

# Behavioral Health Sub-Report

## Psychology

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### Overview

The practice of psychology is regulated in all 50 states. In Utah, the regulation of psychologists is overseen by the Division of Professional Licensing, Department of Commerce. Current license types include Psychologist and Certified Psychology Resident.

License Type	Scope	Authority	Education	Experience	Exam
Psychologist	Mental Health Therapist	Independent	Doctorate	✓	✓
Resident	Mental Health Therapist	Supervised	Doctorate	-	-

### Fee Structure

License Type	Initial Licensing Fee		Annualized Renewal Fee	
	Utah Fee	US Median	Utah Fee	US Median
Psychologist	\$230	\$285	\$64	\$148
Resident	\$85	\$175	\$0	\$75

### Complaints

During the past 5 years (2018-2022), an average of **48** complaints were filed annually against an average of **30** Utah psychologists—or **2.6%** of active licensees in any given year. On average, **12** of those complaints were found to be substantiated (25%).<sup>49</sup> Common types of substantiated complaints among behavioral health licensees include violations of ethical standards, incompetence and/or negligence, sexual misconduct, criminal conduct, substance use, unauthorized practice, and failure to release records.

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<sup>49</sup> OPLR Analysis of DOPL Substantiated Complaint Data

## Wait Times and Active Licensees

On average, Utah psychologists report that at their primary practice location there is a **~64 day wait time** for those seeking care. This is substantially higher than the **~37 day** average across Utah’s behavioral health care field, as well as the **10 day CMS** guideline.<sup>50,51</sup>

Name	# Active Licensees	Annualized 5-Year Growth Rate <sup>52</sup>
Psychologist	1,212	3.35%
Resident	39	1.67%
All	1251	3.30%

## Recommendations

### Relevant Recommendations from OPLR’s Periodic Review

The following recommendations from OPLR’s periodic review of the regulation of the behavioral health care workforce are relevant for psychology (see final report for additional information):

- 1a. Supervisor Requirements
- 1c. Continuing Education
- 2b. Interstate Compacts
- 3a. Recovery Assistance (UPHP)
- 3b. Safety Checks & Disclosures
- 4c. Prescribing Psychologist
- 5a. Multi-Profession Board

### Additional Recommendations

In addition to the relevant recommendations listed above, OPLR does not recommend that Utah policymakers enact any further changes to the regulation of psychologists at this time. Looking ahead, policymakers should be aware that the American Psychological Association (APA) is in the process of accrediting master’s degree programs in health service psychology, which includes clinical counseling and school psychology programs.<sup>53</sup> Based on this ongoing effort, there may be future proposals to create a master’s-level psychology license or to accept APA-accredited master’s degrees as a pathway to existing licensure without the need for curriculum equivalency evaluations. Several U.S. jurisdictions already offer master’s level licensure in the practice of clinical psychology.

<sup>50</sup> OPLR Behavioral Health Care Workforce Survey (CPMDS)

<sup>51</sup> Centers for Medicare & Medicaid Services Center for Consumer Information and Insurance Oversight (2022). *2023 Letter to Issuers in the Federally-facilitated Exchanges*. [online] U.S. Department of Health and Human Services. Available at: <https://www.cms.gov/files/document/2023-draft-letter-issuers-508.pdf>

<sup>52</sup> OPLR Analysis of DOPL Licensing Data

<sup>53</sup> American Psychological Association (2020). *Master’s level accreditation: A status update from the Master’s Accreditation Work Group*. [online] Available at: <https://www.apa.org/ed/accreditation/newsletter/2020/03/masters-accreditation>.

## Master's-Level Psychologist Licensure in U.S. Jurisdictions

State	Title	Educational Accreditation
Alabama	Psychologist Technician	American Psychological Association (APA)
Alaska	Psychological Associate	APA
Arkansas	Provisionally Licensed Psychologist	APA
Kentucky	Psychological Associate	Not specified
Michigan	Master's Limited Psychologist	APA
Michigan	Master's Limited Temporary Psychologist	APA
Nebraska	Psychological Assistant	APA
Nebraska	Psychological Associate	APA
Nebraska	Special Licensed Psychologist	APA
New Mexico	Psychologist Associate	Not specified
North Carolina	Psychological Associate	Recognized by Commission on Recognition of Postsecondary Accreditation (CRPA) or Association of Universities and Colleges of Canada (AUCC)
Vermont	Psychologist	Council of Applied Master's Programs in Psychology (CAMPP)
West Virginia	Psychologist	APA
Wyoming	Psychological Practitioner	Not specified
District of Columbia	Associate Psychologist	Recognized by U.S. Department of Education or Council on Postsecondary Accreditation.

Currently, Utah offers licensure in clinical psychology only for doctoral-level candidates. Individuals with a master's degree in psychology may be eligible for licensure as a clinical mental health counselor, upon verification that their educational credential qualifies as an "equivalent field." Utah also offers a master's-level license for school psychologists, which is regulated by the Utah State Board of Education (USBE),<sup>54</sup> but which does not authorize license holders to engage in the practice of mental health therapy. The APA's efforts in this area may help bridge the current divides between the various psychological providers in the state, and policymakers should stay apprised of these ongoing developments and make appropriate adjustments accordingly.

<sup>54</sup> [R277-306](#)