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May 28, 2009

Ms. Judith Pachter Schulder
Pennsylvania State Board of Psychology
PO Box 2649
Harrisburg, PA 17105-2649

RE: Proposed Regulations on Qualifications
Published in the *Pennsylvania Bulletin*, May 2, 2009

Dear Judy:

Thank you for the opportunity to review the proposed regulations on supervision as published in the *Pennsylvania Bulletin* on May 2, 2009. We appreciate the fact the Board has shared previous versions of these draft regulations with us and obtained our input.

These draft regulations have many positive aspects, including a provision that allows individuals to take their licensing examinations after they complete their doctoral degrees. We also support many of the other changes such as increasing the post doctoral year to 1750 hours, requiring some education in supervision for post doctoral supervisees, and other changes.

However, two concerns remain that lead us to oppose these regulations. We are opposing these regulations because two sections are unclear, apparently contradictory, and possibly conflict with good public policy.

Two Years of Post License Experience for Supervisors

The first area of concern is the requirement that the post doctoral supervisors must have at least two years of experience post licensure (41.32 (3)(v) (A)). We oppose this provision because we know of no public policy argument that justifies this additional requirement.

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Definition of Qualifying Experience

The second area of concern is with the types of experience that may count towards fulfilling the post doctoral supervision requirement. According to the description of the regulation in the Purpose and Background section published in the *Pennsylvania Bulletin*, post doctoral supervisees must have 50% of their required experience in clinical practice, (“performing diagnosis, assessment, therapy or other interventions, supervision or consultation”) while the remaining 50% could be in “clinical practice, teaching psychologists in an organized psychology program or research” (p. 2212). The venue for teaching psychologists is not described in more detail, but the only post license education programs we are aware of consist of continuing education programs for psychologists or post doctoral specialty certificate programs.

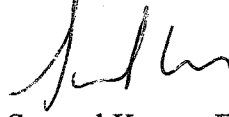
Nevertheless, the regulations themselves state something different. The regulations state that the remaining 50% “may be obtained by teaching in association with an organized psychology program preparing practicing psychologists or a postdoctoral training program, psychological research or any of the above categories” (41.32 (1) (iii)). So the commentary refers to teaching psychologists, but the regulations themselves refer to teaching in programs preparing psychologists.

Even without the confusion created by the wording in the Purpose and Background commentary, we would not know how the Board intends to interpret the regulations 41. 32 (1) (iii). We do not know if “teaching in association with an organized psychology program preparing practicing psychologists” refers to teaching in a doctoral program in an applied field of psychology (such as Clinical, Counseling or School Psychology, where almost all of the graduates become licensed psychologists); teaching in a doctoral program in an experimental field of psychology, where almost all of the graduates will be able to use the term “psychologists” according to the Professional Psychologists Practice Act where “members of the faculty or staff of a duly accredited university [or] college” can use that title; teaching in a masters degree program in psychology, where some of the students will likely use their credits to fulfill some of the academic requirements to become licensed psychologists; or teaching in an undergraduate degree program in psychology, where a few of the students will be likely to become practicing psychologists.

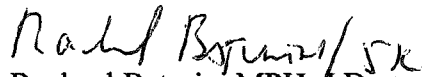
In addition to the confusion as to what teaching experiences qualify, the list of experiences that could qualify for the other 50% of the post doctoral experience should also include experience in administration and management. We note that the competency standards of the National Association of Professional Schools of Psychology include administration among its categories of core competencies for practicing psychologists (this competency is referred to as “management” by the documents of the APA Education Directorate). It is internally inconsistent for the Board to require APA accreditation (or ASPB/NR designation) for licensing, and then fail to count experiences in a content area which APA requires as part of its education of professional psychologists.

Thank you again for the opportunity to comment on these proposed regulations. As we stated above, there are many positive aspects to these regulations which we support and our concerns are limited to the two areas mentioned above.

Sincerely,



Samuel Knapp, Ed.D.
Director of Professional Affairs



Rachael Baturin, MPH, J.D.
Professional Affairs Associate

cc: Independent Regulatory Review Commission