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## Public Comment on CoA IR D.4-7(b) From CAPIC

On behalf of the California Psychology Internship Council (CAPIC), I respectfully submit the following comments on the CoA's intended revisions to IR D.4-7(b) setting a 50% threshold for the expected rate for doctoral academic programs' placement of their students at APA accredited internships.

We greatly appreciate and support the importance of ensuring quality of internship training and the necessity of developing standards upon which to base this determination. The CoA's introduction of a step-wise process towards achieving full APA accreditation status is a commendable means by which to encourage and provide tutelage to sites interested in pursuing this status. Concern, however, rests on several issues, including this proposed change to the existing IR occurring in the midst of what many would refer to as a crisis or imbalance in the national match which is impacting our students. As we are all aware, the number of students applying to APA sites far exceeds the number of APA accredited positions available. Currently, only about 2/3 of the sites available through the APPIC system are APA accredited.

Although many of the 137 CAPIC sites (443 internship positions) may be eligible to apply to the APA for accreditation consideration, some may offer a stipend that would be considered lower than that of other local APA internships, and although we strongly encourage sites to offer stipends, others are not able due to fiscal constraints. These sites nonetheless provide quality training that interns repeatedly choose, even over opportunities to be placed at sites where a stipend is present. One may also note that at present no data have been made available showing a relationship between the presence or absence of stipends, quality of internship training, or distal outcomes post-training (i.e., EPPP pass rates and employability). Although CAPIC has applied and received state contracts of over \$5 million for stipend support, these are not sustainable funds. At present, these sites could not apply for this first level of consideration in the CoA's proposed accreditation process. If the CoA could facilitate the identification and procurement of sustainable funds for stipends, most of these sites would become appropriate for "accreditation eligibility." In addition, based on reports from the field, an internship program's application costs for accreditation consideration may be between \$4,000 and \$6,000. We would like to encourage the CoA to waive these fees or titrate payments across several years which may also promote quality internships to begin the application process.

In addition to full-time and 2-year half-time internships which comprise 45% CAPIC internship positions, another 55% offer one-year half-time position. We would like to encourage the CoA to consider the value of these training experiences and the variety of opportunities they present, particularly in light of the need to increase the availability of quality training opportunities. To date, no data have been presented showing a difference qualitatively between a two-year or 2 one-year half-time internship experience. In the absence of such data, it may be reasonable to allow students to choose from a variety of quality internship training opportunities based upon their own unique needs and interests. These needs may include the inability for students to apply to sites out of state or even out of their current location, due to familial, economic and other concerns. In addition, the stipend amount many interns receive from APA sites does not offset the cost of moving and may not support the cost of living incurred by moving to a new location. This may be compounded further by the intern not having the infrastructure support available outside of where they currently reside. Some students' decisions may be impacted by considering the loss of child care arrangements, the inability of a significant other to leave

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their position of employment, or the stress of separation from their families for the internship year. Others may want to choose to stay local in order to give back to their respective communities, and had chosen to apply to particular academic programs because they are located within these communities. Others may seek training opportunities which provide unique experiences with special populations or clinical interventions. These same agencies providing excellent supervision and training, may not have the fiscal ability to provide a stipend. Innumerable training opportunities have been impacted by significant reductions in mental health funding in California.

To eliminate or reduce quality training opportunities will only serve to limit the choices for students whose professional aspirations may be enhanced by these programs. In addition, it will undoubtedly impact the ability of these agencies to serve underserved and underrepresented populations, many of which are in critical need of mental health care beyond what has historically been the case, and with few viable options available in hard hit communities.

In summation, we are hopeful that the CoA will reconsider the intended changes to the IR on the 50% threshold, and we encourage the CoA to consider the various suggestions presented above in the hopes of facilitating and supporting a diversity of quality internship training programs, in an effort to afford our students greater opportunities to fulfill their professional aspirations.

Respectfully,

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