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Original: 2422

PENNSYLVANIA PSYCHOLOGICAL ASSOCIATION

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<http://www.papsy.org>

September 30, 2004

RECEIVED
SEP 30 2004
STATE BOARD OF PSYCHOLOGY

Judith Pachter Schulder
Counsel, State Board of Psychology
Penn Center
2601 North Third Street
PO Box 2649
Harrisburg, PA 17105-2649

RE: Proposed regulations by the State Board of Psychology

Dear Ms. Schulder:

On behalf of the Pennsylvania Psychological Association, we are writing to express our opposition to the adoption of the proposed regulations relating to definition and qualifications for taking the licensing examination as published in the *Pennsylvania Bulletin* of September 4, 2004.

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 or Provincial Psychology Boards (ASPPB) in order to sit for the licensing exam. However, graduates of foreign universities (other than Canada) could attend programs that have requirements identical to those found in APA approved programs.

These proposed regulations lack reasonableness in the procedures used and lack clarity. In addition, the regulations restrict the creation of new and emerging programs in psychology.

Lack of Reasonable Procedures

The effective date for the proposed regulations would be in 2 years for persons who have not yet enrolled in psychology or psychology-related programs and 5 years for persons who are currently enrolled in such programs. However, since it sometimes takes students 7 or more years to complete a program (including internship), it is possible for a current student who takes more than 5 years to complete the requirements to fall under the new requirements while a student who is not yet enrolled may never fall under the new requirements. It seems reasonable to have all currently enrolled students fall under the new requirements.

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OCT 04 2004

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Lack of Clarity

The proposed definitions of doctoral degrees in fields related to psychology and doctoral degrees in psychology includes a definition of foreign universities which is ambiguous and unclear because it has failed to define the words "individual differences" and "dissertation."

Section (iii) (E) (II) (b) in the definitions of "doctoral degree in a field related to psychology" and of (iii) (E) (II) (a) "doctoral degree in psychology" requires students to have a course in "individual differences in behavior." However, it never described what constituted a course in individual differences in behavior. In the existing regulations the term "individual differences in behavior" is followed by these examples: human development, personality theory, abnormal psychology (49 PA Code 41.1) However, in these proposed regulations human development and psychopathology are listed as separate domains.

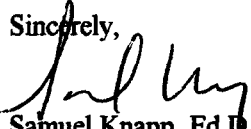
We know of no separate course entitled "individual differences in behavior" nor does the board give any definition or illustration of what might constitute such a course. Consequently, the board is going through the motions of developing an acceptable curriculum for foreign graduates while, at the same time, establishing course requirements that they cannot fulfill because the regulations are vague and incomprehensible.

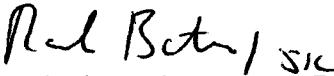
Moreover, the Board has failed to define the term "dissertation" in the definition of "doctoral degree in a field related to psychology" (Section (iii) (E)) nor in "doctoral degree in psychology" (Section (iii) (H)). However, some doctoral programs require "doctoral projects" or use other terms instead of the word "dissertation." We would not want to see graduates denied the opportunity to sit for the licensing examination because of the unique label given to the capstone research project of a doctoral program.

Creation of New and Emerging Programs

Lastly, by requiring that applicants attend a program accredited by the American Psychological Association (APA), the Canadian Psychological Association (CPA), or designated by the National Register/Association of State or Provincial Psychology Boards (ASPPB), the Board is placing a restriction on the creation of new and emerging programs in psychology. It may take several years to become accredited by the APA or CPA or designated by ASPPB.

For these reasons we must oppose the draft regulations as printed in the *Pennsylvania Bulletin*.

Sincerely,

Samuel Knapp, Ed.D.
Director of Professional Affairs


Rachael Baturin, M.P.H., J.D.
Professional Affairs Associate

Original: 2422

Mace, Audrey

From: Schulder, Judith
Sent: Monday, October 04, 2004 02:11 PM
To: Mace, Audrey
Subject: FW: Comment for Board of Psychology

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please send this person the same letter as we are sending to PPA and include their comment with PPAs to the Committees/IRRC.

Judy

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This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmissions shall not constitute a waiver of the attorney-client or any other privilege.

-----Original Message-----

From: William Walker [mailto:wwalker@chc.edu]
Sent: Monday, October 04, 2004 1:48 PM
To: jschulder@state.pa.us
Subject: Comment for Board of Psychology

To Whom It May Concern:

Chestnut Hill College has learned that the Board of Psychology is considering a new regulation that would require all those who stand for the licensing examination to have graduated from an APA accredited institution. Chestnut Hill College has submitted a Self-Study to APA, undergone the required site visit, and has responded to the APA report on the site visit. We anticipate that our application will be acted upon during October 2004.

We support and endorse efforts that professionalize practioners. At the same time, the Board should be aware that there are likely areas of the Commonwealth that need additional 'start-up' programs to serve the health needs of our citizens. We suggest the following:

1. Programs, such as that offered by Chestnut Hill College, should be 'grandfathered' if this regulation is adopted; and
2. New programs should be encouraged by providing a 5-7 year window for them to develop and apply for APA accreditation.

Thank you for your consideration of our suggestions. Please acknowledge receipt of this message.

William T. Walker, Ph.D.
Vice President for Academic Affairs
and Dean of the Faculty
Chestnut Hill College
9601 Germantown Avenue
Philadelphia, PA 19118
Phone: 215/248-7022 or 215/248-7130
Fax: 215/248-7019
E-mail: wwalker@chc.edu

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Sincerely,



Samuel Knapp, Ed.D.

Director of Professional Affairs



Rachael Baturin, M.P.H., J.D.
Professional Affairs Associate

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723-2664



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F A X TO: ROBERT NYCE

FROM: SAMUEL KNAPP DATE: 9/30/04

SUBJECT: Proposes Regulations PAGES TO FOLLOW: 6

MESSAGE:

RECEIVED
SEP 30 2004
11:49 AM

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Samuel J. Knapp, Ed.D.

*Government Relations
Consultant*
Susan M. Shanahan, J.D.

The Honorable Robert Nyce
Executive Director, IRRC
14th Floor Harrisstown 2
333 Market Street
Harrisburg, PA 17120

RE: Proposed Regulations 16A-16313

Dear Mr. Nyce:

On behalf of the Pennsylvania Psychological Association, I am writing to express our opposition to the adoption of the proposed regulations 16A-16313 which were published in the *Pennsylvania Bulletin* on September 4, 2004.

As detailed in the enclosed letter to the State Board of Psychology, these proposed regulations still lack clarity regarding what constitutes a doctoral degree in psychology (or a doctoral degree in a field related to psychology). Specifically, the proposed regulations fail to define what constitutes a course in "individual differences" and fail to define the term "dissertation." Therefore those students are not given fair notice of what they need to do to earn a doctoral degree acceptable to the Board.

Also, the proposed regulations include an unreasonable provision regarding the effective date of the regulations. The effective date for the proposed regulations would be in 2 years for persons who have not yet enrolled in psychology or psychology-related programs and 5 years for persons who are currently enrolled in such programs. However, according to a survey by Dr. John Norcross of the University of Scranton, it takes students an average of 5-6 years to complete a doctoral program (a copy of the abstract page and the relevant table is enclosed). Therefore, at least 50% of the students will take more than 5 years to complete their degrees. Of course those students who enter the programs without already possessing a masters degree may take longer to get their degrees.

Consequently, it is likely that many current student will take more than 5 years to complete the requirements and will fall under the new requirements, while a student who enrolls in the next two years will never fall under the new requirements. It seems reasonable to have all currently enrolled students fall under the new requirements.

For these reasons I request that you oppose the adoption of draft regulations 16A-16313.

Sincerely,

A handwritten signature in cursive script that reads "Thomas H. DeWall".

Thomas H. DeWall, CAE
Executive Director

The PsyD: Heterogeneity in Practitioner Training

John C. Norcross and Patricia H. Castle
University of Scranton

Michael A. Sayette
University of Pittsburgh

Tracy J. Mayne
New York University

The paucity of research on PsyD programs has led to unsubstantiated generalizations and uniformity myths about practitioner training. The authors collected information on the admission rates, financial assistance, theoretical orientations, and selected characteristics of American Psychological Association (APA)-accredited PsyD programs in clinical psychology (89% response rate). Systematic comparisons were made between PsyD programs housed in university departments, university professional schools, and freestanding institutions to describe the differences and commonalities among the heterogeneous PsyD programs. Empirical comparisons were provided among APA-accredited PsyD, practice-oriented PhD, and research-oriented PhD programs in clinical psychology to highlight the distinctive features of PsyD programs.

The first national training conference on clinical psychology, the Boulder conference (Rainy, 1950), was a milestone for several reasons. First, it established the PhD as the required degree, as in other academic research fields. Second, the conference reinforced the idea that the appropriate location for training was within university departments, not separate schools or institutes as in medicine. And third, clinical psychologists were to be trained as scientist-practitioners for simultaneous existence in two worlds: academic/scientific and clinical/professional.

Dissension with the recommendations of the Boulder conference gradually culminated in the 1973 national training conference

held in Vail, Colorado. The Vail conferees endorsed different principles, leading to a diversity of training programs (Korman, 1974; Peterson, 1976, 1982). Psychological knowledge, it was argued, had matured enough to warrant creation of explicitly professional programs along the lines of professional programs in medicine, dentistry, and law. These "professional" programs were to be added to, not replace, Boulder-model programs. Further, it was proposed that different degrees should be used to designate the scientist role (PhD) from the practitioner role (PsyD). Graduates of Vail-model professional programs would be scholar/professionals: The focus would be primarily on clinical service and less on research (Stricker & Cummings, 1992).

The Vail conference led to the emergence of two relatively distinct training models typically housed in different settings. Boulder-model programs are almost universally located in graduate departments of universities. However, Vail-model programs can be housed in three organizational settings: within a psychology department; within a university-affiliated psychology school; or within an independent, freestanding psychology school.

Clinical psychology now has two established and complementary training models that typically, but not invariably, generate different doctoral degrees. Although Boulder-model programs still outnumber Vail-model programs, Vail-model programs enroll, as a rule, three to four times the number of incoming doctoral candidates (Mayne, Norcross, & Sayette, 1994). This creates almost a numerical parity in terms of psychologists produced.

Several early studies demonstrated that initial worries about stigmatization, employment difficulties, and licensure uncertainty for PsyDs did not materialize (Hershey, Kopplin, & Cornell, 1991; Peterson, Eaton, Levine, & Suepp, 1982). Nor are there discernible differences in employment except, of course, that the more research-oriented, Boulder model graduates are far more likely to be employed in academic positions and medical schools (Gaddy, Charlot-Swiley, Nelson, & Reich, 1995).

JOHN C. NORCROSS earned his PhD in clinical psychology from the University of Rhode Island. He is professor of psychology at the University of Scranton, editor of *In Session: Journal of Clinical Psychology*, and 2004 president of the International Society of Clinical Psychology. His research interests center on psychotherapy, clinical training, and practitioner self-care.

PATRICIA H. CASTLE, BS, was formerly a research assistant at the University of Scranton and is currently a doctoral candidate in clinical psychology at the University of Rhode Island. Her research interests focus on the prevention and treatment of health-related behaviors.

MICHAEL A. SAYETTE received his PhD in clinical psychology from Rutgers University. He is professor of psychology at the University of Pittsburgh. His research, supported by the National Institutes of Health, concerns the development of psychological theories of drinking and drug use. In addition, he is involved in research related to graduate training in psychology.

TRACY J. MAYNE, PhD, received his doctorate in clinical psychology from Rutgers University. He directs research within the Outcomes Research department at Pfizer Pharmaceuticals and is also an adjunct associate professor at New York University. His research focuses on the impact of treatment and disease management on workplace productivity, quality of life, and health care resource utilization.

CORRESPONDENCE CONCERNING THIS ARTICLE should be addressed to John C. Norcross, Department of Psychology, University of Scranton, Scranton, PA 18510-4396. E-mail: norcross@scranton.edu

THE PsyD: HETEROGENEITY IN PRACTITIONER TRAINING

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Table 5
 Comparisons Among APA-Accredited PsyD, Practice-Oriented PhD, and Research-Oriented PhD Programs in Clinical Psychology

Variable	PsyD programs		Practice-oriented and equal emphasis PhD programs		Research-oriented PhD programs		F
	M	SD	M	SD	M	SD	
Admission statistics							
No. of applications	149.7	81.1	133.7	83.5	168.5	87.4	3.2*
No. of acceptances	57.4 ^a	39.1	18.5	19.6	14.1	10.8	54.1**
% accepted	41.3 ^a	19.8	16.8 ^a	13.9	11.3 ^a	10.3	66.2**
No. enrolled	33.1 ^a	20.8	9.9	7.2	8.6	9.3	64.2**
% enrolled	59.3	13.5	62.7	19.3	60.0	17.2	0.7
Theoretical orientation							
Psychodynamic/psychoanalytic (%)	29.4	17.7	29.6	23.1	12.0 ^a	12.5	23.0**
Radical behavioral (%)	7.6	8.4	8.1	11.5	11.1	15.7	1.4
Systems (%)	18.9	10.2	20.6	17.3	14.5	15.9	3.1
Humanistic/phenomenological (%)	11.2	8.4	11.7	12.3	6.1 ^a	9.9	6.3*
Cognitive-behavioral (%)	32.8 ^a	17.9	49.0 ^a	25.0	64.4 ^a	20.7	30.2**
Financial aid							
Tuition waiver only (%)	7.9	16.6	5.2	15.3	2.2	11.8	2.4
Assistantship only (%)	19.5	22.6	25.7	37.4	8.5 ^a	24.8	6.7**
Both tuition waiver and assistantship (%)	17.5 ^a	22.6	57.2 ^a	41.7	84.2 ^a	31.6	48.0**
Student characteristics							
Women (%)	69.9	8.6	71.6	8.1	70.8	11.1	0.5
Ethnic minority (%)	20.8	16.0	19.7	13.5	18.7	10.1	0.4
Possessed master's (%)	35.2 ^a	24.8	23.8 ^a	17.1	17.2 ^a	11.7	18.5**
Students entering APA internships (%)	74.4 ^a	25.6	90.8	16.7	95.5	10.0	22.4**
Years to complete degree	5.1 ^a	0.7	6.1	0.8	6.2	0.9	27.7**

Note. Sample sizes were 40–41 for PsyD programs, 71–74 for practice-oriented and equal-emphasis PhD programs, and 80–85 for the research-oriented PhD programs.

^a This group differs significantly from all other groups ($p < .05$ by Newman-Keuls procedure).

* $p < .05$. ** $p < .01$.

Concluding Comments

The overriding objective of our study was to disseminate objective data about APA-accredited PsyD programs and, in so doing, to dispel several of the nagging myths and unfounded generalizations about practitioner training. As with many myths, the PsyD myths contain a kernel of truth. It is true, for example, that freestanding PsyD programs offer admission to a far higher percentage of applicants, but certainly not "Almost anyone can be admitted." It is also true that PsyD programs provide comparatively little financial aid to their students, but it is inaccurate to declare "No financial assistance is provided." PsyD programs routinely accept a higher proportion of master's-degree students, but our data show that almost two thirds of incoming PsyD students in clinical psychology are now baccalaureate level. And while psychoanalytic and humanistic orientations are more prominently represented on the faculty of PsyD programs than in PhD programs, the modal theoretical orientation is cognitive-behavioral in both types of programs.

A second aim of the PsyD Project was to highlight the heterogeneity of the PsyD programs, largely as a function of their institutional settings. The different types of PsyD programs shared similar financial assistance levels, faculty theoretical orientations, student demographics, and time to complete training. By contrast, the freestanding programs differed from both types of university-based PsyD programs on several dimensions. In particular, the former programs received more applications and accepted more students than did the latter programs.

The high rates of acceptance into APA-accredited freestanding PsyD programs—one half of all applicants—raise understandable concerns about quality control. Previous studies (e.g., Mayne et al., 1994; Murray & Williams, 1999; Norcross, Hanych, & Terranova, 1996; Norcross, Sayette, Mayne, Karg, & Turkson, 1998) invariably found that higher acceptance rates were associated with lower GRE scores and GPAs. We would immediately advise caution not to overgeneralize this finding to all PsyD programs. Moreover, our study does not provide data on the GRE scores, GPAs, other academic credentials, and clinical skills of these applicants, more than one third of whom have already earned a master's degree. At the same time, even supporters of PsyD programs have tactfully echoed Peterson's (1997, p. 248) "painful worry about the expansion of PsyD programs in institutions where the general standard of academic quality is—how can I say this—less than lofty." Indeed, after reviewing the accumulating evidence about professional education in clinical psychology, Peterson (2003, p. 795) ruefully concluded "As the professional school movement has advanced, the average performance of graduates has declined."

Differences among the three types of PsyD programs pale in comparison with differences between all PsyD programs and PhD programs in clinical psychology, particularly research-oriented PhD programs (Maher, 1999). Research-oriented PhD programs accepted a much smaller percentage of their applicants but were far more likely to provide financial aid than did PsyD programs. Students at research-oriented PhD programs required more time to complete their degree and were more likely to gain admittance to