



Date: February 16, 2021
To: Rep. Peter Fischer, Chair & House Behavioral Health Policy Division
From: Sam Sands, Executive Director Minnesota Board of Psychology

Re: House File 970

Introduction:

I write on behalf of the Minnesota Board of Psychology (“Board”) as its Executive Director commenting on HF970 with the proposed HF970-A1 Author’s Amendment. The [mission](#) of the Board is to protect the public through licensure, regulation, and education to promote access to safe, competent, and ethical psychological services.

Initial Comments:

The Board was not requested to provide, nor did it provide, its input on this bill and its A-1 amendment. The Board was unaware that this bill with the A-1 amendment would be introduced until last week. As such, the Board has not reviewed the language to take a position on the bill. The Board of Psychology would welcome further vetting of the agency-related proposals in the bill from a regulatory perspective.

Fiscal Impact to the Agency:

A-1 Amendment, Section 6 - Mandating content areas for continuing education results in increased cost for the licensee, and the Board. Licensees often report CE cost as a concern when it comes to renewing their license. In addition, the change to the Board’s practice act will cause a fiscal impact requiring a technical change in the database that tracks continuing education as well as staff time for continuing education audits, efforts to ensure compliance, as well as education of licensees on these requirements.

Section 12 – Board participation in a Culturally Responsive Mental Health Task Force would have a fiscal impact to the agency. The Board may have policy concerns as to composition of the task force, but reserves those issues until the Board can review the language.

Section 13 – Board participation in an Alternative Mental Health Professional Licensing Pathways Work Group would also create a financial impact to the agency. A February 1, 2022 report deadline is not realistic to complete the full regulatory and policy analysis, and to identify any potential impact and unintended consequences. The Board may have policy concerns related to this task force, but reserves those issues until the Board can review the language.

Section 14 – Board participation in a Mental Health Professional Licensing Supervision task force would have fiscal impact to the agency. Again, the February 1, 2022 report deadline is not realistic to complete a full review and identify any potential impact or unintended consequences. The Board may have policy concerns related to this task force, but reserves those issues until the Board can review the language.

Conclusion:

Board members and staff value partnerships and commit to continued work with all stakeholders to ensure diversity in the workforce, while licensing qualified, professional, ethical, and competent psychologists. The Board looks forward to continuing this conversation with stakeholders.

Thank you,

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