

Dear Dr.

On behalf of the American Psychological Association of Graduate Students (APAGS) and the American Psychological Association's Committee on Early Career Psychologists (CECP), we are writing to ask you to prioritize a major concern of these groups and begin the process to change your state's existing licensure policy to reflect APA's new policy on licensure eligibility in professional psychology.

As you know, at their February 2006 meeting, the APA Council of Representatives voted to adopt the following statement as APA policy:

***The American Psychological Association affirms the doctorate as the minimum educational requirement for entry into professional practice as a psychologist.***

***The American Psychological Association recommends that for admission to licensure applicants demonstrate that they have completed a sequential, organized, supervised professional experience equivalent to two years of full-time training that can be completed prior or subsequent to the granting of the doctoral degree. For applicants preparing for practice in the health services domain of psychology, one of those two years of supervised professional experience shall be a predoctoral internship.***

***The American Psychological Association affirms that postdoctoral education and training remains an important part of the continuing professional development and credentialing process for professional psychologists. Postdoctoral education and training is a foundation for practice improvement, advanced competence, and inter-jurisdictional mobility.***

***In adopting the preceding policy statements, the Council supports further development of competency goals and assessment methods in the professional education and training of psychologists.***

Even though APA has changed its policy, we clearly understand that statutory and regulatory changes that reflect a change in the sequencing of education and training for licensure occur and are overseen at the state level. We are asking that you start working towards or prioritizing making these changes in your state because this issue is of central importance to graduate students and early career psychologists. Through this work, we believe you will not only attract new student and early career members to your association, but retain and build a loyal cohort of members and future leaders. Beginning to advocate for the implementation of licensure policy changes in your state will demonstrate to students and early career psychologists that you are invested in and committed to our issues and future.

### **Rationale for the Change**

Over the past 24 years since the original APA policy and Model Licensing Act was approved, which recommended a year of postdoctoral training for licensure, many significant changes have occurred within the education and practice arenas which have made the linkage of licensure and postdoctoral training outdated. Specifically, the current policy and model licensing law was implemented during a time when the predoctoral internship was the only form of clinical experience students received prior to the granting of the doctoral degree. In that context, most would agree that a year of post degree training would be necessary for licensure. However, today's training environment is drastically different and students are receiving substantially more clinical training prior to their predoctoral internships. For example, in a 2005 survey of internship applicants conducted by the Association of Psychology

Postdoctoral and Internship Centers (APPIC), the median number of total practicum hours was 2187 with a median of 906 direct client hours prior to applying for internship. This equates to slightly more than one year of full time work (1 yr full time hours = 2080). Therefore, most students are now receiving the equivalent of two years of clinical experience prior to completing their doctoral degree. Further, a survey of internship training directors conducted by APPIC in 2005 found that the majority of internship training directors say that more than half of their interns possess the competencies, skills and readiness for licensure (independent practice as a psychologist) at the *end* of the internship year. These findings emphasize the effects of training changes over the past 24 years, and they highlight our belief that the requirement for an extra year of supervised experience for entry level practice is no longer needed.

### **A Disconnect between Accreditation Guidelines and Postdoctoral Training**

In addition to the changing educational and practice contexts, until the APA Council of Representatives changed APA's licensure policy, there had been a disconnect between APA policy, the model licensing law and the APA Committee on Accreditation Guidelines and Principles of Accreditation (G&P). The G&P state that doctoral training, including the predoctoral internship, prepares students for "entry level practice," while postdoctoral training is "preparation for entering professional practice at the advanced level of competency." We are in full support of postdoctoral training and agree that it is vital to developing advanced competencies. However, we strongly believe that postdoctoral training should be de-linked from licensure requirements that are designed for entry level practice. This is not a "watering down" of our clinical preparation for licensure eligibility. Rather, it recognizes the changes in our training that have occurred over the past 24 years.

### **Confusion about Credentialing**

There still remains some confusion within our profession on the trajectory from entry level practice to specialty credentialing since both entry level licensure and ABPP credentialing can currently be achieved simultaneously (early career psychologists are now able to apply for ABPP credentialing as licensed professionals with one year of postdoctoral training or two years for Clinical Neuropsychology). The new APA policy recognizes the differences in our credentialing processes and will create more synergy between them.

### **Creating Higher Quality Training Environments**

Many in the training and practice communities believe that by de-linking licensure from postdoctoral training, we will actually have more systematic and better quality training environments. One of the major problems faced by postdoctoral programs relates to financial resources. Programs currently do not receive reimbursement for services provided by trainees. If postdoctoral trainees are licensed they will be eligible for more federal and state funding, which will also provide additional resources for quality training.

Because of these and many other changes in education and training over the years that are too numerous to outline here, several states have already begun to advocate for changing licensure laws and regulations. Washington State has already been successful in making the change, and other states including Maryland, Ohio, and Virginia have started the process. Alabama currently does not require postdoctoral hours for licensure. Moreover, licensing laws in 13 states will not need to be opened in order to implement the change!

### **Professional Responsibility**

We are fully aware that state legislatures and state psychological associations may act independent of APA policy. However, we strongly believe that it is an important responsibility of the profession and its leaders to develop standards and guidelines that serve as models for

others on matters related to professional affairs. The APA Model Licensing Act is a good example of this responsibility, which will be revised to reflect the new policy and can be obtained by contacting the APA Practice Directorate.

Another example is the profession's responsibility to ensure accountability for education and training from which the competencies to practice are developed in preparation for licensure. APA and allied groups are currently working to articulate a taxonomy of core competencies and assessment that can be introduced and applied at all levels of doctoral education and training. We will participate in this process and highly endorse its value to our profession.

Consistent with the recommendation of the APA Commission on Education and Training Leading to Licensure in Psychology and its workgroup, we also urge that priority be given to implementing initiatives that encourage state licensing boards to administer the EPPP exam upon completion of all educational requirements for the doctorate degree, as well as advocacy initiatives that impact funding for graduate education and training.

APAGS and CECP are advising students and early career psychologists not only to join their SPTAs, but to get involved with and talk to their associations about ways they can help introduce new statutes and regulations to implement this licensure change. We hope that you will be welcoming of their involvement and energy, while being especially supportive of this particular initiative.

This policy change reflects APA's understanding of the changing landscape of education and training in preparation for practice, and APA's commitment to modernizing policies that benefit our students and members while serving and protecting the public. This is an exciting time for our profession. It is also a time to recognize the changes in our education and practice environments and to adjust state policies accordingly. As the future of the profession and of your association, we ask that you support us and our collective future by beginning to change the policy in your state or place priority on efforts already underway.

APAGS and CECP have always been very supportive of SPTA activities and have encouraged our members to join their respective SPTA. We can think of no better student and ECP recruitment and retention rationale that you can use than this important licensure issue. Please keep us updated about activities in your state by emailing us at [apags@apa.org](mailto:apags@apa.org).

Thank you for your consideration.

Sincerely,

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