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I am currently part-time Core faculty at the American School of Professional Psychology at Argosy University in the San Francisco Bay Area. I have been a professor of psychology for more than 30 years. For much of that time I have been engaged in accreditation activities for both the Western Association of Schools and Colleges and for the American Psychological Association. I was even a member of the APA's Committee on Accreditation from 2003 to 2006. Consequently I have thought a lot about the nature and function of accreditation standards. After much consideration I have serious concerns about the COA's use of numerical quotas as an accreditation standard. Specifically COA states that APA accredited doctoral programs must place 50% of their graduate students in separately APA accredited internship training programs. (I should point out that it is not entirely clear that there are currently enough existing APA accredited internship positions for 50% of the clinical psychology doctoral student applicants!) The major concern I have is that numerical quotas do not direct the doctoral programs to review and analyze each internship position to determine whether the student's internship accomplishes the training goals appropriate for each individual. It is my understanding that accreditation standards are in place to ensure that doctoral programs and internship training programs focus on providing high quality education and training that will allow students to achieve their professional goals. Currently COA requires doctoral programs to review each non-APA accredited internship to ensure that it meets the learning needs of the applicant student but no such requirement exists for APA accredited internships. This problem is complicated by the fact that a numerical quota forces the doctoral program to overshoot the quota or risk being "dinged" by COA for falling below the 50% level. Thus in order for a doctoral program to meet APA's recommended level of student internship placement the program may in fact be forced to give less attention to the student's learning needs and more attention to the program's need to hit the 50% level of APA accredited internship placement. In the worst case scenario the doctoral program may end up in an adversarial position with students who are relatively powerless in defending the importance of their own professional learning goals. In my understanding this is not how accreditation processes should work.

A numerical quota may be defensible if there is clear evidence that APA accredited internships are in virtually every way superior to CAPIC member internships. The fact is that there is very little evidence, if any, to indicate that CAPIC internships function less well in preparing psychology interns for entry into practice. There has been one article that indicates trainees at APA accredited internships score higher on licensing exams (Schaffer, Rodolfa, Owens, Lipkins, Webb, & Horn, 2012). This study has a rather important methodological flaw as I point out in my poster presented at the NCSPP midwinter conference in 2015. (Morrison, Schaeffer, Ribner, & Puliatti, 2015) The fact is that many more studies need to be undertaken before any reasonable conclusion can be drawn that APA accredited internships prepare students better than CAPIC internships.

Finally there is the concern that there is better quality control and monitoring at APA accredited internships than at CAPIC internships. The fact is that CAPIC internships are visited annually by EACH doctoral program which places students in those training programs. Some CAPIC internship sites may be visited for quality control by four or five doctoral programs each year. CAPIC also visits each internship on a rolling 5 year schedule in order to ascertain that CAPIC training programs are in compliance with

CAPIC membership standards which are very similar to APA and APPIC standards. We believe that CAPIC's methods of quality control, while different than COA's, are working effectively.

In closing I would like to reiterate what many of my colleagues have said today. Having a diversity of training models that meet the diverse learning needs of all our students is not only important for our graduate students, it is essential to ensure the strength and viability of our profession as a whole. Professor Donald Peterson, one of my mentors, implored us to make psychology indispensable. I believe CAPIC internships contribute to making psychology indispensable by improving the lives of many of the people who live in our communities, including the homeless, the drug addicted, and the chronically mental ill who are desperately in need of psychological services. CAPIC internships provide an invaluable function in allowing students who are committed to treating the underserved a pathway to achieve their professional goals.