



CAPIC
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CAPIC Public Comment
On the following Implementing Regulations
Of the American Psychological Association's Commission on
Accreditation

Discipline Specific Knowledge (DSK).

Direct Observation (for doctoral programs).

Profession-wide Competencies (PWC).

Use of Annual Reports for Reaffirmation of Accredited Status and Monitoring of Individual Programs (D.4-7(a)).

Use of Narrative Annual Reports for Reaffirmation of Accredited Status and Monitoring of Individual Programs (D.4-7(c))

Submitted by CAPIC Executive Director, Rene Puliatti, JD
Submitted online on 02/04/2017

Discipline-Specific Knowledge (DSK)

CAPIC supports the comments of NCSPP in this matter on the need for a single but broad standard that recognizes the validity of diverse psychological methods. Consistent with this goal of recognizing valid and diverse methods, CAPIC also supports the comments of SQIP for the inclusion of orientation and training in qualitative methods.

CAPIC also strongly encourages CoA to review this and all Implementing Regulations (IR's) for any unintended consequences on the profession and the public. As CAPIC has previously stated, IR's often have powerful impact on members by virtue of the IR's arising from the CoA which has the power to grant, limit or deny accreditation to its members. CAPIC also continues to contend that IR D-4-7(b) negatively impacts the diversity of the profession as well as and the diversity of populations served, by undervaluing valid quality unaccredited agencies and programs which serve diverse and often underserved communities and often better meet the needs of diverse and non-traditional students.

Promoting Excellence in Professional Psychological Training
Doctoral Academic Programs Ψ Doctoral Internship Programs Ψ Postdoctoral Programs



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Direct Observation

Training at the practicum level is currently outside CAPIC's area of responsibility, although CAPIC supports the value of direct observation in supervisory training, so long as it does not unduly burden training sites. CAPIC recommends further consideration of audiotaping, as suggested by NCSPP, as a means to address CoA's concerns, particularly absent research for invalidating it as an evaluative method.

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Profession-Wide Competencies (PWC)

CAPIC supports the comments of NCSPP in this matter on the need to include psychopathology in the profession-wide competency of both Assessment AND Intervention.

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Annual Reporting for Reaffirmation of Accreditation and Program Monitoring (D.4-7(a))

CAPIC strongly supports the comments of NCSPP in this matter on the need to include qualitative factors, and not exclusively rely on quantitative ones, in order to properly evaluate a program's success, particularly its ability to address the individual needs of diverse and non-traditional students. CAPIC also has similar concerns with the CoA exercise of "professional judgment" to determine the adequacy of a program's response.

As stated in previous Public Comments and other forums, CAPIC strongly opposes CoA's use of numerical quotas as an accreditation standard (i.e. the 50% threshold rule of IR D 4-7(b)), particularly absent strong evidence of the superiority of APA-accredited internships.

CAPIC has directly responded to the contention of APA superiority: (Morrison, A., Schaefer, M., Ribner, N., & Puliatti, R. (January 2015). Training healthcare psychologists: Outcomes from multiple models.). Subsequent studies, both pending publication, have also found no significant difference between APA-accredited and non-accredited internships. (Bucky, S., Stolberg, R., Turner, S., & Kimmel, C. (April 2015). Comparison of supervisory characteristics across accrediting bodies and levels of training; and Rodriguez-Menendez, G., Dempsey, J., Albizu, T., Power, S., and Campbell, M. (2016). Faculty and student perceptions of clinical training experiences in professional psychology.

CAPIC also contends that such numerical quotas do not direct the doctoral programs to review and analyze each internship position to determine whether an internship accomplishes the training goals appropriate for each individual student. 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.

CAPIC further contends that IR D-4-7(b) negatively impacts the diversity of the profession as well as and the diversity of populations served, by undervaluing valid quality unaccredited agencies and programs which serve diverse and often underserved communities and often better meet the needs of diverse and non-traditional students.



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Narrative Annual Reporting for Reaffirmation of Accreditation and Program Monitoring (D.4-7(c))

Regardless whether an item is termed a "policy" or a "guideline" or an "outline," its impact on members, and therefore the profession and the public is often profound, and must be reviewed with that impact in mind.

CAPIC appreciates the inclusion of narratives to supplement quantitative monitoring of a program, particularly its ability to address the individual needs of diverse and non-traditional students. However, CAPIC has concerns with the CoA exercise of "professional judgment" to determine the adequacy of a program's response.

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