

**Testimony/Comments re: Psychology Fees in WAC 246-924-990, Psychology fees and renewal cycle****Comment****Response**

I understand the need to create enough revenue to meet the demands of the EBP. My concern is not knowing how the increase in fees will be determined and making sure the increase and the scheduling for renewal doesn't present in itself a barrier to hiring and maintaining psychologists and other mental health professionals. It's hard to support the increase and other change without more information.

**The adopted rules were not changed a result of this comment.**

The concerns raised in the comment were addressed in the fee narrative provided with the proposal. The fee narrative offers a thorough explanation of how the new fees were determined, including data and graphs showing that costs have consistently increased at a rate higher than incoming revenue, which has led to a gradual depletion of the fund balance. This demonstrated the necessity of the fee adjustment to maintain operational stability. Additionally, the concern regarding changes to the license renewal schedule is addressed by the fact that the schedule remains unchanged and will continue to occur once annually, consistent with long-standing practice.

Raising fees in the current political and economic climate that's leading to layoffs of thousands of people, as well as funding cuts that will impact programs that many psychologists work within would create undue burden to many practitioners. Wages have not kept up with economic costs and now with even more uncertainty ahead, this is not the time to be raising yet another fee.

**The adopted rules were not changed a result of this comment.**

While we understand and appreciate the concerns raised regarding the financial pressures practitioners are currently facing, the Secretary of Health (Secretary) and the board is legislatively required to ensure that the full cost of regulating the profession is borne by its members. The fee narrative provided with the proposal demonstrated that, over time, operational expenses have significantly increased while revenues have not kept pace—resulting in a declining fund balance and necessitating a fee adjustment.

In response to these financial realities, the Secretary and the board made every effort to strike a balance between maintaining fiscal responsibility and minimizing the burden on licensees. Fees were structured with equity in mind, taking into account different career stages, including initial applicants, those in training, and fully licensed practitioners. These considerations were incorporated into the adopted fee schedule, and as such, no changes were made based on this comment.

I would implore the board to consider the rise of financial burdens for practitioners to enter and maintain their ability to practice independently in the field prior to restructuring fees. While demand has continued to increase for competent psychologists over the last 5 to 10 years, compensation has not significantly increased and fees continue to build on the current barriers to practice. Alternative fee structures should include lowered cost for Active Duty military, those paying off student loans, those under financial hardship, and those who may be "grandfathered" into their renewal fees.

**The adopted rules were not changed a result of this comment.**

While we understand and empathize with the financial challenges many practitioners face, especially in light of increasing demand for services and stagnant compensation, the Secretary and the board is legally required to ensure that the costs of regulating the profession are fully borne by its members. The fee narrative provided with the proposal outlines how operational costs have steadily increased, while revenues have not kept pace, leading to a depletion of the fund balance and necessitating the fee adjustments.

We carefully considered the suggestion to implement alternative fee structures for groups such as active duty military, individuals with student debt, or those under financial hardship. However, administering multiple fee schedules would require significant additional resources—such as increased staffing, system modifications, and further oversight. These added administrative costs would ultimately lead to even higher fees, which would defeat the goal of keeping fees as low and sustainable as possible.

In setting the new fees, we worked within the constraints of our statutory responsibilities and made efforts to structure the fees equitably, considering the different stages of a professional's career, such as entry-level, those in training, and fully licensed practitioners with more financial stability. With the psychological associate license, the Secretary and the board rebalanced the fee structure so that students and early-career professionals would bear a lighter financial burden. The fee was reduced to ease the financial entry into the profession. This was a deliberate step toward achieving equity in how the fee amounts were decided.

It is also worth noting that even with the proposed increases, the new fee levels remain lower than what practitioners were paying approximately ten years ago, before the last fee adjustment. This reflects the Secretary and board's commitment to long-term fiscal responsibility while minimizing the financial impact on licensees to the extent possible.

As a result, no changes were made to the adopted rules based on this comment.