

LSBEP

NEWSLETTER

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*Farewell From Former Board Chair, John A. Brun, Ph.D.*

This will be my last contribution to the LSBEP Newsletter as I completed my five years on the Board at the end of June. How could I describe these past five years on the Board? Interesting, challenging, educational, rewarding, draining, overwhelming, tense, the list could be expanded. It was a certainly all of these things and more, but it was largely a very positive, and for me, growth inducing experience.

Having the opportunity to work with and collaborate with so many psychologists in the state has been a highlight. The enormous task of serving on the Board would not have been possible without the joint effort of the other Board members, past Board members, and especially Brenda and Jaime. The opportunity to share ideas and opinions, even differing ones, in a spirit of thoughtful collegiality has been super. Participating in the conduct of oral examinations and meeting new psychologists coming into the state or completing their last steps toward licensure opens doors to seeing the larger world of current training of psychologists. I will miss much of it.

Attending ASPPB meetings and participating in discussions with other board members from around the US, Canada, and in fact Europe has a profound impact on one's perspective. On one level it is reassuring to see the different ways other jurisdictions are addressing the same problems that the Louisiana Board faces. On another level, it is somewhat disturbing to see the vast diversity in approach to regulatory or disciplinary problems that exist across jurisdictions, the attempts to strive for more consistency, and the potential impact of these differences on the public and on the profession, as well as practice. It has taken five years to just begin to get a handle on some issues. Currently the mobility issue is a major one for the US, Canada and for other countries. For those of you eligible for the CPQ, December 31st marks the end of the grandfather period for one of the options, membership in the National Register, which can abbreviate significantly the application process.

There have been a number of changes in policy and procedures as well as some significant rule changes over the course of five years. They have been reported on in other issues and I won't even attempt to summarize them except to note that the Board's work is an evolving process and needs the input and suggestion from many. Having the benefit of the wisdom and experience of past Board members greatly enhances the process, but all licensed psychologists need to be willing to participate. Talking with many of you by phone over thorny and difficult ethical and procedural issues has been very helpful. Keep it up! Contact the Board and share your views.

It has been an honor and privilege to have served on the Board and I am thankful for the opportunity. I would urge other psychologists who have not done so to consider running for the Board so that there can be a continuation of new ideas and approaches to the regulatory process in addition to the continuity that comes from the individual five year terms.

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*Do You KnowHIPAA?  
by Robert Roy Allen, Ph.D.*

If you are not familiar with HIPAA (and chances are you are not), you need to get to know it right away. The Health Information Portability and Accountability Act is a piece of federal legislation that makes it possible to maintain continuity in health care coverage when a person changes employers or health plans. So far, so good. However, tacked on to it is another piece of legislation called The Final Privacy Rule, which is going to have a major impact on the way that psychology and all other health-related professions are practiced.

The Privacy Rule was created to protect confidential patient information that is electronically transmitted. If you deal with any third-party payers (HMO's, Social Security, Medicaid, etc.) in any way, or convey any information specific to any patient across any electronic medium (email, telephone, etc.), or deal with anyone else who does, then the whole Rule applies to your whole practice. Unless you are operating out of a shed in the woods without electricity, this means you. The Rule is broad and far-reaching in its requirements.

The Rule went into effect on April 14, 2001. Its provisions will not be enforced until April 14, 2003. Enforcement means federal investigations by the HHS Office for Civil Rights which could lead to fines of \$100 to \$50,000 and imprisonment for a year. It is unclear whether or not it could be the basis of a private civil action today. A finding against you by the Office of Civil Rights might well be followed by Psychology Board action. Many of the provisions will take considerable time and effort to put into place. Do I have your attention yet?

The Rule runs a few hundred pages and is difficult to digest. However, there is a growing body of information out there (particularly on the internet) which can help you to get oriented. Some of the provisions may yet be modified. This newsletter would have to be a half inch thick to answer most of the questions you need to have answered today. However, here are a few salient points to give you a taste of what you are up against:

- In general, where the Rule and state law conflict, the version which gives the patient greater rights or protection will apply.
- Every provider is required to have a designated "Privacy Officer" who will be responsible for compliance with the Rule.
- At the earliest possible moment of contact with a patient, they must be informed of their rights relative to the Rule, and written consent must be obtained before information about them can be used for treatment, payment, or health care operations. (The rights are estimated to run twelve pages.)
- Patients can refuse or modify their consent at any time.
- Separate, time limited authorizations must be obtained before information can be used for any other purpose.
- Patients have the right to access information you have about them, obtain a comprehensive list of everyone you have sent information to (what and why), and amend information you have which is incorrect or incomplete (yes, you read that right).
- You must keep records of information disclosures for six years.
- The Rule applies to both private and public providers.
- The Rule generally does not apply to inmates.
- Access to confidential information within your organization must be limited to those with a need for it and any outside disclosures must be the minimum necessary to carry out the purpose.
- Psychotherapy notes have a special status but as of now, raw test data does not.
- Providers will be responsible for the compliance of "business associates" (e.g., law firms, accounting or billing firms, janitorial services, transcription services, answering services, etc.).

Are you excited yet? Are you considering a career change? There's more. Pending possible changes, as the law is currently written:

- Sign in sheets such as you might have in a waiting room would be taboo.
- You probably could not say one patient's name in the presence of another patient.
- It might be illegal to make a first time appointment over the telephone.
- A patient could review and perhaps amend test data.
- You would not be able to pick up your spouse's prescription at the drug store.

Many provisions of the Rule are pretty certain, but others will be subject to interpretation. It is full of unrealistically exacting standards on the one hand, but also uses phrases like "make a reasonable effort" on the other. It is possible that enforcement of the Rule will be postponed, but don't bet on it. Start learning about the Privacy Rule and making plans to make your practice compliant with it right away!

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### *EPPP Computerized*

In April of 2001, the first computerized Examination for Professional Practice in Psychology (EPPP) was administered. Louisiana was one of the first states to offer the new computerized examination. The advantages of computer based testing (CBT) include the following:

- There is quicker testing and licensing for candidates. Instead of only being able to take the exam twice per year, candidates can take it up to four times per year. Scores are returned to the jurisdictions sooner and more frequently so that candidates can be licensed more quickly.
- Test sites are more numerous and more conveniently located for candidates. Rather than offering an examination at one test site within a jurisdiction, there may be numerous sites that are more convenient for candidates. For example, the Prometric network offers more than 330 test sites in the US and Canada. If a test site is in another state, but more convenient to get to, candidates can test there as well. If a candidate in one jurisdiction is applying for licensure in another, distant jurisdiction, he or she can take the examination close to home and have the scores automatically sent to the jurisdiction to which he or she has applied.
- Candidates can schedule examinations on the day and at the time of their choice (with some limitations). Most Prometric testing centers are open six days per week.
- Rather than having two periods per year of intense application processing, the flow of work is more evenly distributed over the year.
- Jurisdictional administrators no longer have to plan for and provide test security for the booklets and answer sheets. They do not have to arrange, often at significant expense, for a venue for the administration of the EPPP, and hire extra staff to conduct the administration.
- Computer-based testing offers the potential to provide more stimulus rich test items than might be possible in a paper and pencil format. At least one research proposal has been submitted to ASPPB to study the use of innovative item formats on the EPPP.
- The test security of the EPPP is enhanced in that you do not have 2500 individual copies of the examination, any one of which might get stolen, floating around the country twice a year. Correspondingly, there is decreased exposure for jurisdictions that are charged with safeguarding the security of the exam. One important outcome of the move to CBT is that it has offered an opportunity to convert to a sophisticated scoring system that utilizes Item Response Theory to provide equated scores that are then converted to a scaled score. The ASPPB recommended passing score for independent practice is 500, on a scale that ranges from 200 to 800. The use of equating guarantees that the level of knowledge required to pass the test and demonstrate competency is consistent across test forms. This is ultimately fairer to candidates who are not penalized if they happen to test on a more difficult form of the EPPP. Similarly, candidates who test on an easier form do not have an

advantage over those who do not. Jurisdictions can be confident that a score of 500 on the EPPP represents mastery of the same amount of knowledge, no matter when the exam was taken.

The Louisiana Administrative Code had to be amended to reflect the new pass point of 500. The following recently promulgated rule corrected the passing score to be in keeping with the computerized examination.

Title 46  
PROFESSIONAL AND OCCUPATIONAL STANDARDS  
Part LXIII. Psychologists  
Chapter 5. Examinations  
\* \* \*

§503. Criterion for Passing the Examination for the Professional Practice in Psychology (EPPP)

The Louisiana State Board of Examiners of Psychologists establishes the criterion for a passing score on the Examination for Professional Practice in psychology be 70 percent correct on the paper and pencil version or a scaled score of 500 on the computer administered version.

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### *CPQ Now Accepted Toward Licensure in Louisiana*

On May 20, 2001, a new rule was fully promulgated allowing the LSBEP to accept the Certificate of Professional Qualification in Psychology (CPQ) as a mobility means for licensure in this state.

So far, three candidates for licensure have exercised their privilege to use the CPQ, and three more are in process. The CPQ does not eliminate the need for a candidate to take the jurisprudence examination nor the need to sit before the Board for a face-to-face meeting prior to the issuance of a license. The Board still retains its right to grant, deny or continue the licensure of a candidate for reasons extended by law.

The following is a copy of that portion of the Louisiana Administrative Code which has opened the door to the use of the CPQ in Louisiana.

Title 46  
PROFESSIONAL AND OCCUPATIONAL STANDARDS  
Part LXIII. Psychologists  
Chapter 2. Reciprocity

§201 Licensure of Psychologists through Reciprocity

A. Upon application thereof, accompanied by such fee as determined by the board, the board shall issue a license to any person who furnishes, upon a form and in such manner as the board prescribes, evidence satisfactory to the board that:

1. he/she meets all of the following:

a. is licensed as a psychologist by another member jurisdiction of the Association of State and Provincial Psychology Boards (ASPPB) if the requirements for such licensure in that jurisdiction are the substantial equivalent of those required by Chapter 3 of the LAC, and if that jurisdiction has entered into a similar agreement with this board providing for the licensure of Louisiana psychologists in that jurisdiction by reciprocity; and

b. has met the requirements of such board including five years of satisfactory professional licensed experience in psychology; and

c. has successfully passed written and oral examinations administered by such board; and

d. his/her doctoral program involved at least one continuous academic year of full-time residency on the campus of the institution at which the degree was granted; and

e. he/she has not been subject to any disciplinary action by a professional board, and does not have any pending complaints against him/her, or,

**2. that he/she is a psychologist licensed in another state or territory of the U.S. or a Canadian province who has met the requirements for and holds a current Certificate of Professional Qualification in Psychology (CPQ) issued by the Association of State and Provincial Psychology Boards (ASPPB).**

B. Applicants for reciprocal licensing must pass the Louisiana Jurisprudence Examination prior to the issuance of a Louisiana license, and the Louisiana board may require a meeting with the applicant to review and verify his/her satisfactory character, current fitness, plans to practice, and specialty declaration.

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### *New Licensees...*

#865 - Michelle A. Stiaes, Psy.D. (CL)  
#866 - Megan A. Ciota, Ph.D. (CL)  
#867 - Christine B. Powanda, Ph.D. (DV)  
#868 - Persephanie Silverthorn, Ph.D. (CL)  
#869 - Amy Elizabeth Greer, Ph.D. (DV)  
#870 - Walter C. Buboltz, Jr., Ph.D. (CO)  
#871 - Darla Rutherford Burnett, Ph.D. (CL)  
#872 - Sherryl Scott Heller, Ph.D. (DV)  
#873 - Michael J. Major, Psy.D. (CL)  
#874 - Lynn W. Adams, Ph.D. (CL)  
#875 - Justin R. Wiley, Psy.D. (CL)  
#876 - Molly Algermissen, Ph.D. (CL)  
#877 - John K. Kreymer, Psy.D. (CL)  
#878 - Bryan Campbell Eckert, Psy.D. (CL)  
#879 - Edward M. Anderson, Ph.D. (CL)  
#880 - Brian P. Frederick, Ph.D. (SC)  
#881 - Thomas M. Welsh, Ph.D. (CL)  
#882 - Herschel L. Brunner, Psy.D. (CL)  
#883 - Deane M. Kelley, Ph.D. (CL)  
#884 - Lisa Jo Bertman, Ph.D. (CL)  
#885 - Max H. McDaniel, Ph.D. (IO)  
#886 - James A. LeVelle, Ph.D. (SC)  
#887 - Jane Goins-Flanagan, Ph.D. (SC)

#888 - Thomas R. Warner, Ph.D. (CL)  
#889 - Helmut L. Labrentz, Ph.D. (CL)  
#890 - Sandra Loucks, Ph.D. (CL)  
#891 - Michelle M. Boze, Psy.D. (CL)  
#892 - Alvin G. Burstein, Ph. D. (CL)  
#893 - MKay Bonner, Ph.D. (IO)  
#894 - Karen D. Slaton, Ph.D. (CO)  
#895 - K. Chris Rachal, Ph.D. (CO)  
#896 - Kirsten L. Williams, Ph.D. (CL)  
#897- Erica L. Labrentz, Ph.D. (SC)

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### *Notice of Intent*

The following is being considered by the LSBEP as a Notice of Intent to amend Title 46, Part LXIII. Psychologists, Chapter 8, Continuing Education, Louisiana Administrative Code. The Board is accepting written comments regarding the following draft.

#### **§805. Acceptable Sponsorship**

E. Activities (including home study courses and **electronically offered courses**) offered or approved by the American Psychological Association (APA).

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### *Recent Opinions and Policies Issued by the LSBEP*

#### **Opinion 005: Advertisement**

It is the opinion of the LSBEP that advertisement is defined as any form of public dissemination of information, announcement, or listing of services of a psychological nature as defined in the practice of psychology, including but not limited to radio, television, newspaper, magazine, telemarketing, internet, webpage, business card, stationery, flyer or brochure, telephone, yellow pages, out-door advertising including business signs, building directories, billboards, etc.

It shall be considered a violation of §709 Conduct of Supervision for any supervising psychologist to promote the services of any supervisee via advertisement of any nature. Violators will be subject to disciplinary action such as suspension. No psychologist shall advertise services for which he is not trained or certified to perform as documented by transcript of coursework or approved continuing education.

#### **Opinion 006: Records Retention**

In light of the absence of a generally accepted standard or rule for the retention of patient records, the Louisiana State Board of Examiners of Psychologists establishes the following Opinion which includes reference to the State of Louisiana RS 40:1299.96 (Supp. 1992), pertaining to health care information records and is in ac-cord with this statute as it applies to a "health care provider" which is defined as a "person, corporation, facility or institution licensed by this state to provide health care or professional services as physician, hospital, dentist, registered or licensed practical nurse, pharmacist, optometrist, podiatrist, chiropractor, physical therapist, or psychologist, or an officer, employer, or agent thereof." (RS 40:1299.41) Records of patients who were of their majority (generally considered eighteen years of age in the State of Louisiana) at the time the psychologist provided services shall be maintained in the original, microfilmed, or similarly reproduced form for a minimum of six years past the termination date a patient was seen by the psychologist. Records of minors should be kept at least three years past the age of majority. If the patient was seen in an institution it is the responsibility of the institution to maintain the records. Individual circumstances and the discretion of the psychologist (Opinions, continued from page 4) (Election of Nominees, continued from page 6) may warrant retention beyond these times. Retention of financial records pertaining to patients may fall under other state or federal standards and the psychologist may wish to consult a certified professional accountant, attorney or other financial expert. The psychologist should be acquainted with the Ethical Standards related to the preserving of records and data (LAC, Chapter 13, Ethical Principle 5.09) as well as other Louisiana laws related to this issue.

#### **Opinion 007: Date of Doctoral Degree**

RS 37:2356.A.4 requires an applicant for licensure in Louisiana to hold a doctoral degree with a major in psychology from a school or college as defined in that same chapter. It is the Opinion of the Board of Examiners of Psychologists that the date an applicant actually "holds" their degree is the date which is reflected on their transcript from the school or college from which the degree was obtained.

#### **Opinion 008: Supervision of Unlicensed Assistants**

The Board eliminated the procedure of registering unlicensed assistants commencing July 1, 1998. This was not set forth to be considered as ongoing policy, which would not change according to trends regarding the functions of the unlicensed assistant or the supervisor. The Opinion of the Board is that the supervisor shall make arrangements for supervision in his or her absence. In the case of prolonged illness or absence, the supervisor should designate an-other licensed psychologist to perform as full supervisor with all of the responsibilities of the original supervisor. In like manner, this means that the legal and professional responsibility for the welfare of all clients would be transferred to the temporary supervisor. Therefore, the same responsibility of "functional authority" over the psychological services, which are provided by the unlicensed assistant, would be legally and professionally expected of the temporary supervisor. The Opinion of the Board is that the Board would not need to be notified of this temporary change of supervisor.

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### *Important Notice*

Dr. Beverly Stubblefield has resigned from the Louisiana State Board of Examiners of Psychologists effective November 1, 2001. At the November 2 meeting, Dr. Roy Allen was elected the new Board Chair and Dr. Janet Matthews was elected Vice Chair.

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## *Proposed Rule for Election Process*

Title 46, Part LXI of the Louisiana Statutes makes reference to the election process for nominees to the Board of Examiners only in the broadest of terms. It reads as follows:

RS 37:2353.A(2)...All appointments shall be from a list provided by the Louisiana Psychological Association. The list shall report the results of an election in which persons qualified for board membership may nominate themselves and in which licensed members of the Louisiana Psychological Association and other persons licensed under this Chapter are entitled to one vote for each vacancy on the board.

The Louisiana Administrative Code is the avenue afforded governmental bodies for clarifying and/or defining specific statutes related to a particular department, board or commission. The absence of any rule in the Title 46 of current Louisiana Administrative Code expounding on the process of the election of nominees to the LSBEP has been problematic over the years, to say the least. Therefore, this Board is considering publishing a Notice of Intent to define specific steps required in that election process.

Promulgating the election process as a rule will afford all psychologists and the general public an opportunity to voice their concerns or ideas regarding the proposal before it may be established. It also means that once the rule is fully promulgated it becomes as binding as law and neither the Board, nor any other entity, could change any part of the rule or deviate from its requirements without going through the public process of promulgating or amending the existing rule.

The promulgation of this particular rule regarding the election process for nominees to the LSBEP cannot be considered as breaking new ground since over half of the current 300 Louisiana Boards and Commissions already adhere to a process very similar to the one described below:

Title 46  
PROFESSIONAL AND OCCUPATIONAL  
STANDARDS  
Part LXIII. Psychologists

### Chapter 1. Election of Nominees to the Board

#### §100. Definitions

A. Discipline shall mean any limitation or restriction of practice, or any requirement imposed in lieu of restriction of practice by virtue of consent order or hearing.

#### §101. Candidates for Election to the Board

A) A candidate for election to the Board shall have rendered service, teaching, training, or research in psychology for at least five years, shall have held a doctoral degree in psychology from a school or college as defined in RS 37:2352(7) for a period of five years, and shall be licensed under RS 37:2356

B) No psychologist whose license has been suspended or revoked by any jurisdiction within fifteen years from the inception of an election process shall qualify for that election process.

C) No psychologist who has been disciplined within the past 5 years by any jurisdiction without having his/her license suspended or revoked shall qualify for the election process.

D) No psychologist who has been disciplined by any jurisdiction, and who has failed to meet the requirements of such discipline shall qualify for the election process, until 5 years after completion of the required disciplinary action.

#### §102. Election of Nominees to the Board

A. In September of each year an election process shall be opened the election process by notifying, via mail, all Louisiana licensed psychologists that written nominations are being received for an upcoming vacancy on the Board of Examiners resulting from the expiration of a current Board member's position on June 30 of the following year.

1. The nomination process shall open on September 1st and close on September 30 of each year. All nominations must be received or postmarked no later than that date.

2. No individual solicitation of nominations by the Board or the administering entity of the election process shall be allowed.

3. A psychologist shall not run for two positions on the Board at the same time.

4. If no nomination (or only one nomination) is received the nomination process shall be reopened by October 15 of that year and closed by November 15 of that same year. The remainder of this election process will then be adjusted by the same number of days as required to reopen and close the nomination process.

B. In the first week of December of each year election ballots shall be mailed, along with an official return envelope, to each Louisiana licensed psychologist. The following is applicable to the December election:

1. All eligible nominations shall be listed on these ballots.

2. To avoid any hint of impropriety, election ballots and accompanying election instructions shall contain no other psychologists' names other than those of the nominees.

3. Each ballot must be returned in a sealed envelope bearing the signature of a current Louisiana licensed psychologist.

4. Each Louisiana licensed psychologist shall have one vote for each vacancy on the Board.

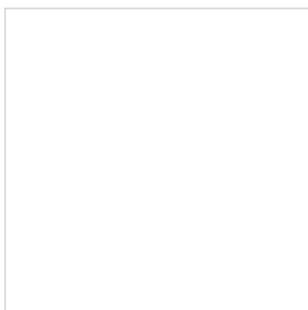
5. No individual solicitation of nominations by the Board or the administering entity of the election process shall be allowed.

6. The LSBEP shall notify the electorate of any disciplinary action taken against any nominee.
  7. Election ballots must be returned no later than December 31 of each year. All ballots must be received or postmarked no later than that date.
  8. All election ballots received on or before the close of business on December 31st shall remain sealed until January of the following year when the administering entity shall use the following procedures for the opening of the ballots.
    - a. The election ballots shall be opened and counted by at least two officials of the administering entity and a representative from the Board of Examiners of Psychologists.
    - b. The opening and counting of the ballots shall be open to the public.
- C. In March of each year the Louisiana Psychological Association shall forward a list (via certified mail or hand delivery) of the two persons receiving the highest number of votes to the Governor for his selection of a new Board member, according to RS 37:2353.
1. The list shall be in rank order and state the actual vote tallies.
  2. In the case of a tie for second rank, both names shall be submitted to the Governor in alphabetical order.
  3. A copy of the above mentioned correspondence to the Governor from LPA shall be forwarded to the LSBEP (via certified mail or hand delivery) on the same date as mailed or delivered to the Governor.
    - a) The Board will immediately forward to the Governor information pertaining to whether any disciplinary action was ever taken against psychologists in any jurisdiction whose names are submitted for selection of a new Board member. That information shall include, but not be limited to, the nature of any violation, action(s) taken by the Board, date of discipline(s) and current standing of each psychologist on the list.
- D. Should an untimely vacancy occur on the Board, the same process as described in paragraphs A-C of this Chapter shall be followed for a "special election". However, the following timetable shall be observed:
1. A special election process shall be initiated by the administering entity within 30 days from the date the administering entity is advised by the Board of an untimely vacancy.
  2. The nomination process shall remain open for 30 days.
  3. The election ballots for special elections shall be mailed to all Louisiana licensed psychologists no more than 30 days after the nominations process is closed.
  4. The opening and counting of the special election ballots shall transpire within 30 days after the close of the balloting process.
  5. The election results shall be forwarded to the Governor by LPA no less than one week after the election results have been determined (via certified mail or hand delivery) in the same manner as described in paragraph C of this Chapter.

### §103. Dual Positions

No appointee to the Board of Examiners of Psychologists shall simultaneously serve on the LSBEP and as a voting member of governing boards of Louisiana psychological association(s).

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#### *A Final Word from Former Board Chair, Beverly A. Stubblefield, Ph.D.*

During my four years on the Board, the LSBEP has had a lot of "firsts". In this new 21st century, technology has been a driving force moving us all forward. The LSBEP now has a web page located at [www.lsbep.org](http://www.lsbep.org), where the latest LSBEP news and activities can be found. The Examination for Professional Practice in Psychology (EPPP) is now computerized and can be taken any time at designated sites, not just twice a year. The LSBEP is developing video vignettes for oral examinations.

LSBEP adopted the Certificate of Professional Qualification in Psychology (CPQ), developed by the Association of State and Provincial Psychology Boards (ASPPB) to assist psychologists seeking mobility secure licensure in other jurisdictions.

Technology and the world wide web present other issues the Board will be facing this year and in the years to come as psychologists further utilize the internet as a means to provide treatment and evaluation.

As with the field of technology, hopefully new terminology will be associated with the LSBEP. Such terminology should include "broadminded"...to look at issues fully from a variety of perspectives with the public's best interest in mind. Another term is "broadshouldered"...to carry the burdens of misplaced ethics, misdirected practices, and mismanaged treatments.

The LSBEP has made history. For the first time ever the majority of its members were female. During my brief time as Chair, the LSBEP's goal was to be better than standard in carrying out the law and to disseminate the LSBEP's policies and procedures in a more "user friendly" manner. I hope that the LSBEP will continue to be outspoken as far as the law is concerned and open to receiving input and constructive criticism and direction.

Although I will no longer serve on the Board, I will continue to promote protection of the public and collegial activities among fellow psychologists.

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**Question:** Can I supervise a candidate for licensure whose specialty is not the same as mine?

**Answer:** As stated in the Louisiana Administrative Code under §705 (Qualifications of Supervisors), "Supervising psychologists shall have training in the specific area of practice in which they are offering supervision." In most cases, this requirement is met by the supervisor and supervisee having degrees in the same psychology specialty. Given the overlap in training among specialties, however, LSBEP will sometimes approve cross-specialty supervising of a candidate for licensure if the qualifications as described above exist.

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