

Rep. Raymond E. Gallison
Chairman
House Committee on Finance
Rhode Island State House
82 Smith Street, Providence, RI 02903
rep-gallison@rilin.state.ri.us

April 2, 2015

RE: AN ACT MAKING APPROPRIATIONS FOR THE SUPPORT OF THE STATE FOR THE FISCAL YEAR ENDING JUNE 30, 2016; ARTICLE 19 RELATING TO CONSOLIDATION OF DEPARTMENT OF HEALTH BOARDS

Dear Representative Gallison and members of the Finance Committee:

The Inter Organizational Practice Committee (IOPC) is a coalition of the American Academy of Clinical Neuropsychology (AACN), the Society for Clinical Neuropsychology/Division 40 of the American Psychological Association, the National Academy of Neuropsychology (NAN), the American Board of Professional Neuropsychology (ABN), and the American Psychological Practice Organization (APAPO) tasked with coordinating national neuropsychology advocacy efforts, and representing thousands of neuropsychologists in the United States.

The IOPC is writing to express our concerns with Article 19 of the Governor's proposed 2016 budget, which proposes to have one board oversee twenty-five professions, including psychology. Combining diverse professional groups with varied training, ethics, and standards of practice in such a way will dilute the licensing board's ability to effectively assess professional qualifications and protect the public when a professional violates standards of practice for his/her discipline in Rhode Island.

Article 19 proposes to have one board oversee twenty-five professions with four professional members, three public members, and three members "employed in the healthcare industry." Included among the professions that would be regulated under the same board with psychologists would be professions as different as barbers and funeral directors.

Some of the other professions listed in Article 19 have specific qualifications for competence that have nothing to do with mental healthcare, and vice versa. The proposed makeup of the board, with only four professional members chosen from twenty-five potential professions, almost ensures that decisions made by the board will not represent all of the professions falling

under their regulations, despite advice from a “technical expert.” For adequate protection of the public, the board regulating professional practice for a particular discipline should be well-versed in the particular training, ethical, and practice guidelines for that profession. Anything short of that risks damaging the public by requiring board members to regulate psychologists and other mental health providers without sufficient knowledge of professional practice boundaries, standards of care, and/or ethics of psychological practice.

We thank you for your valuable time and consideration of these points and welcome any questions that you might have about the concerns outlined in this letter, and we would be happy to provide you with any additional information that you might find to be helpful (karenpostal@comcast.net; 978-475-2025).

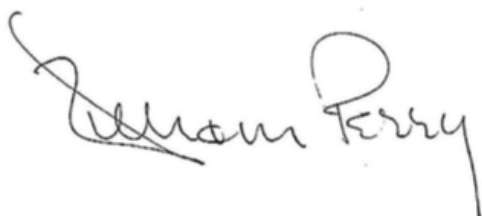
Respectfully submitted on behalf of the American Academy of Clinical Neuropsychology, National Academy of Neuropsychology, Division 40 (Neuropsychology) of the American Psychological Association, the American Psychological Association Practice Organization, and the American Board of Professional Neuropsychology,



Mark Mahone, Ph.D., ABPP
President, American Academy of Clinical Neuropsychology



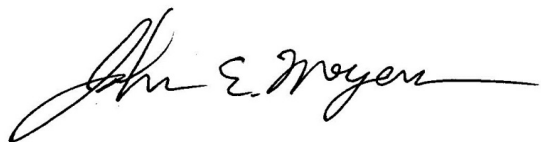
Katherine Nordal, Ph.D.
Executive Director, American Psychological Association Practice Organization



William Perry, Ph.D., ABPP
Executive Director and Past President, National Academy of Neuropsychology



Neil Pliskin, Ph.D., ABPP
President, Society for Clinical Neuropsychology (APA Division 40)

A handwritten signature in black ink, reading "John E. Meyers". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Meyers, PsyD., ABN
President, American Board of Professional Neuropsychology