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APPENDIX B

FISCAL NOTE FOR PROPOSED RULES

Rule Title: TITLE 17, SERIES 1 FEES

Type of Rule: Legislative Interpretive Procedural

Agency: WEST VIRGINIA BOARD OF EXAMINERS OF PSYCHOLOGISTS

Address: STREET ADDRESS: 1205 QUARRIER STREET, CHARLESTON, WV 25301

MAILING ADDRESS: PO BOX 3955, CHARLESTON, WV 25339-3955

1. Effect of Proposed rule:

	ANNUAL FISCAL YEAR				
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
ESTIMATED TOTAL COST					
PERSONAL SERVICES					
CURRENT EXPENSE					
REPAIRS & ALTERATIONS					
EQUIPMENT					
OTHER	\$48,000.00				

2. Explanation of Above Estimates:

The additional \$48,000.00 would be collected mostly from fees from psychologist license renewals and charges for office related information disbursement, and would not affect the general public.

3. Objectives of These Rules:

The objective of increasing revenue is to assure that the Board shall meet its mission to protect the public and assure that psychologists and school psychologists are ethical and competent.

4. Explanation of Overall Economic Impact of Proposed Rule:

A. Economic Impact on State Government:

The economic impact on the State Government would be a very positive one. This State Agency would be able to pay other State Agencies for their services, thus increasing the State's revenue.

B. Economic Impact on Political Subdivisions; Specific Industries; Specific Groups of Citizens:

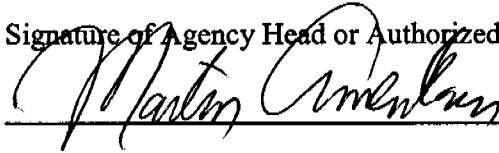
None

C. Economic Impact on Citizens/Public at Large.

None

Date: June 19, 2003

Signature of Agency Head or Authorized Representative:



□
APPENDIX B

FISCAL NOTE FOR PROPOSED RULES

Rule Title: TITLE 17 SERIES 1 FEES

Type of Rule: Legislative Interpretive Procedural

Agency: West Virginia Board of Examiners of Psychologists

Address: Street Address: 1205 Quarrier Street, Charleston, WV 25301

Mailing Address: PO Box 3955, Charleston, WV 25339

1. Effect of Proposed rule:

	ANNUAL FISCAL YEAR				
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
ESTIMATED TOTAL COST	0	0	0	0	0
PERSONAL SERVICES	0	0	0	0	0
CURRENT EXPENSE	0	0	0	0	0
REPAIRS & ALTERATIONS	0	0	0	0	0
EQUIPMENT	0	0	0	0	0
OTHER	0	0	0	0	0

2. Explanation of Above Estimates:

There are zero additional expenses because fees are being raised to increase revenue.

3. Objectives of These Rules:

The objective of increasing revenue is to assure that the Board shall meet its mission to protect the public and assure that psychologists and school psychologists are ethical and competent.

Rule Title: Title 17, Series 1 Fees

4. Explanation of Overall Economic Impact of Proposed Rule:

A. Economic Impact on State Government:

There is zero economic impact on State government because the Board doesn't use State funds.

B. Economic Impact on Political Subdivisions; Specific Industries; Specific Groups of Citizens:

Not Applicable

C. Economic Impact on Citizens/Public at Large.

None

Date: 2/14/03

Signature of Agency Head or Authorized Representative:

Facts and Circumstances for Filing Changes for Title 17, Legislative Rule, Series 1- Fees

The purpose of the Series 1 rule is to authorize the West Virginia Board of Examiners of Psychologists to collect fees, which fund the Board's operation. The Board is proposing to amend this rule to increase revenue to avoid an impending budget deficit. This projected deficit will occur because the Board has incurred increased expenses to process ethical inquiries, and operation costs have increased.

The Board's last increase was in 1998. Since then, the Board:

- Enacted a more prompt and responsive system of processing ethical inquiries via two new legislative rules.
- Developed a computerized register of licensed and supervised Psychologists and School Psychologists.
- Enhanced more timely conduction of oral examinations and processing of applications.
- Dramatically improved responsiveness to general public requests for information.

In addition, if fees are increased the Board will fully develop a website which will enable the West Virginia citizens to have immediate access to ethical inquiry forms, the ethical code, psychology licensure law, legislative rules and regulations, past ethical violations, and other pertinent information. The website will also afford applicants, licensees, and supervisees with downloadable forms for applications, renewals, and etc.

This rule is filed because the budget balance has become extremely low. As of this date, February 14, 2003, the cash balance is **\$2,669.00**. The balance leaves the board with a very narrow margin for error. Payable invoices are being paid on a selective basis. Many invoices submitted by the State for services to the board cannot be paid at this time; board members are not receiving compensation for their time and travel. At this point only the most necessary invoices are being paid. The board is operating below normal and at conservative expenditure levels. If the board continues to operate on the basis of the current fee schedule, it will incur a deficit by the end of fiscal year 2003 and will be in very serious trouble by the end of fiscal year 2004 and will be unable to meet payroll.

Finally, the Board needs the increased fees because these fees are its only source of income. The Board is fiscally self-sufficient. It uses zero state funds to fulfill its mission of protecting the public and assuring that Psychologists and School Psychologists are competent and ethical.

Brief Summary of Proposal

The West Virginia Board of Examiners of Psychologists proposes to increase its fees which are charged to applicants, supervised psychologists, school psychologists, and psychologists. The Board is entrusted by law to protect West Virginia citizens from unethical psychologists. An increase in fees is urgently needed because the Board's budget is low and nearing a deficit. The Board is totally funded by its fees and uses zero in state funds.

QUESTIONNAIRE

(Please include a copy of this form with each filing of your rule: Notice of Public Hearing or Comment Period; Proposed Rule, and if needed, Emergency and Modified Rule.)

DATE: June 11, 2003

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: (Agency Name, Address & Phone No.) West Virginia Board of Examiners of Psychologists

PO Box 3955, Charleston, WV 25339-3955

Phone: 304-558-3040

LEGISLATIVE RULE TITLE: Title 17, Series 1, Fees

1. Authorizing statute(s) citation W.Va. Code 30-21-6(a)(4)

2. a. Date filed in State Register with Notice of Hearing or Public Comment Period:
February 19, 2003

b. What other notice, including advertising, did you give of the hearing?
The Board mailed a letter to each active psychologist, school psychologist, and supervised psychologist explaining the need for the rule change and asking for their comments. The Board also advertized in the newspapers of the larger cities in WV with a notice of the rule changes and asking for comments..

c. Date of Public Hearing(s) or Public Comment Period ended:
The comment period ended April 30, 2003

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached 33 No comments received _____

- e. Date you filed in State Register the agency approved proposed Legislative Rule following public hearing: (be exact)

- f. Name, title, address and **phone/fax/e-mail numbers** of agency person(s) to receive all written correspondence regarding this rule: (Please type)

Kathleen Lynch, Administrative Assistant
PO Box 3955
Charleston, WV 25339-3955

Phone: 304-558-3040
Fax: 304-558-0608

email: klynch@mail.state.wv.us

- g. **IF DIFFERENT FROM ITEM 'f'**, please give Name, title, address and phone number(s) of agency person(s) who wrote and/or has responsibility for the contents of this rule: (Please type)

Jeffrey Harlow, Ph.D., Executive Director
PO Box 3955
Charleston, WV 25339-3955

Phone: 304-415-4050
Fax: 304-415-0608

3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

- a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided.

N/A

b. Date of hearing or comment period:

N/A

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

N/A

d. Attach findings and determinations and reasons:

Attached N/A

FILED

TITLE 17
LEGISLATIVE RULE
BOARD OF PSYCHOLOGISTS

2003 JUN 18 P 2:47

SERIES 1
FEES

OFFICE WEST VIRGINIA
SECRETARY OF STATE

'17-1-1. General.

- 1.1. Scope. -- This legislative rule establishes the fees for applications, examinations, temporary permits, license renewals, and registers for psychologists and school psychologists.
- 1.2. Authority. -- W. Va. Code '30-21-6.
- 1.3. Filing Date. -- April 7, 1998.
- 1.4. Effective Date. -- April 7, 1998.

'17-1-2. Summary Of Fees.

The following fees were approved by the Board ~~June 14, 1997~~ ~~January 10, 2003;~~ May 16, 2003.

2.1. Application fee (whether by standard procedure, reciprocity, or verification by American Board of Professional Psychology): ~~Seventy-five dollars (\$75.00)~~ One hundred dollars (\$100.00).

2.2. Temporary permits: ~~Seventy-five dollars (\$75.00)~~ One hundred dollars (\$100.00).

2.3. ~~Biennial license renewal fee: Two hundred fifty dollars (\$250.00); Non-practicing and/or non-resident psychologists, fifty dollars (\$50.00); School psychologists, triennial renewal fee, fifty dollars (\$50.00); licenses which have been placed on inactive status, no (\$0.00) renewal fee.~~ Licensing Fees:

2.3.1. Biennial Psychologist and Dual License renewal fee: Two hundred fifty dollars (\$250.00); Four hundred dollars (\$400.00) Three hundred fifty dollars (\$350.00).

2.3.2. Non-practicing and/or non-resident Psychologists, fifty dollars (\$50.00); One hundred dollars (\$100.00).

2.3.3. School psychologists, triennial renewal fee, fifty dollars (\$50.00); One hundred fifty dollars (\$150.00).

2.3.4. School Psychologists Independent Practitioners triennial renewal fee, two hundred twenty five dollars (\$225.00); two hundred dollars (\$200.00).

2.3.5. Psychological Assistants annual renewal fee, one hundred (\$100.00).

2.3.6. Licenses which have been placed on inactive status, no (\$0.00) renewal fee.

2.4. Printed Registers: ~~Ten dollars (\$10.00)~~ Twenty five dollars (\$25.00).

2.5. Copies of licensure law and legislative rules: ~~Ten dollars (\$10.00) each~~ Twenty five dollars (\$25.00).

2.6. Examination fee: The fee for the Examination for Professional Practice in Psychology shall cover the fee established by the Association of State and Provincial Psychology Boards and shall include ~~forty dollars (\$40.00)~~ fifty dollars (\$50.00) for administrative costs. An applicant for licensure shall pay the fee to the Board at least thirty (30) days prior to the date of the examination, with the submission of their test application materials.

2.7. ~~Oral examination fee for each examination: Two hundred fifty dollars (\$250.00).~~ Oral Examination Fees:

2.7.1. Oral examination fee for each new examination: ~~Two hundred fifty dollars (\$250.00)~~ Three hundred fifty dollars (\$350.00).

2.7.2. Continued Oral examination fee "Note: A continued examination is not a new examination.":
One hundred dollars (\$100.00).

2.8. Annual supervision fee: ~~Fifty dollars (\$50.00)~~ One hundred dollars (\$100.00).

2.9. ~~All of the fees contained in this section are nonrefundable.~~ Computerized registers sold to for-profit organizations: two hundred fifty dollars (\$250.00).

3.0 Mailing and handling of application-packet fee: twenty five dollars (\$25.00).

3.1 Reinstatement fee: one hundred dollars (\$100.00).

~~3.2 Initial licensure fee: psychologists, two hundred fifty dollars (\$250.00); school psychologists (\$150.00).~~

3.2 Continuing education program application for approval fee, (Note: this fee is to be charged to for-profit organizations only): two hundred dollars (\$200.00).

3.3 Duplicate license certificate fee, twenty five dollars (\$25.00).

3.4 All fees are nonrefundable.

Gary,

Thank you for your comments. The Board will consider all comments as it continues the emergency fee raising process.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Gary Battin [mailto:gbattin@access.k12.wv.us]
Sent: Monday, March 10, 2003 12:07 PM
To: wvpsychologybd@mail.state.wv.us
Subject: Increased fees

March 10, 2003

Dear Dr. Harlow:

I would recommend that the fee for School Psychologist Independent Practitioner be \$100. There would be a very limited number of individuals whose only credentials are for SPIP, if any, who are in full time school psychologist independent practice. Most individuals with a SPIP license who are in private practice also have additional credentials such as a licensed psychologist.

The recommended rate increase would be a significant dollar amount for those of us who provide limited time in school psychologist independent practice.

The Board's consideration to my request for a lower fee than \$225 proposed by the Board would be appreciated.

Sincerely,

Gary L. Battin
Licensed School Psychologist for Independent Practice
WV#21013

Bill,

Thank you for your comments. The Board will consider all comments as it continues with the emergency fee raising process.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Bill May [mailto:docmay@barsltd.net]
Sent: Friday, March 07, 2003 5:28 PM
To: wvpsychologybd@mail.state.wv.us
Subject: rate increase

I recommend leaving the biennial license renewal fee for doctoral level psychologists at the current level.

Reduce the school psych renewal to two years and make the fee the same as doctoral level psychologists.

Add a \$100 surcharge to all masters level psychologists who renew their licenses.

BWM

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[This e-mail was scanned for viruses by F-Prot/Declude Antivirus]

Laurie,

Thank you for your comments. The Board will consider all comments as it proceeds with the emergency fee raising procedure.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: LAH610@aol.com [mailto:LAH610@aol.com]
Sent: Thursday, March 06, 2003 2:50 PM
To: wvpsychologybd@mail.state.wv.us
Subject: fee increases

Dear Board Members:

I understand the need to increase fees, but was surprised by the amount of the increases. I would like the Board to consider more conservative increases, even if that means making some cuts to administrative expenses. My renewal fee is increasing from \$250 to \$400. The new fee will be difficult to manage, as I have a limited practice and pay for my own license expenses.

Laurie A. Helgoe, Ph.D.
LAH610@aol.com

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Cheryl,

Thank you for your comments which I will pass on to Dr. Harlow and the Board. The Board will consider all comments as it proceeds with the emergency fee raising process.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Cheryl Mills [mailto:testinlady@yahoo.com]
Sent: Tuesday, March 04, 2003 8:45 PM
To: wvpsychologybd@mail.state.wv.us
Subject: comment on fee increase

March 4, 2003

Dear Dr. Harlow,

I am writing in response to a call for comments on the proposed fee increases from the WV Board of Examiners of Psychologists. While I am in agreement that some fee increases may be in order, it is very obvious to me which group will bear the brunt of the increases.

While the biennial psychologist and dual license renewal fee is proposed to be increased 60%, the school psychologists proposed increase is 300%, and the school psychologists independent practitioners is proposed to be increased a whopping 350%.

If the biennial psychologist license was increased the same percentage amount as the school psych license, the fee would be \$750. To increase the biennial psychologist license the same percentage as the SPIP license, the fee would be \$875.

One could not help but wonder if this may be a ploy by the board to discourage school psychologists from licensure. Why not increase all fees by the same percentage amount? LET'S BE FAIR!

Sincerely,

Cheryl P. Mills
SPIP #21006

Do you Yahoo!?

Yahoo! Tax Center - forms, calculators, tips, more

Mun,

Thank you for your comments and suggestions. The Board will consider all comments as it proceeds with the emergency fee raising process.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Mun Kostka [mailto:Mun.Kostka@mail.wvu.edu]

Sent: Tuesday, March 04, 2003 5:15 PM

To: wvpsychologybd@mail.state.wv.us

Cc: sfsowell@charter.net

Subject: proposed fee increases

In response to the proposed fee increases, I have difficulty understanding the current and proposed differences in the fees established for School Psychologist and Psychologists. Whatever the rationale, I feel that the increase proposed should include equalizing those rates. The same is true for the licensure fee established for the initial license.

I would also support one of the current suggestions regarding cost efficiency of adapting the current oral exams to be done by a portion of the Board - possibly 2 members - in place of the current total board involvement

Marion "Mun" Kostka, Ed.D.
West Virginia University
P.O. Box 6422
Morgantown, WV 26506-6422
Mun.Kostka@mail.wvu.edu
304-293-4431

Nina,

Thank you for your comments, which I'll pass on to the Board. Please know that the Board will consider all comments as it proceeds with the emergency fee raising process.

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Psicourt@aol.com [mailto:Psicourt@aol.com]

Sent: Tuesday, March 11, 2003 9:14 PM

To: WVPSYCHOLOGYBD@MAIL.STATE.WV.US

Subject: Increased fees

Dear Board of Examiners:

I am writing to express my concern regarding the recently announced fee increase for the renewal of licenses. Although I realize that the Board must generate it's own operating budget, the announced fee increase is excessive. If an increase in fees is needed, a more reasonable increase would be a \$100.00 increase. However, if like WVPA, such increases are to become more frequent, it would behoove the Board to look at how operating costs might be trimmed or excessive services might be scaled back. It is difficult for all of us to sustain our incomes in this time of managed care and reduced and/or lack of insurance coverage for our patients and such excessive fee increases are not appreciated or believed to be warranted.

Sincerely,
Nina L. Shinaberry, MA
Licensed Psychologist

Kathleen Lynch

From: WVCBM@aol.com
Sent: Tuesday, February 25, 2003 11:04 AM
To: wvpsychologybd@mail.state.wv.us
Subject: Comments on fee increases

In view of psychologists' declining incomes due to managed care and reductions in federal program fees, I would be more comfortable with an increase of \$100 to \$350 for the Biennial Psychologist and dual license renewal fee. Thank you,
Connie Mann

Connie,

Thank you for your comments concerning the fee increases. Your comments are appreciated and will be considered by the Board.

Kathy Lynch
Administrative Assistant
WV Board of Examiners of Psychologists

Dr. Harding,

Thank you for your comments. Please know that the Board is considering all comments as it pursues the fee increases.

Kathy

Kathleen Lynch

Administrative Assistant

WVBEP

PO Box 3955

Charleston, WV 25339-3955

Office Phone: 304-558-3040

-----Original Message-----

From: J. Michael Harding, Ph.D. [mailto:hardingjm@charter.net]

Sent: Monday, March 24, 2003 1:21 PM

To: WVPSYCHOLOGYBD@MAIL.STATE.WV.US

Subject: Proposed Fee Increase

I am licensed in states other than WV, one of which is OH. The proposed fee increase would make WV's fee considerably more than Ohio's fee. Frankly, I believe that the proposed fee increase is too much considering to services and benefits afforded to psychologists by the Board.

J. Michael Harding, Ph.D.

#964

Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 8:51 AM
To: 'Lapelle, Carla S'
Subject: RE: increased fees

Carla,

Thank you for your comments. Please know that the Board is considering all comments and has extended the comment period to April 30.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: Lapelle, Carla S [mailto:lapelle@marshall.edu]
Sent: Monday, March 17, 2003 11:55 AM
To: WVPYCHOLOGYBD@MAIL.STATE.WV.US
Subject: increased fees

The amounts proposed are absolutely ridiculous. They are way too high. I suppose the notion that psychologists are all crazy will be proven fact by those who pay such overcharges.

Carla Lapelle

Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 8:52 AM
To: 'WVPSYCON@aol.com'
Subject: RE: fee increase

Thank you for your comments. Please know that the Board is considering all comments and has extended the comment period to April 30th.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: WVPSYCON@aol.com [mailto:WVPSYCON@aol.com]
Sent: Wednesday, March 19, 2003 10:43 AM
To: wvpsychologybd@mail.state.wv.us.
Subject: fee increase

I am opposed to any fee increase. I believe that the proposed fees are excessive and I have seen no fiscal justification.

Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 8:53 AM
To: 'WPSYCON@aol.com'
Subject: RE: fee increase

Harold,

Thanks for your comments. The Board has extended the comment period to the end of April and will consider all comments.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: WPSYCON@aol.com [mailto:WPSYCON@aol.com]
Sent: Wednesday, March 19, 2003 10:45 AM
To: wvpsychologybd@mail.state.wv.us.
Subject: fee increase

I am opposed to any fee increase. I believe the fees proposed are excessive and without fiscal justification.

Harold D. Slaughter

Thank you for your comments. Please know that the Board will consider all comments as it continues the process of raising the fees.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: lex degruyl [mailto:lex_degruyl@hotmail.com]
Sent: Thursday, April 10, 2003 9:50 AM
To: WVPSYCHOLOGYBD@MAIL.STATE.WV.US
Subject: proposed fee increases

The proposed fee increases are excessive in all categories...especially for School Psychologists Independent Practitioners. I would say that a very small percentage of School Psychologists Independent Practitioners are in fact in private practice. Consequently we are on limited incomes as set forth by the teacher pay scales. One may have noticed that the teacher Salaries have not increased along with the Cost of Living Index. Furthermore, there is very little paperwork required in renewals. The board of examiners is trying to increase fees in order to fund their own excessive expenditures.

Lex de Gruyl

Help STOP SPAM with the new MSN 8 and get 2 months FREE*
<http://join.msn.com/?page=features/junkmail>

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Jerry,

Thank you for your comments. Please know that the Board will consider all your comments and appreciates your input as a supervised psychologist.

Sincerely,

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Jerry Spiegler [mailto:jerryspiegler@charter.net]

Sent: Thursday, February 27, 2003 12:23 PM

To: WVPSYCHOLOGYBD@MAIL.STATE.WV.US

Subject: Memorandum of February 19, 2003

Dear Members of the Board:

Thank you for sending me your Request for Comments regarding the proposed fee increases.

At first glance, a proposed 100% increase in the Annual Supervision Fee seems excessive in an environment of 2% inflation, especially since I have been able to secure only part-time employment as a Supervised Psychologist since receiving my Gold Card. Therefore, flat fee increase proposals for all Supervised Psychologists without regard to income may be based on faulty assumptions of income equality and a concomitant equal ability to pay.

Furthermore, the proposed imposition of a new Initial Licensure Fee of \$250 and a Continued Oral Examination Fee of \$100 along with a proposed 40% increase in the Oral Examination Fee do not appear connected with or justified by the assertion of increased operating costs attributed to investigating ethical inquiries and unspecified improvements in quality of services.

Issues such as flat rate increases, unequal ability to pay, and the relationship between increased costs and the individuals who make them necessary have been addressed by other organizations through sliding fee scales and user fees for direct services. Have these alternatives been explored?

Finally, more data is essential to informed decision making. Such information could include the total annual income and expenses incurred by the Board. The number of active Licensed Psychologists, Supervised Psychologists, School Psychologists, and Psychological Assistants affected by the proposed fee increases would help to determine whether the proposals meet, exceed, or fall short of the estimated deficiency and might provide additional guidance with respect to the alternatives suggested above.

Thank you for giving me the opportunity to respond.

Sincerely,
Gerard E. Spiegler, MA
Supervised Psychologist

Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Thursday, February 27, 2003 3:59 PM
To: 'Docdon385@aol.com'
Subject: RE: Comments on Proposed Fee Increases

Dr. Summers,

Thank you for your comments. Please know that the Board really has improved many things including response time to your comments and has many things planned for the near future including a web site. The Board will consider all your comments as they continue the process to increase the fees.

Sincerely,

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Docdon385@aol.com [mailto:Docdon385@aol.com]
Sent: Wednesday, February 26, 2003 6:20 PM
To: wvpsychologybd@mail.state.wv.us.
Subject: Comments on Proposed Fee Increases

Date: February 26, 2003
To: WV Board of Examiners of Psychologists
From: Donald E. Summers, Ph.D. License # 626
Re: Request for Comment of Proposed Fee Increases

Having just received the memorandum proposing fee increases, I feel nearly compelled to comment. I have been licensed in WV since 1995. I also hold an inactive license in Arizona and have held professional licenses in other states as well. Since I work for the federal government, a license from any state will suffice for the purposes of my primary employment. I have chosen to keep the WV license active in part because I reside here and in part because of the lower fees and despite the frankly lesser service (to include no website) provided. When I read the comment in the memo stating that "the Board has successfully increased the quality of services" the only thought that I could manage was to question to what that was referring.

What exactly has the board done to "increase the quality of services?" WV continues to license individuals who hold a masters degree as psychologists. I was licensed as a masters level therapist in another state for several years and therefore respect and acknowledge the contributions of individuals holding that degree. However, I also know what that degree can and should entitle an individual to do and find it very disconcerting and somewhat embarrassing that the state in which I am licensed is known for having a lesser requirement for the licensing of psychologists. Now you propose raising the fees to a level equal to or in some cases higher than in other states. I can see no way that this can be justified. I would very much like to see an itemized list of exactly how the monies that have been collected are being spent rather than hearing about the remaining balance. I cannot openly support this proposal unless I see some indications that services are in fact being improved and will seriously consider reactivating my Arizona license or seeking licensure in another state instead of renewing in WV.

Donald E. Summers, Ph.D.

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Dave,

Thank you for your comments concerning the fee increases. Your comments are appreciated and will be considered by the Board.

Kathy Lynch
Administrative Assistant
WV Board of Examiners of Psychologists

-----Original Message-----

From: Dave [mailto:djm.wv@verizon.net]
Sent: Tuesday, February 25, 2003 7:52 PM
To: wvpsychologybd@mail.state.wv.us
Subject: Comments regarding proposed fees

I am a licensed psychologist in WV, No. 87....I'm in Huntington and have kept my license current even though I no longer maintain a full time practice.

It seems to me that if the Board in a non-profit corporation that being in the black is an accomplishment. Is the \$2,699.00 surplus figure from the beginning of a FY or a calendar year? If you are running with an excess at current fee levels, what is the rationale for rate increases that range from 33% to 350%! In the case of the Biennial license renewal going from 250 to 400, I do not understand how, in today's financial climate, a 60% increase is needed. Why, for example, are "psychologists" being asked to pay \$200.00 per year and School Psychologists only \$50.00 per year?

Some increases may be needed but I'm opposed to the proposed amounts as shown on the mailing I received. I believe they will be a hardship on more than a few. If there is a more comprehensive justification, possibly seeing it would help license holders to understand the crisis. I appreciate your attention.

David J. Musker
Huntington, WV.

-----Original Message-----

From: wvpsychologybd [mailto:wvpsychologybd@mail.state.wv.us]
Sent: Tuesday, March 04, 2003 10:30 AM
To: 'Mulder, Pamela L'
Subject: RE: comments on proposed rate changes

Dr. Pamela Mulder and Dr. Paul Mulder,

Thank you for your comments concerning the emergency fee raising proposed by the Board. Jeff Harlow has read your comments and replies:

In response to your comments about the fee increases, please be informed of the following:

1. Litigation costs have increased dramatically; until two years ago the Board received free legal council from the Attorney General's Office. Now the Board pays for these services. In addition, some ethical inquiries require external legal council reimbursement.

2. The continuing education provider fee will not be required of Marshall University, WVU, WVPA, and like organizations. It will be assessed only from for profit commercial organizations.

Other issues you raised will be addressed in a letter to WVPA, which we will share with you when completed.

Thank you again for your comments. Please know that the Board will consider all comments submitted.

Sincerely,

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Mulder, Pamela L [mailto:mulder@marshall.edu]
Sent: Monday, March 03, 2003 6:52 PM
To: wvpsychologybd@mail.state.wv.us
Subject: comments on proposed rate changes

The following comments are from two of us, Paul and Pamela Mulder, as we are both licensed psychologists in this state.

First, the justifications for the fee increases appears to be that, since 1998, the "board has successfully increased the quality of services" and various increased costs.

We would like to know what actual, documented improvements have been made, particularly improvements that would justify the 62.5% increase in the psychologist's license renewal fee.

Second, before you raise the fees so significantly, we would like to know what steps the board has taken to increase efficiency and reduce waste - ie, to provide the most cost effective services to those you serve? With everyone else in the state facing budget cuts or increased taxes or some

combination of these, we would like to know that the board's budget has been carefully reviewed with attention to these concerns.

You indicate that you are providing us with better services, for which we should pay more, but the only services listed will apparently also cost us, or others, more. What services does the annual license renewal fee itself cover and how have these been improved by 62.5%? What, specifically, are these increased operating expenses that you have incurred and what, exactly, are the increases in litigation costs which are referred to?

Next, regarding the continuing education provider fee, will this be an annual fee or will this be assessed each time that a provider offers a course? Or each time that a group applies for such a credit for specific events / presentations? Our student conference generally involves provision of a small number, usually 3 or 4, CEUs each year. Such an increase in cost would make this impossible.

Finally, why is there such a large discrepancy between the fees charged to psychologists (on a 2 year rotation) and those charged to school psychologists (on the longer three year rotation)? It seems to us that the latter group has already been granted protected employment territory in this state - and now we learn that they also pay lower fees across the board than those without that specialization. Are there specific services which the board provides to psychologists that are not provided to school psychologists, services for which those of us who are psychologists should pay this substantially greater fee?

We will be happy to pay for what we receive, but we have not seen any justification for increased fees thus far. We would be interested in reviewing any reasonably accessible relevant resources to which you can direct us.

Pamela L. Mulder, Ph.D.

Paul A. Mulder, Ph.D.

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RECEIVED
FEB 23 2003
DEPARTMENT OF

MEMORANDUM

Date: February 19, 2003
To: All West Virginia Psychologists, School Psychologists, and Supervised Psychologists
From: West Virginia Board of Examiners of Psychologists
Jeffrey Harlow, Ph.D., Executive Director
Re: Request for Comments of Proposed Fee Increases

Philip E. Comer, Ph.D.
360 Laurel Street
Morgantown, WV 26505-3223

Since 1998 when fees were last increased, the Board has successfully increased the quality of services and in doing so has incurred increased operating expenses and higher costs of investigating ethical inquiries. As of February 14, 2003 the Board's cash balance was \$2,669.00. Therefore, the fee increases are needed. The increase in the renewal fee was set because it is the Board's primary source of income. The Board is required to be financially self-sufficient and receives zero state funds. Under the authority of W.Va. Code '30-21-6(a)(4) the Board voted unanimously to file an emergency rule which proposes to increase fees as denoted below. By no later than 5:00 p.m. on March 24, 2003, please submit written comments to the Board's post office box or email address.

- > Application fee will change from \$75.00 to \$100.00 OK
- > Temporary permits, from \$75.00 to \$100.00 OK
- > Biennial Psychologist and dual license renewal fee from \$250.00 to \$400.00 Suggested \$350.00
- > Non-practicing and/or non-resident Psychologists, \$50.00 to \$100.00 Suggested \$75.00
- > School Psychologists, triennial renewal fee, \$50.00 to \$150.00 OK (Too low in first place)
- > Psychological Assistant annual renewal fee, \$0.00 to \$100.00 Suggested \$75.00
- > School Psychologists Independent Practitioners triennial renewal fee, from \$50.00 to \$225.00 OK (Same as above)
- > Licenses which have been placed on inactive status, there will be no \$0.00 renewal fee Suggested \$25.00
- > Printed registers of licensees and supervisees from \$10.00 to \$25.00 OK
- > Copies of licensure law and legislative rules from \$10.00 to \$25.00 OK
- > EPPP examination processing fee from \$40.00 to \$50.00 OK
- > Oral examination fee \$250.00 to \$350.00. Continued oral exam fee from \$0.00 to \$100.00 Suggested \$300
- > Annual supervision fee from \$50.00 to \$100.00 OK
- > Computerized registers sold to for-profit organizations will be \$250.00 OK
- > Mailing and handling of application packet fee will be \$25.00 OK
- > Reinstatement fee from \$0.00 to \$100.00 Suggested \$50.00
- > Initial licensure fee for Psychologists, \$250.00; School Psychologists \$150.00 Why not both \$200.
- > Continuing education provider fee charged to CE businesses from \$0.00 to \$200.00 OK
- > Duplicate licensure certificate fee from \$0.00 to \$25.00 OK

Dear Board,
Thanks for the opportunity to make suggestions. Thanks for all your time & effort.
Most sincerely,
Phil Comer #.

STATE OF WEST VIRGINIA
BOARD OF EXAMINERS OF PSYCHOLOGISTS
P.O. BOX 3955 * CHARLESTON * WV * 25339-3955
TELEPHONE (304)558-3040 * WVPSYCHOLOGYBD@MAIL.STATE.WV.US * FAX (304) 558-0608

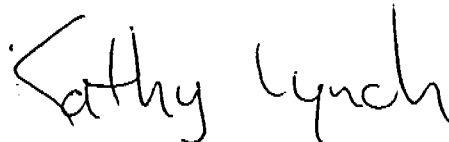
February 28, 2003

Philip E. Comer, Ph.D.
360 Laurel Street
Morgantown, WV 26505-3223

Dear Dr. Comer:

Thank you for your comments concerning the emergency rule fee changes.
Please know that the Board will consider all your comments.

Sincerely,



Kathy Lynch
Administrative Assistant
WVBEP

WVPA

Sally,

Thank you for your letter and your comments. I will have Jeff respond to what you have written in the next few days. Please know that the Board does not intend to charge the WVPA or any non-profit group for CEU approval, only those who are very clearly money making groups, likewise the lists that we provide are always provided free to anyone at the State level, to WVPA, and the other national psychology organizations. We have been instructed by our accounting person at the Department of Administration, who has overseen the Board for many years, that this fee increase is absolutely necessary.

Sincerely,

Kathy Lynch
Administrative Assistant
WVBEP

-----Original Message-----

From: Sally Sowell [mailto:sfsowell@charter.net]

Sent: Thursday, February 27, 2003 1:41 PM

To: wvpsychologybd@mail.state.wv.us

Cc: 'Peggy Allman'; 'Tom Ellis'; 'Rick Gross'; 'Terry Laurita (teezbird@aol.com)'; 'Mike McDaniel'; 'Scott Meit'; 'Penny Perdue'; 'Jimelle Rumberg'

Subject: fee increases

Jeffery Harlow, Ph.D.
Executive Director
West Virginia Board of Examiners of Psychologists
P. O. Box 3955
Charleston, WV 25339-3955

Dear Jeff,

On behalf of WVPA, I am responding to your memorandum regarding proposed fee increases. While we recognize the need for periodic fee increases, we would like additional information in order to understand and educate our membership about the specific proposal.

As an ex-CPA, the easiest way for me to comprehend the complexities of the fee increases would be to have copies of the Board of Examiners last three years budgets and financial statements, and a copy of budget projections based on the proposed fees. I would also like confirmation that I am correct that the "Continuing education provider fee charged to CE businesses" does not apply to WVPA. It would also be very helpful to us in commenting on this issue if we had some additional specific information on the following:

1. The rationale/calculations used to determine the varies fees outlined in your memorandum;
2. The rationale for the differential fees between school psychologist independent practitioners, \$75.00/year, verses Psychologist, \$200.00/year;

3. What actions the BOARD has taken or is taking to be financially self-sufficient, i.e.: cost saving measures, other revenue sources.
4. How do the proposed fees compare to other WV licensing boards and to Board of Examiners of Psychologist in other states?
5. Is the charged fee to CE businesses a normal practice in other states and, if not, will it negatively impact the number and quality of CE offerings to WV psychologists?

As you have asked for comments to be sent to the Board before March 24, 2003, I respectfully request the information we have requested be forwarded as soon as possible, by March 10, 2003 at the latest.

Thank you,

Sally F. Sowell, M.A.
President
West Virginia Psychological Association

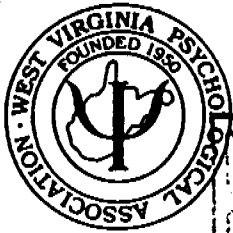


Sally F. Sowell, MA, President
West Virginia Psychological Association

P.O. Box 58058
Charleston West Virginia 25358
(304) 345-5805 (304) 720-2317
wvpa@charter.net sfsowell@charter.net

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WEST VIRGINIA PSYCHOLOGICAL ASSOCIATION, INC.

Box 58058 • CHARLESTON, WEST VIRGINIA 25358
PHONE (304) 345-5805 • FAX (304) 345-3905
APR 22 2003
ELECTRONIC MAIL: WVPA@CHARTER.NET • WEB: WWW.MARSHALL.EDU/WVPA

April 22, 2003

Jeffery Harlow, Ph.D.
Executive Director
West Virginia Board of Examiners of Psychologists
P. O. Box 3955
Charleston, WV 25339-3955

Dear Jeff,

On behalf of WVPA, I am responding to the West Virginia Board of Examiners of Psychologists' proposed fee increases. While we recognize the need for periodic fee increases and the significant improvement in service provided by the Board of Examiners, we believe the requested increase is in excess of that currently required and that the burden of the necessary revenues is unfairly placed upon licensed psychologists.

Historically, the fees for school psychologists were set at significantly reduced rate, \$17.00 per year versus psychologist at \$125.00 per year. We have been told that the reason for that was the belief that school psychologist made less money than other psychologists did. While that may have been true at some point in time, it is clearly not true today. According to WV Board of Education, the salary range for school psychologists is from \$29,077.00 in Clay County to \$60,944.81 in Wood County. There are 99 school psychologists statewide and the average salary is \$46,199.62. In addition to salary, school psychologists receive benefits that most psychologists do not receive such as health insurance, sick leave, vacation, and retirement. According to the APA Research Office, the mean income for psychologists in West Virginia in 2001 was \$52,000. It appears that with benefits, school psychologists actually make more than psychologists do, therefore the reduced licensing fees are clearly unfair.

We propose that school psychologist be required to pay the same amount as psychologists. We recognize this would be a significant increase for them, but past inequities surely do not justify continued inequities. According your budget figures, this would provide additional annual revenues of \$3325.

We request the Board reconsider limiting the increase for psychologists by no more than 20%, ie. from \$250 biennially to \$300 biennially. According to your budget figures, this would provide annual revenues of \$118,875, which exceeds the last four years average expenditures by \$22,505. Including the change to equalize the school psychologist fees, this would provide annual revenues of \$122,200 which exceeds the last four years average expenditures by \$25,830.

Thank you for considering our proposed changes to the Board's requested increases.

Respectfully yours,

Sally F. Sowell, M.A.
President
West Virginia Psychological Association

Cc: Martin Amerikaner, Ph.D.

STATE OF WEST VIRGINIA
BOARD OF EXAMINERS OF PSYCHOLOGISTS
P.O. BOX 3955 * CHARLESTON * WV * 25339-3955
TELEPHONE (304)558-3040 * WVPSYCHOLOGYBD@MAIL.STATE.WV.US * FAX (304) 558-0608

March 17, 2003

Sally F. Sowell, M.A.,
President
West Virginia Psychological Association
PO Box 58058
Charleston, WV 25358

Dear Sally:

In response to your letter of 3/4/03, please find below information in regards to the proposed fee changes. As discussed, the CE provider fee is not changed to WVPA and similar nonprofit organizations.

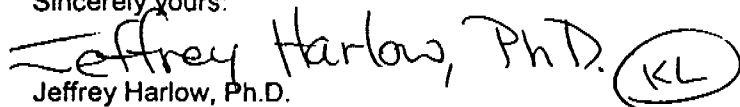
1. The rationale to raise the psychologist renewal fee to \$400 is that it is the Board's largest source of income. The supervision fee was only raised to \$100 because supervisees make significantly less income than psychologists.
2. As was the rationale at the time the school psychology segment of the law was written, the school psychology renewal fee was set lower than psychologist because it was assumed that they make less than psychologists.
3. The Board has always been financially conservative. For example, the Board's office monthly lease is very modest, especially by Charleston standards. As a state agency which receives zero state funding, the Board primarily relies on fees from licensees, supervisees, and applicants. Other sources of income are the fees for computer disc registers and CE program approval, both of which are charged to for-profit entities. These are fees that constitute other revenue sources.
4. Fees in other states with similar populations are very close to ours. Please see attached table.
5. Other states do charge fees to businesses which provide CE programs. In addition, this fee doesn't affect WVPA, APA, WVU, and Marshall University. Thus, quality of CE offering will not decline.

Prior to 2002 when our office became fully staffed, the Board was heavily criticized for inefficiency: delays in processing supervision card applications, oral examination scheduling, and renewal; untimely responses to inquiries about a variety of issues; and etc. Since 2002, the Board office has become very efficient. These delays have been eliminated and staff promptly responds to inquiries. On average, 92% of the Board's budget is devoted to funding this more efficient office. The remainder of the budget is spent on board meetings; mileage, meals, conference room rental, and lodging. Even here, we have economized by having one day meetings which don't involve lodging.

As you can see from the attached budget sheets, the Board began 2002 with a cash balance of \$59,419. This has been reduced to \$6,538. This figure varies from month to month and was \$2,669 at the time the fee memo was written 2/14/03. This situation has arisen because of these reasons: 1) starting at the beginning of 2002 the Board had to reimburse the Attorney General's office for legal services which are vital to completing its mission to protect the public; the office is fully staffed at the level necessary to be efficient, and 3) there is a declining pool of paying psychologists, supervisees, and applicants to pay fees.

The Board is in the process of receiving feedback on the proposed fee increases and will consider reducing the proposed renewal fee increase or staging it in increments.

Sincerely yours:


Jeffrey Harlow, Ph.D.
Executive Director

cc: Board Members

WV Board of Psychologists Expenditures and Revenue

FISCAL YEAR 2000 EXPENDITURES AND REVENUE

EXPENDITURES	REVENUE	DIFFERENCE
\$105,979	\$99,984	- \$5,995

FISCAL YEAR 2001 EXPENDITURES AND REVENUE

EXPENDITURES	REVENUE	DIFFERENCE
\$95,983	\$112,081	+ \$16,098

FISCAL YEAR 2002 EXPENDITURES AND REVENUE

EXPENDITURES	REVENUE	DIFFERENCE
\$98,644	\$81,049	- \$17,595

FISCAL YEAR 2003 EXPENDITURES AND REVENUE TO DATE

EXPENDITURES	REVENUE	DIFFERENCE
\$84,872	\$53,093	- \$31,048

Thus, the pattern is greater losses each year.

In 2001, the Board actually lost \$902 because it withheld a \$17,000 payment to Professional Examination Service.

BUDGET V. ACTUAL - EXPENSES AND REVENUE

ITEMS	OBJECT CODE	BUDGET	EXPENDITURES	REMAINING
Salaries	1	\$0.00	\$0.00	\$0.00
Board Member Per Diem	2	\$10,000.00	(\$2,700.00)	\$7,300.00
Employee Insurance	10	\$0.00	\$0.00	\$0.00
Social Sec. Matching	11	\$0.00	\$0.00	\$0.00
Employee Insurance	12	\$0.00	\$0.00	\$0.00
Health Insurance	13	\$0.00	\$0.00	\$0.00
Workers' Comp	14	\$0.00	\$0.00	\$0.00
Unemployment Comp	15	\$0.00	\$0.00	\$0.00
Pension & Retirement	16	\$0.00	\$0.00	\$0.00
Office Expenses	20	\$5,000.00	(\$1,679.70)	\$3,320.30
Printing	21	\$5,000.00	(\$1,758.14)	\$3,241.86
Rental Expense	22	\$5,000.00	(\$3,175.00)	\$1,825.00
Utilities	23	\$0.00	(\$532.96)	(\$532.96)
Telecommunications	24	\$5,000.00	(\$3,748.88)	\$1,251.12
Contractual & Prof.	25	\$50,000.00	(\$79,144.96)	(\$29,144.96)
Travel	26	\$5,000.00	(\$2,690.21)	\$2,309.79
Computer Services	27	\$2,500.00	(\$615.26)	\$1,884.74
Vehicle Rental	29	\$0.00	\$0.00	\$0.00
Rentals, Misc	30	\$5,000.00	(\$3,168.00)	\$1,832.00
Dues	31	\$4,000.00	(\$3,020.00)	\$980.00
Fire Insurance	32	\$2,000.00	(\$1,180.00)	\$820.00
Food Products	33	\$0.00	\$0.00	\$0.00
Clothing	34	\$0.00	\$0.00	\$0.00
Advertising & Promo	35	\$500.00	(\$65.41)	\$434.59
Vehicle Operating Ex.	36	\$0.00	\$0.00	\$0.00
Research, ED, & Med.	37	\$0.00	\$0.00	\$0.00
Maintenance Contracts	38	\$1,500.00	\$0.00	\$1,500.00
Manufacturing Supplies	39	\$0.00	\$0.00	\$0.00
Merchandise Resale	40	\$0.00	\$0.00	\$0.00
Hospitality	42	\$500.00	(\$55.75)	\$444.25
Educational Training	43	\$0.00	\$0.00	\$0.00
Farm Expense	45	\$0.00	\$0.00	\$0.00
Subsistence	46	\$0.00	\$0.00	\$0.00
Discharge & Parole	48	\$0.00	\$0.00	\$0.00
Miscellaneous	51	\$1,300.00	\$0.00	\$1,300.00
Training & Develop.	52	\$1,500.00	(\$50.00)	\$1,450.00
Postal and Freight	53	\$5,000.00	(\$2,140.81)	\$2,859.19
Computer Sup. & Equip	54	\$2,200.00	(\$90.55)	\$2,109.45
Att. Legal Payments	56	\$0.00	\$0.00	\$0.00
Attorney Reimbursable Ex.	57	\$0.00	\$0.00	\$0.00
Misc. Equip. Purchases	58	\$0.00	\$0.00	\$0.00
Office & Comm. Repair	61	\$0.00	\$0.00	\$0.00
O. & Comm. Equip. Repa.	61	\$1,500.00	\$0.00	\$1,500.00
Office/Commun. Equip.	70	\$2,000.00	\$0.00	\$2,000.00
Other Equipment	78	\$0.00	(\$162.97)	(\$162.97)
Computer Equipment	170	\$3,360.00	\$0.00	\$3,360.00
TOTALS		\$117,860.00	(\$105,978.60)	\$11,881.40

Board Office Summary

7/1/99 Cash Balance	\$49,316.23
2000 PFY Gross Revenue	\$99,984.10
Revenue Refunds	\$0.00
13th Month Expenditures	\$0.00
2000 PFY Expenditures	\$105,978.60
Net for the year	(\$5,995.00)
Cash Balance End of 6/2000	\$43,321.73

**FISCAL YEAR 2001
BUDGET V. ACTUAL - EXPENSES AND REVENUE**

ITEMS	OBJECT CODE	BUDGET	EXPENDITURES	REMAINING
Salaries	1	\$0.00	\$0.00	\$0.00
Board Member Per Diem	2	\$6,000.00	(\$1,200.00)	\$4,800.00
Employee Insurance	10	\$0.00	\$0.00	\$0.00
Social Sec. Matching	11	\$0.00	\$0.00	\$0.00
Employee Insurance	12	\$0.00	\$0.00	\$0.00
Health Insurance	13	\$0.00	\$0.00	\$0.00
Workers' Comp	14	\$0.00	\$0.00	\$0.00
Unemployment Comp	15	\$0.00	\$0.00	\$0.00
Pension & Retirement	16	\$0.00	\$0.00	\$0.00
Office Expenses	20	\$2,500.00	(\$2,175.05)	\$324.95
Printing	21	\$2,500.00	(\$2,073.64)	\$426.36
Rental Expense	22	\$4,000.00	(\$4,102.50)	(\$102.50)
Utilities	23	\$1,000.00	(\$444.98)	\$555.02
Telecommunications	24	\$5,000.00	(\$2,525.28)	\$2,474.72
Contractual & Prof.	25	\$74,000.00	(\$68,518.52)	\$5,481.48
Travel	26	\$2,500.00	(\$1,410.79)	\$1,089.21
Computer Services	27	\$1,500.00	(\$513.80)	\$986.20
Vehicle Rental	29	\$0.00	\$0.00	\$0.00
Rentals, Misc	30	\$3,000.00	(\$3,168.00)	(\$168.00)
Dues	31	\$2,000.00	(\$1,643.00)	\$357.00
Fire Insurance	32	\$1,200.00	(\$1,262.00)	(\$62.00)
Food Products	33	\$0.00	\$0.00	\$0.00
Clothing	34	\$0.00	\$0.00	\$0.00
Advertising & Promo	35	\$500.00	(\$1,172.41)	(\$672.41)
Vehicle Operating Ex.	36	\$0.00	\$0.00	\$0.00
Research, ED, & Med.	37	\$0.00	\$0.00	\$0.00
Maintenance Contracts	38	\$500.00	\$0.00	\$500.00
Manufacturing Supplies	39	\$0.00	\$0.00	\$0.00
Merchandise Resale	40	\$0.00	\$0.00	\$0.00
Hospitality	42	\$250.00	(\$97.50)	\$152.50
Educational Training	43	\$0.00	\$0.00	\$0.00
Farm Expense	45	\$0.00	\$0.00	\$0.00
Subsistence	46	\$0.00	\$0.00	\$0.00
Discharge & Parole	48	\$0.00	\$0.00	\$0.00
Miscellaneous	51	\$250.00	(\$10.83)	\$239.17
Training & Develop.	52	\$0.00	\$0.00	\$0.00
Postal and Freight	53	\$2,250.00	(\$4,736.64)	(\$2,486.64)
Computer Sup. & Equip	54	\$1,000.00	(\$26.49)	\$973.51
Att. Legal Payments	56	\$0.00	\$0.00	\$0.00
Attorney Reimbursable Ex.	57	\$0.00	\$0.00	\$0.00
Misc. Equip. Purchases	58	\$0.00	\$0.00	\$0.00
Office & Comm. Repair	61	\$300.00	(\$135.00)	\$165.00
Other Equipment	78	\$600.00	(\$191.60)	\$408.40
Miscellaneous Equipment	79	\$0.00	(\$576.00)	(\$576.00)
TOTALS		\$110,850.00	(\$95,984.03)	\$14,865.97

Board Office Summary

7/1/00 Cash Balance	\$43,321.73
2001 PFY Gross Revenue	\$112,081.55
Revenue Refunds	\$0.00
13th Month Expenditures	\$0.00
2001 PFY Expenditures	\$95,984.03
Net for the year	\$16,098.00
Cash Balance End of 6/2001	\$59,419.25

BUDGET V. ACTUAL - EXPENSES AND REVENUE

	A	B	C	D	E
1	ITEMS	OBJECT CODE	BUDGET	EXPENDITURES	REMAINING
2	Salaries	1	\$41,000.00	(\$21,600.00)	\$19,400.00
3	Board Member Per Diem	2	\$4,000.00	(\$8,400.00)	(\$4,400.00)
4	Employee Insurance	10	\$215.00	\$0.00	\$215.00
5	Social Sec. Matching	11	\$1,653.00	(\$1,630.00)	\$23.00
6	Employee Insurance	12	\$0.00	(\$1,982.48)	(\$1,982.48)
7	Health Insurance	13	\$0.00	\$0.00	\$0.00
8	Workers' Comp	14	\$0.00	\$0.00	\$0.00
9	Unemployment Comp	15	\$0.00	\$0.00	\$0.00
10	Pension & Retirement	16	\$2,052.00	(\$2,052.00)	\$0.00
11	Office Expenses	20	\$2,500.00	(\$2,823.30)	(\$323.30)
12	Printing	21	\$400.00	(\$139.50)	\$260.50
13	Rental Expense	22	\$4,000.00	(\$4,035.00)	(\$35.00)
14	Utilities	23	\$680.00	(\$564.27)	\$115.73
15	Telecommunications	24	\$4,000.00	(\$3,070.02)	\$929.98
16	Contractual & Prof.	25	\$29,000.00	(\$34,309.63)	(\$5,309.63)
17	Travel	26	\$1,000.00	(\$5,999.04)	(\$4,999.04)
18	Computer Services	27	\$500.00	(\$694.20)	(\$194.20)
19	Vehicle Rental	29	\$0.00	\$0.00	\$0.00
20	Rentals, Misc	30	\$3,000.00	(\$3,114.00)	(\$114.00)
21	Dues	31	\$2,000.00	(\$1,820.00)	\$180.00
22	Fire Insurance	32	\$1,818.00	(\$1,818.00)	\$0.00
23	Food Products	33	\$0.00	\$0.00	\$0.00
24	Clothing	34	\$0.00	\$0.00	\$0.00
25	Advertising & Promo	35	\$500.00	(\$499.32)	\$0.68
26	Vehicle Operating Ex.	36	\$0.00	\$0.00	\$0.00
27	Research, ED, & Med.	37	\$0.00	\$0.00	\$0.00
28	Maintenance Contracts	38	\$200.00	\$0.00	\$200.00
29	Manufacturing Supplies	39	\$0.00	\$0.00	\$0.00
30	Merchandise Resale	40	\$0.00	\$0.00	\$0.00
31	Hospitality	42	\$250.00	(\$401.33)	(\$151.33)
32	Educational Training	43	\$0.00	\$0.00	\$0.00
33	Farm Expense	45	\$0.00	\$0.00	\$0.00
34	Subsistence	46	\$0.00	\$0.00	\$0.00
35	Discharge & Parole	48	\$0.00	\$0.00	\$0.00
36	Miscellaneous	51	\$250.00	(\$35.00)	\$215.00
37	Training & Develop.	52	\$0.00	\$0.00	\$0.00
38	Postal and Freight	53	\$2,632.00	(\$2,788.00)	(\$156.00)
39	Computer Sup. & Equip	54	\$0.00	\$0.00	\$0.00
40	Att. Legal Payments	56	\$0.00	\$0.00	\$0.00
41	Attorney Reimbursable Ex.	57	\$0.00	\$0.00	\$0.00
42	Misc. Equip. Purchases	58	\$0.00	(\$494.99)	(\$494.99)
43	Office & Comm. Repair	61	\$200.00	\$0.00	\$200.00
44		81	\$0.00	(\$264.00)	(\$264.00)
45		110	\$0.00	\$432.00	\$432.00
46		170	\$3,000.00	\$0.00	\$3,000.00
47	TOTALS		\$104,850.00	(\$98,102.08)	\$6,747.92
48	Board Office Summary				
49	7/1/01 Cash Balance		\$59,419.25	Note: Attorney General fees are paid on line 16	
50	2002 PFY Gross Revenue		\$81,049.76		
51	Revenue Refunds		\$0.00		
52	13th Month Expenditures		\$0.00		
53	2002 PFY Expenditures		\$98,644.07		
54	Net for the year		(\$17,595.00)		
55	Cash Balance End of 6/2002		\$41,824.94		

FISCAL YEAR 2003
BUDGET V. ACTUAL - EXPENSES AND REVENUE

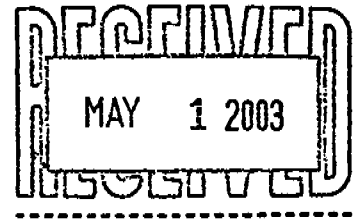
	A	B	C	D	E
1	ITEMS	OBJECT CODE	BUDGET	EXPEN. 2/28/2003	REMAINING
2	Salaries	1	\$44,808.00	(\$29,872.00)	\$14,936.00
3	Board Member Per Diem	2	\$4,000.00	(\$4,050.00)	(\$50.00)
4	Employee Insurance	10	\$400.00	(\$342.50)	\$57.50
5	Social Sec. Matching	11	\$3,500.00	(\$2,285.44)	\$1,214.56
6	Employee Insurance	12	\$6,000.00	(\$92.22)	\$5,907.78
7	Health Insurance	13	\$0.00	\$0.00	\$0.00
8	Workers' Comp	14	\$10,000.00	\$0.00	\$10,000.00
9	Unemployment Comp	15	\$0.00	\$0.00	\$0.00
10	Pension & Retirement	16	\$4,400.00	(\$2,483.04)	\$1,916.96
11	Office Expenses	20	\$2,500.00	(\$1,808.09)	\$691.91
12	Printing	21	\$400.00	(\$756.00)	(\$356.00)
13	Rental Expense	22	\$4,000.00	(\$3,022.13)	\$977.87
14	Utilities	23	\$700.00	(\$698.52)	\$1.48
15	Telecommunications	24	\$4,000.00	(\$2,525.77)	\$1,474.23
16	Contractual & Prof.	25	\$10,000.00	(\$23,004.68)	(\$13,004.68)
17	Travel	26	\$4,000.00	(\$2,333.67)	\$1,666.33
18	Computer Services	27	\$650.00	(\$800.60)	(\$150.60)
19	Vehicle Rental	29	\$0.00	\$0.00	\$0.00
20	Rentals, Misc	30	\$2,600.00	(\$1,798.38)	\$801.62
21	Dues	31	\$2,000.00	(\$2,081.00)	(\$81.00)
22	Fire Insurance	32	\$2,000.00	(\$1,641.00)	\$359.00
23	Food Products	33	\$0.00	\$0.00	\$0.00
24	Clothing	34	\$0.00	\$0.00	\$0.00
25	Advertising & Promo	35	\$0.00	\$0.00	\$0.00
26	Vehicle Operating Ex.	36	\$0.00	\$0.00	\$0.00
27	Research, ED, & Med.	37	\$0.00	\$0.00	\$0.00
28	Maintenance Contracts	38	\$0.00	\$0.00	\$0.00
29	Manufacturing Supplies	39	\$0.00	\$0.00	\$0.00
30	Merchandise Resale	40	\$0.00	\$0.00	\$0.00
31	Hospitality	42	\$500.00	(\$542.82)	(\$42.82)
32	Educational Training	43	\$0.00	\$0.00	\$0.00
33	Farm Expense	45	\$0.00	\$0.00	\$0.00
34	Subsistence	46	\$0.00	\$0.00	\$0.00
35	Discharge & Parole	48	\$0.00	\$0.00	\$0.00
36	Miscellaneous	51	\$0.00	\$0.00	\$0.00
37	Training & Develop.	52	\$600.00	(\$1,637.13)	(\$1,037.13)
38	Postal and Freight	53	\$3,000.00	(\$1,237.91)	\$1,762.09
39	Computer Sup. & Equip	54	\$500.00	(\$813.69)	(\$313.69)
40	Att. Legal Payments	56	\$0.00	\$0.00	\$0.00
41	Attorney Reimbursable Ex.	57	\$0.00	\$0.00	\$0.00
42	Misc. Equip. Purchases	58	\$2,000.00	(\$427.00)	\$1,573.00
43	Office & Comm. Repair	61	\$500.00	\$0.00	\$500.00
44		81	\$0.00	(\$263.75)	(\$263.75)
45	TOTALS		\$113,058.00	(\$84,517.34)	\$28,540.66
46	Board Office Summary				
47	7/1/02 Cash Balance		\$41,824.94		
48	2003 PFY Gross Revenue		\$53,092.85		
49	Revenue Refunds		\$0.00		
50	13th Month Expenditures		\$0.00		
51	2003 PFY Expenditures		\$84,872.47		
52	March Expenses		\$3,507.00		
53	Cash Balance as of March 15		\$6,538.32		

**PSYCHOLOGIST FEES FOR STATES OF LIKE PSYCHOLOGIST POPULATIONS FROM ASPPB
HANDBOOK OF LICENSING...2001**

State	Title	Number of Psychologists of this type in the State	Renewal Per Year	Application and Processing Fee	Temp. License Fee	Oral Exam Required	Oral Exam Fee	Oral Exam Retake	EPPP Proc Fee	State Exam	Reinstate Fee
W Virginia	Psychologist	593	\$125.00	\$100.00	\$75.00	Yes	\$250.00		\$40.00		
Nebraska	Psychologist	359	\$251.00	\$502.00	\$250.00	No					
Nevada	Psychologist	282	\$250.00	\$125.00	\$250.00	Yes	\$240.00				
N Mexico	Psychologist	512	\$300.00	\$300.00		Yes					

Please note that the 593 figure includes 100 active school psychologists

WV Bd. of Examiners of Psychologists
P.O. Box 3955
Chas., WV 25339-3955



April 28, 2003

Dear WV Bd. of Examiners of Psychologists:

As a Level II licensed school psychologist, I could not believe the enormous proposed fee increases by the board for both the practice of psychology & the practice of school psychology. The fee increases ranged from a 50% to 250% increase! This would appear to be an unreasonable hike during these difficult economic times.

For a Level II licensed school psychologist as myself, who does not practice privately since I am employed full time by a WV county school system, a triennial renewal fee from \$50 to \$225 is incredibly high. However, since I worked very hard to obtain this Level II license, I certainly want to maintain it. A smaller amount or a gradual change in the renewal amount would seem fairer for all.

Your letter of explanation to justify such increases still did not appear to warrant such a drastic change in license renewal fees. The processing of renewal fees would appear to be a fairly user friendly, straight forward process, expedient process. In addition, costs for ethical issues should be held to a minimum, not maximum.

I thank you in advance for consideration of my comments and hope that the board develops a more reasonable licensure renewal fee plan.

Sincerely,
Mary R. Misiti
Mary R. Misiti, Ed.S. #21010
1112 Hickory Rd.
Charleston, WV 25314

STATE OF WEST VIRGINIA
BOARD OF EXAMINERS OF PSYCHOLOGISTS
P.O. BOX 3955 • CHARLESTON • WV • 25339-3955
TELEPHONE (304)558-3040 • WVPSYCHOLOGYBD@MAIL.STATE.WV.US • FAX (304) 558-0608

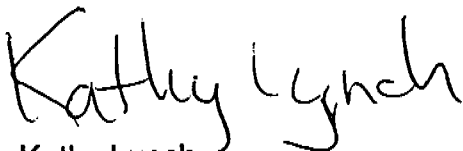
May 6, 2003

Mary R. Misiti, Ed.S.
1112 Hickory Road
Charleston, WV 25314

Dear Ms. Misiti:

Thank you for your comments concerning the fee changes. Please know that the Board is considering all comments as it continues this process.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Lynch". The signature is written in black ink and is positioned above the typed name and title.

Kathy Lynch
Administrative Assistant
WVBEP

Dear Dr. Stroebel,

Thank you for your comments regarding the proposed fees. Below is additional information.

Kathy Lynch

STATE OF WEST VIRGINIA
BOARD OF EXAMINERS OF PSYCHOLOGISTS
P.O. BOX 3955 * CHARLESTON * WV * 25339-3955
TELEPHONE (304)558-3040 * WVPSYCHOLOGYBD@MAIL.STATE.WV.US * FAX (304) 558-0608

April 24, 2004

RESPONSES TO MOST FREQUENTLY ASKED QUESTIONS
REGARDING PROPOSED FEE CHANGES

Thank you for your comments regarding proposed increased fees. The comment period has been extended to April 30th, 2003. Please know that fees are the Board's only source of revenue and receives no state funds. Below are responses to frequently asked questions.

Why Are Fees Being Increased?:

The major reasons fees are being increased are:

1. Revenue has declined.
2. Expenses have increased since the Board has fully staffed its office to offer more efficient service to the public.
3. Legal expenses have increased. The Board is obligated to pay the Attorney General's office for its services. The Board must pay for hearings, and hire an Investigative Attorney for some ethical claims.

Psychologist Renewal Fee

The rationale to raise the psychologist renewal fee to \$400 is so that West Virginia fees will be comparable to fees in other states with similar populations. Given the feedback, the Board is considering scaling back this increase.

Supervision Fee

The Supervision fee was raised because costs related to processing supervision applications, card renewals, quarterly reports, supervision changes, and scheduling and preparation for oral examinations were taken into consideration. This fee has not been increased since before 1989.

School Psychologist Fee

The level of this fee was set on the basis of the assumption that School Psychologists make less money than Psychologists. Currently School Psychologists pay only \$50. per three year period, which is \$16.67 per year. The increase means they will pay \$150. per three year period, which is \$50.00 per year.

Controlling Costs

The Board has always been financially conservative. For example, the Board's monthly office lease is very modest, especially by Charleston standards. As a state agency which receives zero state funding, the board primarily relies on fees from licensees, supervisees, and applicants. Minor sources of income are the fees for computer disc registers and CE program approval, both of which are only charged to for-profit entities. The Board cannot create other sources of income.

Will CE opportunities decline/ Will WVPA, WVU, and MU be charged?:

These fees do not affect WVPA, APA, state agencies, WVU, or Marshall University. Thus, quality of CE offerings will not decline.

How were the fees set?:

Factors taken into consideration were:

1. Proportion of revenue
2. Financial status of licensees and supervisees
3. Comparison of proposed fees (i.e., \$200 per year renewal fee) to states with similar populations.
See attached chart.

How is the Board more efficient?:

Prior to 2002 when our office became fully staffed, the Board was heavily criticized for inefficiency: delays in processing supervision card applications, oral examination

scheduling, and renewal; untimely responses to inquiries about a variety of issues; and etc. Since 2002, the Board office has become very efficient. These delays have been eliminated and the staff promptly responds to inquiries. On average, 92% of the Board's budget is devoted to funding this more efficient office. The remainder of the budget is spent on board meetings; mileage, meals, conference room rental, and lodging. Even here, we have economized by having one day meetings which don't involve lodging.

The West Virginia Board of Examiners of Psychologists would like to thank you again for your comments regarding the proposed fee increases. Should you have further questions or concerns, please contact the Board office. Please write or email the Board office with your comments.

Sincerely,

Jeffrey Harlow, Ph.D.
Executive Director

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: SSS1569@aol.com [mailto:SSS1569@aol.com]
Sent: Wednesday, April 30, 2003 10:01 PM
To: wvpsychologybd@mail.state.wv.us
Subject: Proposed Fee Increases

State of West Virginia
Board of Examiners of Psychologists
P.O. Box 3955
Charleston, WV 25339-3955

April 30, 2003

Dear WVBOE:

I am concerned about the proposed changes to the licensing fees. The increment in fee costs is very large. Is there the need to make such large increases in a single year? Perhaps a smaller increase this year with the intention of making another small increase at a set time.

Would the board please provide more information regarding the need for such a substantial increase in income? Many psychologists would like to be informed of the

increased expenses that the board is incurring.

Respectfully yours,

Sandra S. Stroebel PhD

THE RESPONSE ON THE NEXT PAGE
WAS SENT TO THE
COMMENTORS WHOSE LETTERS WILL FOLLOW
THE RESPONSE LETTER.

April 24, 2004

RESPONSES TO MOST FREQUENTLY ASKED QUESTIONS
REGARDING PROPOSED FEE CHANGES

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The West Virginia Board of Examiners of Psychologists would like to thank you again for your comments regarding the proposed fee increases. Should you have further questions or concerns, please contact the Board office. Please write or email the Board office with your comments.

Sincerely,

Jeffrey Harlow, Ph.D.
Executive Director

**PSYCHOLOGIST FEES FOR STATES OF LIKE PSYCHOLOGIST POPULATIONS FROM ASPPB
HANDBOOK OF LICENSING...2001**

State	Title	Number of Psychologists of this type in the State	Renewal Per Year	Application and Processing Fee	Temp. License Fee	Oral Exam Required	Oral Exam Fee	Oral Exam Retake	EPPP Proc Fee	State Exam	Reinstate Fee
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Nebraska	Psychologist	359	\$251.00	\$502.00	\$250.00	No					
Nevada	Psychologist	282	\$250.00	\$125.00	\$250.00	Yes	\$240.00				
N Mexico	Psychologist	512	\$300.00	\$300.00		Yes					

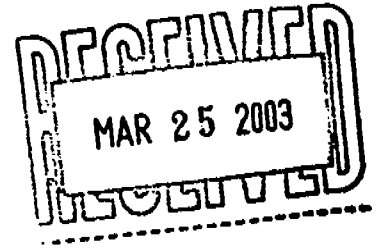
Please note that the 593 figure includes 100 active school psychologists

DATE: March 18, 2003

TO: West Virginia Board of Examiners of Psychologists
Jeffrey Harlow, Ph.D., Executive Director

FROM: Jim Terry, M.A., Brian Sharp, Ph.D., Dennis Kojsza, Ph.D.,
John Stevens, M.A., Melissa Manning, M.A.

RE: Proposed Fee Increases



We are very much interested in rationally evaluating your proposed fee increases, but need more information (see questions). Based on the information you have provided so far, we would like to give you some preliminary input now (see comments).

QUESTIONS

- Could you please define the precise nature of the improvements in the quality of services to which you refer
- How many investigations of alleged ethical misconduct are conducted each year
- What has been the outcome of those investigations since 1998
- What is the average cost of an ethical investigation
- Do you anticipate an increase in the number of such investigations
- What is a psychological assistant
- Are they licensed
- Why is there such a disparity between Psychologist and School Psychologist fees
- Why is there any difference among School Psychologists based upon their employer
- Could the difference in fees charged School Psychologists and Independent School Psychologists be considered a restraint of trade
- Why are registers sold or given to for-profit organizations without our permission
- Is it possible that charging CE Businesses a provider fee will decrease the offerings available in West Virginia
- Please send copies of the board's budgets for the past 5 years
- How much additional revenue would be generated by the proposed increases
- How do you intend to spend the increase
- How would the proposed changes compare with fees in surrounding states

COMMENTS

- A 60% increase in the renewal fee is too extravagant
- The fees should be the same for both School Psychologists and Psychologists
- Copies of the licensure law should be part of the initial information packet for new applicants
- Subsequent copies should be sold at cost
- An increase of \$100.00 for oral examination should preclude an additional fee for continuing the same exam

We shall anxiously await your responses to our questions, so we will be able to develop an informed opinion on this most serious matter. Thank you for your efforts to inform us more thoroughly.

WV Board of Examiners of Psychologists
PO Box 3955
Charleston, WV 25339-3955

Marie Anne Aho, Ph.D.
669 Lee Circle
Chula Vista, CA 91911

Marie Aho Ph.D.



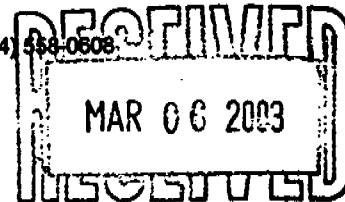
9191146731 03



3-2-03

Dear Board

The fees which affect me will be increased by 60% to 150%. Even considering the economy, these are extraordinary increases. It would seem that smaller incremental increases would be better. I have not practiced in WV since 1992 but have paid all renewals. \$400 exceeds all my other 4 licenses. I would not renew at this fee.

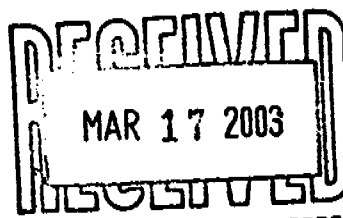


MEMORANDUM

Date: February 19, 2003
To: All West Virginia Psychologists, School Psychologists, and Supervised Psychologists
From: West Virginia Board of Examiners of Psychologists
Jeffrey Harlow, Ph.D., Executive Director
Re: Request for Comments of Proposed Fee Increases

Since 1998 when fees were last increased, the Board has successfully increased the quality of services and in doing so has incurred increased operating expenses and higher costs of investigating ethical inquiries. As of February 14, 2003 the Board's cash balance was \$2,669.00. Therefore, the fee increases are needed. The increase in the renewal fee was set because it is the Board's primary source of income. The Board is required to be financially self-sufficient and receives zero state funds. Under the authority of W.Va. Code '30-21-6(a)(4) the Board voted unanimously to file an emergency rule which proposes to increase fees as denoted below. By no later than 5:00 p.m. on March 24, 2003, please submit written comments to the Board's post office box or email address.

- Application fee will change from \$75.00 to \$100.00
- Temporary permits, from \$75.00 to \$100.00
- Biennial Psychologist and dual license renewal fee from \$250.00 to \$400.00 = ↑ 60%
- Non-practicing and/or non-resident Psychologists, \$50.00 to \$100.00 = 100%
- School Psychologists, triennial renewal fee, \$50.00 to \$150.00
- Psychological Assistant annual renewal fee, \$0.00 to \$100.00
- School Psychologists Independent Practitioners triennial renewal fee, from \$50.00 to \$225.00
- Licenses which have been placed on inactive status, there will be no \$0.00 renewal fee ?
- Printed registers of licensees and supervisees from \$10.00 to \$25.00
- Copies of licensure law and legislative rules from \$10.00 to \$25.00 = ↑ 150 %
- EPPP examination processing fee from \$40.00 to \$50.00
- Oral examination fee \$250.00 to \$350.00. Continued oral exam fee from \$0.00 to \$100.00
- Annual supervision fee from \$50.00 to \$100.00
- Computerized registers sold to for-profit organizations will be \$250.00
- Mailing and handling of application packet fee will be \$25.00
- Reinstatement fee from \$0.00 to \$100.00
- Initial licensure fee for Psychologists, \$250.00; School Psychologists \$150.00
- Continuing education provider fee charged to CE businesses from \$0.00 to \$200.00
- Duplicate licensure certificate fee from \$0.00 to \$25.00



JANIS BOURY

P. O. BOX 834 MORGANTOWN, WV 26507

304 296-0827

March 13, 2003

Jeffrey Harlow, Ph.D., Executive Director
West Virginia Board of Examiners of Psychologists
P.O. Box 3955
Charleston, WV 25339-3955

Dear Jeff:

I have reviewed the material relating to the proposed fee increases and I have the following comments. The Board memorandum states increases in operating and investigative costs have necessitates fee increases from 33% for some minor charges to 350% for some license renewals. The proposed fee schedule appears to double the Board's operating budget. I would like to have information on the proposed annual budget income and expenses and a comparison to the most recent budget and expenses. I am unsure of the need to double the budget. It is really impossible to endorse a doubling in the budget without more information.

On another point, the Board proposes substantial license fees for psychologists and school psychologists. If the new fees take effect, would it be possible to make an annual payment on the biennial license fee? What about a direct withdrawal option on a monthly basis? Many psychologists would still choose the biennial payment but would be helpful to have a choice.

To summarize, I am opposed to the increase in fees as currently presented. I would like the Board to provide the licensees with more information on the reasons for the increases. Finally, I would like more payment options.

Sincerely,

A handwritten signature in cursive script that reads "Janis Boury".

Janis Boury, M.A.

MAR 06 2003

P.O. Box 43
Old Fields, WV 26845

WV Bd of Examiners of Psychologists
Dear Dr. Harlow

Currently I use my level I licensure to help my local RESA Child Intervention meet federal requirements of dual assessments on the birth to three at risk population.

A cost of about 4 to 8 tests per month is all I do.

In order to keep current credentials, I must maintain membership in my state and national associations; pay national and state licensure fees, and pay for conference to maintain CE credits. Gas, food, lodging and registration costs about \$1600 annually, national membership and credentials is about \$150, state dues \$50, and cost of tests and forms about \$220 annually. That equals over three months of income. This does not include state licensure fees.

I understand that costs rise. I certainly accept the need for fees to increase from time to time. However, I think that tripling a fee from \$50 to \$150 is exorbitant!

At least, my other fees result in reduced conference fees, newsletters, political information, ethics information, fellowship with colleagues and valuable resources. Exactly what do I get for licensure fees? I've received too very useless newsletters, no correspondence regarding when and how to renew - only an additional hassle to re-"prove" my CE credits after being nationally certified.

I protest tripling this fee. In terms of doing business in this state it is simply out of line. A seventy five triennial fee (\$25 per year) would be much more appropriate

Sincerely,
Evelyn Batry



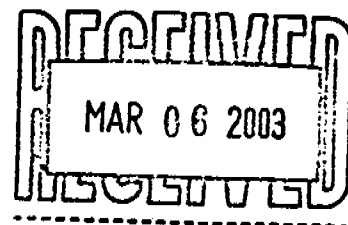
Department of Psychology

West Virginia University

Eberly College of Arts and Sciences

March 4, 2003

Jeffrey Harlow, Ph.D.
Executive Director
West Virginia Board of Examiners of Psychologists
P.O. Box 3955
Charleston, WV 25339-3955



Dear Jeff:

Thanks for the opportunity to comment on the proposed fee increase. I know that the cost of doing business has risen in recent years and certainly understand why the board might need to reconsider its fee structure in light of that. I have a couple of questions and one comment that I would appreciate you sharing with the Board.

First, there is really insufficient information in the memorandum regarding the need for the fee increase for one to judge the merits of the proposal. What is the cost of "doing business," what is the annual income of the Board, and where are the dollars spent? Has there been any attempt to reduce expenditures?

Second, I am a bit concerned about the relative fee sizes for School and "other" psychologists. If School Psychologists hold the same license and are permitted to call themselves psychologists, it seems unfair to have unequal fees. After all, we are paying for the license, not what one does with it.

Again, thank you for the opportunity to provide comments.

Best Wishes,

Barry Edelstein
Professor

Dr. Joseph,

Thank you for your comments. Please know that the Board is considering all comments and has extended the comment period to April 30th. Dr. Harlow will be sending you more in depth information in the next few days.

Kathy

Kathleen Lynch

Administrative Assistant

WVBEP

PO Box 3955

Charleston, WV 25339-3955

Office Phone: 304-558-3040

-----Original Message-----

From: sharon joseph [mailto:sharonjoseph@meer.net]

Sent: Monday, March 24, 2003 4:00 PM

To: wvpsychologybd@mail.state.wv.us

Subject: Licensure Fees

March 24, 2003

Jeffrey Harlow, Ph.D.
Board of Examiners of Psychologist
P O BOX 3955
Charleston, WV 25339-3955

Dear Dr. Harlow,

I am writing to comment on the proposed fee increase for licensure fees. I think that evaluation of the funds necessary to cover Board expenses and subsequent increases should be done in a more systematic fashion with detailed financial information available to psychologists. These increases are drastic, and at a time when reimbursements are shrinking and costs are increasing for psychologists. The need for the increases, and higher costs incurred to investigate ethical costs should be documented. It is incumbent on any professional organization to cultivate efficiency and accountability.

The cost of biennial renewal of licensure of \$250 to \$400 is almost doubling of the fee. I am also licensed in Pennsylvania, and their biennial fee is \$125. There is quite a difference between \$125 and \$400 and I am sure ethical investigations are just as costly in PA.

I suggest you make more moderate increases on an emergency basis, and then create systematic methods to evaluate costs and efficiency on a regular basis in the future.

Thank you,

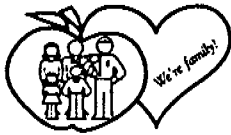
Sharon Joseph, Ph.D.
License #719

Wedgewood

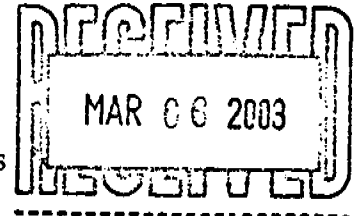
Family Practice & Psychiatry Associates, Inc.

Suncrest Office
1197 Van Voorhis Road, Morgantown, WV 26505
304-599-9400 • Fax 304-599-8917

Westover Office
900 Fairmont Road, Westover, WV 26501
304-292-7316 • Fax 304-296-4408



March 3, 2003



Family Practice

Wilbur Z. Sine, MD
Richard D. Gais, MD
Kim B. Carey, MD
C. Brian Arthurs, MD
Brandon P. Byron, MD
William C. Mitchell, MD
Brian J. Dixon, MD

Pediatrics/Internal Medicine

Vincent P. Kolanko, MD
David A. Bowlin, Jr., MD

Psychiatry

Wilbur Z. Sine, MD

Neuropsychology

Martin L. Boone, PhD

Physician Assistant

Nancy H. Elliott, PA-C
Patricia A. Jenkins, PA-C

Counseling/Psychotherapy

Martin L. Boone, PhD
Melanie B. Rogers, LPC
Rachel M. Czajka, LICSW
Marge Gais, LGSW
Lisa Smell, MA

West Virginia Board of Examiners of Psychologists
Jeffrey Harlow, Ph.D., Executive Director
P. O. Box 3955
Charleston, WV 25339-3955

Re: Comments of Proposed Fee Increases

Dear Dr. Harlow:

I am writing to you with great concern over the proposed fee increases. As you know, beginning the supervision process and the beginning of a career as a psychologist is a very overwhelming procedure. One of the many stressors includes costs. Those costs are additionally difficult given the low salaries of beginning supervised psychologists. The initial fees were quite overwhelming and the "modest" increases are to be honest quite unsettling.

It may be helpful to distribute a budget of expenses the board incurs so that we as psychologists have a better understanding of the board's operating expenses. A graduated fee schedule may be more appropriate and easier to budget.

Thank you for your time in consideration of these issues.

Sincerely,

Lisa K. Smell, M.A.
Supervised Psychologist

Kathleen Lynch

From: wpsychologybd [wpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 8:59 AM
To: 'cszasz@newwave.net'
Subject: RE: Proposed Fee Increases Comment

Charles,

Thank you for your comments. Please know that the Board is considering all comments and has extended the comment period to April 30th. Dr. Harlow will be sending a more in depth response to your comments in the next few days.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: cszasz@newwave.net [mailto:cszasz@newwave.net]
Sent: Saturday, March 22, 2003 2:07 PM
To: WVBOE
Subject: Proposed Fee Increases Comment

Dear Dr. Harlow,

Please find a Word document attachemnt with my comments regarding the propose fee increases. I am also sending the attacment via certified mail to the WVBOE.

Thanks for your time.

State of West Virginia
Board of Examiners of Psychologists
P.O. Box 3955
Charleston, West Virginia 25339-3955

March 22, 2003

Dear WVBOE,

As President of the West Virginia School Psychologists Association and as a licensed school psychologist, I was both very surprised and disappointed with the proposed fee increases. With the exception of the inactive licenses, the increase in fees ranged from 50% to as much as 250%! All of these fee increases are outrageous, arbitrary and unfair!

The 250% (\$50 to \$225) increase for triennial renewal fee for school psychologists is especially unfair and unwarranted. This increase is disappropriated when compared to increase in the biennial psychologist and duel license renewal fee from \$250 to \$400, which is a 60% increase. The

processing of renewal fees is a relatively simple matter and involves very little "office time". These increases certainly do not reflect inflation or cost of living that all of us encounter in everyday life. It raises the question of why the West Virginia Board of Examiners of Psychologists (WVBOE) expenses have increased so drastically compared to previous years. There has been no increase in the number of board members. I can only surmise that these increases are the result of the newly created position of Executive Director for the WVBOE, which is a part time position. These increases may also stem from the creation of an assistant, which as I understand is a full time position to help the executive secretary. If this is the case, then another question is in order: Does the WVBOE have the legal authority to create these positions under the law that created the WVBOE? Consequently, I am requesting financial records from the WVBOE for the past five years within thirty days. I know as both a citizen of West Virginia and as a licensed school psychologist that this is public information and that I have the legal right to request and review these records. When I receive these records, I will also share them with the West Virginia School Psychologists Association Executive Board for their input and review. I am sending a copy of this letter to the West Virginia Attorney General to address these issues. I am also sending a copy to Governor Wise for his consideration.

Sincerely,

Charles Szasz, President,
West Virginia School Psychologists Association

CC: Attorney General Darrell V. McGraw, Jr.
Governor Bob Wise

Nancy,

Thanks for your comments. We have extended the comment period until April 30th. The Board will carefully consider all comments and Dr. Harlow will be sending you additional information soon. Again, thank you for your comments.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: Nancy Cooper [mailto:ncooper@access.k12.wv.us]
Sent: Thursday, March 06, 2003 8:24 AM
To: WVPSYCHOLOGYBD@MAIL.STATE.WV.US
Subject: Proposed fees

Dear Dr. Harlow,

I am writing in response to a call for comments on the proposed fee increases from the WV Board of Examiners of Psychologists. What specifically is the reason, justification, or explanation as to the drastic fee increase? What is the current and proposed budget? These fees are to be earmarked for what?

The Boards proposed fees are quite drastic. If the Board wants to be at the quoted fees, why not do a gradual increase over the next several years?

It does appear from the proposed fees that the school psychologist independent practitioners fees are the greatest increase of all proposed. What message is the Board trying to convey to school psychologist? Is this a means for the Board to discourage school psychologists from licensure? Is to eventually eliminate school psychologist all together?

I am not opposed to reasonable increased fees, but let the Board show equality in all areas of the percentage of increase.

Nancy Cooper
WVSPiP #21022

Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 9:03 AM
To: 'Tony Parsons'
Subject: RE: Comment for Proposed Fee Increases

Dr. Parsons,

Thank you for your comments. Please know that the Board is considering all comments and has extended the comment period to April 30th. Dr. Harlow will be sending you more in depth information in the next few days. Again, thank you.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: Tony Parsons [mailto:dtparsons@sbccom.com]
Sent: Sunday, March 23, 2003 2:13 PM
To: wvpsychologybd@mail.state.wv.us
Cc: Toni
Subject: Comment for Proposed Fee Increases

Dear Dr. Harlow,

I received, only yesterday, the memo dated Feb. 19, regarding proposed fee increases and am submitting my written comments via this email.

I think it only fair that the Board increase fees periodically in order to remain financially self-sufficient. I also believe that such increases should neither be arbitrary nor implemented at a time that would give the appearance that they are based on anything other than the need to be financially self-sufficient. The board is charged in part with monitoring the behavior and practices of licensees and, therefore, needs to be especially vigilant of its own behavior--making every effort to avoid acts that may be misinterpreted as improper or that give the appearance of exploiting its clients.

I, respectfully request that the board share with all licensees just how the quality of services has been increased since 1998. A brief description of pre-1998 fees and services should also be included.

I further request that the board share a summary of the ethical inquiries investigated since 1998, describing the nature of the behavior in question, including the category of licensee involved, and detailing the nature & costs of the investigation.

An increase in fees to meet or override costs is understandable, but some of the increases proposed have more than quadrupled and need to be reconsidered. And unless the board is exempt from the Freedom of Information Act, some of the proposed increases for certain information appear to exceed the standard or customary fees allowed by the Act.

Thank you for considering my comments.

Toni G. Parsons

3/26/2003

Licensed School Psychologist, Independent Practitioner

 Kathleen Lynch

From: wvpsychologybd [wvpsychologybd@mail.state.wv.us]
Sent: Wednesday, March 26, 2003 8:54 AM
To: 'Lottie Pack'
Subject: RE: board fee increases

Lottie,

Thanks for your comments. We have extended the comment period until April 30th. The Board will carefully consider all comments and Dr. Harlow will be sending you additional information soon. Again, thank you for your comments.

Kathy

Kathleen Lynch
Administrative Assistant
WVBEP
PO Box 3955
Charleston, WV 25339-3955
Office Phone: 304-558-3040

-----Original Message-----

From: Lottie Pack [mailto:lottiepack@hotmail.com]
Sent: Friday, March 21, 2003 5:19 PM
To: wvpsychologybd@mail.state.wv.us
Subject: board fee increases

March 21, 2003

Dear Dr. Harlow,

I am writing in response to the letter I received regarding a call for comments on the proposed fee increases from the board. I realize that if fees have not been increased in such a long period of time that they may need to be increased to keep up with increasing financial obligations. However, it seems that the percentages of increase is unfairly disporstioned. It appears that the school psychologists who wish to pursue a license will bear the burden of the proposed increases. As a licensed school psychologist, this concerns me very much.

I don't think that I need to go into detail and tell you what the percentages of increase will be for each category because I think you already know but do you or anyone else on the board care that we will be unfairly treated by these increases.

As you well know, school psychologists are not required by the state to be licensed in order to work for a school system. Therefore, if we want to "practice" outside a school system we have to 'jump throw the hoops'and prove ourselves and rightly so. But, these increases will only discourage those school psychologists who may wish to pursue the privilege of earning

the SPIP license. This may be the motive of the board, who knows, but I would like for all of you to rethink what you are doing and ask is it fair to increase fees so disproportionately.

Sincerely,

Lottie Pack
SPIP #21037

MSN 8 with e-mail virus protection service: 2 months FREE*
<http://join.msn.com/?page=features/virus>

[This e-mail was scanned for viruses by F-Prot/Declude Antivirus]