

Statement on Licensure at the Receipt of the Doctoral Degree for Psychologists in Maryland

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At present, those completing doctoral training in psychology desiring licensure as a psychologist at the entry level in Maryland must complete two years of supervised experience one of which must be post-doctoral before being considered eligible to sit for licensure. This requirement is no longer considered reasonable or relevant to its original purposes. This requirement which is consistent with recommendations in APA's 1987 Model Licensing Act dates back almost 40 years to when it was first recommended. At that time those in training to be licensed psychologists received virtually no supervised clinical experience prior to internship. As a result, the requirement for the additional post-doctoral year of supervised experience made sense. Since that time much has changed in education and training requirements for those preparing to be licensed Psychologists. At present, graduate students in clinical, counseling, and school psychology receive an average of 1800 to 2000 hours of supervised clinical experience prior to entering the internship year; an amount equal to or more than the amount of experience that the postdoctoral requirement was originally intended to provide and also an amount greater than the 1750 hours of supervised experience presently required in the post-doctoral year in Maryland. Thus, the need for an additional year of supervised clinical experience after the internship as a requirement for licensure no longer exists. This requirement is outdated and needs to be changed.

In fact, Olvey, Hogg, and Counts (2002) report "graduates completing the current minimum requirements for licensure generally have a minimum of 4,500 hr of supervised experience based on practicum, predoctoral internship, and postdoctoral experience" (p. 324). They also report that psychologists are required to complete more months of training for entry level licensure than any of the 11 other professions they examined to include physicians, veterinarians, podiatrists, optometrists, dentists, attorneys, and social workers. The profession of psychology, at present, is out of step with other professions that require licensure for entry at the independent practice level.

In 2000 the APA President created a commission to study this and related training issues for our profession. Its report was then recently reviewed and recommendations for action were made by a 2005 APA Presidential Working Group. Among other things (please see attached report) they recommend as APA policy the following statements:

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 two years of supervised experience, which can be completed prior or subsequent to the granting of the doctoral degree.

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.

The Working Group further finds that the current post-doctoral supervised year as a requirement for licensure has significant adverse, and apparently unintended, consequences for Early Career Psychologists, for the professional practice of psychology, for the quality and funding of advanced education and training opportunities in psychology, and on the public we serve to include access to and quality of services to underserved populations.

The post-doctoral training experiences available to graduates at present are very limited. Most graduates must piece together supervision of clinical work without the benefit of an integrated training experience.

The quality of these experiences varies greatly and they provide little actual training for many graduates.

There is no consistent standard of training across post-doctoral training experiences.

The requirement of an additional year of supervised experience does not assure an actual increase in competence. For many, it is an obstacle in the licensure process as well as an obstacle to reimbursement for services provided by highly trained and competent individuals who could otherwise be licensed. For example, only licensed health care providers may provide clinical services in publicly funded institutions in Maryland. Such facilities which exist based on the reimbursement of services provided can not survive unless all practitioners are licensed. But due to the current licensure obstacle for psychologists, and that fact that a number of other health care professionals may be licensed in Maryland with much less education, training, and supervised experience, our neediest citizens are precluded from receiving much needed services from this group of new psychologists. Additionally, the reimbursement of services by this group would enable the funding of training programs, bringing in additional trainees and actually creating more post-doctoral training opportunities, encouraging newly licensed psychologists to seek out advanced training beyond licensure. This would result in more of our neediest citizens receiving assistance and it would expose more trainees to clinical work with these populations, likely increasing the number of psychologists who choose this practice sector for their careers.

The requirement for the post-doctoral year of supervised experience prior to entry level licensure long ago ceased to be a valid requirement in the best interest of the citizens of Maryland. Continuing this requirement has numerous unintended adverse consequences and it is out of step with other health care professions. This needs to be rectified. The American Psychological Association is moving forward with this. The memorandum and report below were received by APA's Council of Representatives at its August 2005 meeting. It is now being circulated for comment by various constituencies. The Council of

Representatives will vote on accepting it as APA policy at its February 2006 meeting. Extremely strong support for it already exists among Council's members.

The state of Alabama never has required a post-doctoral year of supervised experience for licensure as a psychologist. This past year the Psychology Board in the state of Washington changed its regulations so this requirement no longer exists. It is vital that Maryland follow their lead and act to remove this out of date requirement and mitigate its unintended negative consequences. It is also interesting to note that the requirement for the post-doctoral year of supervised experience for licensure as a Psychologist in Maryland "shall be professional work in psychology, including, but not limited to, teaching, counseling, clinical practice, research, and industrial consultation" (Title 10.36.01.04 C (2)). Thus, an individual may spend that post-doctoral year conducting research or teaching receiving the required minimum of one hour of individual face-to-face supervision each week, and then become licensed and provide assessment and treatment services to our citizens as learned during the pre-doctoral supervised clinical experiences. In such circumstances there is little possibility that the experience received during this post-doctoral year will actually be beneficial and relevant to the clinical services to be provided upon licensure and will not add to or enhance the competence developed during the pre-doctoral experiences. Yet, clinical supervised experiences during the student's doctoral training that occur as part of a coordinated course of graduate study will be monitored closely and will be under scrutiny as part of APA-accreditation along with the rest of the graduate program.

It is important that we act to change this situation in Maryland. Please read the documents below, provide input to APA as asked, and please let the Board of Directors of MPA know your views and thoughts on this important issue. While resolution of this issue may not seem of direct relevance to practicing psychologists it has great implications for those we serve as well as for future generations of psychologists. Please share your comments directly with your MPA Board of Directors. You may forward your feedback directly to me at drjbarnett1@comcast.net. All comments will be shared with the entire Board. We also encourage you to attend the MPA Board of Directors' November meeting to participate in our discussion of this important issue and to share your views.

Thank you for considering this important issue, for reading these documents, and for providing us with your input and feedback.

On behalf of the MPA Board of Directors,

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Reference

Olvey, C.D.V., Hogg, A., & Counts, W. (2002). Licensure requirements: Have we raised the bar too far? *Professional Psychology: Research and Practice*, 33, 323-329.