      duplicates more general language already present in the

1 Public Health Code. It is feared that such duplication  
2 may lead to confusion about precisely what conduct is and  
3 is not prohibited.

4           Although I feel I understand LARA's  
5 reasoning on this matter, I disagree with it based on the  
6 following seven points:

7           (1) I have found it difficult to  
8 understand precisely why the language of the Public  
9 Health Code does not allow the Board of Psychology to  
10 promulgate rules for the conduct of its own licensees.  
11 Not being an attorney myself, I have deferred to  
12 individuals who are attorneys and have observed some  
13 disagreement among them on this matter. Given that, I'm  
14 not sure that the primary rationale put forth rescinding  
15 Rule 27 is uncontestable.

16           (2) Whether or not the new -- whether or  
17 not the Public Health Code provides language allowing the  
18 Board of Psychology to promulgate new rules or not, no  
19 new rules are being proposed or added with this revision.  
20 I would merely request that rules already present and  
21 having a long history be maintained without modification.  
22 Even if the authority to promulgate rules by the Board is  
23 legitimately open to question, it seems there would be  
24 little danger in maintaining the current rules while the  
25 matter is resolved.

1                   (3) The existence of Rule 27 is not mere  
2 window-dressing. The rules on prohibited conduct,  
3 particularly those related to sexual misconduct and other  
4 forms of boundary crossing, are routinely cited by  
5 attorneys from the Office of the Attorney General as a  
6 basis for misconduct charges brought against licensees.  
7 As it stands, Rule 27 is relied upon by attorneys as an  
8 effective and convenient tool for dealing with  
9 professional misconduct.

10                   (4) The presence of similar sections  
11 entitled "Prohibited Conduct" are found in the  
12 administrative rules for other professions, including  
13 Massage Therapy, Physical Therapy, and Acupuncture. The  
14 long-standing presence of such a section in the  
15 psychology rule set and its continuing presence in these  
16 newer professions suggests that there is no inherent  
17 problem having such a section in addition to the more  
18 general language present in the Public Health Code.

19                   (5) The practice of psychology presents  
20 unique challenges regarding client safety as compared  
21 with other professions. For us, the rules regarding  
22 boundary crossing are particularly important because of  
23 the private, one-on-one, and often emotionally intimate  
24 nature of our work with clients. Our training and ethics  
25 rigorously and explicitly address these challenges and we

1 have no problem ensuring that our public rules do so as  
2 well. Rule 27 provides bright lines for misconduct that  
3 are not subject to interpretation. Psychologists welcome  
4 such transparency as good for both our profession and for  
5 the public.

6 (6) All competent psychologists are  
7 acutely aware of the rules and ethics surrounding the  
8 complex relationships we engage in as a matter of course.  
9 While we are clear-thinkers in this regard, we are not  
10 lawyers. Delving into the minutiae of the carefully  
11 crafted language present in the Public Health Code is  
12 akin to deciphering hieroglyphics for many of us. Given  
13 that, every psychologist I know relies on the  
14 Administrative Rules for Psychology as their source for  
15 guidelines regulating our profession. Until I became a  
16 member of the licensing board in 2012, I had never even  
17 thought of consulting the Public Health Code for  
18 professional guidance, and I never needed to. I think  
19 this is likely true of most practicing psychologists. As  
20 with most professions, I believe, we rely on what is  
21 present in the rules as a more accessible and  
22 understandable distillation of the Public Health Code.

23 (7) A final consideration regards the  
24 optics of removing Rule 27; how it would appear to our  
25 colleagues and the public at large. With the release of

1 any new rule set, the most natural first question to ask  
2 is, "What's changed?" In the current cultural and  
3 political climate, matters of sexual impropriety by  
4 professionals are rightly being taken more seriously by  
5 all of us. Why would we chose to remove rules clearly  
6 forbidding such misconduct? The fact that the Public  
7 Health Code may contain duplicate protections may be lost  
8 on many as those protections are relatively hidden from  
9 view. I am proud to be a member of a profession that has  
10 clearly written rules specifically identifying sexual and  
11 other misconduct as unacceptable. I can see no danger in  
12 keeping those rules specific and stating them clearly in  
13 an easily accessible document like this rule set.

14 Overall, the current set of proposed  
15 rules represents a clearer, leaner set of guidelines for  
16 the psychologists of Michigan to follow. Additions have  
17 been made which clarify the requirements for licensure,  
18 and inconsistencies in many areas have been disposed of.  
19 Expanded opportunities for obtaining continuing education  
20 credits are especially important to push forward at this  
21 time. I strongly support the content of this proposed  
22 revision of the rules, except for one controversial but  
23 consequential issue regarding the recision of Rule 27.

24 Please consider reinstating R 338.2527,  
25 Prohibited Conduct, Rule 27. The rationale for  
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1 rescinding it is simply inadequate in the face of  
2 numerous and varied reasons for keeping it. In informal  
3 discussions among colleagues, I have not found a single  
4 instance where its removal from the rules was considered  
5 anything but a mistake.

6 Thank you very much.

7 MR. MacINTOSH: Do I have anyone else who  
8 wishes to speak at this time?

9 FRANCES BROWN: I'm sorry, I forgot to  
10 mention that on this document that I gave you, on the  
11 back --

12 MR. MacINTOSH: You might want to state  
13 your name again.

14 FRANCES BROWN: Oh, I'm sorry. Frances  
15 Brown, President, Michigan School of Psychology.

16 On the back of this document, for your  
17 information, we've provided the semester information  
18 where the breaks are for the major psychology programs in  
19 the State of Michigan. Thank you.

20 MR. MacINTOSH: Okay. If there's no one  
21 else who wishes to speak at this time, we'll take a short  
22 recess.

23 (Recess held from 1:26 p.m. to 1:44 p.m.)

24 MR. MacINTOSH: Okay. If there are no  
25 further comments at this time, I hereby declare the  
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1 hearing closed. The record will remain open until 5:00  
2 p.m. today for any additional comments you may wish to  
3 share regarding the proposed rules. Thank you for  
4 coming.

5 (Hearing concluded at 1:45 p.m.)

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I, Lori Anne Penn, certify that this transcript, consisting of 22 pages, is a complete, true, and correct record of the public hearing held on Monday, April 22, 2019.

I further certify that I am not responsible for any copies of this transcript not made under my direction or control.

April 26, 2019  
Date

\_\_\_\_\_  
Lori Anne Penn, CSR-1315  
Notary Public, Macomb County, Michigan  
My Commission Expires June 15, 2019





April 22, 2019

Department of Licensing and Regulatory Affairs Bureau of Professional Licensing  
Public Hearing

Respectfully Submitted for Consideration:

On behalf of the Michigan School of Psychology, and in consideration of other institutions of higher education, we request greater clarity in the language pertaining to monthly hours of supervision as outlined in PART 3. LIMITED LICENSED PSYCHOLOGISTS R 338.2561, Rule 61(1)(b)(iv). Training:

(ii) The practicum must require not less than 500 clock hours of psychological work. 12 (iii) The applicant shall be supervised by a psychologist who is licensed in this state, eligible for licensure in this state, or licensed or certified at the independent practice level in the state where the practicum takes place.

**(iv) The applicant shall meet in person with his or her supervisor for a minimum of 8 hours a month during the practicum.**

The beginning and end of an academic semester does not coincide with the beginning and end of a month. For your consideration, a student in a graduate program will fulfill the 500-hour practicum requirement over multiple semesters of enrollment, which may also span multiple years. A semester, and consequently, practicum work, often will begin and/or end mid-month or with partial months of active practicum work due to semester breaks or training site schedules.

Clarification is sought as to the intent of the language of 8 hours per month. During this important time in a student's training, supervision is provided weekly, with at least two hours per week spent in supervision. In certain months, December for example, students are typically only enrolled for a two-week period at the beginning of the month. Additionally, in months that contain more than four weeks a student may have more than 8 hours of supervision per month.

Below is proposed language for your consideration, intended to provide clarity and maintain the required hours and function of supervision:

**8 hours of supervision per month, to be pro-rated during the training experience to no less than two hours per week while in practicum.**

In contrast to the language pertaining to LIMITED LICENSED PSYCHOLOGISTS, in R 338.2543 the following is the language for those with a doctoral degree:

Application for licensure; psychologist; requirements

b) Training: The applicant shall have successfully completed an internship that was an integrated part of a doctoral degree that meets satisfies the requirements in subdivision (a)(i) and (a)(ii) of this rule, or an equivalent postdoctoral internship as determined by the board.

This section does not specify hours per month or week, nor is it specified in the Psychology Supervision Evaluation form for doctoral applicants.

We thank you for your consideration.

Fran Brown, PsyD, LP  
President

**Academic Semesters of Representative Michigan Colleges/Universities\***

Eastern Michigan University	Michigan School of Psychology	Michigan State University	Oakland University	University of Detroit Mercy	University of Michigan	Wayne State University	Western Michigan University
<b>Fall</b> 9/5/18 - 12/11/18	<b>Fall</b> 8/30/18 - 12/10/18	<b>Fall</b> 9/29/18 - 12/14/18	<b>Fall</b> 9/5/18 - 12/15/18	<b>Fall</b> 8/27/18 - 12/15/18	<b>Fall</b> 9/4/18 - 12/20/18	<b>Fall</b> 8/28/18 - 12/10/18	<b>Fall</b> 8/29/18 - 12/15/18
<b>Winter</b> 1/7/19 - 4/18/19	<b>Winter</b> 1/7/19 - 4/5/19	<b>Spring</b> 1/7/19 - 5/3/19	<b>Winter</b> 1/3/19 - 4/24/19	<b>Winter</b> 1/7/19 - 4/27/19	<b>Winter</b> 1/9/19 - 5/2/19	<b>Winter</b> 1/7/19 - 4/22/19	<b>Spring</b> 1/7/19 - 4/27/19
<b>Summer</b> 5/6/19 - 8/12/19	<b>Spring/ Summer</b> 4/15/19 - 7/19/19	<b>Summer I</b> 5/13/19 - 6/27/19	<b>Summer</b> 5/6/19 - 8/24/19	<b>Summer</b> 5/6/19 - 8/8/19	<b>Summer</b> 5/7/19 - 8/20/19	<b>Spring/ Summer</b> 5/6/19 - 7/26/19	<b>Summer I</b> 5/6/19 - 6/26/19
		<b>Summer II</b> 7/1/19 - 8/15/19					<b>Summer II</b> 6/27/19 - 8/16/19

\*Information obtained from individual college/university websites.

## MacIntosh, Weston (LARA)

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**From:** BPL-BoardSupport  
**Sent:** Tuesday, April 23, 2019 7:56 AM  
**To:** MacIntosh, Weston (LARA)  
**Subject:** FW: Input for Psychology Rules  
**Attachments:** PSYCH\_RULESINPUT\_04222019\_1.docx

Thank you,  
Stephanie Wysack  
Departmental Technician  
Boards and Committees Section  
Bureau of Professional Licensing  
Michigan Department of Licensing and Regulatory Affairs  
Phone: 517-241-7500  
Email: BPL-BoardSupport@michigan.gov

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**From:** Lauren <yoohoo@usa.net>  
**Sent:** Monday, April 22, 2019 4:09 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Input for Psychology Rules

See Attached Document  
May be sending a second

Thank you for your work!

Sincerely,  
Lauren Levinson

**COMMENTS ON PSYCHOLOGY PROPOSED RULE CHANGES**

**04/22/2019**

<b>TOPIC #1</b>	<b>Exam Requirements</b>
<b>SECTIONS/PAGES</b>	PART 3: Rule 61, Page 12, (d) Examination:
<b>BACKGROUND/ CONTEXT</b>	<p>The RFR, Page 2, Second Item States:          "Update the requirements for a temporary limited license, including the necessary changes related to recent passage of legislation that modified MCL 333.18223"</p> <p>Issue: This does not appear to be updated in <b>Rule 61 (d) Examination</b></p>
<b>COMMENTS</b>	<p><b>CURRENT TEXT IN NEW RULES PROPOSAL:</b> Rule 61 (d) Examination: The applicant shall have passed the examination approved by the board under R 338.2563. An individual who was licensed under section 18223(2) of the code, MCL 333.18223(2), prior to June 30, 2010, shall is not be required to take the examination unless the individual's license has lapsed for 3 years or more.</p> <p><b>TEXT OF MCL CODE Re: Section 18322(2) affected by Bill SB634:</b> The applicant shall have passed the examination approved by the board under R 338.2563. An individual who applies for an initial limited license under this subsection before March 31, 2018 is not required to take an examination that is approved by the board to be granted a limited license...</p>
<b>PROPOSED SOLUTION</b>	1. Update the Rule to reflect the legislation that modified MCL 333.1823(2)