From: BPL-BoardSupport

To: MacIntosh, Weston (LARA)

Subject: Fwd: Psychology rules comment

Date: Monday, January 9, 2023 4:38:32 PM

**From:** Sarah Domoff <sarah.domoff@gmail.com> **Sent:** Monday, January 9, 2023 4:34:27 PM

To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>

**Subject:** Psychology rules comment

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To the Michigan Board of Psychology,

The Diversity, Inclusion, and Social Responsibility (DISR) committee of the Michigan Psychological Association (MPA) recommends that the list of sponsors of CE programs be expanded to include two additional organizations:

Society for the Scientific Study of Sexuality: <a href="https://www.sexscience.org/content.aspx?">https://www.sexscience.org/content.aspx?</a>
<a href="page-id=22&club\_id=173936&module\_id=500493">page\_id=22&club\_id=173936&module\_id=500493</a>

National Latinx Psychological Association: https://www.nlpa.ws/continuing-education

Thank you for considering this comment.

Dr. Domoff, DISR Chairperson

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Sarah E. Domoff, Ph.D. Associate Professor Department of Psychology Central Michigan University

Research Faculty Affiliate School of Public Health University of Michigan

Family Health Research Lab: http://www.sarahdomoff.com/

Twitter: @sarah\_domoff

From: BPL-BoardSupport

To: MacIntosh, Weston (LARA)

**Subject:** FW: Psychology – General Rules (MOAHR #2022-14 LR)

**Date:** Monday, January 9, 2023 3:42:40 PM

From: Tyler, Mike <mtyler@msp.edu> Sent: Monday, January 9, 2023 3:40 PM

**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov> **Subject:** Psychology – General Rules (MOAHR #2022-14 LR)

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Re: Psychology – General Rules (MOAHR #2022-14 LR)

I am pleased to have this opportunity to comment on proposed changes to rules and regulations for the professional licensing of psychologists in the state of Michigan. Overall, I and members of the team I work with had no substantive concerns. We are excited that efforts continue to support master's level practitioners in the state of Michigan and believe these individuals are an important part of the mix needed to address the needs of citizens.

One member of our team expressed concern about wording that might be confusing to some readers. This is in relation to R 338.2573 (2) (i). After careful reading, she interpreted this section to apply to an LLP (not a TLLP). If the interpretation is correct and it applies only to LLP, then is was unclear if it referred to an LLP who allows their license to lapse and may have the license renewed <u>if</u> they re-apply within three years of the lapse <u>or</u> if they can re-apply at any time and be renewed for three years but only if they have passed the EPPP within the 2 years prior to the application for relicensure.

If the only way to reapply is within the first three years of the lapse, then the language may be clearer if "more" was replaced with "within". The suggested wording provided is:

(2) An applicant whose limited license has lapsed may be relicensed within the three years after the expiration date of the license under section 16201 (4).....if the applicant....

I would note that there was not agreement on how this section was to be interpreted. This disagreement might suggest some lack of clarity. I appreciate the opportunity to be a part of this important conversation.

Sincerely,

## Mike Tyler, PhD Dean of Academic Programs Michigan School of Psychology



## Mike Tyler, PhD, LP

Dean of Academic Programs Michigan School of Psychology p: 248.476.1122, ext. 126 f: 248.476.1125 w: www.msp.edu

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