

Clinical Licenses Policy

The Michigan Medicine/VAAHS Network training programs follow the Institutional Policy for “Clinical Licenses for Advanced Postgraduate Trainees enrolled in Psychology Postdoctoral Training Programs,” shown below.

INSTITUTIONAL POLICY for Psychology Postdoctoral Training Programs Michigan Medicine, University of Michigan		
Clinical Licenses for Advanced Postgraduate Trainees enrolled in Psychology Postdoctoral Training Programs		
Date Initiated: 07/10/2018	Last Revised: 05/28/2019	Last GPEC Approval: 05/29/2019

A. POLICY STATEMENT/PURPOSE

In accordance with the Michigan Department of Licensing and Regulatory Affairs (LARA) all Advanced Postgraduate Trainees (APTs) enrolled in Psychology Postdoctoral Training Programs must have current State of Michigan psychology licenses.

DEFINITIONS

1. **Doctoral Educational Limited License**: Issued by the Michigan Department of Licensing and Regulatory Affairs (LARA). A doctoral educational limited license authorizes the holder to engage in the practice of psychology as part of a postgraduate educational training program. It is valid for the original application period (one (1) year) and can be renewed annually for an additional five (5) years.
2. **Permanent/Full License**: Issued by the Michigan Department of Licensing and Regulatory Affairs (LARA). An applicant shall have successfully completed the required examinations and eligibility requirements of LARA for the license being sought.

B. POLICY

It is the responsibility of each trainee to obtain and maintain appropriate licensure to practice psychology in the State of Michigan and at UMHS for the duration of the training program. Failure to do so is a criminal offense and reflects a lack of professionalism. A trainee found to be practicing without a license will be subject to disciplinary actions up to and including dismissal.

Accountability for oversight of and lapses in trainee’s licenses rests with the Program Directors and Program Coordinators of all of the individual training programs.

In order to ensure compliance, the following financial penalties will be levied on the training program for noncompliance with notification to the trainee, the Program Director, the Program Coordinator, and the Department Chair. The fines will be imposed in a graduated process that includes a larger financial penalty for a second occurrence. Should a third or more occurrence

take place, the training program will be in jeopardy of withdrawal of the psychology training program. These financial penalties, which will be tracked and which will accrue across years must be paid within thirty (30) days of discovery.

- First occurrence: \$10,000 fine
- Second occurrence: \$20,000 fine
- Third or more occurrence: Consideration of withdrawal of the training program

RESPONSIBILITY

For Michigan psychology license verification, the “Michigan Department of Licensing and Regulatory Affairs (LARA) Verify a License” website is the primary source for determination of current licensure status.

“LARA Verify a License Website” can be accessed at the following address:

<https://val.apps.lara.state.mi.us/License/Search>

1. **Michigan License:** The trainee is responsible for obtaining and maintaining the appropriate license, and must, at the least, qualify for a doctoral educational limited license. A permanent/full license is also acceptable. Trainees must provide a copy of their State of Michigan license to their Program Director, or designee. For holders of this license, the State of Michigan allows for a sixty (60) day grace period, following the expiration date, to complete the renewal process. If the license is not renewed within the identified period, it is considered lapsed retroactive to the expiration date, not inclusive of the grace period. Once the license has lapsed, the trainee cannot represent themselves as a licensed registered practitioner. The trainee must cease the practice of psychology until the license has been reinstated.
2. **Licensure Monitoring/Tracking:** The status of trainee psychology licenses must be monitored by the training program with sufficient frequency to ensure compliance. When a license has been either issued or renewed, a program official will 1) upload the PDF from LARA’s “Verify a License” to the trainee’s “Forms/Files” tab within MedHub, and 2) notify the GME APT Appointment Specialist, who will edit the MedHub Certification Tab. No license information shall be deleted.

The specific responsibilities of Program Directors and Program Coordinators are listed below:

- Program Directors must annually inform fellows of the requirements for and maintenance of clinical licensure.
- Each year, Program Directors or their designee must request that their trainees inform them as to whether or not they have obtained or applied for a permanent/full license or renewal of the doctoral limited license. The Program Directors are responsible for validating whether each trainee’s licensure, as listed on the LARA Verify a License website, is consistent with the data that has been

provided within MedHub.

- Beginning two (2) months prior to expiration of a trainee’s license, the Program Director, or his or her designee, must begin monitoring the trainee’s license renewal status. It is the responsibility of the Program Director or his/her designee to provide the trainee with documented reminders to ensure that renewal is obtained within the appropriate timeframe.
 - When the Program Director, or designee, becomes aware that a trainee has applied for a license, or license renewal, the Program Director, or his or her designee, must begin monitoring the status of the licensure on the LARA Verify a License website. License information contained in MedHub cannot be used for verification purposes.
 - A trainee whose license has not been renewed, but is within the grace period, must be notified by their Program Director in a timely fashion of pending termination of clinical duties and other educational activities, should licensure not be renewed by the end of the grace period.
3. **Licensure Renewal:** Refer to “Attachment A – License Renewal” for specific expiration dates based on license type.
- A. The trainee is responsible for making sure the State of Michigan Department of Licensing and Regulatory Affairs has his/her current mail/email address on file. The trainee remains responsible for timely renewal of his/her psychology license, even if the address information is incorrect.
 - B. If a lapse in license occurs, the steps to be followed are indicated in the “Procedure for Lapsed Psychology License”.
4. **Grace Period – State of Michigan Only:** Section 333.16201(2) of the Michigan Public Health Code states, *“A license or registration not renewed by the expiration date may be renewed within 60 days after the expiration date on application, payment of renewal and late renewal fees, and fulfillment of any continued competency or continuing education requirements...The licensee or registrant may continue to practice and use the title during the 60-day time period.”*
- A trainee whose license has not been renewed, but is within the grace period will be notified by their Program Director of pending termination of clinical duties and other educational activities should licensure not be renewed by the end of the grace period.**
5. **Conversion of a Doctoral Educational Limited to Permanent/Full License:** A trainee who has successfully completed the required examinations and eligibility requirements of LARA may apply for a permanent/full license. If current licensure will expire within ninety (90) days, the trainee is responsible for renewing his/her doctoral educational limited license first and then applying for permanent/full license to avoid any lapse in licensure.

PROCEDURE FOR LAPSED PSYCHOLOGY LICENSE

When a trainee's State of Michigan psychology license lapses, the following procedure will immediately go into effect:

- All trainee clinical educational activities and trainee access to all clinical systems will immediately cease.
- The Program Director, or his or her designee, will immediately speak with the affected trainee and notify him/her of the situation and procedure to be implemented.
- The trainee will be placed on an unpaid, personal leave of absence effective (LOA) immediately. However, if the training program required the trainee to list the training program's mail and/or email address as the registered address with LARA, and if the training program had failed to notify the trainee of his or her pending expiration or had failed to monitor the licensure renewal status, the trainee will be placed on an immediate personal LOA; however, pay will not be withheld.
- Lapsed licenses are not eligible for renewal, therefore the trainee must submit a new application for licensure. The Program Director and the trainee will be informed of this status via written communication from the GPEC Chair. Leave status will remain in effect until documentation of valid licensure (primary source verification) is received by the GPEC Chair.
- If a trainee is placed on an unpaid LOA, should the APT have available vacation days, with approval of the Program Director and GPEC Chair, the APT may choose to use some or all of his or her remaining vacation days during the LOA period. Should vacation days be exhausted, the trainee will then be immediately placed on an unpaid LOA.
 - o Within 24 hours of the beginning of the LOA, the Program Director, or his or her designee, will submit relevant LOA paperwork to the HR Solutions Center.
 - o Due to the circumstances of this LOA, any unpaid LOA time may result in extension of the APTs training program by the number of days of the unpaid LOA.
- The GPEC Chair will notify the Program Director, Program Coordinator, Department Chair, Associate Dean for GME, Office of Clinical Affairs, Compliance Office, and Revenue Cycle of the lapsed medical license.
- The LOA/vacation will continue until such time as the affected license has been re-issued. Reinstatement to active training status will occur only upon receipt of documented valid licensure (primary source verification) by the GPEC Chair.
- Once a valid license has been issued, the GPEC Chair will notify the Program Director, Program Coordinator, Department Chair, Associate Dean for GME, Office of Clinical Affairs, Compliance Office, and Revenue Cycle of the updated status, which will include the effective date.

- The Program Director must indicate a lack of professionalism in the trainee’s next semi- annual evaluation for allowing his or her psychology license to lapse.

ATTACHMENT A – LICENSE RENEWAL

Specific licensure information, including type of license, expiration dates, and length of licensure is provided in the table that follows:

Profession	License Type	Expiration	Renewal Cycle
PhD/PsyD	Psychologist - Masters Limited	August 31	2 years (4 year maximum)
PhD/PsyD	Psychologist - Doctoral Limited	August 31	1 year (5 year maximum)
PhD/PsyD	Psychologist - Regular	August 31	2 years

The Michigan Department of Licensing and Regulatory Affairs establishes license application and renewal fees.

REFERENCES AND RESOURCES

UMHS Policy No. 04-06-050