Testimony/Comments re: Psychology Licensure Standards in Chapter 246-924 WAC, Psychologists	
Comment	Response
The Washington State Psychological Association (WSPA) requested the board revise WAC 246-924-057 to remove the requirement that "at least 75 percent of the supervision must be by a licensed psychologist with two years of post license experience." This provision is inconsistent with the board's intent to align Washington's supervision requirements with nationally recognized accreditation standards—specifically, those of the American Psychological Association (APA). APA accreditation standards do not stipulate a minimum number of years post-licensure for internship supervisors. They require only that supervisors be licensed and competent to supervise. If left unchanged, this rule will continue to create avoidable barriers to licensure, particularly for applicants trained in other states who may not be able to verify the post licensure status of their supervisors.	**The adopted rules were changed a result of this comment.** We appreciate your close attention to aligning Washington's supervision requirements with nationally recognized accreditation standards and for highlighting the potential barriers created by the two-year post-licensure requirement. After careful review, the board has made the requested revision. The updated language in WAC 246-924-057 now states that "at least 75 percent of the supervision must be by a licensed psychologist," removing the requirement for two years of post-licensure experience. We acknowledge that the retention of the two-year requirement in this section was an oversight during earlier revisions when it was removed from other areas. We agree that the intent has always been for all categories of supervised experience to align, and not to continue including a post-licensure experience requirement for supervisors. This correction ensures consistency across supervision standards, reduces unnecessary barriers to licensure, and supports workforce development efforts across Washington.