APPROVED SCHOOLS	APPROVED	ACCREDITATION	NEW ADDRESS	DEGREES	WEB
CALIFORNIA GRADUATE INSTITUTE 1145 Gayley Ave., 3rd Floor Los Angeles, CA 90024 (310) 208-4240	Not listed	Merged with The Chicago School of Professional Psychology - NCA accreditted	Same		No Website - directed to CSPP
CALIFORNIA INSTITUTE FOR HUMAN SCIENCE 701 Garden View Court Encinitas, CA 92024 (760) 634-1771	State Approved		Same	PHD Clinical Psychology	http://www.cihs.edu/academic/psy_license.htm
CENTER FOR PSYCHOLOGICAL STUDIES 2288 Fulton Street, #201 Berkeley, CA 94704 (510) 524-0291	State Approved	Merged with NOVA Southeastern University - SACS accreditted	Same	PHD Clinical Psychology PHD Developmental Psychology PHD Organizational Psychology	Directed to Nova Southeastern University http://cps.nova.edu/
GRADUATE CENTER FOR CHILD DEVELOPMENT AND 6404 Wilshire Blvd. Suite 999 Los Angeles, CA 90048 (213) 655-8175	State Approved		Same	MA Clinical Child Psychology PHD Clinical Child Psychology PSYD Clinical Child Psychology	No website
INSTITUTE OF IMAGINAL STUDIES 47 6th Street Petaluma, CA 94952 (707) 765-1836	New name: Meridian University		Same		http://www.meridianuniversity.edu/
NEWPORT UNIVERSITY 20101 S W Birch Street, #120 Newport Beach, CA 92660-174 (949) 757-1155	State Approved		1601 Dove Street Newport, Beach, CA 92660	MA Psychology	http://www.newport.edu/news/school-news/73-approval
PROFESSIONAL SCHOOL OF PSYCHOLOGY 425 University Avenue, Ste. 201 Sacramento, CA 95825 (916) 641-6542	State Approved		Mailing: 3550 Watt Avenue #140 Sacramento CA 95821 Physical: 2411 Manning Street Sacramento CA 95827	Organizational Psychology MA I/O Psychology MA Psychology PSYD	http://www.psychology.edu/about/degree-granting-authority/
RYOKAN COLLEGE 11965 Venice Blvd. Los Angeles, CA 90066 (310) 390-7560	State Approved		Same	MA Counseling Psychology MA Psychology PsyD Clinical Psychology	http://www.ryokan.edu/index.php
SAN DIEGO UNIVERSITY FOR INTEGRATIVE STUDIES 5703 Oberlin Dr., Ste. 201 San Diego, CA 92121 (858) 638-1999	State Approved		3900 Harney Street Suite 210 San Diego, CA 92110	PHD Psychology Specialization in Expressive Arts Therapy PHD Psychology Specialization in Sport Psychology PHD Transpersonal Psychology Specialization in Tibetan Buddhist Psychology	http://sduis.edu/
SOUTHERN CALIFORNIA PSYCHOANALYTIC INSTITUTE 9024 Olympic Blvd. Beverly Hills, CA 90211 (310) 276-2455	New name: New Center for Psychoanalysis 2014 Sawtella Blvd. LA 310-478-6541				http://www.n-c-p.org/training-analysis-course.asp
SOUTHERN CALIFORNIA UNIVERSITY FOR PROFESSIONAL STUDIES 1840 E 17th St., #240 Santa Ana, CA 92705 (714) 480-0800	State Approved known as CALIFORNIA SOUTHERN UNIVERSITY	DETC accreditted	930 Roosevelt Irvine, CA 92620	PSYD MA Psychology Master in Science Psychology	http://www.calsouthern.edu/about-us/accredited-online-degrees/

TRINITY COLLEGE OF GRADUATE STUDIES 1661 N. Raymond Ave., #140 Anaheim, CA 92801-112 (714) 992-9110	State Approved		Mailing: 1500 South Mooney Blvd Bldg B Visalia 94590 Physical 3595 Sonoma Blvd #10 Vallejo CA 94590		http://www.tcgs.edu/

Approved School Pass Rates for EPPP

Currently there are 12 unaccredited schools in California that are approved by the BPPVE. Pursuant to AB400, the number of approved schools that grant psychology degrees that allow graduates to sit for the CAPsychology license cannot increase.

School	City	2010			2009			2008			2007			2006		
		Total Applicants	Pass	Fail	Total Applicants	Pass	Fail	Total Applicants	Pass	Fail	Total Applicants	Pass	Fail	Total Applicants	Pass	Fail
CA Graduate institute	Los Angeles	26	12	14	42	26	16	33	8	25	24	17	7	19	6	13
CA Institute for Human Science	Encinitas	2	1	1	1	1	0	3	2	1	3	0	3	1	1	0
Center for Psychological Studies	Berkeley	0	0	0	1	1	0	1	0	1	1	0	1	2	1	1
Graduate Center for Child Development and Psychotherapy	Los Angeles	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0
Institute of Imaginal Studies	Petaluma	5	4	1	10	9	1	1	1	0	5	4	1	3	3	0
Newport University	Newport Beach	6	1	5	3	0	3	1	0	1	3	1	2	2	0	2
Professional School of Psychology	Sacramento	9	2	7	5	3	2	12	4	8	8	3	5	8	4	4
Ryokan College	Los Angeles	30	8	22	25	11	14	34	15	19	21	10	11	3	1	2
San Diego University for integrative Studies	San Diego	1	0	1	2	0	2	1	0	1	1	1	0	0	0	0
Southern CA Psychoanalytic Institute	Beverly Hills	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Southern CA university for Professional Studies	Santa Ana	24	6	18	27	8	19	21	3	18	13	5	8	9	2	7
Trinity College of Graduate Studies	Anaheim	6	2	4	11	2	9	5	1	4	7	4	3	3	0	3
TOTAL		109	36	73	128	61	67	112	34	78	86	45	41	50	18	32
PERCENT			33	67		48	52		30	70		52	48		36	64

National Pass Rate for EPPP
n=5006

83% First Timers
76% Overall

Approved School Pass Rates for CPSE

Currently there are 12 unaccredited schools in California that are approved by the BPPVE. Pursuant to AB400, the number of approved schools that grant psychology degrees that allow graduates to sit for the CAPsychology license cannot increase.

		2010			2009			2008			2007			2006		
School	**City**	**Total Applicants**	**Pass**	**Fail**	**Total Applicants**	**Pass**	**Fail**	**Total Applicants**	**Pass**	**Fail**	**Total Applicants**	**Pass**	**Fail**	**Total Applicants**	**Pass**	**Fail**
CA Graduate institute	Los Angeles	24	24	0	28	21	7	19	10	9	23	12	11	6	5	1
CA Institute for Human Science	Encinitas	3	1	2	3	3	0	2	0	2	1	0	1	0	0	0
Center for Psychological Studies	Berkeley	0	0	0	1	1	0	0	0	0	1	1	0	1	1	0
Graduate Center for Child Development and Psychotherapy	Los Angeles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Institute of Imaginal Studies	Petaluma	4	3	1	6	6	0	4	3	1	5	4	1	1	1	0
Newport University	Newport Beach	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0
Professional School of Psychology	Sacramento	1	1	0	7	6	1	7	3	4	7	5	2	1	0	1
Ryokan College	Los Angeles	2	2	0	23	16	7	15	10	5	12	8	4	6	6	0
San Diego University for integrative Studies	San Diego	0	0	0	0	0	0	0	0	0	2	2	0	0	0	0
Southern CA Psychoanalytic Institute	Beverly Hills	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Southern CA university for Professional Studies	Santa Ana	9	7	2	9	7	2	6	3	3	4	4	0	0	0	0
Trinity College of Graduate Studies	Anaheim	5	3	2	2	1	1	5	3	2	4	1	3	2	2	0
TOTAL		48	41	7	79	61	18	58	32	26	60	38	22	17	15	2
PERCENT			85	15		77	23		55	45		63	37		88	12

Specific National (US only) Standards Accreditation Summary

Jursidiction	Regional	APA	Designated/APA	Designated	Other
Alabama	X				
Alaska	X				
Arizona	X				
Arkansas	X				
California					X
Colorado	X				
Connecticut	X				
Delaware	X				
District of Columbia			X		
Florida		X			
Georgia		X			
Hawaii	X				
Idaho	X				
Illinois	X				
Indiana	X				
Iowa			X		
Kansas	X				
Kentucky	X				
Louisiana	X				
Maine	X				
Maryland	X				
Massachusetts				X	
Michigan	X				
Minnesota	X				
Mississippi		X			
Missouri	X				
Montana		X			
Nebraska	X				
Nevada	X				
New Hampshire	X				
New Jersey	X				
New Mexico			X		
New York	X				
North Carolina	X				
North Dakota	X				

Specific National (US only) Standards Accreditation Summary

Jursidiction	Regional	APA	Designated/APA	Designated	Other	
Ohio	X					
Oklahoma	X					
Oregon		X				
Pennsylvania			X			
Puerto Rico					X	
Rhode Island	X					
South Carolina	X					
South Dakota	X					
Tennessee			X			
Texas	X					
Utah	X					
Vermont	X					
Virgin Islands	X					
Virginia	X					
Washington	X					
West Virginia	X					
Wisconsin	X					
Wyoming	X					
TOTAL	40	5	5	1	2	
						0

Emil Rodolfa, Ph.D.
Chair, California Board of Psychology
Re: CA Accredited Schools

Dear Emil:

In 1989 the National Register wrote a letter in support of legislation requiring all California schools to be regionally accredited in order to graduate license-eligible students. Although that bill was approved by the State Assembly, it was later amended in the State Senate and eventually returned to the Assembly for reconciliation in August 2000. The result was an amended bill which, through a grandparenting provision, allowed and still allows graduates from unaccredited CA-based schools to qualify for licensure in California. That bill, AB400, did pass.

The letter that we sent in support of requiring regional accreditation is attached to the email, and was printed in the January 1999 issue of the *California Psychologist*. None of the facts presented then have changed. Regional accreditation is a minimum and necessary standard for an educational institution to offer educational programs. However, regional accreditation of an institution is not sufficient to define an acceptable doctoral program in psychology. In the United States there are two mechanisms for evaluating doctoral programs: Accreditation by the Committee on Accreditation (COA) and Designation by the ASPPB/National Register Designation Project. These bodies are a valuable resource to state boards and credentialing organizations in their evaluation of applicants for licensure.

With regard to the evaluation of CA licensed psychologists who apply for credentialing by the National Register, the minimum requirement is that the doctoral program is COA accredited, CPA accredited or ASPPB/National Register Designated at the time of the applicant's graduation. (Foreign applicants are evaluated to determine if their program meets the designation criteria.) Thus no graduate of a CA state accredited school is eligible for credentialing by the National Register. By now most graduates have learned that they are not eligible, although a few apply anyway. (It is not clear to me when they learn the restrictiveness that results from enrollment in these programs.) As is obvious, none have been approved for National Register credentialing.

In addition, supervision during the internship or in the postdoctoral year must also be from a psychologist who graduated from an approved program, as described above. Thus, students from acceptable programs must be careful not to be supervised by a psychologist who graduated from one of the state accredited schools. The National Register has to obtain degree information on each CA licensed psychologist to determine if the psychologist graduated from a regionally accredited institution. See attached article written for APPIC on internship pitfalls (although this standard also applies to the postdoctoral year).

Finally, there is another limitation on these licensed psychologists: they have no licensure mobility. Because they have not completed an approved program, they must remain in CA if they wish to continue to practice as a psychologist. It is possible that a few have slipped through the cracks in other states, simply because the state board might not have checked the yearly publication of accredited institutions nor been aware that the category of CA State Accredited Programs did exist, but virtually all of these graduates are restricted to practice in CA.

The most troubling aspect is that these CA state accredited schools are not always forthcoming with prospective students about the limitations which will be place upon their careers. I do not know the costs of enrolling in these programs but it is a shame that some students pay significant tuition to these institutions for an education that does not meet national standards. I believe it would be fairer to students to only permit enrollment in institutions with regional accreditation, given that they are more vulnerable to making decisions now that may limit them in the future.

Thank you for this opportunity to comment on this issue. I hope that CA revisits this and is successful in passing the bill originally introduced in 1989. As is obvious from the exam data the programs are not going away. In the meantime CA consumers are being treated by psychologists who do not meet licensure standards in any other state.

Sincerely,

Judy Hall

Judy E. Hall, Ph.D.
Executive Officer, National Register of Health Service Providers in Psychology
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Learn more about our mission, values, and activities at
www.nationalregister.org/about_NR.html

Implications Of California's Failure To Adopt The National Standard In Psychology Training

by Judy E. Hall, Ph.D

California provisions allowing psychologists who are graduates of unaccredited schools to be eligible for licensure has created problems and confusion not only for California psychologists, but also for professional associations, credentialing organizations and licensing boards throughout the United States and Canada. Here is some background and history from the perspective of the National Register, a credentialing organization.

In 1977, the guidelines for defining "Doctoral Degree in Psychology" were developed at an education and credentialing meeting attended by representatives of the major professional psychology organizations. These organizations included the American Psychological Association, the American Board of Professional Psychology, the Association of State and Provincial Psychology Boards and the National Register. The guidelines were a compilation of characteristics that identify an acceptable psychology doctoral program; most of the groups who were represented at the meeting identified regional accreditation as a qualifying standard for a degree-granting institution. For example, since its inception in 1974, the National Register has required that members receive a doctoral degree from a regionally accredited school or university.

Purpose Of Regional Accreditation

One basic reason for the widespread adherence to the standard of regional accreditation is the assurance it provides that an educational institution's meeting a recognized, uniform set of standards. In most countries, the establishment and regulation of educational standards is the responsibility of the central government. However, in the United States, education was established as a responsibility of the individual states. Therefore, regional accreditation has become the mechanism by which educational standards are established, maintained and publicly known on a national basis. Although regional accreditation is a voluntary, privately operated service, it has come to be recognized by the federal government and state governments as a factor in decisions regarding public funding for educational institutions and for individual students.

The fact that the regional-accrediting bodies are independent bodies evaluating on a general, institutional basis (rather than specific fields or programs) helps to maintain their integrity to ensure and promote quality of education. The accreditation evaluating process consists basically of a site visit by a team that includes experienced educators. The site visit team evaluates standardized material submitted by the institution and submits a report to the accrediting commission, which does the final evaluation. The involvement of the two groups in making the accreditation decision helps maintain the integrity of the review. The integrity is further maintained by the fact that the regional-accrediting bodies are evaluated themselves by a private, independent organization, currently the Council for Higher Education Accreditation (CHER).

Dual Standard

As indicated above, the recognition of unaccredited education for psychologists in California has been an issue of concern to professional psychology organizations and state boards of psychology because of the precedent it establishes for a dual standard for the licensing of psychologists. The fundamental goal in developing the guidelines was to create a uniform set of standards for psychology doctoral programs that are recognized in all 50 states. Underlying this goal is the conviction that it is the best way to serve both the public and the profession of psychology. For many years, regional accreditation has been the minimum national standard for identifying acceptable educational institutions throughout the country. In my view, there is no discernible reason to change that standard.

Misguiding Of Students

The National Register has concluded from its communications with graduates of state approved schools that many of their institutions do not inform their students of the limitations and outcomes of completing their doctoral programs in an unaccredited school. Many of these graduates who have expressed interest in becoming listed in the *National Register of Health Service Providers in Psychology (National Register)* were surprised to learn that their training did not meet the minimum requirements for the National Register. They were equally surprised to learn that they did not meet the minimum requirements for licensure in other states. In some instances, these graduates were interested in becoming listed in the *National Register* because insurance companies did not find the doctoral program acceptable; and because companies had informed them that a listing in the *National Register* would be the only other way they would qualify for third party payment.

California Vs. New York State Approved Programs

The National Register's primary concern is not that California has standards for evaluating and accepting educational institutions, but rather that it has standards that do not incorporate the national standard of regional accreditation. In contrast, the State of New York has its own system of approving doctoral programs in psychology. As the New York State Board of Regents is an approved accrediting body under the United States Office of Education, this recognition can substitute for regional accreditation (e.g., Rockefeller University). However, in all other instances the degree granting institution is regionally accredited. For many years I was involved with the review of these training programs. This review involved a comprehensive evaluation of the quality and substance of each doctoral program in psychology and the educational institution in which it was housed. The New York state approval does not provide an alternative to regional accreditation, but a separate evaluation process in addition to regional accreditation by which, in the interest of the public, the state is assured that its own standards of quality in education and professional training have also been met.

Conclusion

In light of the reasons summarized above, the National Register strongly supports the California Psychological Association's move toward regional accreditation as the minimum training standard for psychology licensure in California.

Dr. Hall is the Executive Officer of the National Register of Health Service Providers in Psychology.

For Your Information

"The APA Model Act for State Licensure of Psychologists states that "by 1995 all applicants for licensure must minimally be graduates of a regionally accredited institution of higher education...." The Model Act serves as a prototype for drafting state legislation regulating the practice of psychology."

Billie J. Hinnefeld, J.D., Ph.D., Director Legal and Regulatory Affairs, APA Practice Directorate

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S99-2CP

Pitfalls in Internship Selection

Now that the 2009 match date for internships is in the past, the majority of applicants for internships can catch their breath. Others less fortunate must submit their qualifications to the clearinghouse and look for other ways to find a suitable internship training experience to complete their doctoral training. Those who have not matched have options, and most will find suitable training sites. However, they must be careful in their decision making. These future professionals must understand that the consequences of their choices may not arise until they complete licensure and credentialing applications several years after the completion of the internship. Those involved in supervising these future professionals have a tremendous responsibility as well.

When I worked in a large internship site early in my career, I did not know that much about internship training and how it related to standards for licensure and credentialing. I have a different perspective now based upon years of evaluating the internship training programs submitted by applicants for licensure (a total of 16 years in two different states) and for credentialing purposes at the National Register of Health Service Providers in Psychology where I have been Executive Officer for 19 years. I have seen many times what can happen when a doctoral student feels, understandably, enormous pressure to locate an internship site. Shortcuts are taken. Often the doctoral student is least qualified to anticipate some of the pitfalls, and that is why this article is oriented towards those who provide internship training, those who select training sites for internship, and those who evaluate internship training.

Quality Assurance in Internship Training

Doctoral students need to be aware of the types of review mechanisms for internship training. They know about APA/CPA accredited internships but may be less familiar with APPIC internships and how they differ from APA/CPA accredited sites. The majority of students will know very little about CAPIC listed internships, and their characteristics.

Students are often concerned about the risks of not completing an APA/CPA accredited internship. The importance of having an APA accredited internship is one of the most frequent questions I get from students and from applicants for the National Register HSPP credential. I generally start by stating that an APA accredited internship and an APA accredited doctoral program are required for graduates seeking employment in the VA. However, neither is universally required for licensure, credentialing, and other types of employment. Many state boards have adopted the National Register internship criteria into their regulations. Other board may require APA accredited *or* the equivalent and then use the National Register criteria to determine equivalence.

<u>What are the most common internship problems?</u>

1. Supervisor is licensed as a psychologist, but not at the doctoral level.
2. Supervisor has a doctoral degree in psychology, but the degree is not from a regionally accredited institution.
3. Supervisor has a doctoral degree in psychology from a program that is neither APA/CPA accredited nor ASPPB/National Register Designated.
4. Fewer than two psychologists serve as supervisors.

5. Fewer than two interns are training at the site.

Origination of the Criteria for Evaluation of Internship Training

The current internship criteria developed by the National Register grew out of the reviewers' experience in reviewing large number of applicants (12,000+) during the National Register's grandparenting period (1974-1978). Al Wellner, Ph.D., founding Executive Officer of the National Register, was also chair of the APA Committee on Accreditation during 1974-1979. He and Carl Zimet, Ph.D., Chair of the National Register at that time, suggested to APIC (APPIC's name at that time) that APIC adopt the same criteria to strengthen both organizations effort to identify proper internship training. These events help explain why the criteria adopted at that time by APA, APPIC and the National Register were so similar (Ron Kurz, personal communication, 9/21/93). Although modified independently over the years and with greater detail by APA and APPIC, the three sets of criteria remain very similar. The main difference among the three is that the National Register allows for the internship to occur after the completion of the doctoral degree. For the National Register criteria, go to http://www.nationalregister.org/internship.pdf. (See recommended web pages at the end of this article for APPIC and APA criteria)

These criteria were adopted by licensure boards to determine standards for an acceptable internship. Over time small but significant differences in licensing requirements for internship evolved, just as they did for doctoral degrees. Having completed an APA approved internship usually clears all hurdles at the state and national level. However, if the internship is not APA accredited, licensing boards and credentialing organizations examine the characteristics of the internship. In that instance differential outcomes may highlight problems in implementation of the training experience. Some of the examples below may be typical outcomes of the evaluation by a state licensing board or national credentialing organization.

The First Dear Applicant Letter

Dear Applicant:

> After a careful review of your application, Internship Confirmation Form, Internship Guidelines Compliance Worksheet, and an additional written explanation received from Dr. X, it appears that the internship program you completed does not meet the Guidelines for Defining an Internship or Organized Health Service Training Program in Psychology.

Next are the several reasons that may be given. Let's examine those pitfalls.

Pitfall 1: Supervisor is licensed as a psychologist but not on the basis of a doctoral degree in psychology.

One criterion addresses the qualifications of the internship supervisors. Licensure is required for at least one of the two required supervisors. For the National Register and many licensing boards, it is insufficient if the supervisor's license was based upon a master's degree in psychology. For the two individuals who are face to face supervisors and who certify to the credentialing authority the satisfaction of the internship by the applicant, their degrees should be a doctoral degree in psychology. Many licensing boards also want face–to-face supervision provided by psychologists who meet the doctoral standard. Not having doctoral level supervisors may also pose a problem for psychologists

seeking participation in healthcare plans and may be an issue for those seeking expedited mobility. This does not mean that those supervisors may not be competent in supervision; they could serve as adjunctive but not as primary supervisors.

Pitfall 2: Supervisor is licensed as a Psychologist on the basis of a doctoral degree but not from an institution that is regionally accredited or from a program that is approved by a credible quality assurance mechanism (APA/CPA Accredited Program or ASPPB/National Register Designated Program).

This is a variation of the first pitfall but in this instance the supervisor's doctoral degree may cause the problem. It is not clear the degree to which accrediting bodies, APPIC, or CAPIC look beyond the supervisor's license and actually examine the origin of the doctoral degrees. The criteria often do not address this issue, and state licensing and national credentialing requirements vary. For example, in CA licensure applicants from state approved schools will now be evaluated on a case-by-case basis to determine whether the degree meets the statutory educational requirement for admission to the CA licensing examination. These are programs which are housed in institutions which are not accredited by one of the regional accrediting bodies approved by the US Department of Education. Thus, knowing that a person is a licensed psychologist in CA does not tell us that the licensee has a doctoral degree which would meet standards for licensure in other jurisdictions or for credentialing by national organizations. If that licensed psychologists starts supervising doctoral students, he/she may unwittingly be creating a future licensing roadblock for the student.

Supervisors who completed a doctoral program in a program which is neither accredited nor designated, even though housed in a regionally accredited institution, do not qualify as acceptable supervisors for the National Register (A list of eligible programs is available at www.nationalregister.org/designate.html.)

A suggested approach to solving this problem is to request a CV from the supervisor and verify that degree from a recognized source such as the National Register, which has on file transcripts of more than 25,000 psychologists. The APA Membership Office or the state board may also be able to verify doctoral degree program, institution, and year of graduation.

All this goes to the issue that licensure is insufficient to qualify someone as a supervisor. It is important for interns to carefully qualify their supervisors in advance.

Pitfall 3: Remember the Twos: Two psychologists, two interns and two supervision hours face to face

The Second Dear Applicant letter

> The internship criteria specify that there must be two or more psychologists on the staff as supervisors, at least one of whom was actively licensed as a psychologist by the State Board of Examiners in Psychology. According to your supervisor, he was the only psychologist on staff. There was a second psychologist on staff as a supervisor, but she was there for only two weeks of your training. The drug and alcohol licensed counselor who provided supervision does not fulfill the requirement of having two psychologist supervisors. Apparently there were no arrangements made by the internship to bring in a second acceptable supervising psychologist when the second psychologist left.

A Third Dear Applicant letter

> The internship criteria specify that there must be a minimum of two interns at the site during the applicant's training period. The requirement of two interns makes it appear that there is the potential for a training environment. From the information we received, it was confirmed that you were the only doctoral level psychology intern on site from 09/01/2005 to 08/31/2006. Although your supervisor indicated that you had meetings with doctoral externs and psychology associates periodically, that does not substantiate that an internship level training environment was maintained by the internship program. In addition, participating in professional training and in-service training with staff or professionals in training for other professions does not demonstrate that you interacted with and affected a collegial relationship with other individuals going through doctoral level training in psychology on a regularly scheduled basis.

Or another version of this situation can be described as follows:

> The internship criteria specify that there must be a minimum of two interns at the site during the applicant's training period. The requirement of two interns makes it clear that there is the potential for a training environment. From the information we received, it was confirmed that you were the only doctoral level psychology intern on site from 09/01/2000 to 08/31/2001. Dr. X indicated that the program was unable to physically house and fund no more than one intern, and that although there were other training programs in the area, he said she could not arrange joint activities due to scheduling conflicts. Although Dr. X encouraged you to "seek creative ways of connecting with others" because she "valued and understood the loss of collegial contact" you would experience, it does not substantiate that a training environment was maintained by the internship program. In addition, participating in a conference where you met with other interns, and occasionally corresponding with local interns via email or phone does not demonstrate that you interacted with and affected a collegial relationship with other individuals going through doctoral level training on a regularly scheduled basis. There are several APPIC member and APA accredited psychology internship programs in that city which could have provided opportunities for meaningful interaction, support, and socialization with other interns. Accommodations should have been made in advance to ensure that the training needs of the intern took precedence over service requirements for the counseling center.

The solutions to these internship problems lie in the execution of the criteria. In the first instance, the internship director should have made immediate plans to bring in another qualified supervisor, signed a contract with that person, and notified the interns so that their internship would later qualify. This would be the basis for the letter that would accompany the internship confirmation form to the state board or the credentialing body of the special circumstances for that year. Similarly with the last two examples, it would appear that the experience was really more like that of an employee and that creating a training environment was really not the foremost consideration. Unfortunately, interns may not appreciate these necessities but they are the ones held accountable.

Pitfall 4: Good intentions: bad implementation

The National Register and most state licensure boards ask if the internship was APA approved at the time of the applicant's training. If the answer is no, the next question is if the internship was APPIC listed at the time. Failing to be APPIC listed typically means that the internship must be individually examined to determine if the internship meets the 12 widely accepted criteria.

It is not infrequent that in response to a question about whether the internship meets APPIC standards, the internship supervisor states that "the program was designed to follow APPIC guidelines." However, by examining the history of the internship in the APPIC Directory over the years, it was determined that the internship did not qualify until many years later for APPIC approval (and may not have even applied until many years later). As a result, at the time this individual was admitted, the internship may not have met criteria.

How is this assessed by the National Register and licensing boards? First, for any internship that is not accredited or APPIC listed, a copy of the internship brochure from that time period is generally requested. Invariably, the internship director sends a copy of the current brochure, if that even exists, stating that no copies of the brochure from 19XX exist. This has happened so frequently that at the National Register we now routinely ask that the internship director complete a form and describe in their own words how the internship met each of the 12 criteria *at the time* the applicant was in training. We have found that to be more helpful than simply relying on a brochure because the content and quality of the brochures vary tremendously.

Internships listed by CAPIC present a special challenge (www.capic.net). Most internships submitted as part of an application for the National Register credential are APA accredited or APPIC listed. Only a few are CAPIC listed. It is the latter group that is less well known especially outside of CA. In addition to the unfamiliarity, most of the CAPIC listed internships are half time and many do not fund interns, thus the intern may have difficulty getting licensed in states if unpaid internships are unacceptable. According to the survey results of students published in the APPIC Newsletter in November 2008, 19% of Ph.D. programs and 45% of Psy.D. programs would allow students to apply for an unfunded internship. Even so, lack of intern funding now makes internships ineligible to qualify for APPIC listing.

While half time internships pose no problem, it is important that the two half time internships be part of an organized sequence of training for the future psychologist. Often the search for qualified internships in today's competitive environment drives the applicant to find any internship. Thus, for CAPIC internships or for internships that existed prior to APPIC approval, the completion of the internship form is an essential part of the quality assurance review by the National Register. For some individuals the half time internships are essential to their life style and education sequence. Secondly, with the competition for internship training it is important that internships have an opportunity to demonstrate whether they meet standards.

Thus, I was surprised to hear from a doctoral student at one of my recent presentations on credentialing and licensure that her doctoral program supervisor suggested that she should not pursue a CAPIC listed internship. I would not feel comfortable making that statement myself. I think it is a criterion based and empirical issue state by state and organization by organization. It is a different issue if the doctoral program requires an APA approved or APPIC listing internship.

Finally there is another category of internships which occasionally are presented for licensure or credentialing purposes: internships that are created to fill a need for a particular student. These are the most dangerous from the perspective of satisfying the professional goals of the student. Urgency may trump qualified training. Creating an internship out of a work setting is often unsuccessful. In the first place there is the requirement for two interns in training at the same time. That means recruiting another individual for training purposes. Secondly, converting an employee into an intern means that the need for the training environment supersedes service needs. This is not to say that service needs are

not important but balance must be achieved. In this situation a contract is essential to protecting the student and making clear the characteristics of a training site. In most instances it will be necessary for the former employee to be assigned to a different location with new supervisors if the employment setting is serious about creating a training environment. It can be done. It just has to be carefully implemented.

International training sites

In the past five years or so I have seen increasing interest from doctoral students in obtaining experience working in foreign countries. Many of these students would like to complete an internship abroad. Even though internship training in some countries may not be as developed as our criterion-based system in the US and Canada, students should find out in advance if the experience would count for US licensure. One barrier is the qualifications of the supervisors. Is there governmental licensure in that country, and if so, is the license based upon a requirement of having a doctoral degree in psychology? Often the answer to both questions is no. If licensure exists it is typically at the master's level in psychology. Finally, training in some European countries may be available only in psychotherapy training institutes as opposed to health service delivery systems. Unlike the US, some countries have two recognition systems or approaches to psychologists, one of which is as a psychotherapist. For these many other reasons related to structural barriers (work permits) and cultural barriers (language and culture) it is a challenge for US trained students. I am willing to try to advise these students if they are interested. Simply suggest that they email me at judy@nationalregister.org

What could be done by internship directors to solve some of these problems?

1. Certify Internship for all Interns at the time of Completion:
   Internship directors should complete and sign the NR Internship Confirmation Form for each intern at the end of the year and then submit a copy to the National Register credentials bank. The National Register will serve as a bank for those forms until they are reviewed formally at the request of the applicant at the time of credentialing. At the same time supervisors should keep a copy and give a copy to the intern. Attach a copy of the brochure for that year to the form that you keep and be certain that the internship brochure is dated. Then at the time the intern applies for a license you will have in your files a contemporaneously completed form which attests to satisfactory completion of an internship. The internship form is available online at www.nationalregister.org/internship.pdf
2. Bank Official Descriptions of Internship:
   Keep copies of dated internship brochures and descriptions, especially when the program is not APA accredited or APPIC /CAPIC listed for each year that the internship is in existence. Keep a list of the names in the internship class by year. This contemporaneous information is typically needed when former interns apply for licensure and the National Register HSPP credential. As both applications typically occur several years after the completion of the internship, each year's description or contract with the student is critical to have on file and dated.
3. Determine that Supervisors at the Internship Site Meet Professional Standards:
   At the time that the supervisor is chosen to be part of the internship staff, obtain accurate and verified information on education and training and licensure. Then keep dated copies of CVs on file. When former interns apply for NR, licensure, or other credential, the credentials of the supervisors may be questioned. Be certain that doctoral degree institution, program completed and date of degree are provided in response to questions about the credentials of the internship staff. As indicated previously, hiring supervisors who have completed a doctoral program from an institution that is regionally accredited but not APA Accredited or ASPPB/National Register

Designated may not be sufficient to meet standards for the profession. The degree must be from a program that is accredited, designated or determined by a credible authority to be the equivalent. For instance, for credentialing by the National Register, state accreditation of an institution/program is insufficient to qualify a person as an acceptable supervisor, even if the supervisor is licensed as a psychologist. To do so would mean that a standard for supervisors is lower than what is expected for applicants for credentialing by the National Register.

Other Resources

http://www.apa.org/ed/accreditation/grg_interns.html
http://www.appic.org/about/2_3_1_about_policies_and_procedures_internship.html

About the Author

Judy E. Hall, Ph.D., has been the Executive Officer of the National Register of Health Service Providers in Psychology since 1990. Before that she was the Executive Secretary for the New York State Board for Psychology for 12 years. She has served as President of the Association of State and Provincial Psychology Boards and Chairperson of the APA Board of Professional Affairs and APA Ethics Committee. Dr. Hall co-edited *Global Promise: Quality Assurance and Accountability in Professional Psychology* (Oxford, 2008). She is Fellow of APA.

For more information on the National Register, see www.nationalregister.org.

Hi Emil:
Here is the chart I spoke with you about. There are only 2 jurisdictions (CA and Puerto Rico) who do not require at least regional accreditation.
All of the jurisdictions that require APA/CPA/Joint Des. obviously also require regional accreditation.

Good Luck

Carol

On Nov 1, 2011, at 7:05 AM, Paszkiewicz, Wendy wrote:

November 1, 2011
Drs. Rodolfa and Kahane –
I am writing in response to your request for information about California Approved Schools and their ability to become a member of NCSPP. NCSPP does not have a formal policy about state approval in the absence of regional accreditation. We do, however, have membership categories and regional accreditation is required for both classes of membership within NCSPP.
In order to be eligible for full membership in NCSPP a doctoral level program in psychology must be accredited by the American Psychological Association, and thus needs to be regionally accredited. Associate members include programs within an institution with either provisional or full accreditation by a regional accrediting body recognized by the United States Department of Education. Such programs must offer doctoral training in professional psychology but need not be accredited. Programs are not eligible for associate or full membership with state approval only.
We believe it is essential for all NCSPP members to have regional accreditation for the purposes of quality assurance and institutional and program improvement. It is also our belief that specialized accreditation, such as APA-accreditation, is valued and we encourage and provide mentoring to our Associate member programs to seek this status.
Sincerely,

Wendy B. Paszkiewicz, PsyD

President, NCSPP

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AMERICAN
PSYCHOLOGICAL
ASSOCIATION

Education Directorate

November 2, 2011

Emil Rodolfa, Ph.D.
Chair, BOP Credentials Committee Board of Psychology

Robert Kahane, Vice President,
State of California Board of Psychology Executive Officer

Dear Dr. Rodolfa and Mr. Kahane,

Thank you for your query regarding accreditation of programs in psychology by the American psychological Association (APA) Commission on Accreditation (CoA) and the requirement for accreditation that programs seeking accreditation are part of regionally accredited institutions.

Quality control in higher education in the United States has been conducted by a system of peer review by accrediting bodies rather than by a federal agency. A system of federal and non-federal recognition bodies is in place to recognize those accrediting bodies that follow appropriate policies and procedures to ensure continued quality and stability of the higher education enterprise. Both groups recognize three basic types of accrediting bodies:; national, regional; and specialized and professional accrediting bodies.

In the United States, the role of the federal government in higher education has by design been limited to funding for educational opportunities. The United States Department of Education follows the law and concomitant regulations regarding the recognition of peer review agencies that are "reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit" under the Higher Education Act which was revised in August 2008 in the Higher Education Opportunity Act. The regulations call for adherence to a series of regulations regarding standards and procedures in place for the purposes of recognition at both the institutional level (for regional and national accreditation) and at the programmatic level (for agencies such as the APA-CoA). These standards include: standards for accreditation; information about the consistency of decisions regarding accreditation, how institutions and programs are consistently monitored regarding their quality; student learning outcomes – including graduation and licensure rates; and how accreditation standards are enforced and reviewed. The regulations also include a review of policies and procedures including: review of changes in the institutions/program; policies regarding the review process and due process; notification of the public. Institutional accreditors (regional and national accrediting bodies) also must address the fiscal viability of institutions since the accreditors serve as Title IV gatekeepers of federal funds.

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E-mail: education@apa.org
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The non-federal recognition body, the Council of Higher Education Accreditation or CHEA, also has standards for the recognition of accrediting bodies. One major difference between the two recognition bodies is that there are no links to federal funding involved in CHEA recognition and CHEA is limited to accreditation of agencies reviewing degree-granting institutions and programs.

One major difference among these accrediting bodies includes different scopes in terms of what the "unit of analysis" is that is undergoing quality review. In the case of regional and most national accreditors), the unit of analysis is the entire institution seeking accreditation. For most of the professional accreditation agencies, such as the APA-CoA, it is the particular program itself that is being reviewed for the purposes of quality assurance. Thus, the six regional accrediting bodies focus on institutions granting undergraduate and post graduate degrees, the CoA looks solely at the quality of programs providing advanced education and training in professional psychology. The APA CoA is the only accreditor recognized by both the Department of Education and the Council of Higher Education Accreditation to provide accreditation of programs in professional psychology.

The APA CoA relies on regional institutional accreditation for a variety of judgments including the stability of the overall institution and other institutional resources such as access to library materials, student services, financial aid services, and broader faculty policies and procedures that meet standards for higher education. With recent regulations such as the federal definition of a credit hour, the APA-CoA also relies on the review of regional accrediting bodies.

With respect to APA membership, it is important to note that many psychologists are trained in areas (e.g., social psychology, cognitive psychology) that do not prepare them to enter professional practice. Those programs are not eligible for APA accreditation, thus the reliance on regional accreditation as a criteria for APA membership.

Sincerely

Cynthia D. Belar, Ph.D., ABPP,
Executive Director, Education Directorate
American Psychological Association

Dear Dr. Rodolfa and Mr. Kahane:

I will gladly respond to your inquiry, as this is an issue that I have found poses difficulties for some individuals who seek to advance their career as a psychologist by either becoming board certified through the American Board of Professional Psychology (ABPP) and/or becoming licensed in another jurisdiction.
It has long been a requirement of ABPP, as well as many other psychology organizations and jurisdictions, that an individual must graduate from a doctoral degree program in an institution that has at least been accredited by a regional accrediting body (e.g., the Western Association of Schools and Colleges or similar). It is generally preferable that the degree program be accredited by the American Psychological Association (APA) or an ASPPB/NR designated program (and for those programs accredited/designated, regional accreditation of the degree granting institution is a requirement). ABPP expects the candidate's doctoral training to meet a minimum standard of rigor as well as include training in the foundational areas of psychology through a relatively standard course of study. Regional accreditation has been the minimum level acceptable for an institution; regional accreditation of the institution helps assure credentialing/licensing boards that the institution has met standards that the psychology education profession has deemed acceptable for minimal requirements for education – it should be noted that regional accreditation in and of itself does not apply to the education degree program, per se, but rather to the institution. Further review of the graduate program from which an individual has graduated is also a requirement for ABPP, and for many jurisdictions.

It has been my experience that many students appear to not understand the implications of graduating from a program at an institution that is not, at a minimum, regionally accredited. Further, many such applicants from California state approved programs often seem to be of the impression that the doctoral degree program from which they graduated is acceptable for ABPP Certification and/or licensure in other jurisdictions because they have been led to believe that the program was "in the process of applying" for APA accreditation, or they simply did not realize that most jurisdictions would require that the degree be from a regionally accredited institution in order to be license-eligible. They are often sorely disappointed and, at times, outright angry that they did not know this or were "misled" by the degree granting institution.
All of this impacts protection of the consumer of psychological services. Professional psychology has established minimal entry expectations that include regional accreditation. The emphasis here is on minimal; essentially, there is a consensus that residency in the program is also a significant requirement (in other words, regional accreditation of distance learning program may not meet the current professional expectations). To have institutions that are not accredited accepted by a state licensing board leads to licensing individuals in one state who will very likely not be eligible for licensure in any other jurisdiction. Thus, this situation results in one state determining that eligibility for licensure is acceptable below the standard widely accepted within our profession.

Why the California Board of Psychology would feel that its constituents do not deserve the same minimal standards expected nationally within the profession of psychology is

difficult to comprehend. I suspect that in its efforts to protect the citizens of the State of California, the legislature, and the Board of Psychology, would want to at least meet, if not exceed, those minimal standards that have been accepted widely within the profession of psychology.

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