



June 11, 2013

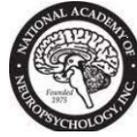
The Honorable Kenneth P. Lavallo  
Chair, Senate Committee on Higher Education  
188 State Street  
Room 806, Legislative Office Building  
Albany, NY 12247

The Interorganizational Practice Committee (IOPC) wishes to express unequivocal support for the pending New York state legislation S.4176-A/A.6948. This bill would exempt duly educated and trained psychological testing technicians from the psychology scope of practice, and thereby enable such technicians to administer and score standardized psychological or neuropsychological tests under the supervision of licensed psychologists. By way of background, the IOPC is a consortium of all major national neuropsychology organizations in the United States and includes the Neuropsychology Division of the American Psychological Association (Division 40), the American Academy of Clinical Neuropsychology, the American Board of Professional Neuropsychology, and the National Academy of Neuropsychology.

The use of psychological testing technicians is the accepted standard of practice in neuropsychology for the assessment of all patient age groups and medical/neurologic conditions. Neuropsychologists around the country very frequently choose to employ technicians as the needs of their practice dictate. Current restrictions in the state of New York on the use of technicians in clinical practice significantly and unfairly limit patient and family access to psychological assessment and care in New York, and in particular have a disproportionate adverse impact on minority patients and families due to financial, linguistic, and cultural factors.

In all psychological assessments, including neuropsychological assessments, the licensed psychologist is directly responsible for all clinical services, including test selection, interpretation, and conveying results. The technician works under the direct supervision of the licensed psychologist. The data produced by the technician is just part of the information the psychologist and neuropsychologist gather in evaluating the patient. As all psychological tests are administered in a standardized manner, the administration of the tests does not vary between technicians and licensed psychologists and neuropsychologists.

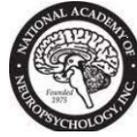
We note that the use of testing technicians has been the standard of practice in clinical psychology across the country for over 70 years. The professional responsibility of licensed psychologists includes the delegation and supervision of services provided by technicians in such a way that is consistent with established practice standards and that



meets the needs of the patients we serve. Clinical neuropsychologists employ technicians in a manner similar to the practice of physicians and other health care providers who use clinical extender staff. Recent surveys of practicing neuropsychologists reveal that a large percentage of North American clinical neuropsychologists involved technicians in their assessments. The IOPC strongly believes that the use of technicians in neuropsychological practice in no way endangers public health, welfare, and/or safety, and is unaware of any documented case of harm to a patient by a technician.

The member national organizations of the IOPC have consistently supported the vital role of technicians in administering and scoring psychological and neuropsychological tests while under the supervision of licensed psychologists. We note that over the past decade or more, the following organizations support the use of technicians in administering and scoring psychological and neuropsychological tests:

1. In 1999, the American Academy of Clinical Neuropsychology articulated and published a policy on the use of non-doctoral-level personnel in conducting clinical neuropsychological evaluations, recognizing the use of technicians as “an acceptable and widespread practice.”
2. The National Academy of Neuropsychology established a policy on May 15, 1999, that “technicians, psychometrists, psychometricians and psychological assistants” can, in a supervised setting, administer neuropsychological tests as well as related psychological and behavioral instruments (NAN Policy and Planning Committee, 2000).
3. The American Psychological Association recommended the use of psychological extenders in its Model Act for regulating the practice of psychology (2/20/10).
4. The Division of Clinical Neuropsychology of the American Psychological Association has developed recommendations for the education, training and supervision of non-doctoral personnel to be used in this capacity.
5. The Veterans Administration (DM & S Supplement, MP-5, Part I, Authority: 38 US U.S.C. 4105, Appendix 17A, change 43) outlined the qualifications, supervision and duties of a “psychology technician” (GS 181-5/7/9).
6. In 2006, the American Medical Association and the Center for Medicare and Medicaid Services (CMS), published codes that explicitly define the use of technicians in the administration of neuropsychological tests. New York psychologists are the only ones in the country who are unable to use these codes.



In summary, the use of testing technicians is a widespread, safe, and important aspect of neuropsychological practice. The IOPC gives its unconditional support to the pending state legislation which seeks to make access to testing technicians possible for neuropsychologists in New York. In providing this support, the IOPC is carrying out its responsibility to support community neuropsychologists, both in the state of New York and around the country.

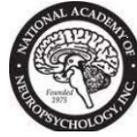
We thank you for your time and attention to our letter. The IOPC leadership would be happy to participate in any forum or discussion on this topic as you and other involved parties deem appropriate.

Respectfully submitted,

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