



CAPIC
100 Ellinwood Way
Suite N275h
Pleasant Hill, CA 94523

925.969.4550
capicadmin@capic.net
www.capic.net

NACIQI Hearing on APA/CoA Accreditation Status

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Double Tree by Hilton Hotel, Crystal City
300 Army Navy Drive, Arlington, VA 22202

Oral Comment by CAPIC Executive Director, Rene Puliatti, Esq.

NACIQI Members, good morning and thank you for this opportunity.

My name is Rene Puliatti and I am the Executive Director of CAPIC, the California Psychology Internship Council. We need your help to ensure that diverse, inclusive, and high-quality training opportunities remain available to psychologists, so they can in turn provide much-needed mental health services to the public.

About CAPIC. CAPIC is a membership organization of 37 doctoral academic and over 100 internship programs throughout California. Our programs are recognized for licensure by the CA Board of Psychology, and we facilitate quality psychology training without the formal stamp of accreditation.

CAPIC was founded in 1991 to address the need for high-quality training at smaller, often county-based, publicly-funded internships. Twenty five years and over 12,000 CAPIC alumni later, the majority of CAPIC internships continue to be located there, addressing the mental health needs of traditionally underserved and underrepresented communities and populations.

CAPIC has routinely collaborated with APA and CoA over the years, and half of our academic programs are APA-accredited. However, the negative impact of some APA/CoA policies have led us to speak out here for fair and inclusive policies from APA/CoA that will better serve the profession and the public.

I have seen changes in the profession and I have heard stories from students and psychologists who are experiencing an impoverishment of the profession due to APA and CoA policies. You will hear some of these stories today from other speakers today.

One striking example is Implementing Regulation (IR) D-4-7(b), which essentially uses a quota to require academic programs to place 50% of their students at APA-accredited internships. The problems with this IR are multiple:

- 1. There is inadequate evidence that this IR improves the quality of student training, its underlying purpose. We have questioned the methodology used in the 2012 Schaffer article. We also have studies showing no significant difference evidence between APA-accredited internships and others (e.g. CAPIC internships).*
- 2. The use of quotas has a discriminatory impact on non-traditional and diverse students by marginalizing valid non-accredited internships often preferred by them. Also, doctoral academic programs often feel such pressure to meet this quota that they end up serving APA/CoA needs rather than their own students' needs.*
- 3. The use of quotas IR D-4-7(b) is (a) a poor means to address individual student goals and needs; and (b) are not based on the quality of the internship experience.*
- 4. IR D-4-7(b) also negatively impacts public mental health services, particularly in traditionally underserved communities by reducing the pool of students able or willing to serve there. Without sufficient students, valid unaccredited internships are not able to keep their training programs open, and the public loses the mental health services that they would have helped to provide.*

IR D-4-7(b) is one example. More importantly, it is a symptom of a much larger problem, which is the interwoven relationships and conflicts of interest among APA, CoA, APPIC and others. The push by APA for a Model Licensing Act which would require an accredited academic program and an accredited internship for licensure, at the same time that CoA is requiring 50% quotas from its academic programs, is just one of the more glaring examples of such conflicts of interest.

Am I am conflating CoA with APA? No. We don't speak of CoA-accredited schools or internships, we speak of APA-accredited ones. Further, the impact of CoA policies – as well as APPIC and others-- serves APA's professional organizational goals. That they are implemented through CoA administrative rules and policies does not lessen that impact.

We need more diversity and inclusion in the training of psychologists. Given the immense impact of APA/CoA on psychology training, the profession and the public, its policies – and their consequences – must be carefully examined, and, when appropriate, changed to better serve the public. A fundamental, cultural change is needed at APA/CoA. A good starting point is the repeal of IR D-4-7(b).

Thank you.