

April 22, 2011

The Honorable Jan Brewer
Governor of Arizona
1700 West Washington Street
Phoenix, Arizona 85007

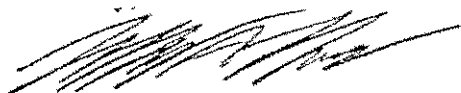
Dear Governor Brewer:

We are writing on behalf of the Arizona Psychological Association (AZPA) and the American Psychological Association (APA) to register our serious concerns with *Arizona House Bill 2565*. Specifically, we find the following provision to be highly problematic: "A university or community college shall not discipline or discriminate against a student in a counseling, social work or psychology program because the student refuses to counsel a client about goals that conflict with the student's sincerely held religious belief if the student consults with the supervising instructor or professor to determine the proper course of action to avoid harm to the client" (*Article 6, Section 15-1862, Paragraph E*). This provision is in marked conflict with both the ethical principles of psychologists and the standards for accreditation of our professional education and training programs, which are designed to prepare our workforce to meet our nation's increasingly diverse needs. The relevant sections of these standards are attached and discussed for your information.

Simply stated, accredited academic programs train psychologists who will become eligible for state licensure upon meeting certain requirements. Licensure as a psychologist in Arizona requires compliance with the APA Ethical Principles of Psychologists and Code of Conduct (Ethics Code). Programs that graduate professional psychologists need to demonstrate that their students comply with the Ethics Code, or they would be remiss in graduating them. Moreover, the standards for accreditation of professional psychology training programs, as articulated in the Guidelines and Principles for Accreditation of Programs in Professional Psychology, require not only compliance with the Ethics Code but also with a number of standards related to diversity and nondiscrimination to train competent professionals. In effect, enactment of *Arizona House Bill 2565* would result in Arizona redefining the parameters of competence needed for the profession of psychology and, in the process, endangering the accreditation of its psychology doctoral and internship programs in clinical, counseling, and school psychology.

Thus it is to safeguard both ethical and educational standards related to the prevention of discrimination that APA opposes *Arizona House Bill 2565*. We hope you will seriously consider these issues before enacting legislation that could have such a negative impact on the training of psychologists and their professional conduct. We urge you to veto this bill.

Sincerely,



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President
Arizona Psychological Association



Norman B. Anderson, Ph.D.
Chief Executive Officer
American Psychological Association



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

Arizona House Bill 2565, Article 6, Section 15-1862, Paragraph E

Relevance of American Psychological Association Accreditation and Ethics Code

Accreditation of Professional Psychology Training Programs

With respect to the education and training of professional psychologists, the American Psychological Association (APA) Commission on Accreditation accredits doctoral, internship, and postdoctoral residency programs in professional psychology using the Guidelines and Principles for Accreditation of Programs in Professional Psychology (G&P). These standards were written to promote best practices in the education and training of doctoral level professional psychologists to ensure that the public is well served and that psychologists are appropriately trained in the discipline. The importance of cultural and individual differences is a key theme through many of these standards organized in “domains.” In addition, there is one domain that is completely dedicated to diversity. That individual and cultural diversity is infused in multiple domains, as well as in a domain of its own, reflects the importance of this value to the practice of professional psychology. It is fundamental to preparing a workforce competent to serve a diverse U.S. population and to ensuring educational programs that can effectively serve an increasingly diverse student body.

Research on treatment efficacy and on assessment has demonstrated that there are significant differences based upon some cultural and individual difference variables. If students are to learn effective intervention strategies, it is important for them to learn not only the scientific literature but to also apply interventions under supervision to diverse populations. Hence, the provision in the G&P states:

Domain D: Cultural and Individual Differences and Diversity

The program recognizes the importance of cultural and individual differences and diversity in the training of psychologists.

1. The program has made systematic, coherent, and long-term efforts to attract and retain students and faculty from differing ethnic, racial, and personal backgrounds into the program.

Consistent with such efforts, it acts to ensure a supportive and encouraging learning environment appropriate for the training of diverse individuals and the provision of

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training opportunities for a broad spectrum of individuals. Further, the program avoids any actions that would restrict program access on grounds that are irrelevant to success in graduate training.

2. The program has and implements a thoughtful and coherent plan to provide students with relevant knowledge and experiences about the role of cultural and individual diversity in psychological phenomena as they relate to the science and practice of professional psychology. The avenues by which these goals are achieved are to be developed by the program.

This standard has broad acceptance within the educational and training community of psychologists, has been subject to public notice and comment, and has been reviewed and approved by the Department of Education and the Council for Higher Education Accreditation in their respective recognitions of the APA Commission on Accreditation.

Arizona House Bill 2565, which is currently under review by the Governor of Arizona, provides as follows: “A university or community college shall not discipline or discriminate against a student in a counseling, social work or psychology program because the student refuses to counsel a client about goals that conflict with the student's sincerely held religious belief if the student consults with the supervising instructor or professor to determine the proper course of action to avoid harm to the client” (*Article 6, Section 15-1862, Paragraph E*). This unprecedented exception from the broadly accepted principles that apply to programs accredited by the APA Commission conflicts with and undermines the educational standards deemed as necessary and appropriate for our discipline. In so doing, the proponents of the legislation ask Arizona to redefine the parameters of competence needed for the profession.

Compliance with the APA Ethics Code

The APA *Ethical Principles of Psychologists and Code of Conduct* (2002, amended 2010), (Ethics Code) is the foundation of psychology ethics and sets the standard of ethics for the profession of psychology. The Ethics Code sets forth five core principles, one of which is “Respect for People’s Rights and Dignity.” This principle prohibits discrimination on a number of bases:

Principle E: Respect for People's Rights and Dignity

Psychologists respect the dignity and worth of all people, and the rights of individuals to privacy, confidentiality, and self-determination. Psychologists are aware that special safeguards may be necessary to protect the rights and welfare of persons or communities whose vulnerabilities impair autonomous decision making. Psychologists are aware of

and respect cultural, individual, and role differences, including those based on age, gender, gender identity, race, ethnicity, culture, national origin, religion, sexual orientation, disability, language, and socioeconomic status and consider these factors when working with members of such groups. Psychologists try to eliminate the effect on their work of biases based on those factors, and they do not knowingly participate in or condone activities of others based upon such prejudices.

In addition to being found in the aspirational Principles section of the Ethics Code, the prohibition against discrimination is likewise found in the Ethics Code's enforceable ethical standards, as Ethical Standard 3.01 illustrates:

3.01 Unfair Discrimination

In their work-related activities, psychologists do not engage in unfair discrimination based on age, gender, gender identity, race, ethnicity, culture, national origin, religion, sexual orientation, disability, socioeconomic status, or any basis proscribed by law.

It is critical to note that the Ethics Code *includes religion* as a prohibited basis for discrimination: In the provision of psychological services, psychologists may not discriminate against individuals on the basis of religion. It is likewise critical to note that under the Ethics Code psychologists *may not use religion* as a reason to discriminate. To the extent the proposed language under review in Arizona permits discrimination on any basis identified in Principle E, such language would be antithetical to the Ethics Code. To the extent that the proposed language under review in Arizona permits discrimination on any basis identified in Ethical Standard 3.01, such language would be inconsistent with an enforceable ethical standard. An APA member who discriminated on a basis identified in Ethical Standard 3.01 could face sanction by the Association's Ethics Committee, regardless of whether religion is invoked as a reason for the discriminatory behavior. *Simply stated, under the APA Ethics Code, psychologists may not invoke religion as a justification for engaging in prohibited discrimination.*