My name is Melodie Schaefer, and I would like to thank the committee for this opportunity to express my concerns and opinions pertaining to the American Psychological Association's Commission on Accreditation, including Implementing Regulation IRD-4-7b. The IR stipulates expectations for APA accredited academic programs to achieve a 50% minimum internship placement rate of their students at APA approved internship sites.

I am a licensed psychologist in the state of California and have developed and provided doctoral level psychology training and supervision for over 20 years at APA, APPIC, CAPIC and exempt settings. I am and have been a board member of the California Psychology Internship Council, current Vice-Chair and past Chair, and have served on numerous local, county, state and federal mental health and profession of psychology-related committees and boards for over 30 years.

The CoA's position on APA internship placement rates has been implemented without justifiable data to support their platform, and by doing so, betrays the very principles upon which our profession stands. The ramifications of such are far reaching and perhaps have not been fully anticipated or appreciated in this undertaking.

We live in a world in which discrimination and classism continues to lead to divisiveness and exclusion, and a lack of appreciation and respect for the benefits of our nation's rich diversity. Our profession and APA espouse the virtue, the necessary importance of appreciating and educating ourselves on the relevance of diversity in providing service. Yet, an inherent contradiction to that tenet lies within the restriction placed upon academic programs and their students to acquire what is postulated as the preferred training experience -- vis-à-vis APA internships.

Internships in California, and I would suspect in other states as well, that are NOT APA approved, ironically are quite often those focusing on psychological services to underserved and underrepresented communities that are in markedly high need of care and greatly impacted by reductions in fiscal streams of support. To what end does the CoA's position serve? It would not seem to serve a "do no harm" position as critical care needs of impacted communities will be unmet. The

agencies that provide local care are not financially equipped to seek APA status, nor able to provide the level of stipends that APA would require.

CAPIC served as paladin for ensuring doctoral internship training funding be identified within the state of California beginning in 2008, whereas doctoral psychology training funding had previously been excluded. To date, our efforts have resulted in over 8 Million dollars of funding, most of which CAPIC has and currently is awarded, to provide stipends of over \$20,000 per FT status to doctoral interns committing to conducting their pre and post doctoral internships at within-state public mental health settings. This amount is significant, even when compared with the APA's 3 Million in funding that was distributed nationally to help sites that are not APA, to submit applications. We applaud this effort by APA, although even with the APA funding available, many sites cannot meet their criteria as there is no recurring, hence sustainable funding for stipends. CAPIC's stipends must be directed to the intern, not the sites, so in APA's view, it would not be considered as viable for the site to pursue applying.

State and County funded facilities within California have had a history of not pursuing APA accreditation status in part, as the cost in doing so is prohibitive in respect to limitations in funds. Students have slowly reduced their applications to such sites due to the pursuit of APA internships per their academic programs' encouragement or insistence. We are now seeing a gross reduction in the number of Psychologists being employed throughout the state's county and state funded mental health agencies, and an increase in social workers, licensed marriage and family therapists. Again, to what end is the CoA's position leading? We would assume hopefully, that the APA and CoA would not support a reduction in our profession while inadvertently seeing that the position they are holding may be facilitating that very process.

Among our constituencies, many have brought forth the concern that an inherint conflict of interest may exist in that the APA, as a professional membership organization, is putting forth a mandate for at least 50% APA internship placement, whereas the APA directly benefits financially from this arrangement. Others have voiced concerns that the position of the CoA might be looked at as a restriction of trade issue. I do not have an opinion on either of these points as they do not lie within my area of expertise, and would leave that for the committee to consider. However, I would hope that we would all be concerned that our profession and that of APA and the CoA appear "above board" and that any possible conflicts be at least given consideration as another area of impact.

So again – to what end does APA's position lead? Does it serve the students entering our profession, many of whom are seeking to work with marginalized, high need populations? OR students who are unable due to restrictions in familial, social, financial challenges, to bear the emotional and financial brunt of moving their families across country for an APA training year? Does it meet the needs of students who are single parents? Are married with spouses and children they cannot move? Of those who cannot sustain the costs of moving for the year? Those that have much needed local family support and in-kind financial support? Or to students who want to work within the local communities from which they themselves have lived and plan to continue to do so and where they wish to begin their profession? The diversity of student issues that are not well-served by the limitations of the CoA, are as diverse as the student population that is entering and of those that might like to enter our profession, but might not consider doing so due to the news that is made available through various means by doctoral students who are frustrated with these same issues.

Here we stand with contraction towards the heralded importance of encouraging individuals with diverse backgrounds to enter our field, but to whom we will not honor their diverse and particularly important interests and pragmatic social, familial and financial limitations and needs. Instead, the expectation is that they are to bear the financial brunt of moving their families across country for an APA training year --- or be strongly encouraged by their academic programs, to hold back another year and try again next, while they put their career path on hold and accrue additional debt as a result. What rationale for supporting this approach could possible exist that would not be devoid of an empathic understanding of what students in today's "real world" face when they choose to enter our profession?

It is time for change to be embraced within APA, including the CoA, especially in light of recent national events that have casted a pall upon our profession and have led to questioning the integrity or very SOUL of our collective character. Such change will not diminish the importance of their leadership and what they can provide, but rather will strengthen it, I believe. If APA and the CoA can embrace this as part of their and our profession's "Hero's Journey" at this crucial juncture in tis developmental history, then transformation and growth in finding a new, collective and therefore respectful voice will be found.

It cannot be easy for this committee to consider embracing the tenets of what I and many others have put forth today. For in doing so, it means a shift in position -- to challenge a systemic pattern of how the CoA has been functioning. Our profession, however, needs to find a new and more open heart for if we do not move forward collectively together with a healthier and more representative voice, then we risk the future withering our profession.

Thank you for your time and consideration.