

Understanding and Applying the CoA Implementing Regulations

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Overview & Goals

- To provide purpose and format of the Implementing Regulations.
- Draw attention to those regulations to which programs should pay particular attention.
- Focus on common areas of non-compliance for accredited programs, with the goal of fostering greater understanding of the CoA Implementing Regulations.

Why Implementing Regulations (IRs)?

- One goal of the Accreditation Assembly is to enhance understanding of and compliance with policies of the APA Commission on Accreditation (CoA).
- Programs may not be aware of the role or importance of Implementing Regulations

Role of Implementing Regulations (IRs)

- Section II of the *Accreditation Guidelines and Principles (G&P)* notes that the CoA has the authority to adopt implementing regulations which elucidate, interpret, and operationally define its guidelines and principles, procedures, domains, and standards.
- The CoA has developed and published such Policy Statements and Implementing Regulations in accordance with this statement.

Why are IRs Developed?

- Accredited programs often have questions regarding the specific meaning of aspects of the G&P.
- The CoA publishes Implementing Regulations as needed to clarify this information.
- The CoA aims to make programs aware of its interpretation of the G&P.
- As such, this session will focus specifically on CoA Implementing Regulations.

Finding a Copy of the IRs: Website – www.apa.org/ed/accreditation

The screenshot shows the APA ONLINE accreditation website. The main navigation menu includes: EDUCATION RESOURCES, ACCREDITATION RESOURCES, ABOUT ACCREDITATION (Commission on Accreditation, FAQ, Chapters and Fees, Standards/State), ACCREDITED PROGRAMS (Guidelines, Principles & Procedures, G&P, Canada/Provinces, G&P, Accredited, Accredited, Nov. 2008, G&P), AND ACCREDITATION (Team, Submission, Submission), and RESEARCH. A sidebar on the right contains: COA Governance, CoA Online Newsletter, CoA Committee, and Applicants for Initial Accreditation. The main content area features several news items: 'Provide Your Feedback on the G&P', '2009 Accreditation Assembly', 'Upcoming Accreditation Workshops', 'Guidelines & Procedures', and 'Final Date for APA Accreditation of Canadian Programs'. A red circle highlights the 'Guidelines & Procedures' link in the main menu.

Guidelines & Principles: PDF available online

The cover of the 'Guidelines and Principles for Accreditation of Programs in Professional Psychology' PDF document. It features the title in a blue box, the 'G&P' logo, and the American Psychological Association logo. The text 'Effective January 1, 2008' is visible at the bottom right.

Implementing Regulations: PDF available online

The cover of the 'COMMISSION ON ACCREDITATION POLICY STATEMENTS & IMPLEMENTING REGULATIONS' PDF document. It features the title in a large, bold font, and the date 'NOVEMBER 2008' at the bottom.

Types of IRs (Sections of Table of Contents)

- A. APA Policies Governing Accreditation
 - Specify general policies, e.g., nominations and appointments of CoA members
- B. CoA Policy Statements: Philosophy, Values, and Responsibilities
 - Specify broad overarching policies, e.g., scope of accreditation

Types of IRs (Sections of Table of Contents)

- C. Implementing Regulations Related to the Guidelines and Principles
 - Serve to interpret and operationally define specific elements of the G & P.
 - These are the IRs that we focus on today.

Types of IRs (Sections of Table of Contents)

- D. IRs Related to the Accreditation Operating Procedures
 - Specify operating procedures, e.g., Role and Responsibilities of a Site Visitor
- E Self-Governance and Regulation

C. IR's Related to the G & P

IR	SAP Issues	Program Type	
		Marketing	Non-Profit
1.1	Operational evaluation of marketing, promotional and training programs	Y	Y
1.2	Operational evaluation of recruitment and retention programs	Y	Y
1.3	Operational evaluation of the "ask before you ask" system	Y	Y
1.4	Operational evaluation of admissions forms	Y	Y
1.5	Operational evaluation of website design and content	Y	Y
1.6	Operational evaluation of accreditation program data of training, financial management	Y	Y
1.7	Operational evaluation of accreditation program data	Y	Y
1.8	Operational evaluation of accreditation program data	Y	Y
1.9	Operational evaluation of accreditation program data	Y	Y
1.10	Operational evaluation of accreditation program data	Y	Y
1.11	Operational evaluation of accreditation program data	Y	Y
1.12	Operational evaluation of accreditation program data	Y	Y
1.13	Operational evaluation of accreditation program data	Y	Y
1.14	Operational evaluation of accreditation program data	Y	Y
1.15	Operational evaluation of accreditation program data	Y	Y
1.16	Operational evaluation of accreditation program data	Y	Y
1.17	Operational evaluation of accreditation program data	Y	Y
1.18	Operational evaluation of accreditation program data	Y	Y
1.19	Operational evaluation of accreditation program data	Y	Y
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1.46	Operational evaluation of accreditation program data	Y	Y
1.47	Operational evaluation of accreditation program data	Y	Y
1.48	Operational evaluation of accreditation program data	Y	Y
1.49	Operational evaluation of accreditation program data	Y	Y
1.50	Operational evaluation of accreditation program data	Y	Y

Selected IRs for Discussion

Across All Levels

- C-1 Systematic Evaluation of Supervision, Consultation, and Evaluation in Programs
- C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs
- C-19 Notification of Changes to Accredited Programs

C-1 Systematic Evaluation of Supervision, Consultation, and Evaluation in Programs

- In the context of these sections of the Guidelines and Principles for Accreditation, the term “evaluation” refers to such activities as program evaluation or evaluation of an intervention at the individual or group level. It does not refer to the psychological assessment of an individual person [underline added].

C-1 Systematic Evaluation of Supervision, Consultation, and Evaluation in Programs

- G & P Requirements – Doctoral Programs, B.3(c) “...the students shall be exposed to the current body of knowledge in at least the following areas: theories and methods of...consultation and supervision; and evaluating the efficacy of interventions...”
- IR C-1: At the doctoral level, students are expected to be exposed to the current body of knowledge in supervision, consultation, and evaluation. [underline added]

C-1 Systematic Evaluation of Supervision, Consultation, and Evaluation in Programs

- G & P Requirements – Internships, B.4 “...all interns [must] demonstrate an intermediate to advanced level of professional psychological skills, abilities, proficiencies, competencies, and knowledge in the areas of: ... (b) Theories and/or methods of consultation, evaluation, and supervision...”
- IR C-1: “Although direct experience in the practice of these activities will be the typical road to intermediate or advanced competence, actual practice is not required at the internship level.”

C-1 Systematic Evaluation of Supervision, Consultation, and Evaluation in Programs

- **G & P Requirements – Postdoctoral, B.3** “...all residents [must] demonstrate an advanced level of professional psychological competencies, skills, abilities, proficiencies, and knowledge in the following content areas: ...*(b) consultation, program evaluation, supervision and/or teaching...*”
- **IR C-1:** “*At the post-doctoral level, an advanced level of professional psychological competency and knowledge gained through professional practice is required in one or more of these areas: supervision, consultation, program evaluation, and teaching.*”

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- **G & P Requirements – Internships C-1(c):** [Supervisors] “Are doctoral-level psychologists who have primary professional (clinical) responsibility for the cases on which they provide supervision, and are appropriately credentialed (i.e., licensed, registered or certified) to practice psychology in the jurisdiction in which the internship is located...”

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- **G & P Requirements – Postdoctoral C-2(d):** [Supervisors] “Are appropriately credentialed (i.e., licensed, registered or certified) to practice psychology in the jurisdiction in which the program is located...”

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- **IR C-15 (internships):** “The CoA looks to determine appropriate credentialing of the supervisor on the basis of jurisdiction governing the practice or service that is being supervised, provided the credential is generic in legally qualifying the holder for the independent practice of professional psychology.”
- **IR C-15 (postdocs)** “The CoA looks to determine appropriate credentialing of the supervisor on the basis of jurisdiction governing the practice or service that is being supervised.”

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- Most often “appropriate credentialing” would be state (or Canadian provincial) licensure at the independent practice level.
- In Federal settings, “...credentialing rules pertaining to practice in a federal setting would apply.”
- Where the intern or fellow works in multiple settings, “the jurisdiction governing the intern service that is being supervised would determine the appropriate supervisor credential.”

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- “When the services for which supervision is being provided are conducted in a context where a state or province requires a credential in a specific substantive area (e.g., school psychology certification), the generic credential in professional psychology and the specific substantive area credential are both required.”
[only included in internship IR]

C-15 Jurisdiction of Licensure for Supervisors/ Required Supervision in Training Programs

- What About Credentials for Doctoral Program Faculty and Practicum Supervisors?
- G & P Doctoral B.4(a): “*[Practicum is] in settings that: ...supervise students using an adequate number of appropriate professionals...*”
- G & P Doctoral C.1(e): “*[Faculty] Demonstrate substantial competence and have recognized credentials in those areas which are at the core of the program's objectives and goals...*”
- **Stay Tuned!**

C-19 Notification of Changes to Accredited Programs

- Programs must inform CoA in a timely manner of changes that could alter the program's quality. CoA must be informed in advance of major program changes such as changes in:
 - model,
 - degree offered,
 - policies/procedures,
 - administrative structure,
 - faculty and supervision resources,
 - area of emphases, or tracks/rotations.

C-19 Notification of Changes to Accredited Programs

- If advance notice is not possible "...it is incumbent upon the program to immediately inform the CoA in writing of the change and to include in its notification a proposed plan for maintaining program consistency with the G&P."

Selected IRs for Discussion

Doctoral Programs

- C-16 *Evaluating Program Adherence to the Principle of "Broad and General Preparation" for Doctoral Programs*
- C-18 Core Faculty in Doctoral Programs

C-16 Evaluating Program Adherence to the Principle of "Broad and General Preparation" for Doctoral Programs

- G & P II. B. I: Broad and General Preparation for Practice at the Entry Level
 - *"Doctoral graduate and internship education and training in preparation for entry-level practice in professional psychology should be broad and professional in its orientation rather than narrow and technical."*

C-16 Evaluating Program Adherence to the Principle of "Broad and General Preparation" for Doctoral Programs

- G & P II. B. I: Broad and General Preparation for Practice at the Entry Level, con't
 - This preparation should be based on the existing and evolving body of knowledge, skills, and competencies that define the declared substantive practice area(s) and should be well integrated with the broad theoretical and scientific foundations of the discipline and field of psychology in general.

C-16 Evaluating Program Adherence to the Principle of “Broad and General Preparation” for Doctoral Programs

IR C-16 (Re: Breadth of Scientific Psychology)

- “Accredited programs ensure the competence in these content areas including the history of thought and development in those fields, the research methods, and the applications of the research. “
- “Further, it is expected that the program will ensure understanding and competence in these content areas at the graduate level.”

C-16 Evaluating Program Adherence to the Principle of “Broad and General Preparation” for Doctoral Programs

- Demonstrating that the program is consistent with the G&P in this regard would preclude coverage only of:
 - a narrow segment of the aspect of the content area (such as biological basis of gerontology, race relations, preschool learning)
 - the application of these aspects of the content area to practice problems or settings (such as cognitive therapy; group therapy, multicultural counseling)

C-16 Evaluating Program Adherence to the Principle of “Broad and General Preparation” for Doctoral Programs

IR C-16 (Re: Practice Area Knowledge and Competencies)

- “...the question of breadth of exposure has been interpreted by the Commission in the context of
 - (a) the particular substantive area in question and
 - (b) the particular model and goals of the program”

C-16 Evaluating Program Adherence to the Principle of “Broad and General Preparation” for Doctoral Programs

IR C-16 (Re: Practice Area Knowledge and Competencies)

- “That is, a program is considered not only as based on its own particular training model and goals, but also in the context of the broader domain of doctoral training in the substantive area(s) (e.g., clinical, counseling, or school psychology, or combinations thereof).”

C-18 Core Faculty in Doctoral Programs

- G & P Doctoral C.I.
- The program has an identifiable core faculty responsible for its leadership who:
 - (a) Function as an integral part of the academic unit of which the program is an element;
 - (b) Are sufficient in number for their academic and professional responsibilities;
 - (c) Have theoretical perspectives and academic and applied experiences appropriate to the program's goals and objectives;

C-18 Core Faculty in Doctoral Programs

- G & P Doctoral C.I., con't
- The program has an identifiable core faculty responsible for its leadership who:
 - (d) Demonstrate substantial competence and have recognized credentials in those areas which are at the core of the program's objectives and goals; and
 - (e) Are available to and function as appropriate role models for students in their learning and socialization into the discipline and profession.

C-18 Core Faculty in Doctoral Programs

- IR C-18:
- Faculty members' education, training, and/or experience must be consistent with their roles in the program in light of the program's practice area.
- A core faculty member's "...professional employment (50% or more) is at the institution in which the program is housed, and to whom the institution has demonstrated a multi-year commitment (as supported by an examination of the history of appointments in the program or by contracts)."

C-18 Core Faculty in Doctoral Programs

- IR C-18:
- "Core faculty must be identified with the program and centrally involved in program development, decision-making, and student training."
 - Publicly so-identified in documents, etc.
 - Views him/herself as in such a role.
 - Is perceived by students to be in such a role.
- At least 50% of core faculty professional time must be devoted to program-related activities.
 - i.e., 50% of full-time equivalent

C-18 Core Faculty in Doctoral Programs

- Program-Related Activities Include:
 - program-related teaching;
 - research, scholarship, and/or professional activities;
 - supervision of students' research or teaching;
 - mentoring students' professional development;
 - providing clinical supervision;
 - monitoring of student outcomes;

C-18 Core Faculty in Doctoral Programs

- Program-Related Activities Include:
 - teaching in a masters program that is an integral part of the doctoral program;
 - and developing, evaluating, and maintaining the program.

C-18 Core Faculty in Doctoral Programs

- Program-Related Activities Do NOT Include:
 - undergraduate teaching in general and related activities;
 - teaching and related activities in terminal masters or other graduate programs;
 - and clinical work or independent practice not directly associated with training.

Selected IRs for Discussion

Internships

- C-9 *Unfunded Internships and Stipend Equity*
- C-17 *Consistency in Internship Experiences Within a Program*

C-9 Unfunded Internships and Stipend Equity

“The spirit of this policy is clear—the Commission strongly discourages the use of unfunded internship positions.”

C-9 Unfunded Internships and Stipend Equity

- *“The Commission understands, however, the **rare or unusual** circumstance in which the award of an additional unfunded internship would serve to alleviate unavoidable hardship for the potential unfunded intern candidate (e.g., remaining geographically close to an ailing family member, etc.)”*
- *“In [such compelling cases] the responsibility for documenting and the accountability for articulating the rationale for the placement rests with the doctoral and internship programs, jointly...”*

C-9 Unfunded Internships and Stipend Equity

Internship Stipends Should:

- Lend tangible value to the intern’s service contribution;
- Communicate a valid and dignified standing with professional/trainee community;
- Provide appropriate and realistic monetary resources to permit interns and their families to subsist during the training year.

C-9 Unfunded Internships and Stipend Equity

Internship Stipends Should:

- Be sufficient so as to avoid imposing an undue hardship upon the intern in terms of basic living needs.
- Wherever possible, basic support for health/medical insurance should be in place to protect the welfare of interns and their families.

C-9 Unfunded Internships and Stipend Equity

Stipend Equity

- “[CoA] continues to encourage uniform stipends across positions within internship programs, including consortia or otherwise. “
- CoA recognizes “exceptional” cases, but ... “In these cases, the Commission encourages the programs to identify how resources might be pooled across consortium participants in such a way that comparable intern compensation can be achieved.”

Selected IRs for Discussion

Postdoctoral Residencies

- C-11 Statement on Postdoctoral Residency Accreditation
- C-11(a) Accreditation Process for Postdoctoral Residencies
- C-11(b) Postdoctoral Residency Substantive Specialty Practice Areas

C-11 Statement on Postdoctoral Residency Accreditation

- Programs could be Located:
 - Within a single administrative entity , or
 - Be a consortium
- Programs Reflect Advanced Training which may be:
 - Broad and general or
 - Focused and in-depth.

C-11(a) Accreditation Process for Postdoctoral Residencies

- Programs May Be:
 - Traditional Practice Area Program (i.e., Clinical, Counseling, or School)
 - Specialty Practice Program (See next slide for acceptable specialty areas)
 - Integrated Practice Program - Combinations of two or more traditional practice and/or specialty practice programs

**C-11(b) Postdoctoral Residency
Substantive Specialty Practice Areas**

- Substantive Specialty Practice Areas Are:
- Recognized by CRSPPP or by ABEP
- Has been recognized by and holds membership on the Council of Specialties, and
- Has provided the CoA with specialty specific postdoctoral educational and training guidelines endorsed by the Council of Specialties.