

APA Board of Professional Affairs Town Hall

Draft Revised Model Licensure Act

Public Comment Period

February 11th, 2026



Board of Professional Affairs

- Why is BPA sponsoring this Town Hall?
- BPA is the primary governance voice for practice within APA

Goals of This Town Hall

- Provide information about the Model Licensing Act (MLA)
 - Share some rationale regarding why master's psychology graduates have been included in this proposal
 - Share some key challenges or concerns about the proposal
 - Encourage discussion and questions today
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- Encourage Comments to APA about this Proposed MLA
 - Provide historical overview of MLA
 - MLA TF reports to BPA

Participants

2026 BPA Chair: Paul Kettlewell, PhD, ABPP

2026 BPA Vice Chair: Paul Korte, PhD

2026 BEA Chair: Laurie “Lali” McCubbin, PhD & BEA Member Annette Kluck, PhD

MLA Task Force Co-Chairs: Syretta James, PhD, ABPP; Art Gillaspy, PhD

APA Executive Lead Psychologist, Practice: Lynn Bufka, PhD, ABPP



Education and Training of Master's HSP

Hundreds of institutions currently offer master's degrees in HSP with established faculty and training programs

2018: APA Council voted to proceed with accreditation of M-HSP programs

2021: Council approved Standards of Accreditation in 2021

2024: APA's Commission on Accreditation (CoA) accredited its first programs

With the infrastructure established, CoA can continue moving M-HSP programs through the accreditation process



Board of Educational Affairs

- In 2025, Council approved principles to establish a pathway to licensure for master's-trained HSP providers.
 - Develop a title and define scope of practice for licensure
 - The scope of practice should ensure M-HSP practitioners are competitive in the marketplace with other mental health master's level practitioners outside of psychology
- BEA Feedback on MLA
 - The MLA revision to address the pathway is timely and consistent with the APA accrediting master's HSP programs.
 - Colleagues with training grounded in the science of psychology should be able to use titles clearly documenting such training.

We think that it is important for our colleagues with training grounded in the science of psychology to be able to use titles that clearly document such training and to ensure that such titles are not used to engage in HSP activities without appropriate licensure. The change to allow our doctorally trained colleagues to identify as psychologists when doing so is not conflated with HSP is welcomed.

Identification of a title for use by licensed master's level HSP providers that reflects the grounding of their training in the science of psychology is essential. The MLA should also protect the use of such term.



Board of Educational Affairs

- Alignment with already approved documents is essential. Council already approved the SOA for master's level program accreditation so any pre-degree requirements should not differ from those specified in the SOA.
 - The use of the DSK and PWCs from both doctoral and master's SOA in defining the scope of practice is appropriate.
 - We encourage removal of additional requirements for the pre-degree training that are in conflict with the already approved SOA.
- It is appropriate to specify post-degree supervised hours at the master's level for a period of time. The ratio of direct service to total hours should reflect that typical for individuals still identified as trainees. Requiring a newly trained practitioner to spend well over 50% of their time in direct service does not account for their need for more time for record keeping, ongoing didactic training, and supervision in order to be ready for licensure for independent practice (and it is not consistent with what pre-doctoral interns tend to attain).
- Allowing for the equivalent of APA-accreditation for master's training programs is important. Other accreditors also have CHEA recognition for training people to be master's level mental health providers trained in the science of psychology.
- The deferential to the examination developer is an area of concern given that APA empaneled a group of experts to devise a position statement on licensure examination, transparency, and fairness.

Why Revise the MLA

- Guide to states
- Benefits of interjurisdictional consistency
- Establishes policy for APA
- States have full responsibility for psychology licensing laws
MLA does not provide a mandate for any state

Task Force Process

- Task force first met in June 2024, 13 original members, 3 additional members added, 2 resigned; 11 liaisons
- Charged with updating guidance for licensure of doctoral psychologists, develop appropriate licensure parameters for M-HSP, address other to-be-identified issues
- Reviewed results of call for comments on 2010 MLA conducted in winter 2024
- Proposed a scope of practice and title for M-HSP and sought public comment in fall 2024
- BoD appointed a work group to focus on applied issues
- Feedback from BPA at consolidated meetings
- Public comment currently underway



States with Master's Level Clinicians

- Currently, 19 jurisdictions recognize master's trained individuals in psychology
 - 7 states allow for independent practice
 - 10 states require supervision
 - 2 have independent and supervised categories
- Lack of uniformity in title and scope of practice across all 19 states
 - Many of those 19 states have no scope distinction between master's and psychologists
- Varying education & training requirements

States with Master's Level Clinicians

The following states have a licensure category for psychology at the master's level for independent practice: Arkansas, Louisiana, North Carolina, Texas, Vermont, Virginia & West Virginia

The following states allow for master's level licensure in psychology for supervised practice (supervision by a licensed doctoral-level psychologist): Alaska, Alabama, Maine, Maryland, Michigan, Nebraska, New Mexico, Ohio, Tennessee & Wyoming

Kansas and Kentucky have both supervised and independent practice for masters



States with Master's Level Clinicians

Draft revisions of APA's Model Licensure Act aim to:

- Address the need to move towards consistency for title, scope, education & training requirements for states licensing M-HSPs
- Licensure mobility/portability
- Payor/agency credentialing
- Allow for pathways for M-HSPs interested in becoming psychologists
- NOT a mandate for 31 states that do not license at master's level in psychology or for existing states to change

Benefits of Consistency

19 states already license psychology master's graduates under psychology boards.

If APA chooses not to provide guidance about licensure of master's psychology graduates, master's psychology licensure will continue without guidance from APA and little consistency across states.

Access to Care

Clear evidence of widespread problems with finding adequate high quality behavioral health care.

The limited number of behavioral health providers is a main contributor to access problems.



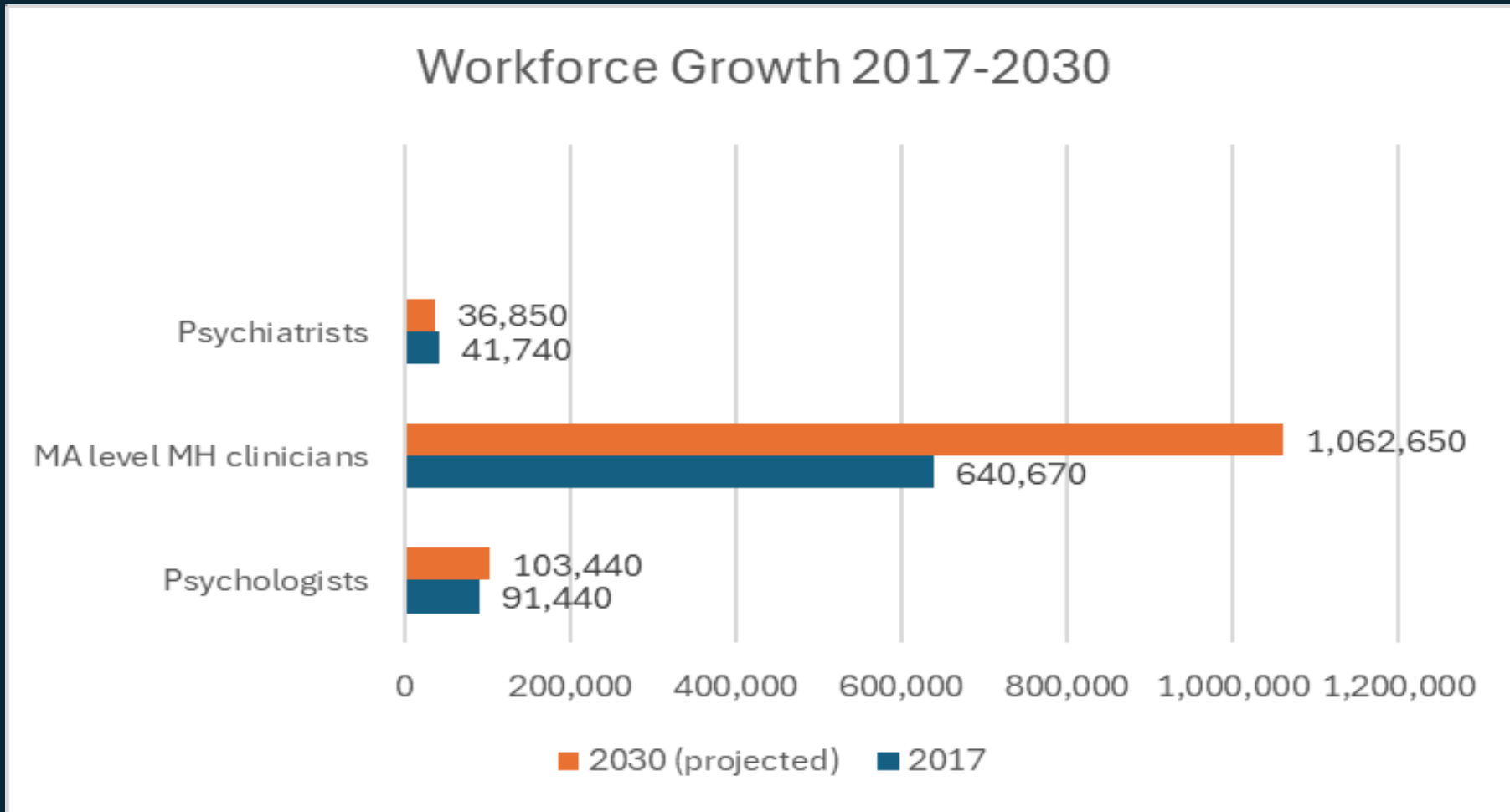
Workforce Projections

Mental Health Workforce: Current and Projections

Master's level providers dominate the field currently.

Projections for the future indicate that master's providers will experience substantially more growth than psychologists and psychiatrists.

Projections for BH Workforce



Elevate the voice of psychology and psychologists

Including master's-level practitioners allows psychology to retain stewardship over how its science shows up in practice—so the work reflects the profession's brand, values, and standards, not someone else's.

It will allow the profession of psychology to have more impact on how behavioral health care is delivered and who delivers it.

What might happen?

Doctoral clinicians have concerns that expansion of master's licensure will diminish the value of the doctoral degree

- With possibly fewer students choosing doctoral programs?
- With possibly lower fees for doctoral providers from payors?
- Will the profession of psychology become a master's profession?

Are there steps to take to strengthen and promote doctoral training?



How should the MLA relate to Applied Psychologists?

- Current (2010) MLA includes an exemption to use the title psychologist for those who provide applied services for the benefit of the organization (but not direct services to individuals).
- Proposed changes expand the exemption to use the title psychologist to all working in applied areas of psychology so long as they do not engage in HSP services.

Looking at the work ahead:

- Overlap of tasks both HSP and Applied psychologists provide.
- Ensuring all psychologists are accountable for competent and ethical behavior.



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Public Comment Period

Please submit your public comments by 5pm
Eastern Time March 3rd, 2026.

<https://commentinggov.apa.org/>

Contact mlastaff@apa.org for assistance with the public comment portal.

Public Comment Portal Instructions

Go to <https://commentinggov.apa.org/>

Use the buttons on the right side of the page to register for an account or log in to an account

Enter your login information

After logging in, you will arrive on the 'MY REVIEWS' page

Within the table in the middle of the page, look down at the column for 'Comment Category'

Click the link to 'MLA Comments'



Comment Category	Progress	Status
APA Comments (Public)	NOT STARTED	OPEN
MLA Comments	DRAFT	OPEN

Public Comment Portal Instructions

You will arrive on the 'APA Commenting Portal' page

In the table listing topics, click on the link to 'Proposed Updates to the Model Licensing Act'



You will arrive on 'Topic – Proposed Updates to the Model Licensing Act' page. To submit a comment:

1. Select the document you are commenting on, provide section and line information
2. If providing comments on behalf of your group, enter Group Name
3. Click on the  [pencil and green checkmark icon] to enter your comments
4. You can provide additional comments by clicking on 'Add New Comment'
5. Click on 'Submit Comments' to save all your comments

A screenshot of a comment submission form. The form has a header with five columns: 'Document*', 'Section*', 'Line Number*', 'Group Name (optional)', and 'Comments*'. Below the header, there are input fields for 'Document' (with a dropdown arrow), 'Section' (with a dropdown arrow), and 'Line Number' (with a dropdown arrow). A blue box highlights the 'Document' field. A blue callout '1' points to the 'Document' field. A blue callout '2' points to the 'Group Name (optional)' field. A blue callout '3' points to a pencil and green checkmark icon in the 'Comments*' column. Below the input fields, there is an 'Add New Comment' button with a plus icon, highlighted with a blue box and a blue callout '4'. To the right of the 'Add New Comment' button is a 'Submit Comments' button, highlighted with a blue box and a blue callout '5'.

Public Comment Portal Instructions

Note: The 'Topic Details' on the right side of this page includes a 'Documents' section, with links to three documents that are provided for full context. Clicking on each link will download a PDF copy of the document. The documents are as follows:

- The 2025 draft Model Licensing Act (MLA), which is open for comments
- A comparison version showing changes from 2010, which is for reference only
- The 2010 MLA, which is for reference only





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Questions/Comments?

Please raise your virtual hand if you have a question or comment.
We have allotted the remaining time to hear from you.

The townhall will end at 9:30pm ET.