



An affiliate of the  
American Psychological  
Association

# PENNSYLVANIA PSYCHOLOGICAL ASSOCIATION

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March 28, 2006

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Michael Stephens  
Independent Regulatory Review Commission  
333 Market Street  
14<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: State Board of Psychology Regulation 16A-6313

Dear Mr. Stephens:

On behalf of the Pennsylvania Psychological Association, we are writing concerning the proposed regulations relating to definition and qualifications for taking the licensing examination that we received from you on February 23, 2006. The proposed regulations would clarify and simply the definition of doctoral programs in psychology and fields related to psychology; provide a mechanism for graduates of non-Canadian foreign universities to become licensed; and would not apply retroactively to persons already enrolled in graduate programs.

### Definition of Psychology and Fields Related to Psychology

The proposed regulations would require attendance at a graduate program accredited by the American Psychological Association (APA), the Canadian Psychological Association (CPA), or designated by the National Register/Association of State and Provincial Psychology Boards (ASPPB) in order to sit for the licensing exam. The program must be either APA, CPA, or National Register/ASPPB designated within one year of the applicant's graduation.

We support the effort of the State Board of Psychology to standardize the educational requirements of psychologists. However, it has come to our attention that some doctoral programs in psychology in Pennsylvania feel a greater need to adhere to National Association of School Psychologists (NASP) training standards than APA/CPA accreditation standards. Therefore we recommend that the regulations be modified to include applicants who have graduated from programs that are NASP-approved and that meet otherwise the current definition for doctoral programs in psychology.

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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## Graduating Within One Year from an Otherwise Approved Program

The proposed regulations state that the applicants to have graduated from a program which, within one year of the award of the doctoral degree, meets the standards for approval referenced above. We believe that the State Board of Psychology has adopted an important provision here that provides a safeguard for students. For example, it is possible for a student to enroll in an APA-approved program which, months or even weeks before the student's graduation, loses its accreditation. Except for the one-year provision in the proposed regulation, that student would then lose the ability to sit for the licensing examination. We commend the State Board of Psychology for its effort to be fair in this regard.

However, individuals whom we consulted who were knowledgeable about the APA approval process, believed that it could take a program well more than one year to correct and then go through the APA accreditation process again. For example, a student may graduate one year and a day after the program lost its accreditation, but have knowledge that the school is reapplying and have good faith confidence that the problems that led to the loss of accreditation have been corrected. However, if the site visit and accreditation process is not completed within one year, the student will have forever lost the opportunity to use their doctoral degree as a basis for licensure for psychology. This problem could be very greatly minimized by allowing the student to graduate from a program which, within two years, meet the approved criteria of a doctoral program in psychology (or field related to psychology).

## Graduates of Foreign Universities

Graduates of foreign universities (other than Canada) could attend programs that have requirements equivalent to those found in APA approved programs. Equivalency would be determined by the National Register, and the Board would allow applicants graduating from non-Canadian foreign universities to make up experiential or didactic requirements if necessary. We believe that these are fair provisions that ensure quality standards while, at the same time, allowing for reasonable mobility from qualified applicants of non-Canadian foreign universities. According to a recent article in the *American Psychologist*, the number of applicants for licensing from foreign countries other than Canada is very small. However, we do want to provide them with the opportunity to become licensed if they are qualified. These draft regulations allow this.

## Summary

We commend the State Board of Psychology for their efforts. We support the intent to bring uniformity to the education of psychologists.

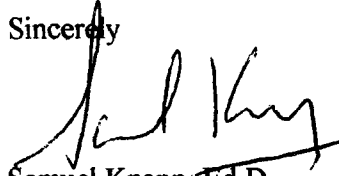
We recommend that the definition of a doctoral degree in psychology (and doctoral degree in a field related to psychology), be amended to include programs that are NASP-approved and which otherwise meet the current definition of a doctoral degree in psychology (or field related to psychology).

We recommend that the applicant must have successfully completed a program which,

within two years from the award of the doctoral degree, meets the approved criteria.

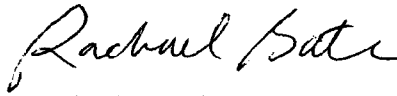
We commend the State Board of Psychology for the manner in which they propose to evaluate the credentials of non-Canadian foreign graduates.

Sincerely

A handwritten signature in black ink, appearing to read "Samuel Knapp". The signature is fluid and cursive, with a long horizontal stroke at the end.

Samuel Knapp, Ed.D.

Director of Professional Affairs

A handwritten signature in black ink, appearing to read "Rachael Baturin". The signature is cursive and somewhat stylized.

Rachael Baturin, M.P.H., J.D.

Professional Affairs Associate