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SAMPE LETTERS of Support
for SB 251

J. John Lang, Ph. D.
9621 Stikine St.
Juneau, AK 99801
January 15, 1986

[Handwritten signature]

Senator Bettye Fahrenkamp
Ch: NESS
Alaska State Legislature
Pouch V
Juneau, AK 99811

Dear Senator Fahrenkamp:

Just recently I received a letter from Robert Arvidson of Cordova, urging my support for Senate Bill 251, which I understand would have the Board of Examiners of Psychologists and Psychological Associates remove the words "approved program" in reference to the graduate academic program a candidate for licensure must have completed in order to qualify for examination for licensure in this state. I am very glad to see that Dr. Arvidson is pursuing this issue, for it has arisen several times in cases that I have known, and the requirement of an APA approved program for admission to Alaska licensure is in my opinion very misguided and discriminatory.

I am licensed as a psychologist here in Alaska, in the State of Arizona, and in the State of California. I am a full-time faculty member in Psychology at the University of Alaska - Juneau. I have previously been on the faculty of the University of Dallas and of the California School of Professional Psychology in Los Angeles. I have worked extensively in state agencies in all three states in areas as diverse as API, community mental health centers, corrections, and with native populations as a Tribal Psychologist. I keep current with the affairs of contemporary professional psychology nationally and internationally.

What the Legislature must realize is that, as Mr. Arvidson states in his letter, it is not even the majority of graduate programs that are approved by the American Psychological Association. In fact, many programs do not seek the approval, because they have creative and innovative curricula they would not be able to maintain if they were to adhere to the conservative and even stodgy requirements of the APA. The most exciting programs I know of in contemporary professional psychology are not APA approved, but their graduates become licensed or certified psychologists in most states after they graduate and make some of the most remarkable academic and clinical accomplishments the field can recognize. APA approval of an academic program tells me only that the curriculum is biased in a certain way -- heavy on experimental design, statistics, and traditional textbook topics. These are not what I have seen to be effective preparation for human services professionals.

Psychology in particular is characterized by strong factions and disagreements philosophically. This is probably, overall, positive, because without debate the field would not grow. It is a young field, and it is a difficult field.

Universities have to pass stringent accreditation procedures -- I witnessed these here at UAJ two years ago. It makes perfect sense to me that a psychology licensing board would require that a candidate for licensure have a degree from an accredited school, but not that it demand that the degree be from an APA approved program. In fact, some university departments have let go of their APA affiliation deliberately at times or been "put on probation" by APA because they exercised some initiative or creativity.

I would like to think of Alaska as a state of people who are open to change, of people who come here to strike out anew. I have always been shocked to see how conservative some of our professional requirements and alliances are. I personally know psychologists who were previously in the state and who worked with me in places like API who had to leave the state because they could not become licensed owing to the ultra-conservatism of the board. One of these persons got his doctorate from Fielding Institute in Santa Barbara and has been licensed since leaving Alaska in Virginia. He also qualified for licensure in most other states. Alaska lost one of the most flexible and creative psychologists it had. I also remember when the Psychology Board was "sunseted," and I believe the board at that time deserved the sunset.

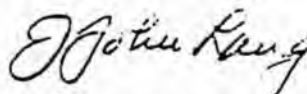
As Mr. Arvidson so correctly states, Alaska in a dire way needs all the mental health personnel it can get. It needs people who are creative, versatile, adventuresome. One does not find these qualities in persons who go through the most traditional and lockstep graduate programs. Many programs that are excellent later go on to get APA approval. This was the case with the California School of Professional Psychology's four campuses. Would it be fair to keep a person from being a psychologist in Alaska simply because he has completed a program from an accredited institution that is new or is somewhat different? Why does the Alaska board so fear diversity? What ever happened to the so-called spirit of freedom and independence Alaskans are supposed to display?

I think that probably a legislative officials who have reviewed this issue in the past and agreed to let the statute requiring an "approved program" stand were likely confusing an "approved program" (APA approved) with an "accredited school." In other words, just because a program has not been APA approved in no way implies that it is in disfavor with the APA.

Let's stop driving good mental health professionals out of Alaska. Let's focus on criteria that are meaningful in licensure, not those that simply serve to keep some people out of the state unjustly. Let's have Alaska come into the Twentieth Century and conform to the practices of the majority of states in regard to this critical issue.

cc Robert N. Arvidson

Yours sincerely,



J. John Lang, Ph.D.

Herbert Dörken, Ph.D.
A Psychological Corporation
508 Scripps Drive
Davis, Calif. 95616
(916) 753-3999

February 2, 1986

Dr. Robert M. Arvidson
Box 258
Cordova, Alaska 99574

Dear Dr. Arvidson:

Here are a few reprints. The one on the state legislative program is a chapter in my forthcoming book (end May), "Professional Psychology in Transition: Meeting Today's Challenges," Jossey Bass.

You have a point. Restriction to only APA accredited is too limiting, requiring the educational institution to itself be accredited (regional or U.S. Office of Education) is not. I would go one step further, however, and require that the doctoral program meet designated standards/content of training. That is a reasonable alternative to APA.

Licensing laws are state matters but psychology is long overdue in meeting national minimum standards. We have a number of state "approved" psychology programs in California and they are by and large not good. Just because it's in the state, California or Alaska, doesn't make it any good. It's the content, the faculty and the resources which count.

I am a Registered Lobbyist here and have provided legislative consultation to a number of states. I would certainly be pleased to consult for you or the Alaska Psychological Association, put on a workshop on legislation and advocacy, or give a keynote address at your annual or a special meeting. Enclosed is a listing of bills I drafted which have been enacted into law, also pertinent publications (out of reprints for most) and presentations. Better to have a soundly developed and continuing program than one-shot bills from time to time.

Sincerely,


Herbert Dörken, Ph.D.

HD:bas

Enc.



California Institute of Integral Studies

765 Ashbury Street San Francisco, CA 94117 (415) 753-6100

Formerly the California Institute of Asian Studies

February 10, 1986

House HESS
Alaska State Legislature
Juneau, AK 99811

Dear HESS Committee Members,

I am writing in support of Senate Bill 251 relating to regulation of the practice of psychology.

Senate Bill 251 proposes to bring Alaska licensure laws in line with those of many other states, eliminating unnecessary restrictions on the eligibility of well-trained and educated mental health service providers in your state. It is not necessary, in my view, that licensed psychologists be trained at APA approved institutions. Assurance of competency to practice in the field of psychology can be determined in other equally effective ways (see, for example, California's licensure laws).

If you are disposed to utilize some sort of "independent" stamp of approval for graduates of psychology Ph. D. programs, you might consider using what is called "Designated Program" status rendered by the Council for the National Register of Health Service Providers in Psychology. This organization maintains a listing of degree programs in psychology that are in compliance with standards for education and training in psychology promulgated by APA, though the organization is independent of APA itself.

Again, my hearty support for Senate Bill 251!

Sincerely,

Walt Voigt, Ph. D.
Program Director, Clinical Psychology

COLLEGE OF HUMAN AND RURAL DEVELOPMENT



UNIVERSITY OF ALASKA—FAIRBANKS
Fairbanks, Alaska 99775-0900

December 18, 1985

STATE OF ALASKA
DEPARTMENT OF COMMERCE
& ECONOMIC DEVELOPMENT

DEC 23 1985

Regulations Specialist
Department of Commerce and Economic Services
Division of Occupational Licensing
Board of Psychologist
Pouch D-LIC
Juneau, Alaska 99811

DIVISION OF
OCCUPATIONAL LICENSING

Dear Regulation Specialist:

This letter is in response to your informing psychologists and the public of proposed changes to the regulations concerning psychologists and psychological associate examiners. I am presently an assistant professor in psychology at the University of Alaska, Fairbanks and a clinical psychologist, and licensed to practice psychology here in Alaska. I am also a graduate of an APA-approved clinical psychology program and internship.

Alaska has too many mental health problems to unduly restrict the practice of psychology. I think that the present Alaska Psychology Regulations are unduly restrictive and elitist, and serve to penalize the consumer by making therapy and counseling too expensive.

In an age where we are attempting to minimize the irrational power of bureaucracies over our lives it seems ridiculous to let the American Psychological Association in D.C. determine what is appropriate in Alaska. Incidentally, I am a full member of A.P.A. and support much of their efforts - but not in this regard. Also, I am not aware that they insist that training in an APA-approved program is required to competently practice psychology.

The proposed requirement that any person in a state agency who practices psychology must be supervised by a licensed psychologist can only be due to greed on the part of those who would profit from such a requirement. I find it difficult to comprehend that any humanitarian would support this requirement. I oppose the proposed changes to the regulations of psychologist and psychological associate examiners.

Sincerely,

Kenneth D. Green, Ph.D.
Assistant Professor of Psychology
Department of Behavioral Sciences
and Human Services

John



CITY/BOROUGH OF JUNEAU
★ ALASKA'S CAPITAL CITY

Health and Social Services

January 29, 1986

Senate HESS Committee
Room 125 Capitol
Juneau, Alaska 99811

Dear Senators:

I'm writing in support of Senate Bill 251 along with the modifications by Mr. Kettler, Program Director of the North Slope Borough Community Mental Health Center. (see attachment) I've followed the activities of the licensing board since 1977, and have often felt that its policies restricted the availability of competent mental health care for the Alaskan public.

There is a special irony in this: Alaska, of all states, has the most widely varying and culturally diverse psychological needs, and yet the board has applied standards that adapt to the narrowest possible segment of these needs.

I hope you pursue the polar opposite: the widest range of services for the public under the least restrictive but adequate safeguards.

Sincerely,

John Jensen, Ph.D.
Acting Director

- cc: Senator Ray
- Senator Duncan
- Senator Miller (Juneau)
- Mr. Kettler
- ROBERT ARVIDSON

Attachment



COMMUNITY COLLEGES, RURAL EDUCATION AND EXTENSION (CCREE)

3601 C Street, Suite #400
Mailing Address: 3605 Arctic Blvd. #420
Anchorage, AK 99503

January 23, 1986

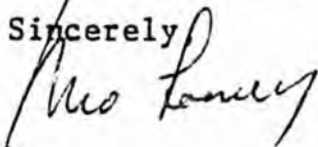
Robert M. Arvidson, Ph.D.
Box 258
Cordova, Alaska 99574

Dear Dr. Arvidson:

Thank you for bringing to my attention Senate Bill
291 and its ramifications for psychology professionals
within educational settings.

I have sent copies of the bill and the related
materials you enclosed to our community colleges
throughout the state. Again, thank you for
bringing this matter to our attention.

Sincerely


M. O. Looney
Chancellor

jp



THE UNION FOR EXPERIMENTING COLLEGES AND UNIVERSITIES

Office of the President

February 4, 1986

Dr. Robert Arvidson
Box 258
Cordova, AK 99574

Dear Dr. Arvidson:

Thank you for your letter and enclosures concerning Alaska Senate Bill 251. We are in full support of your efforts and I hope the attached letter will be of some assistance to you in your impressive efforts to effect passage of this most necessary legislation.

Thank you for inviting our response.

Sincerely,

Robert T. Conley, Ph.D.
President

RTC/mrw

encls.



THE UNION FOR EXPERIMENTING COLLEGES AND UNIVERSITIES

Office of the President

February 4, 1986

Senate Health Education
and Social Services Committee
State of Alaska

Dear Senators:

I am writing in strong support of Senate Bill 251, "An act relating to regulation of the practice of psychology". As President of an established, high quality and accredited institution, which for many years has graduated talented Ph.D. psychologists, I ardently encourage your support of this bill.

The rigidity of the existing single criterion, mandating program approval by the American Psychological Association as a requirement for state certification of psychologists, is clearly not in the best interests of the citizenry. Senate Bill 251 will place Alaska in the more flexible posture utilized by a majority of states. The Alaska Psychology Board should have the ability and authority to thoroughly review and approve/reject applicants based on their ability to effectively serve the mental health needs of Alaskans. The current policy clearly precludes many fine, qualified and committed professionals from being allowed to practice what they know and do best: caring for the health of your citizens.

Please feel free to call on me if I can lend any additional support on behalf of this legislation.

Sincerely,

Robert T. Conley, Ph.D.
President

RTC/mrw

Alaska Pacific University

Anchorage, Alaska 99504

907-276-8181

January 27, 1986

Senator Jay Kertulla
State Capitol
Juneau, AK 99801

Dear Senator Kertulla:

I want you to know that I fully support S.B. 251 regarding the dropping of "APA approved" from the State's requirements concerning licensing of psychologists.

Since other states do not have this requirement and many fine professional programs (e.g. at Harvard) are not "APA approved," it seems strange indeed that Alaska maintains a requirement that benefits only certain psychologists by giving them a monopoly on services.

Thank you for introducing S.B. 251. I shall be very pleased if this bill becomes law.

Sincerely,

O. W. Frost
Research Professor of Humanities

Copy for Bob

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574

March 14, 1986

Senator Bettye Fahrenkamp
Ch: Senate HESS Committee
P.O. Box V
Juneau, Alaska 99811

Re: Draft No. 2 - CSSB 251 (HESS)

Dear Senator Fahrenkamp and Committee Members,

Although I support Draft No. 2 of CSSB 251 as it is written, I believe that a small change in the bill could help avoid later problems for licensure candidates and for the psychology board. I recommend the substitution of : has two years of experience approved by the board, at least one of which shall be postdoctoral. for paragraph (3) in AS 08.86.130(a) of proposed * Sec. 2. in Draft # 2. This suggestion is based on California licensure law Sec. 2914 (c) and Regs. 1387/1387.5.


The reason for calling this to your attention is that stipulating two years of experience rather than requiring an internship plus one year of postdoctoral experience (as subsumed in the Draft Letter of Intent) recognizes the generic nature of the psychology statutes and profession as well as the many avenues for obtaining proficiency. Some specialty areas of psychology such as industrial/organizational or engineering psychology, or developmental disabilities do not have internships per se. This is reflected in Criterion 9 of the enclosed comparison Guidelines from the National Register (Exhibit A).

The proposed two year requirement would also allow the psychology board to credit an applicant, who has had extensive predoctoral supervised experience, with at least one year of supervised experience in lieu of an internship. This suggestion is consistent with the expanded recognition proposed for psychological associates (through supervised experience) and with credit granted for experience in other professions licensed under Title 8 of the Alaska Statutes. It is another area where the psychology board could adopt regulations specifying types of acceptable supervised experience (e.g., internship, health service training, research, teaching, on-the-job training) , subject to public review.

I have taken the liberty of suggesting two changes (A&B, marked in red) to the committee's Draft Letter of Intent. I note, for comparison purposes only, that these changes are consistent with the National Register Guidelines. Several regionally accredited institutions that grant the doctorate in psychology (e.g., Union Graduate School or the Fielding or Saybrook Institutes) do not require traditional forms of full time residential study. The psychology board had to stretch Criterion 8 (b) of the American Psychological Association Guidelines to approve an otherwise qualified applicant for licensure at their March 1986 meeting.

Thank you for your time, effort and patience with this bill (and with me). Please call me at 424-7405 if I can be of any assistance.

Sincerely,


Robert M. Arvidson

Encs.

cc. Senate HESS Committee Members
Senators Kerttula and Eliason

DRAFT LETTER OF INTENT

CSSB 251 (HESS) directs the State Board of Psychologist and Psychological Associate Examiners to ~~promulgate~~ ^{adopt} regulations defining ~~criteria of graduate study in psychology~~ ^{of the 1st session} ~~approval of doctoral programs~~ for the purposes of licensure, and to present those regulations to the legislature on the 10th day of the 15th ^{As State} Legislature. It is the intent of the Senate Committee on Health, Education and Social Services that ~~regulations~~ ^{Program ~~of~~ definition} be based on the following criteria.

1. Doctoral education and training in psychology are offered in an institution of higher education accredited by one of the regional accrediting bodies recognized by the Council of Postsecondary Accreditation.
2. The doctoral program is publicly identified as a psychology program, and is specified as such in pertinent institutional catalogs and brochures.
3. The psychology program stands as a recognizable, coherent organizational entity ~~[within the institution]~~.
4. Psychologists have clear authority and primary responsibility for the academic core and specialty preparation, whether or not the program involves multiple administrative lines.
5. There is an identifiable core of psychology faculty.
6. There is an identifiable body of students who are matriculated in the psychology program for the doctoral degree.
7. The psychology program is an organized, integrated sequence of study.
8. The program requires the equivalent of 3 full-time academic years of graduate study:
 - a. Two years of which are at the institution from which the doctoral degree is granted
 - b. One year of which is in full-time residence at the institution from which the doctoral degree is granted.
9. The program requires students to acquire knowledge in the following program components:
 - a. Methodology and History. Systematic preparation in scientific standards and responsibilities, research design and methodology, quantitative methods, and historical foundations in psychology.
 - b. Foundation in psychology. Coursework in each of the 4 following areas of study:
 - i. biological bases of behavior (physiological psychology, comparative psychology, neuropsychology, psychopharmacology)
 - ii. cognitive-affective bases of behavior (learning, memory, perception, cognition, thinking, motivation, emotion)
 - iii. social bases of behavior (social psychology, cultural, ethnic, group processes, sex roles, organizational behavior)
 - iv. individual differences (personality theory, human development, individual differences, abnormal psychology, psychology of women, psychology of the handicapped, psychology of the minority experience)
 - c. Additional preparation in the area of specialization.
 - i. Knowledge and use of ethics, guidelines, standards.
 - ii. Supervised practicum and/or laboratory experiences appropriate to the area of practice, teaching, or research in psychology
 - iii. Advanced preparation appropriate to the area of specialization. Internship or other appropriate supervised experience takes place following the supervised practicum and/or laboratory experience and which is not within the purview of the designation ~~or the equivalent thereof~~ ^{or the equivalent thereof}.
10. Programs accredited by the American Psychological Association are recognized as one way of meeting program approval.

Note: The original second sentence in 9-c-ii in the Draft Letter of Intent was written as follows:

Internship takes place in a specialized doctoral program following the supervised practicum and/or laboratory experience and as such is not within the purview of the designation process.

A handwritten signature consisting of the letters 'RMA' in a cursive style, enclosed within a hand-drawn oval.

STATE OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

Laws, Rules and Regulations Relating to the Practice of Psychology

Licensure Requirements

2914. Each applicant for licensure shall comply with all of the following requirements:

- (a) Is not subject to denial of licensure under Division 1.5.
- (b) Possess an earned doctorate degree (1) in psychology, (2) in education, psychology, (3) in education with the field of specialization in counseling psychology or educational psychology, or (4) possess an earned doctorate degree deemed equivalent by the committee in regulations duly adopted under this chapter. Such degree or training shall be obtained from an accredited or approved university, college, professional school, or any other educational institution approved by the committee as offering a comparable program in regulations duly adopted under this chapter.

No educational institution shall be denied recognition as an accredited or approved academic institution solely because its program is not accredited by any professional organization of psychologists, and nothing in this act or in the administration of this act shall require the registration with the committee by educational institutions of their departments of psy-

chology or their doctoral programs in psychology.

- (c) Have engaged for at least two years in supervised professional experience under the direction of a licensed psychologist, the specific requirements of which shall be defined by the committee in its regulations, or such suitable alternative supervision as determined by the committee in regulations duly adopted under this chapter, at least one year of which shall be after being awarded the doctorate in psychology.

- (d) Take and pass the examination required by Section 2941 unless otherwise exempted by the committee under the provisions of this chapter.

(Amended by Stats. 1978, Ch. 1208.)

(Register 83, No. 25—6-18-83)

1385. Revised Criteria for Evaluation of Education.

(a) Only those doctorate degrees which are designated as being earned in a department or school of psychology, educational psychology or education with the field of specialization in counseling psychology or educational psychology shall be accepted as an earned doctorate degree as specified in Section 2914, subsections (b) (1) through (3), of the code. Any other degree shall be subject to evaluation as an equivalent degree pursuant to the requirements of this section even though the designation "psychology" may be included in the title. If it is not evident on the official transcript, the committee may require that any doctorate degree earned in education with the field of specialization in counseling psychology or educational psychology be certified by the registrar as such a degree.

(b) Any doctorate degree earned in a program while approved by the American Psychological Association shall be deemed an equivalent degree pursuant to the provisions of this section.

(c) In order to be acceptable for psychology licensure as an equivalent degree, an applicant's doctorate degree shall meet the following requirements:

(1) The doctorate degree shall be equivalent or similar to a doctorate degree in psychology although not completed within a school or department of psychology, such as, a degree in child development, human development or behavioral medicine.

(2) Although the emphasis for evaluation of an equivalent degree is placed on the nature of the degree and the contents of the graduate program, the applicant's graduate program leading to the doctorate degree shall have completed at least 48 semester or 72 quarter units in those subject areas listed in subsection (c) (4) which have been successfully completed since receipt of a baccalaureate degree.

(3) The degree program shall be a recognizable and organizational unit within an educational institution which is under the authority of an official who has responsibility for the core and specialty areas of the program's curriculum.

(4) The degree program shall have an integrated, organized curriculum and sequence of study which includes instruction in the areas of biological bases of behavior, cognitive-affective bases of behavior, social bases of behavior and individual differences, instruction in psychometrics and research methodology, and professional ethics, and supervised practicum, internship and field or laboratory training, all of which is appropriate to the practice of psychology.

(5) All the coursework submitted as part of the equivalent degree program shall have been completed prior to receipt of the doctorate degree; however, the committee in its discretion may consider coursework which is directly relevant and appropriate to the course of study of the degree program which is completed after the doctorate degree is received.

(d) Applicants submitting evaluation for licensure shall submit official course descriptions of all post-baccalaureate courses completed and an abstract of the doctoral dissertation.

(e) Graduates of foreign universities, colleges or professional schools are exempt from the provisions of this section and shall be evaluated pursuant to Section 1385.

NOTE: Authority cited: Section 2930, Business and Professions Code. Reference: Section 2914, Business and Professions Code

HISTORY:

1. Renumbering and amendment of former Section 1386 to Section 1387.5, and renumbering of former Section 1384.6 to Section 1386 filed 6-15-83; effective thirtieth day thereafter (Register 83, No. 25) For prior history, see Registers 80, No. 9; 79, No. 17; and 78 No. 39

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574
Jan 13, 1986

Senator Bettye Fahrenkamp, Chair
Senate HCSS Committee
Pouch V
Juneau, Alaska 99811

Re: Possible CSSB 251 HCSS

Dear Senator Fahrenkamp,

Thank you for the recent memo concerning exemptions to the psychology statutes.

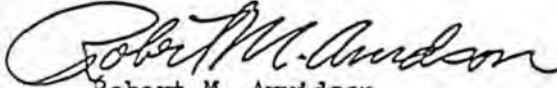
In case you are considering a committee substitute for SB 251, I have three items to call to your attention.

One. The first suggestion comes from a recent review of the tapes of the Sept. 12 & 13, 1985 meeting of the Board of Psychologist ... Examiners . The board has passed a resolution to delete " counseling or psychometrics " from AS 08.86.170(b) and "counseling or psychometry" from AS 08.86.190(b), and replace the terms with "psychology". I recommend this substitution since it would bring the sections in line with regulations the board adopted last year (i.e., 12AAC60.180 (b)--even if this^{is} the reverse order , it at least makes the statutes and regulations consistent. The proposed change is enclosed on a work draft of the statutes marked Exhibit A.

Two. It may be appropriate to add the following to the end of the confidentiality section in AS 08.86.200 : " Notwithstanding the provisions of this section, a psychologist or a psychological associate must report knowledge of child abuse or neglect as required by AS 47.17.020" (Exhibit B). The psychology board may also want to include a statement concerning the duty to report threats of harm to others (including ~~adults~~ adults).

Three . The language current extant in AS 08.86.162 (1) was deleted from AS 08.86.130 (1) in 1980. It may be appropriate to also delete it from AS 08.86.162(1). The apparent issue here is current behavior and character. Exhibit C includes a consideration of " Character and Fitness" from the article, "Challenging licensure and certification."

Sincerely yours,


Robert M. Arvidson

Encs: As stated.
cc: Senator Jay Kerttula

SENATE BILL 251/PSYCHOLOGY: PROTECTION, PROMOTION AND COSTS OF PUBLIC HEALTH AND WELFARE

Robert M. Arvidson
Box 258, Cordova, Alaska, 99574, December 1985

SB251 entitled, "An Act relating to regulation of the practice of psychology..." is pending in the fourteenth legislature. The bill is best viewed as legal-social legislation for expanding the availability of needed psychological health services in Alaska.

SB 251 will repeal the arbitrary requirement that candidates for licensure must be graduates of programs approved by the American Psychological Association (APA, a worthy but non-legal entity as far as Alaska is concerned). The bill also provides for an increased number of viable programs and degrees that can be recognized by the psychology board under the psychology statutes (AS08.86). To date, no research is available that has shown that graduates of APA programs are superior to graduates of non-APA programs in terms of client outcomes.

SB 251 will protect the public by retaining necessary and sufficient entry requirements, and will promote public health and welfare by creating a functional licensing law that will allow qualified applicants to gain licensure.

As of April 1985, Alaska had only 93 licensed psychologists (seventeen ^{other} licensees listed out of state addresses). The shortage of psychologists has been noted in past performance reviews of the psychology board. The 1981 legislative audit of the board indicated that the board has "... been unnecessarily restricting the licensing of qualified psychologists..." since 1975. SB 251 will help alleviate this problem by specifying the doctoral degrees that must be recognized by the board. SB 251 will reduce arbitrary decisions and constitutional due process problems.

SB 251 is modeled after portions of existing California licensure law (Sec. 2914; Business and professions code). California has recently experienced a tremendous increase in the number of psychologists licensed under its progressive licensure code. Similarly, it is expected that the passage of SB 251 will lead to an increased number of licensed psychologists in Alaska.

The passage of SB 251 will help force open competition on the marketplace. Increased competition in any field means better services and lower costs for the public, and as is appropriate in this case, for the state. As for the latter, licensed independent psychologists in California proved in 1982 that the unit cost of psychological services in county public programs was twice the cost of that for state Medicaid clients seen by psychologists in private practice (page 1212, in Dorken, H., "Advocacy and the legislative process: representation in a changing world." American Psychologist, 1982, 38, 1210-1215). Of course, reduced costs cannot be passed on to the public or to the state until a substantial cadre of independent licensed psychologists is created. Such a cadre does not exist in Alaska.

In conclusion, it is argued that SB 251 will protect the public by specifying realistic minimum requirements for licensure. In turn, SB 251 will promote public health, welfare, and reduced costs by establishing reasonable licensure provisions that will encourage qualified applicants to seek licensure and locate in the state.

The intent of SB 251 is to enhance public well-being. Please support Senate Bill 251.

— SB 251



PSYCHOLOGY IN ALASKA: THE APPROVED AND THE NON-APPROVED

Robert M. Arvidson
Box 258, Cordova, Alaska 99574 , January 1986

This short paper is a plea to the Alaska academic community and other concerned individuals for support for Senate Bill 251 which is now pending in the State Legislature. SB.251 entitled, "An Act relating to regulation of the practice of psychology..." may at first appear to be a simple procedural bill, but it is far more wide reaching than that. It contains unmistakable implications for academic freedom, substantive due process and equal protection as well as for mental health.

The importance of SB 251 centers on the repeal of just two words from the psychology licensure statutes- to wit, "approved program" which means a program approved by the American Psychological Association (APA).

As the psychology statutes (AS 08.86) now read, applicants for licensure at either the masters level (psychological associate) or doctoral level (psychologist) must be graduates of programs approved by the APA (or equivalent??). This means that universities and colleges in Alaska and elsewhere must tailor their psychology programs according to arbitrary criteria established by an organization based in Washington, D.C., if they want the Alaska Board of Psychologist and Psychological Associate Examiners to certify their advanced graduates eligible for licensure examinations.

No danger exists that justifies the ultra-restrictive educational requirements in AS 08.86.130. Rather, if any threat to public safety or welfare exists, it stems from current licensure requirements that retard the development of adequate mental health delivery services in Alaska.

This resort to administrative convenience via approved programs creates an artificial dichotomy that violates academic freedom and denies substantive due process and equal protection of the laws to licensure candidates from non-approved programs. It constitutes a negation of fundamental importance of ideas in our society. It appears to be an unconditional surrender of state's rights to a non-legal entity (and it should be emphasized that the delegation of future law making power to the APA in AS 08.86.230 is invalid).

There are more than 600 psychology graduate programs in the U. S. and Canada, but only about 200 of these programs are approved (some provisionally) by the APA. No research is available to validate the presumption that graduates of APA "approved programs" are superior to graduates of other programs in terms of client outcomes or other factors. This lack of valid distinctions provides ample justification for the repeal of the exclusionary educational requirements in AS 08.86.130 and AS 08.86.162.

-2-

I have been a full member of the APA since 1968 and I appreciate what the organization has done for the development of psychology in general. There is no reason not to use the APA as a resource, but I do not think that the Alaska psychology board should grant the APA carte blanche to determine who will or who will not become a psychologist. Neither does Dr. Milton D. Hakel who was a candidate for president-elect of the APA in 1985. In his statement of issues facing psychology, he said, "The proposed requirements of graduation from an APA-accredited program as a prerequisite for state licensure violates academic integrity. Dictating the content of graduate programs will do nothing to assure that licensees perform competently." To quote from Justice William J. Brennan, Jr., "We must "... not tolerate laws that cast a pall of orthodoxy over the classroom" (Keyishian V. Board of Regents, 385 U.S. 589 (1967)).

- over -

Mental health is Alaska's number one problem. Alaska needs mental health professionals. SB 251 is designed to restore equity to licensure requirements and to encourage qualified applicants to seek licensure in Alaska. SB 251 contains stringent but reasonable entry requirements for licensure.

Alaskan universities are involved in educating psychological specialists and counselors. Programs must be continued and new ones developed with particular reference to rural considerations. Academic freedom is basic in tailoring programs according to Alaska's particular needs. SB 251 provides for licensure (associate) of graduates of Alaskan universities in community psychology, guidance and counseling, and in psychology. SB 251 will be critical for the entry of Alaskan graduates into the mainstream of professional Alaska psychology when doctoral programs are developed in Alaskan universities.

Please support SB 251 by writing a letter to Senator Bettye Fahrenkamp, CH:HESS, Alaska State Legislature, Pouch V, Juneau, Alaska 99811. The legislature reconvenes Jan. 13, 1986. If you do not have time to write a letter, send a Public Opinion Message (P.O.M) or just sign this page and mail it to Juneau today as an indication of your support for SB 251.

You should also make your views known if you do not agree with the line of reasoning presented here. It is your State.

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574
Feb. 11, 1986

Senator Bettye Fahrenkamp
Chair, Senate HESS
Alaska State Legislature
P.O. Box V
Juneau, Alaska 99811

Re: Draft CSSB 251 (HESS)

Dear Senator Fahrenkamp,

Thank you for holding a teleconference on HB 172 and the Draft of CSSB 251 (HESS) this afternoon. I appreciate the time and effort spent by the entire Senate HESS Committee on these important bills. The interest shown in these bills by people throughout the state is also worthy of note.

I am enclosing a copy of the testimony that I planned to give at today's teleconference. I support the work draft of CSSB 251 (HESS) as it is written.

I am also sending (under separate cover) the psychology licensure statutes for the states of Florida and South Dakota for the committee's information. The psychology licensure laws were "sunsetting" in these two states in recent years, but have been reinstated as indicated by the dates of the statutes.


In addition to the above, I am sending (also under separate cover) the current psychology licensure statutes and regulations for the states of Connecticut, Ohio, Missouri, Oregon, Alabama, Washington, New York, Illinois, North Dakota and California for the committee's information. Some material from Hawaii and Massachusetts is also included. These are the only licensing laws that I have on hand, or I would send more.

My review of the above licensure laws reinforces my belief that the Alaska psychology statutes and regulations specify educational entry requirements that are too rigid and final. Other states, including California, make prudent use of criteria developed by the American Psychological Association (APA) by not enthroneing it as Alaska has done.

I do not believe that the draft copy of CSSB 251 (HESS) is an attack on APA approved programs par se. The bill certainly challenges the injudicious use of the APA criteria as a sole educational standard, but applicants from APA programs will readily qualify for licensure under the proposed law, as will qualified applicants from non-APA-approved programs .

Alaska cannot help but benefit from the passage of Draft CSSB 251 (HESS).

Sincerely yours,


Robert M. Arvidson

Enc: As stated
cc: Senate HESS Committee Members
Senator Jalmar Kerttula

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574

Jan 17, 1986

Sen. Bettye Fahrenkamp
Chair, Senate HESS
Pouch V
Juneau, Alaska 99811

Re: Senate Bill 251 and Public opposition to proposed psychology regulations.

Dear Senator Fahrenkamp,

I have recently reviewed the public response to regulations proposed by the psychology board that would restrict exemptions to the psychology practice act. These proposed regulations were public noticed Oct. 29, 1985. The public, including licensed psychologists, educators, state officials and concerned citizens, is strongly opposed to the proposed regulations.

My count indicates that 61 (sixty one) letters express opposition to the proposal. Many of these letters have multiple signatures and represent organizations. Only 4 (four) letters support the psychology boards' attempt to require licensure or supervision of currently exempt agency employees (12AAC60.910 referenced to AS 08.86.180).

I believe that many of these letters can be viewed as support for SB 251, either indirectly or directly. For example, Dr. Kenneth Green, a licensed psychologist and Asst. Professor of Psychology at the University of Alaska -Fairbanks states, "Alaska has too many mental health problems to unduly restrict the practice of psychology. I think that the present Alaska Psychology Regulations are unduly restrictive and elitist, and serve to penalize the consumer by making therapy and counseling too expensive."

I am enclosing a sample of 15 of the letters (copies) opposed to the restrictive regulations. I feel that these letters support the continued delivery and development of maximum mental ~~health~~ ^{services} services in the state.

I am also enclosing a proportional sample of the letters supporting the psychology board's restrictive proposal. This sample consists of a copy of one letter.

Looking to the future, I am sending a copy of the above information to the House HESS Committee and I am asking that they keep it on file for reference to SB 251.

Best wishes for the session.

Sincerely yours,



Robert M. Arvidson

Encs: As stated

cc: Senator Kerttula
House HESS Committee

HESS

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574
Jan. 3, 1986

Senator Bettye Fahrenkamp
Chair: Senate HESS Committee
Alaska State Legislature
Pouch V
Juneau, Alaska 99811

RE: SB 251: Criteria for evaluation of education; California and Alaska Administrative Codes; Population growth; Senate intent.

Dear Senator Fahrenkamp,

This letter addresses questions of definition for the doctoral level education requirements listed in * Sec. 2. (Sec. 08.86.130 (a) of SB 251 (p. 2, lines 8-18). I propose that the basic psychology doctoral requirement or its equivalent can be best defined in regulations by utilizing criteria in existing California licensing regulations. I realize of course that regulations are the proper domain of the psychology board, and I am merely offering suggestions to forestall any criticisms directed towards SB 251.

I am enclosing Section 1386 (Revised Criteria for Evaluation of Education) of the California "Rules and Regulations Relating to the Practice of Psychology," (Title 16, Register 83, No. 25--6-18-83). It is my opinion that Sec. 1386 can be used as a working draft for promulgating necessary regulations. In fact, with the exception of (5) (e) (Foreign graduates) and minor language changes, the substantive content of the entire Section could be adopted in toto, should the psychology board concur when regulations are proposed.

Section 1386 specifies the degrees that are acceptable without qualification under SB 251 and provides criteria for evaluating the equivalency provision of SB 251. The only problem foreseen here is that a date may have to be specified for programs approved by the American Psychological Association, since agencies cannot adopt future amendments to regulations by reference (Northern Lights Motel, Inc. v. Sweaney, 561 P.2d 1176, aff'd on rehearing, 563 P.2d 256 (1977)).

As you know, SB 251 is modeled on California law (Sec. 2914, Business and Profession Code). , and I think that in the interest of consistency, the California regulations should also be subjected to close legislative notice by Alaska for possible adoption.

California is our largest state, with a population of 26,365,000 according to an article in the Dec. 30, 1985 issue of the Anchorage Daily News (enclosed). Certainly, licensing laws and regulations that are functional in such a populous and diverse state should also be functional in Alaska, where the population has only recently passed the one-half million mark.

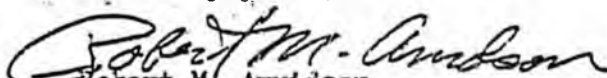
I urge passage of SB 251. Alaska is the nation's fastest growing state. We need a progressive psychology licensing law directed toward the solution of problems associated with population growth (and other factors). For an example of these problems: " As of October, there had been 37 suicides in Anchorage, compared to 23 for the entire year of 1984..." (Anchorage Daily News, C-1,3, Dec. 27, 1985. Some 20,000 calls were logged by the Anchorage Suicide Prevention and Crisis Line in 1985 (article enclosed).

Sen. Fahrenkamp
Jan. 3, 1986
Page 2.

If you find merit in my above suggestion concerning psychology regulations based on California Regulation 1386, I respectfully request that the Senate HESS Committee consider it for inclusion in any letter of intent accompanying the Committee's findings or recommendations for SB 251. A statement of regulatory direction could help avoid some of the problems such as those the psychology board recently experienced in attempting to promulgate regulations that would limit exemptions to AS 08.86.130.

Best wishes for the new year.

Sincerely yours,


Robert M. Arvidson

Enc: As stated

cc: Senator Kerttula
Senator Josephson

Board of Psychologist and Psychological Associate Examiners
Other interested parties

Statement of Candidate for President-elect of APA - 1985

NAME: MILTON D. HAKEL

Milton D. Hakel is an Industrial and Organizational Psychologist who is currently Professor of Psychology at the Ohio State University. He will join the faculty of the Department of Psychology at the University of Houston this autumn. During his seventeen years at Ohio State he has chaired 45 doctoral committees and served as head of the Industrial/Organizational program for ten years. He has conducted research on interpersonal perception, decision-making and behavior modeling. Work on interpersonal perception and behavior prediction was funded by the National Science Foundation. Funding was also received from the Air Force and Coast Guard as well as private industry.

His awards include the Cattell Award for excellence in research design, 1965, and a Fulbright-Hays Senior Scholar award, 1978, for research in Italy. He is an APA Fellow, 1972, a Diplomate in Industrial and Organizational Psychology of the American Board of Professional Psychology, 1984, and a licensed Psychologist in Ohio.

As a partner in the Applied Research Group, he serves as a consultant to industry and government on human resource and organizational problems. He also serves as Chair of the Scientific Advisory Group for Project A, the largest effort in the measurement and interpretation of human differences ever undertaken. Project A is being conducted for the Army Research Institute by a consortium of research institutes.

Hakel has been active in APA. He is Past-President of the Society for Industrial and Organizational Psychology and he has served on the Council of Representatives, the Board of Professional Affairs and the Board of Trustees of the Association for the Advancement of Psychology. He has attended 19 of the last 20 APA conventions and been on the program each time.

His publications include the book *Making It Happen: Doing Research with Implementation in Mind* (with Melvin Sorcher, Michael Beer and Joseph L. Moses), 31 articles, 4 chapters, several book reviews, many technical reports, and more than 40 convention addresses, colloquia and symposia. He is a frequent speaker on topics such as interviewing and testing.

For eleven years Hakel edited *Personnel Psychology*, and he now serves as its publisher. He has also served on the Editorial Boards of *Educational and Psychological Measurement*, the *Journal of Assessment Center Technology*, *Organizational Behavior and Human Performance*, and the *Journal of Vocational Behavior*. His most recent publication is an essay on the science and practice of making decisions in *Professional Psychology* (October, 1984). His chapter on personnel selection will appear in the 1985 *Annual Review of Psychology*.

Hakel was born in Minnesota in 1941. He received his B.A. in 1963 and his Ph.D. in 1966 from the University of Minnesota and taught there for two years following graduation. He is married to Lee Hakel, Managing Editor of *Personnel Psychology*. They have two college-age children. His interests outside of psychology include music, art, politics, religion, photography, skiing, bicycling and human-powered vehicles.

MILTON D. HAKEL

STATEMENT ON ISSUES FACING PSYCHOLOGY

The key issue is how to nurture the diversity and vigor of psychology within APA. How can we unite science and practice in the public interest? APA needs to change. Science and practice are on diverging courses. The unity of psychology as a discipline is at risk.

Symptoms of the crisis abound. They are described more completely in my statement in the May *Monitor*. In brief:

1. There is a continuing stream of policy initiatives from the Board of Professional Affairs that stifles the development of innovative approaches to problems and interferes with scholarly work.
2. State licensing law content is being studied by COPP and SFPEP. Whatever drafts come forward from these groups must recognize the diversity of professional psychological practice, rather than attempt to force psychologists of all specialties into a single medical-model private-practice mold.
3. Our governance structure is convoluted and unwieldy, and participation in it is frustrating and demoralizing.
4. The proposed requirement of graduation from an APA-accredited program as a prerequisite for state licensure violates academic integrity. Dictating the content of graduate programs will do nothing to assure that licensees perform competently.
5. From time to time the Council of Representatives approves advocacy issues. We should consider advocacy issues in the light of solid research evidence—this will lead to greater impact.

MILTON D. HAKEL (continued)

6. Dues are high relative to other scientific societies.
7. Resignations are at an all-time high.
8. Fewer than half of new Ph.D.s bother to join APA.
9. APA will have spent a half-million dollars in legal fees for two recent suits concerning private practice issues.
10. The use of dues to support non-voting representatives from unrepresented state associations is objectionable, and violates our basic "unit of membership," which is the individual, not the group, coalition, faction, division or state association.

Whither APA?

Many of these symptoms were visible in 1978 when the blue-ribbon Commission on Organization was created to "consider in depth the issues involved in the question of APA organization." The Commission made many recommendations, but their report was tabled. Nothing has been done, except to establish another Task Force. In the meantime, the fundamental problems that led to the creation of the Commission have gotten worse.

Here is the crux of the crisis: With each passing year the probability increases that the trends already clearly discernible when the Commission filed its report will result in the evolution of a national Society for Psychological Research outside of the framework of APA. Already several independent societies exist outside of APA, and some divisions within APA, such as 8 and 14, are incorporated and could function independently or as members of a federation should the benefits of belonging to APA no longer outweigh the costs.

Reorganization is long overdue. Psychologists in private practice have legitimate interests and concerns. So do other psychologists. As noted at the outset, the issue is how to nurture the diversity and vigor of psychology within APA. Psychology will surely grow and diversify. The question is where and how. Will APA continue to include research and scientist-practitioner interests as well as practitioner interests?

There should be only one major organization representing psychology. Unity has three tactical advantages: 1) lower cost, 2) a unified voice (in testimony to congressional committees, various agencies, and state boards), and 3) greater credibility (science and practice support each other).

But the major benefit of unity is strategic: We are more likely to learn from each other if we remain together. Our scientists need the stimulation of practical problems. Our practitioners need the products of rigorous research.

Change is imperative. We must restructure our organization to assure future vitality. This is the key issue.

The priority I place on the direction and future vitality of APA makes other issues pale by comparison, but here are brief comments on some of my other concerns.

1. *Psychology Today*: Although I voted against its purchase, it's now ours and we need to make it work. The editorial content is much improved but there is room for further improvement. It has mortgaged our future, and has consumed many budgetary degrees of freedom.
2. The *Monitor* continues to be controversial. Many members dislike it, disapprove of it, and discard it unread.
3. The annual convention is expensive to attend, huge, and impersonal. What suffers is time for serious exchange, scientific and professional.

My candidacy represents a referendum on APA's future direction. I will provide the leadership needed for a ninety-degree turn in the direction of our association. I know APA's governance structure because I have worked in it. I will bring experience and skill to the task of reorganization. I will work to bring science and practice together.

- In voting, you are asked to rank or order the five candidates. In the spirit of the referendum, here's how I suggest you interpret the five ranks you could make by my name:
1. I don't like where we're going, APA needs new direction. Let's give Hakel a try!
 2. I have a sentimental favorite in one of the other candidates, but I'm for Hakel in spirit!
 3. I have two sentimental favorites—but Hakel's on the right track.
 4. Change will come even without Hakel.
 5. I like things the way they are. Status quo, come weal or woe!

My election this year would be a clear message to the Task Force on Structure of APA, to the Board of Directors and to the Council of Representatives that the membership wants a unified APA, with strong representation for research and scientist-practitioner interests.

The issue is clear. We must balance the interests of scientists, practitioners, and scientist-practitioners. Give me your first-place vote, and recruit other voters who want APA's direction to change.

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574
Jan 13, 1986

Senator Bettye Fahrenkamp, Chair
Senate HESS Committee
Pouch V
Juneau, Alaska 99811

Re: Possible CSSB 251 HESS

Dear Senator Fahrenkamp,

Thank you for the recent memo concerning exemptions to the psychology statutes.

In case you are considering a committee substitute for SB 251, I have three items to call to your attention.

One. The first suggestion comes from a recent review of the tapes of the Sept. 12 & 13, 1985 meeting of the Board of Psychologist ... Examiners . The board has passed a resolution to delete " counseling or psychometrics " from AS 08.86.170(b) and "counseling or psychometry" from AS 08.86.190(b), and replace the terms with "psychology". I recommend this substitution since it would bring the sections in line with regulations the board adopted last year (i.e., 12AAC60.180 (b))--even if this, the reverse order, it at least makes the statutes and regulations consistent. The proposed change is enclosed on a work draft of the statutes marked Exhibit A.

Two . It may be appropriate to add the following to the end of the confidentiality section in AS 08.86.200 : " Notwithstanding the provisions of this section, a psychologist or a psychological associate must report knowledge of child abuse or neglect as required by AS 47.17.020" (Exhibit B). The psychology board may also want to include a statement concerning the duty to report threats of harm to others (including adults).

Three . The language current extant in AS 08.86.162 (1) was deleted from AS 08.86.130 (1) in 1980. It may be appropriate to also delete it from AS 08.86.162(1). The apparent issue here is current behavior and character. Exhibit C includes a consideration of " Character and Fitness" from the article, "Challenging licensure and certification."

Sincerely yours,


Robert M. Arvidson

Encs: As stated.
cc: Senator Jay Kerttula

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574
Jan. 27, 1986

Mrs. Jenny Logsdon
Senator Kerttula's Office
Alaska State Legislature
Pouch V
Juneau , Alaska 99811

Re: SB 251-Licensing of psychological associates as psychologists.

Dear Jenny,

This morning you informed me by telephone that Mr. Berry M. Levit, M. Ed., of 1867 Airport Way, Fairbanks, AK, 99701, has suggested an amendment to SB 251 that would allow psychological associates to petition the psychology board for licensure as psychologist after five years of supervised experience.

I would be willing to support the amendment, but only with the following stipulations:

- (1). The applicant must pass the required examination at the psychologist level(12AAC60.140
- (2). The five years of supervised experience must be obtained after licensure as a psychological associate and licensure must be in effect during this required period.
- (3). The applicant must have the recommendation of his supervisor, and
- (4). The candidate presents written evidence of professional growth beyond continuing education requirements. This evidence may consist of, but is not limited to the following:
 - or (a). Completion of the equivalent of one academic year of graduate study in an appropriate speciality.
 - or (b). Authorship of a published article, book, or monograph related to psychology.
 - or (c). Presentation of a psychology paper at a professional meeting.
 - or (d). Presentation of clinical case material to the psychology board or a panel approved by the board, and defense of the material.
 - or (e). Satisfactory completion of a course of study with a licensed psychologist or other individual approved by the board (see AS 08.08.207 for an example of a tutorial program for law clerks).
 - or (f). Other evidence of a significant contribution to psychology.
- (5). The time limitations for the successful completion of the above, except for the five years of supervised experience after licensure shall be liberally construed.

The above is a suggested outline. A candidate for full licensure should not have to retake the required objective examination if the necessary score has already been obtained. The general idea that I am trying to convey here is that there should be some type substantive requirement beyond the completion of five years of supervised experience for full licensure of psychological associates as psychologists.

As we discussed earlier, the doctoral degree is the recognized terminal degree for professional psychologists, and only four states now provide for full licensure of master level applicants.

It is most unfortunate that Alaskan universities have not developed doctoral level programs in psychology. The existence of such programs would provide an opportunity for completion of a doctorate and full licensure for associates.

Mrs. Logsdon
Jan. 27, 1986
Page 2.

To be frank, I feel that SB 251 is caught in the middle between opposing forces, with the psychology board on one side, and psychological associates on the other. That I support the need for licensure of psychological associates is due to the fact that Alaska needs all of the competent psychological service providers that it can attract.

However, in all candor, I suspect that the void that is now being filled by psychological associates will be gradually filled by doctoral level psychologists when SB 251 becomes law.

This is a sensitive issue, but I believe that many competent doctoral level psychologists left the state in disgust because they could not obtain licensure under Alaska's ultra-restrictive licensing laws. SB 251 should change the long term outlook, and I think that many doctoral psychologists will want to locate in the state if they are given a reasonable opportunity to present their credentials.

As of April 4, 1985, there were only 15 licensed associates in the state, as compared to 100 licensed psychologists. I predict that with the adoption of SB 251 into law, the ratio of associates/psychologists will become even lower unless licensure is required in exempt agencies where master level psychology providers are traditionally employed.

For the record, the 1981 legislative audit of the psychology board and the Nov. 1985 article, "Challenging licensure and certification," in the American Psychologist were taken into account in determining my position on this issue. As you know, Mr. Leroy Kettler has suggested an amendment to SB 251 that would allow licensure of master level applicants on a par with doctoral applicants, and I do not support his amendment.

I will however, call Dr. John Crowley's attention to Mr. Levit's amendment. I am forwarding a copy of this letter to a board of psychology member and to the psychology departments at the University of Alaska- Anchorage/Fairbanks since they can provide valuable perspectives on this issue.

Best regards,

Sincerely yours,


Robert M. Arvidson

cc: Senator Bettye Fahrenkamp, Senate HESS Committee
Senator Joe Josephson
House HESS Committee
Rep. Bette Cato
Dr. Linda Olsen Webber, Board of Psychologist... Examiners
Dr. M.S. Nagabhushana Rao, Head BSHS, UA/Fairbanks
Dr. Robert J. Madigan, Chair, Psychology Dept., UA/Anchorage
Mr. Berry Levit, M. Ed.
Other interested persons

Florida licensure attacked in suit

By Carol Turkington
Staff Writer

Unlicensed Florida mental health professionals have filed a suit which charges that the state licensing law which excludes them is unconstitutional and discriminatory.

The Florida Psychological Practitioners Association (FPPA) has been granted an injunction against enforcement of the five-year-old licensing law until the suit has been resolved. The injunction does not allow its members to sit for the state's licensing exam, but it temporarily prohibits disciplinary action against them by state officials, according to Ben Poitevent, assistant attorney general and general counsel to the state Board of Psychological Examiners.

Practitioners sued the Department of Professional Regulation and the State Board of Psychological Examiners in their attempt to overturn the law. The Florida Psychological Association later joined the suit as a third defendant.

"The same attacks on various professional chapters and licensing laws have always been unsuccessful," Poitevent said. "The courts consistently uphold the constitutionality of professional statutes. Of course, that doesn't preclude individuals from charging unconstitutionality."

The law which the practitioners are trying to overturn was enacted in 1981 after previous licensing regulations expired in 1979. The law states that, to obtain a license as a psycholo-

gist, a person must pay a fee, pass the examination, meet experience requirements and have received a doctoral degree with a psychology major from a school or program approved by — or comparable to those approved by — the American Psychological Association, among other requirements.

When the new law was enacted, those providers who did not meet the qualifications filed an antitrust suit against the Florida Psychological Association and the American Psychological Association which charged the two organizations had conspired to pass the law to avoid competition. The APA was dropped from the suit in 1982. That case, still pending, has been set aside until the new suit is settled.

The practitioners object to educational requirements included in the new law that disqualify for licensure many practitioners who "have been practicing for many years and who were practicing prior to the enactment of the statute," according to their brief. They say that those remaining psychologists who are not excluded will be "greatly benefitted" as a result of the law.

The practitioners assert that they are in the same class with licensed psychologists, psychotherapists and mental health counselors because they had practiced psychology under the old, less restrictive law, and during the two-year hiatus when Florida essentially had no licensing law.

The FPPA claims that the classification in the new law serves no legitimate state interest and is an "arbitrary classification" between "persons similarly situated." They believe that the statute unlawfully delegates legislative authority by giving the psychology examining board "unbridled discretion" to "determine who will and who won't practice, and does not es-

tablish standards to evaluate applicants for licensure or to guide them in evaluating schools or colleges.

"Those persons who are members of, or who are graduates of, programs approved by the APA or state universities are favored over non-members of the APA or graduates with degrees from other schools having programs even superior but not comparable to those approved by the APA," the brief states.

Attorneys for the defendants are confident that the court will act quickly to uphold the law.

"We believe that, when the dust settles, the statute will be upheld on the very issues [the FPPA attorney] now raises," Poitevent said.

"The great bulk of licensed psychologists in the state are members of the FPA," he went on, "and the unlicensed psychologists have formed the FPPA mainly to attack the statute."

The circuit court was expected last month to set a trial date. Poitevent also hoped by that time to have filed a motion for summary judgment. If the court grants a motion for summary judgment, there would be no trial.

Even if the practitioners fail to overturn the law, it will expire in October 1988. State legislators have promised to insert similar sunset language into any new legislation if mental health providers cannot agree on the contents of such a bill. ■

Miranda rights not tied


main silent and to have a lawyer present during questioning.

Greenfield said he wanted to talk to a lawyer, and thanked the police for telling him of his rights. He later pleaded not guilty by reason of insanity, but was convicted of sexual battery and received a life sentence. His con-

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(517) 437-7341

February 25, 1966

Mr. Robert M. Arvidson
Box 258
Cordova, AK 99574

Dear Mr. Arvidson:

Thank you for your kind words about "Challenging Licensure and Certification." I am glad the article has proved useful to you. I also appreciate the information about SB251; I had not heard about the movement to change the licensure requirements in Alaska.

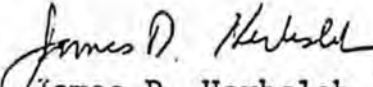
In regard to your question about the states which allow full licensure at the masters level, I am enclosing a copy of a table taken from a draft copy of

Stigall, T. T. (1983). In B. D. Sales (Ed.)
Professional psychologist's handbook (pp. 285-337).
New York: Plenum Press.

As you will see, Iowa, Missouri, West Virginia, and Pennsylvania are the states where full licensure is permitted with only a masters degree. I hope this information proves useful to you. Stigall's chapter is an excellent, still fairly up-to-date summary of the licensure requirements in all 50 states. It might prove to be a valuable reference for you.

Good luck in your encounters with the legislature. I would appreciate it if you could take the time to drop me a line and let me know how it turns out. Thanks.

Sincerely,


James D. Herbsleb

JDH:d1v

Enclosure

SEE COVER LETTER

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point ^b
			Total	Pre	Post	Written	Oral	
Ala.	Psychologist	Doctoral	0			x	x	\bar{x}
Alas.	Psychologist	Doctoral	1			x		-1 S.D.
	Psychological Associate	Masters	3			x		-1 S.D.
Ariz.	Psychologist	Doctoral	0			x		\bar{x}
Ark.	Psychologist	Doctoral	1			x	x	-2/3 S.D.
	Psychological Examiner	Masters	0			x	x	-1 S.D.
Calif.	Licensed Psychologist	Doctoral	2		1	x	x	\bar{x}
	Educational Psychologist ^c	Masters	3			x	x	
	Psychological Assistant ^d	1 yr. grad. psych. ^e						
Colo.	Psychologist	Doctoral	2		2	x		75% ^f
Conn.	Psychologist	Doctoral	1		1	x	x	25%ile
Del.	Psychologist	Doctoral			5 or 2	x	x	-1 S.D.
D. C.	Psychologist	Doctoral	2		2	x	x	-1 S.D.
Fla.	Psychologist	Doctoral	2	1		x	x	35%ile

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point ^b
			Total	Pre	Post	Written	Oral	
Ga.	Licensed Applied Psychologist	Doctoral	1			x	x	75% correct
Haw.	Psychologist	Doctoral	1			x	x	-1 S.D.
Ida.	Psychologist	Doctoral	2		2	x	x	-½ S.D.
Ill.	Psychologist	Doctoral	2			x		-1 S.D.
Iri.	Psychologist (Pvt. Practice)	Doctoral	3		3	x	x	-1½ S.D.
	Psychologist (Basic)	Doctoral	0				x	
Ia.	Psychologist	Doctoral	1			x	x	75% correct
	Psychologist	<u>Masters</u>	5			x	x	75% correct
	Associate Psychologist	Masters	0			x	x	75% correct
Kan.	Psychologist	Doctoral	2		1	x		-¾ S.D.
Ky.	Psychologist	Doctoral	1			x	x	-1 S.D.
	Certificand	Masters	1			x	x	-2 S.D.
La.	Psychologist	Doctoral	2		2	x	x	25%ile
Me.	Psychologist	Doctoral	2			x	x	-¾ S.D.
	Psychological Examiner	Masters	1			x	x	-1 S.D.

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point
			Total	Pre	Post	Written	Oral	
N. H.	Psychologist	Doctoral	2			x	x	-1 S.D.
	Associate Psychologist	Masters	0 ✓					
N. J.	Practicing Psychologist	Doctoral	2		1	x	x	-1 S.D.
N. Mex.	Psychologist	Doctoral	2		2	x	x	75% correct
N. Y.	Psychologist	Doctoral	2			x		-1 S.D.
N. C.	Practicing Psychologist	Doctoral	2		2	x	x	-1 S.D.
	Psychological Examiner	Masters	0 ✓			x	x	-1½ S.D.
N. Dak.	Psychologist	Doctoral	0 ✓			x	x	X
Oh.	Licensed Psychologist	Doctoral	2		1	x	x	70% correct
	Licensed School Psychologist	Masters	4		3	x		
Okla.	Psychologist	Doctoral	2		1	x	x	-3/4 S.D.
Oreg.	Psychologist	Doctoral	2			x	x	X
	Psychologist Associate	Masters	4		3	x	x	-1 S.D.
Pa.	Psychologist	Doctoral	2		2	x		65% correct
	Psychologist	Masters	4		4	x		65% correct

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience		Examination		EPPP Pass Point ^{bf}
			Total	Pre Post	Written	Oral	
Md.	Psychologist	Doctoral	2	1	x	x	-3/4 S.D.
Mass.	Psychologist	Doctoral	2	1	x	x	-1 S.D.
Mich.	Psychologist	Doctoral	2	2	x		<div style="border: 1px solid black; width: 100px; height: 20px;"></div>
	Limited Psychologist	Doctoral	0				
	Limited Psychologist	Masters ^g	0				
Minn.	Licensed Consulting Psychologist	Doctoral	2	2	x	x	-1 S.D.
	Licensed Psychologist	Masters	2	2	x	x	-1½ S.D.
Miss.	Psychologist	Doctoral	1	1	x	x	75% correct
Mo.	Psychologist	Doctoral	1	1	x	x	h
	Psychologist	Masters	3	3	x	x	h
Mont.	Psychologist	Doctoral	2	1	x	x	X
Neb.	Licensed Psychologist	Doctoral	0		x		-3/4 S.D.
	Certified Clinical Psychologist	Doctoral	1		x ^j	x ^j	
Nev.	Psychologist	Doctoral	1	1	x	x	75% correct

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point ^b
			Total	Pre	Post	Written	Oral	
R. I.	Psychologist	Doctoral	2		1	x	x	-1 S.D.
S. C.	Psychologist	Doctoral	0			x	x	-1 S.D.
S. Dak.	Psychologist	Doctoral	2			x	x	-1 S.D.
	Associate Psychologist	Masters	1			x	x	-1½ S.D.
	Psychological Technician ^d	Baccalaureate	0					
Tenn.	Psychologist	Doctoral	1			x	x	26%ile
	Psychological Examiner	Masters	k			x	x	9%ile
Tex.	Licensed Psychologist	Doctoral	2		1	x	x	-½ S.D.
	Certified Psychologist	Doctoral	0			x	x	-½ S.D.
	Psychological Associate	Masters	0			x		
Ut.	Psychologist	Doctoral	2			x		70% correct
Vt.	Practicing Psychologist	Doctoral	3		2	x	x	-½ S.D.
	Psychological Associate	Masters	4		3	x	x	-1 S.D.

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point ^{b)}
			Total	Pre	Post	Written	Oral	
Va.	Psychologist	Doctoral	2		1	x	x	-1 S.D.
	Clinical Psychologist	Doctoral	2		1	x	x	-1 S.D.
	School Psychologist	Masters	4		1	x	x	-1 S.D.
Wash.	Psychologist	Doctoral	1		1	x	x	\bar{X}
	Psychological Affiliate	Masters	3		1	x	x	-1/2 S.D.
	Psychological Assistant	Masters	3		1	x	x	-1/2 S.D.
W. Va.	Psychologist	Doctoral	2		2	x	x	-1 S.D.
	Psychologist	Masters	8		8	x	x	-1 S.D.
Wis.	Psychologist	Doctoral ^m	1			x		\bar{X}
	School Psychologist	Masters						
Wyo.	Psychologist	Doctoral	0			x	x	\bar{X}
Alta.	Certified Psychologist	Masters	0			x		
B. C.	Psychologist	Doctoral	1			x		-1/2 S.D.
Man.	Psychologist	Doctoral	1			x	x	-1 S.D.

16 States
NO experience required

Table 2
Requirements for Credential

Jurisdiction	Title	Education ^a	Experience			Examination		EPPP Pass Point ^b
			Total	Pre	Post	Written	Oral	
N. B.	Psychologist	Doctoral	1			x		
Ont.	Psychologist	Graduate	1			x	x	15
Que.	Psychologist ⁿ	Postgraduate ^o	0	—				
Sask.	Psychologist	Doctoral	0	—		x		

Note: All jurisdictions have general requirements such as age, citizenship or residency, and character. Some jurisdictions may require continuing education for renewal of the credential, including Arkansas, California, Colorado, Georgia, Iowa, Maryland, Michigan, Minnesota, Nevada, New Mexico, Oregon, South Dakota, Utah, Vermont, Washington, West Virginia.

^a Minimum level required.

^b All values relative to national norms on the Examination for Professional Practice in Psychology (EPPP), unless otherwise noted.

^c Licensed by Board of Behavioral Science Examiners under provisions of Calif. Bus. and Prof. Code Art. 5, Sec.

17860-17870.

Table 2

Requirements for Credential

- d Statutorily recognized title; no credential issued.
- e Must continue graduate coursework in psychology until graduate degree earned.
- f 75% of highest score nationwide for given form and administration of EPPP.
- g Degree must have been earned on or before September 30, 1980; application must have been filed with the board not later than September 30, 1981.
- h First administration of the EPPP on October 19, 1979.
- i Predoctoral clinical internship plus one year postdoctoral experience, or three years postdoctoral experience including approved internship.
- j Examination not required for licensed psychologist with clinical internship and appropriate experience.
- k Varies with declared competency area(s).
- l Special application only.
- m In accordance with requirements for highest level of certification as a school psychologist established by Dept. of Public Instruction.
- n Working knowledge of French language required.
- o Doctorate, licentiate, or masters.

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574

March 7, 1986

Senator Bettye Fahrenkamp
Ch: Senate HESS Committee
P.O. Box V
Juneau, Alaska 99811

Re: Draft CSCB 251 (HESS); 847 Designated doctoral programs in psychology.

Dear Senator Fahrenkamp and Committee Members,

I am enclosing , for the HESS Committee's information, several pages from the 1985 edition of Designated Doctoral Programs in Psychology, referred hereinafter to as the Register. As you will recall, this type of designation was referred to by Dr. Walt Voigt of CIIS in his Feb. 10, 1986 letter of support for SB 251.

The enclosed material and partial summary below are for informational and comparison purposes only; there is no particular endorsement of the designation system on my part. The committee may want to compare it with material and data presented in my letters of Jan. 17, 1986 and Feb. 22, 1986.

The Register identifies (if I have counted correctly) 847 doctoral programs in 219 U.S. institutions of higher education based on the enclosed criteria. The 847 programs satisfy what the Register considers to be the basic requirements for a recognized doctoral degree in psychology. If a psychologist meets this and other criteria specified in the enclosed material, and pays \$225.00, the psychologist is eligible for listing in what is known as the National Register, which is independent of the American Psychological Association (APA). There were 14,500 listings of licensed/certified psychologists in the 1985 National Register (APA membership exceeds 80,000; 30,900 APA members were licensed as of Feb. 1985).

While this listing of 847 designated programs dwarfs the 192 APA approved programs referred to in my letter of Jan. 17, 1986, it falls short of the 1200 programs identified (or referred to) in my letter of Feb. 22, 1986. A cursory review of the Register indicates that it does not include all of the regionally accredited schools that have doctoral programs in psychology, such as for example, Union Graduate School or the Fielding or Saybrook Institutes (or others; nor of course does it include any of the 1400 master level programs in psychology-see apa Monitor, p. 14, Jan., 1986)

Since SB 251 is based on California licensure law, I note that the Register lists 68 different doctoral programs in 21* universities or professional schools. Eleven of these psychology programs have some form of APA approval as I indicated before in my Feb. 1986 "Questions and Answers" paper. Perhaps California may have something to offer, testimony from interior Alaska during the Feb. 11, 1986 tele/c. notwithstanding.

* California

Senator Fahrenkamp / HESS
March 7, 1986
Page 2

Again, referring to the Feb. 11, 1986 teleconference, perhaps these 847 doctoral programs defined by identifiable criteria may be useful to the Alaska psychology board in their quest for professional educational standards. The criteria used by the Register are quite similar to the criteria listed in California Register No. 1386 for the equivalency provision (q.v. my letter of Jan. 3, 1986).

I am enclosing the page for Alaska's listing in the Register and the Harvard University listing since this great institution has been referred to in past communications.

There is a multitude of different types of programs listed in the Register. If I may be allowed a light moment in this tedious task of counting schools and programs, I suspect that you and the committee will be relieved to know that I am not going to list , or even count the different types of psychology doctoral sanctioned by the Register.

With best wishes,

Sincerely,


Robert M. Arvidson

Encs: As stated.

cc: Senators Kerttula, Josephson and Eliason
House HESS (file)

Ms. Nancy Dunn, Director Div. Occupational Licensing.

Other interested persons.



COUNCIL FOR THE NATIONAL REGISTER
OF HEALTH SERVICE PROVIDERS IN PSYCHOLOGY

1200 Seventeenth Street, N.W., Suite 600
Washington, D.C. 20036 202/833-2377

INVOICE 3844

February 25, 1986

Robert M. Arvidson, Ph.D.
Box 258
Cordova, AK 99574

YOUR ORDER NO.

TERMS-CASH

PLEASE MAKE CHECK PAYABLE TO: NATIONAL REGISTER
NO RECEIPT WILL BE SENT UNLESS REQUESTED

One 1985 Designated Doctoral Programs in Psychology \$7.00



Designated Doctoral Programs
in
Psychology
1985

© 1985 by the Council for the National Register of Health
Service Providers in Psychology, 1200 Seventeenth Street,
N.W., Washington, D.C. 20036

1985 DESIGNATION

MASSACHUSETTS (Cont'd.)

CLARK UNIVERSITY (Cont'd)

Department of Psychology (Cont'd)

- c. Experimental (1981)
- d. Physiological (1981)
- e. Social/Personallty (1981)

HARVARD UNIVERSITY

Department of Psychology & Social Relations

- a. General Psychology (1981)
- b. Social Psychology (1981)

Graduate School of Education

Program in Counseling & Consulting Psychology

- a. Counselling & Consulting Psychology (1981)

UNIVERSITY OF MASSACHUSETTS

Department of Psychology

- a. Clinical (APA) (1981)
- b. Cognitive (1984)
- c. Developmental (1982)
- d. Developmental Disabilities (1984)
- e. Developmental Pediatrics (1981)
- f. Educational (1984)
- g. Neuroscience and Behavior (1984)
- h. Personality (1984)
- i. Social (1984)

School of Education

Division of Human Services & Applied Behavioral Sciences

- a. Counseling Psychology (APA-prov) (1981)

Date in parentheses is year initially designated by National Register.

1985 DESIGNATION

MASSACHUSETTS (Cont'd)

MASSACHUSETTS SCHOOL OF PROFESSIONAL PSYCHOLOGY

- a. Clinical (1985)

NORTHEASTERN UNIVERSITY

Department of Psychology

- a. Experimental (1981)

TUFTS UNIVERSITY

Department of Psychology

- a. General Experimental (1981)

Date in parentheses is year initially designated by National Register.

INTRODUCTION

This is the fifth edition (1985) of Designated Doctoral Programs in Psychology. The publication identifies doctoral programs in psychology which meet the guidelines developed at the 1977 national conference on Education and Credentialing in Psychology held in Washington, D.C. The 1985 publication updates the 1984 edition. Information and update forms were received from universities identifying new programs, changes in existing programs, organizational changes, and other modifications. In addition to communications with Department Chairs, Program Directors, and other faculty, additional information was submitted through university catalogs, program descriptions, brochures and other descriptive material.

The National Register's designation effort began in 1980. The data which served as the basis for the development of the designation publications included a survey of all doctoral programs listed in the APA publication, "Graduate Study in Psychology" (1980), communications with the American Association of State Psychology Boards (AASPB), the State Boards of Examiners in Psychology, contacts with the Council of Graduate Departments of Psychology (COGDOP), information from thousands of applications for listing in the *National Register*, transcripts of academic work from applicants, contacts with university faculty, administrators and program directors, and reference materials from the Council on Postsecondary Accreditation (COPA), and the American Psychological Association (APA).

The 1985 publication is based on the above sources of information in addition to recent communications on specific programs. The review of the programs on the basis of the guidelines does not, in itself, involve determination of the educational quality of the program.

Since the publication of the first edition in 1981, the National Register has published Designated Doctoral Programs in Psychology on an annual basis. All reasonable efforts have been made to maintain accurate and current information. The review of information is an ongoing process. Please note the insert in this booklet which may be used to inform us of new information, corrections or revisions of the existing information.

The National Register's effort in identifying Designated Doctoral Programs in Psychology is part of the field's continuing concern

1985 DESIGNATION

with improving the education and credentialing system in the interest of both the public and the profession. We are pleased that the National Register's publication has been found useful and helpful by a number of groups, and it has become an important professional resource.

This publication is also used by the National Register to facilitate the application review process. In the absence of special circumstances, graduates of programs listed can expect their academic work and degrees to be acceptable in meeting one of the three basic requirements for listing in the National Register, a doctoral degree in psychology.* Applicants to the National Register who have earned their degrees from programs not included here will be carefully evaluated on an individual basis.

It is important to note that the list is designed to facilitate the review of applications for listing in the National Register and that it does not purport to include at this time all programs which meet the stated guidelines. That is, the programs listed are those which were known to us and from which information was submitted or was available in April 1985 in support of meeting the guidelines. There may be other programs which meet the guidelines for which we did not have sufficient information available to include them at the time of the compilation of this publication.

It has been the policy of the National Register to support a comprehensive designation system that will serve the public and prospective students as well as the profession. The guidelines used for listing in the National Register and for the development of the designation publication strongly endorse the principle that the general science of psychology forms the basis for the application of psychological knowledge in professional practice.

The 1985 edition again contains the date the program was first recognized by the National Register as a designated program in psychology. It is important to emphasize that since the first publication of *Designated Doctoral Programs in Psychology* was available in 1981, the date does not necessarily reflect the date the

* In addition to the doctoral degree in psychology, the criteria for listing in the National Register include an active license or certificate from the State Board of Examiners of Psychology and two years of supervised experience in health services in psychology with one year in an organized health service training program or internship in psychology and one year of post doctoral supervised experience in health services in psychology.

1985 DESIGNATION

program was initiated at the educational institution. The date indicates the year the program was first recognized by the National Register as meeting the guidelines based on information available to us. If there were any changes in the program including emphasis, title, or other modification from a similarly listed program, it was considered a "new" program and identified as (1985). It may be, therefore, that the core elements of the program were present for some time but that as a result of the modifications, it is identified as a program listed since 1985.

On the basis of feedback from the 1984 edition, we have included the explanation of the notations as a footnote on each page.

We invite comments and updates on the information in this publication.

Vera S. Paster, Ph.D.
Chair, Board of Directors

Alfred M. Wellne, Ph.D.
Executive Officer

May 1985

GUIDELINES* FOR DEFINING "DOCTORAL DEGREE IN PSYCHOLOGY"

The following criteria will be used to identify doctoral programs as psychology programs:

1. Programs that are accredited by the American Psychological Association are recognized as meeting the definition of a professional psychology program. The criteria for accreditation serve as a model for professional psychology training,

or all of the following criteria, 2 through 10

2. Training in professional psychology is doctoral training offered in a regionally accredited institution of higher education.

3. The program, wherever it may be administratively housed, must be clearly identified and labeled as a psychology program. Such a program must specify in pertinent institutional catalogues and brochures its intent to educate and train professional psychologists.

4. The psychology program must stand as a recognizable, coherent organizational entity within the institution.

5. There must be a clear authority and primary responsibility for the core and specialty areas whether or not the program cuts across administrative lines.

6. The program must be an integrated, organized sequence of study.

7. There must be an identifiable psychology faculty and a psychologist responsible for the program.

8. The program must have an identifiable body of students who are matriculated in that program for a degree.

9. The program must include supervised practicum, internship, field or laboratory training appropriate to the practice of psychology.

10. The curriculum shall encompass a minimum of three academic years of full time graduate study. In addition to instruction in scientific and professional ethics and standards, research design and methodology, statistics and psychometrics, the core program shall require each student to demonstrate competence in each of the following substantive content areas. This typically will be met by including a minimum of three or more graduate semester hours

* As developed by the Education and Credentialing in Psychology Meeting in 1977.

1985 DESIGNATION

(5 or more graduate quarter hours) in each of these 4 substantive content areas:

a) Biological bases of behavior: Physiological psychology, comparative psychology, neuropsychology, sensation and perception, psychopharmacology.

b) Cognitive-affective bases of behavior: Learning, thinking, motivation, emotion.

c) Social bases of behavior: Social psychology, group processes, organizational and systems theory.

d) Individual differences: Personality theory, human development, abnormal psychology.

In addition, all professional education programs in psychology will include course requirements in specialty areas.

1985 DESIGNATION

ALABAMA

UNIVERSITY OF ALABAMA, UNIVERSITY

Department of Psychology

- a. Clinical (APA)* (1981)**
- b. General Experimental (1981)
- c. Mental Retardation/Developmental Disability (1981)

UNIVERSITY OF ALABAMA, BIRMINGHAM

Department of Psychology

- a. Behavioral Neuroscience (1982)
- b. Clinical (specialization in Medical Psychology) (1982)

AUBURN UNIVERSITY

Department of Psychology

- a. Clinical (APA) (1981)
- b. Experimental (1981)
- c. Industrial/Organizational (1981)

Department of Counselor Education

- a. Counseling Psychology (1984)

ALASKA

NO DOCTORAL PROGRAMS

* The following notations are used to indicate programs which have been approved (February 1985) by the APA, Committee on Accreditation:

(APA) = full approval

(APA-prcv.) = provisional

(APA-probation) = programs on probation

** Year program first listed in Designated Doctoral Programs in Psychology (See Introduction)

1985 DESIGNATION

CALIFORNIA

BIOLA UNIVERSITY

Rosemead School of Psychology

- a. Clinical, Ph.D. (1981)
- b. Clinical, Psy.D. (APA) (1981)

CALIFORNIA SCHOOL OF PROFESSIONAL PSYCHOLOGY,
BERKELEY

- a. Clinical (APA) (1981)

CALIFORNIA SCHOOL OF PROFESSIONAL PSYCHOLOGY,
FRESNO

- a. Clinical (APA) (1981)
(with proficiencies in Child/Family,
Neuropsychology/Behavioral Medicine, or Rural
Community)

CALIFORNIA SCHOOL OF PROFESSIONAL PSYCHOLOGY,
LOS ANGELES

- a. Clinical (APA-prov.) (1981)
 - 1. Health Psychology
- b. Organizational (1985)

CALIFORNIA SCHOOL OF PROFESSIONAL PSYCHOLOGY,
SAN DIEGO

- a. Clinical (APA) (1981)
- b. Industrial/Organizational (1984)

Date in parentheses is year initially designated by National Register.

1985 DESIGNATION

CALIFORNIA (Cont'd.)

UNIVERSITY OF CALIFORNIA, BERKELEY

Department of Psychology

- a. Biological (1981)
 - b. Clinical (APA) (1981)
 - c. Cognitive (1981)
 - d. Developmental (1981)
 - e. Personality (1981)
 - f. Quantitative (1981)
 - g. Social/Organizational (1981)
- Graduate School of Education,
Division of Educational Psychology
- a. Educational Psychology (1981)
 - b. School Psychology (APA) (1981)

UNIVERSITY OF CALIFORNIA, DAVIS

Department of Psychiatry,
Graduate Group of Clinical Psychology

- a. Clinical Psychology (1981)

UNIVERSITY OF CALIFORNIA, IRVINE

School of Biological Sciences,
Department of Psychobiology

- a. Psychobiology (1981)

School of Social Sciences

- a. Cognitive Sciences (Experimental Psychology)
(1981)

UNIVERSITY OF CALIFORNIA, LOS ANGELES

Department of Psychology

- a. Clinical (APA) (1981)
- b. Cognitive (1981)
- c. Developmental (1981)

Date in parentheses is year initially designated by National Register.

1985 DESIGNATION

CALIFORNIA (Cont'd.)

UNIVERSITY OF CALIFORNIA, LOS ANGELES (Cont'd)

Department of Psychology (Cont'd.)

- d. Learning & Behavior (1981)
- e. Measurements & Psychometrics (1981)
- f. Personality (1981)
- g. Physiological (1981)
- h. Social (1981)

UNIVERSITY OF CALIFORNIA, RIVERSIDE

Department of Psychology

- a. Comparative (1981)
- b. Cognitive (1985)
- c. Developmental (1981)
- d. Physiological (1981)
- e. Social-Personality (1981)

UNIVERSITY OF CALIFORNIA, SAN DIEGO

Department of Psychology

- a. Experimental (1981)
(Specializations in Applied Social Science, Cognitive Science, Developmental, Basic and Applied Learning & Motivation, Perception, Physiological, Psycholinguistics, Social, Visual Science)

UNIVERSITY OF CALIFORNIA, SAN FRANCISCO

School of Medicine

Graduate Group in Psychology

Department of Psychiatry

- a. Health Psychology (1981)

Date in parentheses is year initially designated by National Register.

1985 DESIGNATION

CALIFORNIA (Cont'd.)

UNIVERSITY OF CALIFORNIA, SANTA BARBARA

Department of Psychology

- a. Biopsychology (1981)
- b. Developmental (1981)
- c. Learning, Memory & Cognition (1981)
- d. Perception (1981)
- e. Personality (1981)
- f. Social (1981)

Graduate School of Education

- a. Counseling Psychology (APA) (1981)

CALIFORNIA INSTITUTE OF INTEGRAL STUDIES

- a. Clinical Psychology (1985)

CLAREMONT GRADUATE SCHOOL

Department of Psychology

- a. Applied Cognitive (1981)
- b. Applied Research Methodology (1984)
- c. Applied Social/Environmental (1981)
- d. Organizational Behavior (1984)

FULLER THEOLOGICAL SEMINARY

Graduate School of Psychology

- a. Clinical (APA) (1981)

UNIVERSITY OF SOUTHERN CALIFORNIA

Department of Psychology

- a. Aging (1984)
- b. Clinical (APA) (1981)
- c. Developmental (1981)

Date in parentheses is year initially designated by National Register.

CALIFORNIA (Cont'd.)

UNIVERSITY OF SOUTHERN CALIFORNIA (Cont'd)

Department of Psychology (Cont'd)

- d. Experimental (1981)
- e. Quantitative (1981)
- f. Social (1981)

School of Education

Department of Counseling and Special Education

- a. Counseling Psychology (1981)

STANFORD UNIVERSITY

Department of Psychology

- a. Developmental (1982)
- b. Experimental (1981)
- c. Personality (1982)
- d. Physiological (1982)
- e. Social (1982)

School of Education

Committee on Psychological Studies in Education

(APA-REV)

- a. Counseling Psychology (1981)
- b. Counseling Psychology (Health Psychology) (1983)

UNITED STATES INTERNATIONAL UNIVERSITY

School of Human Behavior

Division of Psychology

- a. Clinical (1981)
- b. Clinical Sports (1983)
- c. General (1985)
- d. Industrial and Organizational (1984)
- e. Marriage & Family Therapy (1981)
- f. Psychology of Chemical Dependence (1981)

Date in parentheses is year initially designated by National Register.

COLORADO

COLORADO STATE UNIVERSITY

Department of Psychology

- a. Counseling (APA) (1981)
(Option in School Certification)
- b. Experimental (1981)
- c. Industrial/Organizational (1981)

UNIVERSITY OF COLORADO

Department of Psychology

- a. Behavioral Genetics (1985)
- b. Behavioral Neurosciences (1985)
- c. Clinical (APA) (1981)
- d. Cognitive (1985)
- e. Learning and Motivation (1985)
- f. Social (1983)
- g. Socio-Cultural (1985)

UNIVERSITY OF DENVER

Department of Psychology

- a. Clinical (APA) (1981)
- b. Developmental (1981)
- c. General Experimental (1981)

School of Professional Psychology

- a. Clinical (APA) (1981)

School of Education

- a. Counseling Psychology (1983)

UNIVERSITY OF NORTHERN COLORADO

Department of Professional Psychology

- a. Counseling (1982)
- b. School (APA) (1982)

Date in parentheses is year initially designated by National Register.

MEMORANDUM

State of Alaska

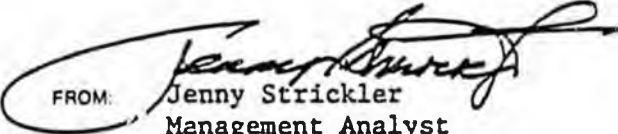
TO: Sandra Schubert, Aide
to Senator Fahrenkamp

DATE: March 10, 1986

FILE NO:

TELEPHONE NO:

FROM:


Jenny Strickler
Management Analyst
Division of Occupational -
Licensing

SUBJECT: Reference to SB 251

Attached please find the following information which the board uses to determine equivalency of psychology programs which are not approved by the American Psychological Association Education and Credentialing Committee:

1. Criteria for Designation of Doctoral Program Checklist; and
2. Criteria for Designation of Doctoral Programs in Clinical, Counseling and School Psychology.

Item #2 above is a listing of standard criteria developed by the APA Education and Credentialing Committee. Any educational program which meets the criteria for designation of doctoral programs in clinical, counseling and school psychology, including APA approved programs are considered to be equivalent.

This is our understanding and is subject to confirmation from the Chairman of the Board.

Also enclosed for your information:

1. Guidelines for Defining "Doctoral Degree in Psychology";
2. Ethical Standards of Psychologists.

We have researched records of licensees from 1983 to date and the records reflect the following:

Licenses issued since 1983 = 36

32 are licensed psychologists
4 are licensed psychological associates

Of the 32 licensed psychologists, 6 were from non-accredited APA programs.

You have also requested our assistance in suggesting options to offer the committee. The following are suggestions for your consideration:

1. Require in statute that the board provide applicants with the criteria used to evaluate their program.

Sandra Schubert
Page 2

March 10, 1986

The criteria presently established by the APA Education and Credentialing Committee is revised periodically and therefore, we would not recommend that this be placed in statutes.

2. Another suggestion is to clarify the language found in AS 08.86.130(2) and AS 08.86.150(1) to clearly identify schools approved by the board using nationally accepted criteria as defined in regulations.

The current language "accredited school with an approved program" tends to mislead applicants in thinking that this automatically refers to APA approved schools. This language is further defined in AS 08.86.230(11) to include equivalent programs as determined by the board.

We suggest that clarifying the language in those sections would eliminate the perception problem and would not require a definition. Also, in requiring that the board use nationally accepted criteria defined in regulations would prevent the possibility of inconsistencies in reviewing various programs.

If you have any further questions, please call me at 465-2144.

Enclosures

cc: Board members

SENATE BILL 251 - QUESTIONS & ANSWERS

Robert M. Arvidson
Box 258; Cordova, Alaska 99574
February 1986

This brief paper focuses on some of the questions that have been asked about SB 251, "An Act relating to regulation of the practice of psychology; and providing for an effective date." This bill was introduced in the Alaska Senate on March 22, 1985 by Senator Kerttula and Senator Josephson and is currently in the Senate HESS Committee.

Q. What is the purpose of SB 251?

A. The purpose of any licensure law is for the protection of public health, safety, and welfare. In addition to continuing the public safety features of the psychology statutes (AS 08.86), the purpose of SB 251 is to enhance mental health efforts in the state by expanding the recognition given to doctoral degrees held by applicants for psychology licensure. This will be accomplished by the repeal of the "approved program" stipulation in the current psychology statutes. "Approved program" refers to the requirement that applicants for licensure must be graduates of programs approved by the American Psychological Association (APA) or its equivalent as determined by the board.

Q. Why is this repeal necessary?

A. The APA "approved program" requirement is unnecessarily restrictive and has an adverse effect on mental health efforts in the state because it discourages qualified applicants from non-approved schools from applying for licensure in Alaska where mental health professionals are needed. Only slightly more than one-half of the 350 professional schools and universities in the nation that grant the doctorate in psychology are approved by the APA. Almost all of these non-APA approved schools are accredited by at least one recognized accrediting body, such as a state department of education or a regional agency.

Q. What about the equivalency provision ?

A. It is basically meaningless and inoperative as far as psychology licensure in Alaska is concerned.

Q. Is there evidence for this?

A. Yes. It is part of the public record. A review of the official minutes of the psychology board meetings or/and the 1981 legislative audit of the board provides ample evidence of the need for the repeal of "approved program" from the statutes. The repeal of the approved program concept in SB 251 provides for the repeal of the equivalency provision as well.

Q. Why does the psychology board take such a hard line on APA criteria?

A. This is probably due to misguided professionalism. It is also convenient from an administrative point of view. The APA stipulations free the board from having to make decisions. The APA does it for them.

Q. Is this (APA criteria) an unlawful delegation of legislative authority to the APA?

A. Not per se, but it is an unnecessary delegation of legislative authority to the American Psychological Association in Washington, D.C.

Q. What's the alternative?

A. SB 251. This bill will require the board to evaluate applicants according to merit, not on the basis of exclusionary criteria. This is the *raison d'etre* of any board.

Q. Is the use of the APA criteria by the board arbitrary?

A. Yes! The board has not provided the public or the legislature with any evidence that graduates of APA programs are superior to graduates of non-approved programs.

Q. What if all but a handful of programs were approved by the APA? Would the APA requirements be legitimate then?

A. No, not necessarily. This nation and this state are committed to equality. Minority groups have basic rights and these rights must be protected and preserved. On the one hand laws are not generally adopted for a single individual or special groups* and on the other, laws and regulations must not be based upon arbitrary criteria that would exclude certain persons.

Q. Is there a precedent for the provision of SB 251?

A. Yes, SB 251 is based on current California licensure law. The current California law has been in existence for several years and its provisions provide adequate protection for the public. So will SB 251.

Q. What about the requirement for one year of post doctoral supervised experience in SB 251? Doesn't California require two years of post doctoral experience?

A. California does require two years of supervised experience, but one year of this experience may be satisfied by pre-doctoral experience. A doctorate is required for licensure in SB 251 and it is assumed that an applicant will have a variety of supervised experiences by the time the doctorate is obtained. The one year of required post-doctoral supervised experience in SB 251 is the generally accepted standard for the field. The Alaska psychology licensure law is a generic law.

Q. Does Harvard University have an APA-Approved psychology program?

A. No. The psychology doctoral programs in many prestigious universities such as Harvard, Princeton, Stanford and Chicago have research and academic orientations. There is, however, a counseling and consulting program at Harvard in the Graduate School of Education, but it is not APA-Approved. The Counseling psychology program at Stanford received provisional accreditation from the APA on April 19, 1985.

Q. Does the APA certify programs at the Masters level?

A. No.

Q. Can persons with master's degrees practice psychology?

A. In Alaska, master level persons are licensed as psychological associates and can practice psychology under the supervision of a licensed psychologist. An amendment to SB 251 that would allow associates to petition the board for independent status after five years of supervised practice has received some support.

* Exceptions to this are beyond the scope of this paper.

- Q. Isn't the doctorate the terminal professional degree in psychology?
- A. Yes. Only four states now provide for full licensure of applicants with master's degrees. Alaska needs all of the competent mental health practitioners that it can attract.
- Q. How serious are Alaska's mental health problems?
- A. The proposed state operating budget for the Division of Mental Health and Development Disabilities for fiscal 1987 is \$62,381,300.00 (see House Bill 500).
- Q. Does this figure include funds for youth services and child and youth custody?
- A. No, these agencies are separate divisions where the proposed budget comes to \$34,582,100.00. There is also \$12,848,900.00 proposed for vocational rehabilitation in the Dept. of Education budget. Add to this \$5,492,500.00 that is being proposed by the Dept of Public Safety to address problems of domestic violence and sexual assault.
- Q. Is the proposed mental health budget adequate?
- A. No, not really. The proposed operating budget does not contain any specific funds earmarked for research; nor, does the capital construction budget contain any funds for research equipment or facilities.
- Q. What does SB 251 have to do with Alaska's Mental Health budget?
- A. The passage of SB 251 could conceivably lead to lower mental health service costs to individuals and to the state. California psychologists have proved that the private sector can provide mental health services more economically than governmental units. Thus, if the passage of SB 251 attracts qualified psychologists to Alaska, the Div. of Mental Health could contract with the private sector for the delivery of certain services at savings to the state. This situation will not take place overnight. The problems in Alaska are so severe, that Alaska's U.S. Senator Murkowski has recently co-sponsored legislation that will, "authorize the Indian Health Service to prevent and treat alcohol and drug abuse problems among Indians and Alaska Natives," (U.S. Senator Frank Murkowski, Report to Alaskans, Jan. 1986).
- Q. Will psychologists educated in Alaska's state universities qualify for licensure if SB 251 is passed into law?
- A. Psychology graduates of Alaska's universities will only qualify for licensure as psychological associates, since there are no doctoral programs in Alaska. Psychological associates must be supervised for the rest of their professional lives under current law.

- Q. Will Alaskan universities ever develop doctoral programs in psychology?
- A. The answer to that question is not known, but the lack of doctoral programs related to Alaska's number one problem should not be due to shortage of funds. The proposed operating budget for FY1987 for the University of Alaska system is \$275,141,600.00. This figure does not include \$61,365,000.00 for scholarship loan funds; nor does it include \$4,919,100.00 that is proposed for the Alaska Postsecondary Education Commission to implement the WICHE student exchange program. It is not known how many WICHE students, if any, are studying psychology at the doctoral level.
- Q. What does SB 251 have to do with doctoral programs in psychology in Alaskan Universities?
- A. When doctoral psychology programs are finally developed in Alaska's universities, graduates will meet the basic educational requirement of SB 251 and will qualify for full licensure upon completion of one year of post doctoral supervised experience and examination requirements.
- Q. Is Alaska the only state that does not have a psychology doctoral program?
- A. No. Alaska shares this non-distinction with the state of Idaho. The University of Idaho does, however, have a doctoral program in guidance and counseling in Elementary Education.
- Q. Are federal funds available to help develop doctoral programs in Alaskan universities?
- A. In the past, many universities have received substantial grants from the National Institutes of Health and the National Science Foundation for developing graduate programs in psychology. These agencies also fund behavioral science research; the National Institutes of Health, for example, had a budget of \$150 million for biobehavioral research in 1984. This year, the agency will have \$137 million available for behavioral and social science research and training. Many other federal agencies have funds available for research and training.
- Q. SB 251 is based on California psychology licensure law, a law that does not require graduation from an APA approved program. Does California have any APA approved programs?
- A. Yes. Eleven professional schools and universities have APA approved programs in California, including programs in clinical, counseling and school psychology (two of these programs are provisionally approved).

Q. How many professional schools and universities grant the doctorate in psychology in California?

A. According to the 1983 edition of The College Blue Book, there are 22 institutions that grant the doctorate in psychology in California. This total does not include institutions that grant the doctorate in fields such as school psychology, guidance and counseling, human development or psychobiology.

Q. Are these institutions accredited by a recognized accreditation agency?

A. All but one of these institutions are fully accredited by the Western Association of Schools and Colleges (a regional agency). The non-accredited school is California Western University and it is a recognized candidate for accreditation by the National Association of Private Non-traditional Schools and Colleges.

Q. Are all of the campuses of the University of California System APA approved in clinical psychology?

A. No. Only the Berkeley and Los Angeles branches are APA-approved. The campuses at Irvin, Davis, Riverside, San Diego, Santa Cruz, Santa Barbara*, and the University of California Medical Center at San Francisco are all regionally accredited and grant a doctorate in psychology, but are not APA approved. Stanford and Claremont also grant a doctorate in psychology but these universities are not APA approved in clinical psychology. The California Institute of Technology grants a degree in psychobiology but it is not APA approved. The Alaska psychology statutes require licensure to conduct research on human behavior.

Q. What are the implications of the above for Alaska?

A. Under current law, doctoral degrees in psychology granted by these and other institutions across the nation that are known for academic excellence, are not given across the board recognition by the Alaska psychology statutes. Licensure applicants from these institutions must prove (to the Alaska psychology board) that their programs are equivalent to APA approved programs.

Q. Will SB 251 change this?

A. Yes. With the passage of SB 251, any bona fide doctoral degree in psychology or guidance and counseling will satisfy the basic educational requirements for licensure. An applicant will still have to pass a required examination and complete one year of post doctoral supervised experience for full licensure as a psychologist. This means that a doctoral graduate in behavioral neuroscience or psychology from Stanford University who might want to study Alaska's alcohol and drug abuse problem would not have to prove to the Alaska Board of Psychologist and Psychological Associate Examiners that his graduate program is equivalent to the APA approved program at Biola University or Concordia University.

* The Santa Barbara campus has an APA approved program in counseling psychology.

SB 251 ✓

JAN 24 1986

PSYCHOLOGY IN ALASKA: THE APPROVED AND THE NON-APPROVED

Robert M. Arvidson
Box 258, Cordova, Alaska 99574 , January 1986

This short paper is a plea to the Alaska academic community and other concerned individuals for support for Senate Bill 251 which is now pending in the State Legislature. SB 251 entitled, "An Act relating to regulation of the practice of psychology..." may at first appear to be a simple procedural bill, but it is far more wide reaching than that. It contains unmistakable implications for academic freedom, substantive due process and equal protection as well as for mental health.

The importance of SB 251 centers on the repeal of just two words from the psychology licensure statutes- to wit, "approved program" which means a program approved by the American Psychological Association (APA).

As the psychology statutes (AS 08.86) now read, applicants for licensure at either the masters level (psychological associate) or doctoral level (psychologist) must be graduates of programs approved by the APA (or equivalent??). This means that universities and colleges in Alaska and elsewhere must tailor their psychology programs according to arbitrary criteria established by an organization based in Washington, D.C., if they want the Alaska Board of Psychologist and Psychological Associate Examiners to certify their advanced graduates eligible for licensure examinations.

No danger exists that justifies the ultra-restrictive educational requirements in AS 08.86.130. Rather, if any threat to public safety or welfare exists, it stems from current licensure requirements that retard the development of adequate mental health delivery services in Alaska.

This resort to administrative convenience via approved programs creates an artificial dichotomy that violates academic freedom and denies substantive due process and equal protection of ~~the~~ laws to licensure candidates from non-approved programs. It constitutes a negation of fundamental importance of ideas in our society. It appears to be an unconditional surrender of state's rights to a non-legal entity (and it should be emphasized that the delegation of future law making power to the APA in AS (08.86.230 is invalid).

There are more than 600 psychology graduate programs in the U. S. and Canada, but only about 200 of these programs are approved (some provisionally) by the APA. No research is available to validate the presumption that graduates of APA "approved programs" are superior to graduates of other programs in terms of client outcomes or other factors. This lack of valid distinctions provides ample justification for the repeal of the exclusionary educational requirements in AS 08.86.130 and AS 08.86.162.

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*

I have been a full member of the APA since 1968 and I appreciate what the organization has done for the development of psychology in general. There is no reason not to use the APA as a resource, but I do not think that the Alaska psychology board should grant the APA carte blanche to determine who will or who will not become a psychologist. Neither does Dr. Milton D. Hakel who was a candidate for president-elect of the APA in 1985. In his statement of issues facing psychology, he said, "The proposed requirements of graduation from an APA-accredited program as a prerequisite for state licensure violates academic integrity. Dictating the content of graduate programs will do nothing to assure that licensees perform competently." To quote from Justice William J. Brennan, Jr., "We must "... not tolerate laws that cast a pall of orthodoxy over the classroom" (Keyishian V. Board of Regents, 385 U.S. 589 (1967)).

Mental health is Alaska's number one problem. Alaska needs mental health professionals. SB 251 is designed to restore equity to licensure requirements and to encourage qualified applicants to seek licensure in Alaska. SB 251 contains stringent but reasonable entry requirements for licensure.

Alaskan universities are involved in educating psychological specialists and counselors. Programs must be continued and new ones developed with particular reference to rural considerations. Academic freedom is basic in tailoring programs according to Alaska's particular needs. SB 251 provides for licensure (associate) of graduates of Alaskan universities in community psychology, guidance and counseling, and i' psychology. SB 251 will be critical for the entry of Alaskan graduates into the mainstream of professional Alaska psychology when doctoral programs are developed in Alaskan universities.

Please support SB 251 by writing a letter to Senator Betty Fahrenkamp, Ch:HESS, Alaska State Legislature, Pouch V, Juneau, Alaska 99811. The legislature reconvenes Jan. 13, 1986. If you do not have time to write a letter, send a Public Opinion Message (P.O.M) or just sign this page and mail it to Juneau today as an indication of your support for SB 251.

You should also make your views known if you do not agree with the line of reasoning presented here. It is your State.

*Would like to see these
changes implemented*

Kew Sath

Alaska Native Health Board

1135 W. 8th AVENUE, SUITE 2, ANCHORAGE, ALASKA 99501

PHONE (907) 276-8989

Reference #A86-0406

*what's
response
with
this
issue*

April 9, 1986

Representative Mike Davis
Alaska State Legislature
P.O. Box MS3100
Juneau, Alaska 99811

Dear Representative Davis:

The Senate has passed the Committee Substitute for Senate Bill 251, "An Act relating to regulation of the practice of psychology; and providing for an effective date." Sponsors of the bill are Senators Kerttula and Josephson. As passed, the bill does allow for participation in providing psychological services by para-professionals, or "psychological associates," which we believe is appropriate in Alaska.

However, the bill as passed fails to deal with another important issue, that of the very poor past performance by the Board of Psychologist and Psychological Associate Examiners, together with the current definition of "mental health professional."

Currently, AS. 47.30.915 (1.1), defines "mental health professional" as:

...a psychiatrist or physician who is licensed to practice in this state or employed by the federal government; a clinical psychologist licensed by the state Board of Psychologists and Psychological Associate Examiners; a psychological associate with a clinical psychology or counseling specialty licensed by the Board of Psychologists and Psychological Associate Examiners; a registered nurse with a master's degree in psychiatric nursing, licensed by the Board of Nursing; a social worker with a master's degree in social work and experience in the field of mental illness.

We would add:

ALEUTIAN/PRIIBILOF ISLAND ASSOC., INC.
BRISTOL BAY AREA HEALTH CORPORATION
COOK INLET NATIVE ASSOCIATION
COPPER RIVER NATIVE ASSOCIATION

KODIAK AREA NATIVE ASSOCIATION
MANIILAQ ASSOCIATION
THE NORTH PACIFIC RIM
NORTH SLOPE BOROUGH HEALTH CORP.

NORTON SOUND HEALTH CORPORATION
SOUTHEAST ALASKA REGIONAL HEALTH CORP.
TANANA CHIEFS CONFERENCE
YUKON-KUSKOKWIM HEALTH CORPORATION

...and a person with a master's degree in psychology, behavioral science, or sociology with experience in the field of mental illness.

At this time, universities in Alaska do not offer a master's level program in social work. They do graduate students at the baccalaureate and master's levels in psychological areas. The current definition, would favor hiring of persons who did their college work out-of-state. Anyone receiving a master's degree in psychology in any of the state's universities would not be acceptable under this definition because there is no MSW program in Alaska. The Alaska schools, under the current definition, will get absolutely no recognition for the masters level people they are graduating in the behavioral services.

The entire arena of psychological/mental health/substance abuse management (in other words, all of the so called "behavioral sciences") is in a state of crisis in Alaska. In a recent study complete, by the Alaska Native Health Board for the Alaska Legislature, it was found that "most" of the current activity that purports to deal with the devastating behavioral issues we are experiencing in rural Alaska is largely without effect.

The reasons for this abject failure are several:

1. The driving philosophies of these disciplines tend to be urban/Euro-American in their origins, and are in direct cultural conflict with Native and rural non-Native values and worldviews.
2. "Exclusionary" practices of professional organizations and the Board of Psychologists and Psychological Associate Examiners tends to "lock out" Native participants from active and legitimate participation.

Quite simply, licensing, as practiced by the Board of Examiners, is not what it seems. It does not insure professionalism in the behavioral sciences. What it does is limit access to a field of endeavor that is of paramount importance to Alaska's Native people (important by virtue of the fact that aberrant behavior as manifested in suicide, homicide, physical trauma, drowning, family abuse and violence, is the number one cause of morbidity and mortality among Natives).

The practice of psychology is not a science. It is an art. But, it is an imperfect art so far as its application to the Native "condition" is concerned. It is an art which has articulated

Representative Davis
Page three

reasonably well the parameters of behavior for modern, Euro-American society. It is woefully ignorant and ineffective when attempting to apply that "art" in third world and minority American populations.

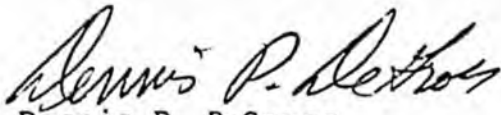
As the enclosed recent audit of the Board of Psychologists and Psychological Associate Examiners would seem to indicate, that body is characterized by invidious and capricious behavior. They have, for all practical purposes, become a public utility commission, not unlike the PUCs which have protected monopolies in the trucking, energy and telecommunications fields in the past.

The above addition that we have suggested would limit the power of the Board of Examiners somewhat by broadening the definition of "mental health professional," would credit the competent people who are entering this field from within the state, and would allow access by Native people into the field at a level above that of "aide."

We hope these comments will be helpful in your deliberations as you consider the merits of SB 251. If you have questions please contact the Alaska Native Health Board.

Sincerely,

ALASKA NATIVE HEALTH BOARD, INC.



Dennis P. DeGross
Executive Director

Alaska State Legislature

adopted
3-18-86

BETTYE FAHRENKAMP, Chairman
ARLISS STURGULEWSKI, Vice Chairman
JOE JOSEPHSON
PAUL FISCHER
EDNA ARMSTRONG DE VRIES



P. O. BOX V
STATE CAPITOL
JUNEAU, ALASKA 99811
(907) 465-3834
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Senate Committee on Health, Education and Social Services

LETTER OF INTENT FOR CSSB 251, AN ACT RELATING TO THE REGULATION OF THE PRACTICE OF PSYCHOLOGY

CSSB 251 (HESS) directs the State Board of Psychologist and Psychological Associate Examiners to adopt regulations identifying criteria for programs of graduate study in psychology for the purposes of licensure, and to present these regulations to the legislature no later than the 10th day of the first session of the 15th Alaska State Legislature. It is the intent of the Senate Committee on Health, Education and Social Services that program criteria be based on the following:

For a program of graduate study for a doctorate degree:

1. The doctoral education and training in psychology are offered in an institution of higher education accredited by one of the regional accrediting bodies recognized by the Council of Postsecondary Accreditation.

2. The doctoral program is publicly identified as a psychology program, and is specified as such in pertinent institutional catalogs and brochures. *OR AN EQUIVALENT DEGREE THAT IS PSYCHOLOGICAL IN NATURE*

3. The psychology program stands as a recognizable, coherent organizational entity within the institution.

4. Psychologists have clear authority and primary responsibility for the academic core and specialty preparation, whether or not the program involves multiple administrative lines.

~~5.~~ There is an identifiable core of psychology faculty.

~~6.~~ There is an identifiable body of students who are matriculated in the psychology program for the doctoral degree.

7. The psychology program is an organized, integrated sequence of study.

8. The program requires the equivalent of three full-time academic years of graduate study:

a. Two years of which are at the institution from which the doctoral degree is granted.

b. One year of which is in full-time residence at the institution from which the doctoral degree is granted.

OR THE EQUIV. AS DETERMINED BY THE Bd.

9. The program requires students to acquire knowledge in the following program components:

a. Methodology and History. Systematic preparation in scientific standards and responsibilities, research design and methodology, quantitative methods, and historical foundations in psychology.

b. Foundation in psychology. Coursework in each of the four following areas of study:

i. biological bases of behavior (physiological psychology, comparative psychology, neuropsychology, psychopharmacology)

ii. cognitive-affective bases of behavior (learning, memory, perception, cognition, thinking, motivation, emotion)

iii. social bases of behavior (social psychology, cultural, ethnic, group processes, sex roles, organizational behavior)

iv. individual differences (personality theory, human development, individual differences, abnormal psychology, psychology of women, psychology of the handicapped, psychology of the minority experience)

c. Additional preparation in the area of specialization.

i. knowledge and use of ethics, guidelines, standards.

ii. supervised practicum and/or laboratory experiences appropriate to the area of practice, teaching, or research in psychology specialization.

iii. advanced preparation appropriate to the area of specialization. Internship takes place in a specialized doctoral program following the supervised practicum and/or laboratory experience and as such is not within the purview of the designation process. *on the equiv. as determined by the faculty.*

10. Programs accredited by the American Psychological Association Education and Credentialing Committee are recognized as meeting the program definition.

For a program of graduate study for a masters degree:

1. The masters level education in psychology is offered in an institution of higher education accredited by one of the regional accrediting bodies recognized by the Council of Postsecondary Accreditation.

2. The masters level program is publicly identified as a psychology program, and is specified as such in pertinent institutional catalogs and brochures. *on the equiv.*

3. The psychology program stands as a recognizable, coherent organizational entity within the institution.

4. Psychologists have clear authority and primary responsibility for the academic core and specialty preparation, whether or not the program involves multiple administrative lines.

5. There is an identifiable core of psychology faculty.

6. There is an identifiable body of students who are matriculated in the psychology program for the masters degree.

7. The psychology program is an organized, integrated sequence of study.

STATE OF ALASKA 1985 LEGISLATIVE SESSION
FISCAL NOTE

Revision Date: _____

REQUEST

Bill/Resolution No.: SB 251
 Title: Relating to regulation of the practice of psychology
 Sponsor: Sen. Kertulla & Josephson
 Requestor: _____
 Date of Request: _____

FISCAL DETAIL

Agency Affected: Commerce & Economic Dev.
 Program Category Affected: _____
 Consumer Protection
 Division, Program or Subprogram(s) Affected: _____
 Occupational Licensing

EXPENDITURES/REVENUES: (Thousands of Dollars)

	FY 83	FY 84	FY 85	FY 86	FY 87	FY 88
OPERATING						
100 PERSONAL SERVICES						
200 TRAVEL						
300 CONTRACTUAL						
400 SUPPLIES						
500 EQUIPMENT						
600 LAND & STRUCTURES						
700 GRANTS, CLAIMS						
800 MISCELLANEOUS						
TOTAL OPERATING		-0-	-0-	-0-	-0-	-0-

CAPITAL						
---------	--	--	--	--	--	--

REVENUE						
---------	--	--	--	--	--	--

FUNDING: (Thousands of Dollars)

GENERAL FUND		-0-	-0-	-0-	-0-	-0-
FEDERAL FUNDS						
OTHER						
TOTAL		-0-	-0-	-0-	-0-	-0-

POSITIONS:

FULL-TIME		0	0	0	0	0
PART-TIME						
TEMPORARY						

ANALYSIS: Attach a separate page if necessary

Prepared By: Jennifer Strickler Mgnt Analyst Phone: 465-2144
 Division: Occupational Licensing Date: 4-8-85

Approved by Commissioner: Loren H. Lounsbury Date: 4/10/85
 Agency: Commerce and Economic Development

Distribution (by Agency preparing fiscal note):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)

7/1/84

prepared by Senate HESS

→ CSSB 201 (HESS) LICENSING OF PSYCHOLOGISTS

1. DELETE REQUIREMENT THAT TO BE LICENSED IN THE STATE YOU MUST BE A GRADUATE OF AN A.P.A. (AMERICAN PSYCHOLOGICAL ASSOCIATION) APPROVED PROGRAM. INSTEAD, YOU WOULD HAVE TO BE A GRADUATE OF A PROGRAM THAT MEETS THE CRITERIA ESTABLISHED BY THE BOARD BY REGULATION.

→ LETTER OF INTENT OUTLINES PROGRAM CRITERIA TO BE PROPOSED IN REGULATIONS.

POINTS: - AGREEMENT OF BOARD, DIV. OCCUPATIONAL LICENSING, AND SPONSOR
- A.P.A. APPROVAL IS MEASURE OF HIGH QUALITY, NOT OF MINIMUM COMPETENCE

- PAST 3 AUDITS OF BOARD (LATEST 1981) FOUND THAT BOARD UNNECESSARILY RESTRICTS THE LICENSING OF QUALIFIED PSYCHOLOGISTS. THIS IS INTENDED TO ALLEVIATE THAT CRITICISM.

- REVIEWED STATUTES OF SEVERAL OTHER STATES. MANY APPROACH IT TO THE WAY WE'RE PROPSOING.

2. ALLOW A PSYCHOLOGICAL ASSOCIATE (P.A. - THEY HOLD MASTERS DEGREES) TO PETITION THE BOARD FOR INDEPENDENT PRACTICE AFTER 5 YEARS OF SUPERVISED PRACTICE (AGAIN, IF THEY MEET THE CRITERIA ADOPTED BY THE BOARD BY REGULATION). CURRENTLY, MUST BE SUPERVISED FOR REST OF LIFE

POINTS: - RECOMMENDED BY AUDIT (1978, 1981)

- MUST BE SUPERVISED 3 YEARS BEFORE CAN EVEN BE LICENSED (1 HOUR A WEEK OF PERSONAL INTERVIEW). ONCE LICENSED, MUST BE SUPERVISED 5 YEARS (CONTACT MONTHLY, FACE-TO-FACE CONSULTATION QUARTERLY). THEN MUST STILL MEET BOARD STANDARDS.

- NO COMPLAINTS FILED AGAINST PSYCH. ASSOCIATES IN ALASKA.

- WILL ENHANCE EFFORTS TO IMPROVE DELIVERY OF PSYCHOLOGICAL SERVICES IN ALASKA.

3. BOARD MUST SUBMIT REGS. TO LEGISLATURE BEGINNING OF NEXT SESSION.

0 fiscal note

Passed Senate with Letter
of Intent 4-2-86
18-0

Offered: 3/20/86
Referred: Rules

Original sponsors: Kerttula and
Josephson

BY THE HEALTH, EDUCATION AND
SOCIAL SERVICES COMMITTEE

1 IN THE SENATE

2

CS FOR SENATE BILL NO. 251 (HESS)

3

IN THE LEGISLATURE OF THE STATE OF ALASKA

4

FOURTEENTH LEGISLATURE - SECOND SESSION

5

A BILL

6

For an Act entitled: "An Act relating to regulation of the practice of
psychology; and providing for an effective date."

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BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:

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* Section 1. AS 08.86.070 is amended to read:

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Sec. 08.86.070. DUTIES OF THE BOARD. The board shall

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(1) establish objective examination requirements for per-
sons who apply for a license to practice psychology in the state;

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(2) examine, or cause to be examined, eligible license
applicants;

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(3) approve the issuance of licenses to qualified appli-
cants;

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(4) adopt regulations establishing standards for the prac-
tice of psychology;

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(5) impose disciplinary sanctions as authorized by this
chapter;

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(6) adopt regulations requiring proof of continued compe-
tency for license renewal;

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(7) prepare an annual report for submission to the depart-
ment covering board activities, the number of applicants, the number
of examinations conducted, the passing and failure rate of each ex-
amination, finances, and other information as requested by the depart-
ment;

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(8) review, when requested by the department, the quality
and availability of psychological services in the state;

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1 (9) compile information for submission to the department on
2 the practice of psychology by psychologists and psychological associ-
3 ates in the state [;

4 (10) ADOPT REGULATIONS ESTABLISHING EDUCATIONAL AND TRAINING
5 REQUIREMENTS FOR PSYCHOLOGICAL ASSOCIATES LICENSED UNDER THIS CHAPTER;

6 (11) ADOPT REGULATIONS NECESSARY TO CARRY OUT ITS DUTIES
7 UNDER THIS CHAPTER].

8 * Sec. 2. AS 08.86.130 is repealed and reenacted to read:

9 Sec. 08.86.130. LICENSING REQUIREMENTS. (a) The board shall
10 issue a license to a person who

11 (1) holds an earned doctorate degree, from an academic
12 institution whose program of graduate study for a doctorate degree in
13 psychology meets the criteria established by the board by regulation,
14 in

15 (A) psychology;

16 (B) educational psychology;

17 (C) education with the field of specialization in
18 counseling psychology or educational psychology; or

19 (D) a subject considered equivalent by the board.

20 (2) has one year of post doctoral experience approved by
21 the board; and

22 (3) takes and passes the objective examination developed or
23 approved by the board.

24 (b) The board may not deny recognition as an accredited or
25 approved academic institution to an educational institution solely
26 because its program has not been accredited by a professional organi-
27 zation of psychologists.

28 * Sec. 3. AS 08.86.135 is amended to read:

29 Sec. 08.86.135. TEMPORARY LICENSE. The board may issue a

1 temporary license to a person who meets the requirements of AS 08.86.-
2 130-(a)(1) and (2) [AS 08.86.130]. A temporary license issued under
3 this section is valid until the results of the examination following
4 the issuance of the temporary license are published.

5 * Sec. 4. AS 08.86.150 is amended to read:

6 Sec. 08.86.150. LICENSE BY CREDENTIALS. A person who is li-
7 censed or certified as a psychologist by a licensing [AN] authority
8 other than the state [ALASKA] is entitled to be licensed in the state
9 [ALASKA] without examination if the person applies on the proper
10 application form, submits proof of continued competence as required by
11 regulation of the board, pays the credential review fee, and

12 (1) the person holds a doctoral degree with primary empha-
13 sis on psychology that satisfies the requirements of AS 08.86.130 and
14 [FROM AN ACCREDITED SCHOOL WITH AN APPROVED PROGRAM;

15 (2)] the examination and qualification requirements for the
16 person's out-of-state license or certificate were essentially similar
17 to or higher than the examination and qualification requirements for
18 licensure under this chapter; or

19 (2) [(3)] the person is a diplomate in good standing of
20 the American Board of [EXAMINERS IN] Professional Psychology [;

21 (4) THE PERSON COMPLETES AND RETURNS THE PROPER APPLICATION
22 FORMS, SUBMITS PROOF OF CONTINUED COMPETENCY AS REQUIRED BY REGULATION
23 OF THE BOARD, AND PAYS THE CREDENTIAL REVIEW FEE].

24 * Sec. 5. AS 08.86.162 is amended to read:

25 Sec. 08.86.162. ASSOCIATES: QUALIFICATION FOR EXAMINATION. A
26 person is entitled to take a psychological associate examination if
27 the board finds that the person:

28 (1) has not engaged in dishonorable conduct related to the
29 practice of counseling or psychometry;

1 (2) holds a master's degree with primary emphasis on psy-
2 chology from an academic institution whose program of graduate study
3 for a master's degree in psychology meets the criteria established by
4 the board by regulation [ACCREDITED EDUCATIONAL INSTITUTION WHICH HAS
5 AN APPROVED PROGRAM], with the equivalent of at least 24 semester
6 credit hours of graduate course work directly related to a specialized
7 area of psychology in which licensure is requested, including a prac-
8 ticum;

9 (3) has at least three years' supervised experience after
10 obtaining a master's degree [WITHIN THE PAST TEN YEARS]; as used in
11 this paragraph, "supervised experience" means the equivalent of at
12 least one hour a week of personal interview with a supervisor whose
13 educational qualifications are consistent with the level of activity
14 being supervised;

15 (4) has the recommendation of an immediate supervisor if a
16 licensed psychologist, or two licensed psychologists who hold doctoral
17 degrees; and

18 (5) has not within the preceding six months failed an
19 examination given by the board.

20 * Sec. 6. AS 08.86.164 is amended by adding a new subsection to read:

21 (e) Notwithstanding (b) of this section, a psychological associ-
22 ate who has completed at least five years of licensed practice under
23 this section may petition the board for certification to practice
24 without supervision. The board shall grant the petition if the
25 associate satisfies the criteria established by the board by regula-
26 tion.

27 * Sec. 7. AS 08.86.200 is amended by adding a new subsection to read:

28 (b) Notwithstanding (a) of this section, a psychologist or
29 psychological associate shall report incidents of child abuse or

1 neglect as required by AS 47.17.07

2 * Sec. 8. REGULATIONS. The board shall submit proposed permanent
3 regulations establishing the requirements for graduate programs in psychol-
4 ogy under AS 08.86.130 as amended by sec. 2 of this Act and AS 08.86.162 as
5 amended by sec. 5 of this Act and establishing the criteria for practice
6 without supervision under AS 08.86.164(e) as added by sec. 6 of this Act to
7 the legislature no later than the 10th day of the First Session of the
8 Fifteenth Alaska State Legislature. Notwithstanding AS 44.62, the perma-
9 nent regulations adopted under AS 08.86.130, 08.86.162, and 08.86.164(e)
10 take effect on the 60th day of the First Session of the Fifteenth Alaska
11 State Legislature unless a law is enacted disapproving the regulations
12 before that day.

13 * Sec. 9. AS 08.86.120 and 08.86.230(11) are repealed.

14 * Sec. 10. This Act takes effect immediately in accordance with AS 01.-
15 10.070(c).

↓
old "entitlement
to licensure"
provision now
contained in
AS 08.86.130.

↓
old definition of
"approved program"
which meant A.P.A.
(American Psycho-
logical Association)
approval.

HOUSE
COMMITTEE REPORT

(7)
Date referred: 4/3/86

FURTHER REFERRALS: HESS

DATE: Apr. 21, 1986

The LABOR & COMMERCE Committee has considered CSSB 251(HESS)

"An Act relating to regulation of the practice of psychology; and providing for an effective date."

and recommends:

- do pass
- do not pass
- do pass with attached amendment(s)
- no recommendation
- replace with _____ same title
- replace with _____ new title

and recommends _____

further referral to the _____ Committee

- and attaches:
- letter of intent
 - first fiscal note
 - new fiscal note
 - zero fiscal note

SIGNING DO PASS:

SIGNING OTHER RECOMMENDATIONS:

Mike Favone

John Keenan

Deane Henley

John T. ...

Mike Davis

Edgar ...

HESS REVIEW SUGGESTIONS
IN ANHB LTR OF
4/9/86

Mike Favone
Chairman

Section
140. Fees
150. License by credentials

Licensing of — Psychologists,

Collateral references. — 61 Am. Jur. 70 C.J.S. Physicians and Surgeons.
2d, Physicians, Surgeons and Other §§ 6, 12.
Hearers, §§ 85-87.

Sec. 08.86.120. Entitlement to licensure. A person who passes the examination given by the board is entitled to be licensed as a psychologist. (§ 1 ch 136 SLA 1967)

repealed
MSB 251

NOTES TO DECISIONS

Applied in *Allred v. State*, Sup. Ct. Op. No. 1304 (File No. 2343), 554 P.2d 411 (1976).

Sec. 08.86.125. Malpractice insurance.
Repealed by § 40 ch 177 SLA 1978.

Editor's notes. — The repealed section ch. 177, SLA 1978 as amended by § 7, ch. derived from § 32, ch. 102, SLA 1976. 46, SLA 1982, in the 1982 Temporary and As to purpose of repealing act, see § 1, Special Acts and Resolves.

repealed & reenacted
in SB 251

Sec. 08.86.130. Qualification for examination. A person is entitled to take an examination if the board finds that person

- (1) (deleted);
- (2) holds a doctoral degree with primary emphasis on psychology from an accredited school with an approved program;
- (3) has at least one year's experience acceptable to the board. (§ 1 ch 136 SLA 1967; am § 8 ch 58 SLA 1980)

Effect of amendments. — The 1980 amendment deleted former paragraph (1), which read: "has not engaged in dishonorable conduct relevant to the practice of psychology," and added "with an approved program" at the end of paragraph (2).

Editor's notes. — This section was amended by the revisor of statutes to remove personal pronouns in conformity with AS 01.05.031(c) and § 4, Chapter 58, SLA 1982.

NOTES TO DECISIONS

Applied in *Allred v. State*, Sup. Ct. Op. No. 1304 (File No. 2343), 554 P.2d 411 (1976).

Cited in *Handley v. State*, Sup. Ct. Op. No. 2155 (File Nos. 3946, 4935), 615 P.2d 627 (1980).

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AS
08. 86. 230(11)

§ 08.88.071

BUSINESS AND PROFESSIONS

§ 08.88.071

(9) [Repealed. § 24 ch 58 SLA 1980.]

(10) "private agency" means a clinic or private practice, or custo-
dial, rehabilitative or health care organization whose mental health
services are under the direction of a licensed psychologist or psychia-
trist;

→ (11) "approved program" means a program which meets the re-
quirements established by the American Psychological Association
Education and Credentialing Committee in Psychology for an ap-
proved program, or its equivalent as determined by the board. (§ 1 ch
136 SLA 1967; am §§ 12, 13 ch 65 SLA 1973; am § 55 ch 218 SLA
1976; am §§ 18 — 20, 22, 24 ch 58 SLA 1980; am § 6 ch 29 SLA 1983)

repeated in
SB 251

Effect of amendments. — The 1983 amendment added "or its equivalent as determined by the board" at the end of paragraph (11).

Chapter 88. Real Estate Brokers and Salesmen.

Article

1. Real Estate Commission (§ 08.88.071)
2. Licensing (§§ 08.88.171, 08.88.201, 08.88.221, 08.88.261)
3. Miscellaneous Provisions (§ 08.88.263)
5. Real Estate Surety Fund (§§ 08.88.450 — 08.88.465, 08.88.474)

Article 1. Real Estate Commission.

Section

71. Duties of the commission

Sec. 08.88.071. Duties of the commission. (a) The commission shall

(1) pass on qualifications of applicants for licenses and issue licenses to those who qualify;

(2) prepare and grade examinations;

(3) after hearing, have the authority to suspend or revoke the license of a licensee who

(A) with respect to a real estate transaction

(i) made a substantial misrepresentation;

(ii) made a false promise likely to influence, persuade, or induce;

(iii) in the case of a real estate broker, pursued a flagrant course of misrepresentation or made a false promise through an agent, associate real estate broker, or real estate salesman;

(iv) has engaged in conduct that is fraudulent or dishonest;

(v) violates AS 08.88.391;

(B) procures a license by deceiving the commission, or aids another to do so;

(C) has engaged in conduct in which the commission had no knowledge at the time the licensee was licensed demonstrating th

Collateral references. — 61 Am. Jur. 70 C.J.S. Physicians and Surgeons, 2d, Physicians, Surgeons and Other §§ 6, 12. Healers, §§ 85-87.

confor
Chapi

Licensing of Psych. Associates

Sec. 08.86.160. Associates: Entitlement to licensure. A person who passes the examination given by the board is entitled to be licensed as a psychological associate. (§ 5 ch 65 SLA 1973)

App
No. 1.
(1976)

NOTES TO DECISIONS

Applied in Allred v State, Sup. Ct. Op. No. 1304 (File No. 2343), 554 P.2d 411 (1976).

Sec. 08.86.162. Associates: Qualification for examination. A person is entitled to take a psychological associate examination if the board finds that the person:

- (1) has not engaged in dishonorable conduct related to the practice of counseling or psychometry;
- (2) holds a master's degree with primary emphasis on psychology from an accredited educational institution which has an approved program, with the equivalent of at least 24 semester credit hours of graduate course work directly related to a specialized area of psychology in which licensure is requested, including a practicum;
- (3) has at least three years' supervised experience after obtaining a master's degree within the past ten years; as used in this paragraph, "supervised experience" means the equivalent of at least one hour a week of personal interview with a supervisor whose educational qualifications are consistent with the level of activity being supervised;
- (4) has the recommendation of an immediate supervisor if a licensed psychologist, or two licensed psychologists who hold doctoral degrees;
- (5) has not within the preceding six months failed an examination given by the board. (§ 5 ch 65 SLA 1973; am §§ 11, 12, 21 ch 58 SLA 1980; AS 08.86.230(11))

amended in SB 251.
Program must meet
criteria adopted
by board.

Effect of amendments. — The 1980 amendment, in paragraph (2), inserted "with primary emphasis on psychology," deleted "or approved" following "from an accredited," inserted "which has an approved program," "the equivalent of," "semester," "graduate," and "of psychology," and substituted "a" for "counseling or another" preceding "specialized area"; in paragraph (3), inserted "supervised," and "after obtaining a master's degree,"

and deleted "two of which are in Alaska, and including one year's supervised postgraduate experience acceptable to the board" at the end of the paragraph.

Editor's notes. — The definition of supervised experience was formerly numbered AS 08.86.230(11) and was relocated by the revisor of statutes pursuant to AS 01.05.031.

This section was redrafted by the revisor of statutes to remove personal pronouns in

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Chapter 58, SLA 1982.

Licensing of
Psychological
Associates

NOTES TO DECISIONS

Applied in Allred v. State, Sup. Ct. Op.
No. 1304 (File No. 2343), 554 P.2d 411
(1976).

Sec. 08.86.164. Scope of practice. (a) A psychological associate shall be licensed for specific activities or areas of competence as determined by the nature and extent of the psychological associate's training and experience, and those areas shall be specified on the license.

(b) A psychological associate shall function under the supervision of a licensed psychologist.

(c) Supervision of a licensed psychological associate is the responsibility of the supervising licensed psychologist, and includes face-to-face consultation as required by the nature of the work of the psychological associate which is consistent with accepted professional practices in psychology. The supervising psychologist is responsible for insuring that the extent, kind and quality of the psychological services performed are consistent with the training and experience of the psychological associate.

(d) A psychological associate and the psychological associate's supervisor shall register with the board a statement of the intended area of practice and arrangements for supervision. (§ 13 ch 58 SLA 1980)

amended in SB 251
to allow "unsupervised
practice" by p.a.

Editor's notes. — This section was redrafted by the revisor of statutes to remove personal pronouns in conformity with AS 01.05.031(c) and § 4, Chapter 58, SLA 1982.

Article 4. Prohibitions and Penalties.

Section	Section
170. Use of title	206. Disciplinary sanctions
180. Practice of psychology	210. Penalty
185. [Repealed]	220. Limits or conditions on license; discipline
190. Name under which person practices	
200. Confidentiality of communication	
204. Grounds for imposition of disciplinary sanctions	

Sec. 08.86.170. Use of title. (a) Unless licensed under this chapter, a person may not use the title "psychologist" or a title, designation, or device indicating or tending to indicate that the person is a psychologist or practices psychology.

(b) Unless licensed under this chapter, a person may not use the title "psychological associate" or a title, designation, or device indicating or

ORIGINAL

FULL AUDIT IS
AVAILABLE FROM
COMMITTEE STAFF

Fairbanks Legislative Information Office
315 Barrow Street
Fairbanks, Alaska 99701
907-452-4448

A PERFORMANCE REVIEW OF THE
BOARD OF PSYCHOLOGIST AND
PSYCHOLOGICAL ASSOCIATE EXAMINERS

August 12, 1981

Audit Control Number
08-121-1054-R

Commissioner, Department of Commerce and Economic Development Charles R. Webber

Deputy Commissioner, Department of Commerce and Economic Development, Acting Lois Cook

Deputy Commissioner, Department of Commerce and Economic Development Vacant

Members of the Board of Psychologist
and Psychological Associate Examiners

Chairperson	Pam Delys-Baglien, Ph.D
Member	Dorothy Whitmore, Ed.D
Member	James Greenough, Ph.D
Member	Paul E. Turner, Ph.D
Member	Charles C. Bovee, Ed.D

REPORT CONCLUSION

Policy Issues

This review contains policy issues raised as a result of our evaluation of various Board practices. The final policy decisions affecting these practices are not within the scope of this review but require legislative consideration. In debating these decisions, the legislative oversight committees should consider the findings and alternatives presented in this report so that the potential impact of policy changes can be evaluated.

Report Conclusion

In our opinion, the continuation of the Board and the licensing of psychologists and psychological associates is not necessary to protect the public's health, safety and welfare. The Board's performance has not always been in the public's best interest. Two prior audit reports dated August 5, 1975, and October 31, 1978, show that the Board had been unnecessarily restricting the licensing of qualified psychologists and psychological associates in the State. These conditions still exist (see Recommendation No. 1).

In the event that the Board is reestablished, certain changes need to be implemented in order for the Board to more effectively serve the public. A statutory change should be considered which will increase the number of public members on the Board and allow the public to be better represented (see Prior Audit Recommendation No. 1).

Legislation should be introduced which clarifies the jurisdiction of the Board. The Board has not established regulations defining which professions are exempt from Title 8 Chapter 86 of the Alaska Statutes. The lack of regulations has caused confusion as to which professions are covered by the statutes (see Recommendation No. 2).

* Legislation needs to be introduced to change the licensing statutes of psychological associates (PA's). The statutes should be changed to encourage additional qualified applicants to apply and become licensed in the State without lowering the quality of services provided by PA's (see Prior Audit Recommendation No. 8).

The Board should consistently apply statutory licensing criteria to all applicants (see Prior Audit Recommendation No. 2). The Board needs to openly conduct its meetings and provide documentation supporting its deliberations and

FINDINGS AND RECOMMENDATIONS

Recommendation No. 1

The Board of Psychologist and Psychological Associate Examiners should be allowed to terminate and the licensing of psychologists and psychological associates should be discontinued.

The Board has had a long history of not always operating in the public's best interest. Two reports by the Division of Legislative Audit dated August 5, 1975, and October 31, 1978, found that the Board has been unnecessarily restricting the licensing of qualified psychologists and psychological associates in the State. Several times the Attorney General has had to intervene and strongly advise the Board to halt these practices. Other reports by different organizations supported these findings.

We have reviewed the Board's performance since 1978 and conclude that past conditions still exist. The following has been left unresolved by the Board.

1. The Board has continued to be inconsistent in approving applicants to take the Board's examination and in licensing psychologists and psychological associates (see Prior Audit Recommendation No. 2).
2. The Board has continued to conduct its deliberations in secrecy (see Prior Audit Recommendation No. 3).
3. The Board has proposed and supported statutory changes which have unnecessarily restricted the licensing and practice of psychological associates and decreased the representation of the public on the Board (see Prior Audit Recommendations No. 1 and No. 8).
4. The Board has not passed or developed regulations establishing specialty designations for psychologists and psychological associates and requiring proof of continued competency before a license is renewed. Both types of regulations are required by AS 08.86.070 (see Prior Audit Recommendations No. 8 and No. 9).
5. The Board has inconsistently graded the essay examination. In addition, the records of applicants' grades are confusing, unorganized, and inaccurate (see Prior Audit Recommendations No. 2 and No. 7).

In our opinion, the Board's performance has not always been in the public's best interest. These actions not only discourage qualified applicants from attempting to become

licensed in the State, but also harm the public by artificially creating shortages of mental health practitioners. These shortages tend to increase the costs of mental health services in the State.

In our prior audit dated October 31, 1978, we recommended that if the Board continues to inconsistently apply the statutes, the Board's licensing function should be transferred to the Department of Commerce and Economic Development.



However, we believe that the intent of Sunset legislation is to reduce government control and interference over the public. The Alaska statutes broadly define who is to be licensed to practice psychology. The Board has not established regulations to better identify those professions who are covered by the statutes or to give guidance to those who are exempt. We found no evidence after reviewing complaints filed against those practicing psychology in the State that the public would be harmed by not licensing psychologists. The Board has never revoked or suspended a license and the violations filed with the Board have been minor in nature. Therefore, we recommend that the State eliminate licensing of psychologists and psychological associates and allow the profession and other legal remedies to regulate and discipline the practice of psychology (see Recommendation No. 2).

Other alternatives to the above recommendation would include terminating the Board and allow the Department of Commerce and Economic Development to certify qualified applicants. This approach to licensing would allow only qualified applicants to use the title "psychologist" or "psychological associate". However this would not prohibit other persons from practicing psychology (see Recommendation No. 2). Another option would be registration. In this case, all persons who practice psychology must register with the State. However, they do not need to meet minimum educational or experience requirements or be required to pass an examination.

Another alternative would be to require that professionals must have a minimum amount of malpractice insurance before being allowed to practice psychology. The insurance companies would then be responsible for establishing the minimum licensing requirements for psychologists. The Department of Commerce could keep a register of those qualified persons.

If the Board is not terminated and the licensing functions are not discontinued, then the following should be implemented.

2. Two applicants were given different identification numbers to take the national examination. One applicant did not show to take the examination. However, the Division of Occupational Licensing received grades for the identification number of the no-show. These grades were sent to the other applicant.
3. The Board took four months to process the grades for four applicants tested in October 1980. This processing time could be greatly reduced.
4. Board members are inconsistently grading the essay examination. We found that for the October 1980 examination, grades computed separately by two Board members for an applicant varied by 34 points. One member scored the examination as 52%. Another member grading the same paper scored it as an 86%. The official score given to an applicant is calculated by averaging the four Board members grades. This score could be skewed by a large difference in two members scores such as in the above example.
5. A Board member forgot to grade a question in the October 1980 examination. The question had a value of as much as 15 points.

The Ombudsman's Office has reviewed two complaints against the Board for delays in grading the examination. In addition, the office received another complaint in 1980 concerning ambiguous exam instructions. The complaint was later withdrawn since the complainant was allowed to retake the examination.

We found that the questions on the essay examination are similar to the topics covered on the standard national examination. Because of the similarity and the problems experienced with the essay examination, we suggest that the Board consider dropping the essay portion. In any case, we concur with our prior recommendation and recommend that a test manual be developed.

Prior Audit Recommendation No. 8

* Legislation should be introduced to change licensing statutes for psychological associates in order to encourage more qualified applicants to apply and become licensed in the State.

As of September 30, 1978, there were only three licensed psychological associates (PA) in the State. Other psychological associates who were statutorily exempt from being licensed

may also have been practicing in the State. However from 1975 to 1978, at least two applicants were denied licensure because of the licensing requirements. Others may have been discouraged from applying.

Legislative Audit's Current Position

Chapter 58 SLA 80 made the following significant changes to the licensing requirements for PA's in 1980.

1. A qualified applicant for a PA's license must have three years postgraduate experience after obtaining a Master's Degree. The prior statutory requirement that applicants must have two years of Alaskan experience was deleted.
2. In order to practice as a PA, a licensee must be supervised by a licensed psychologist.
3. The duties that PA's may perform within the State were expanded. However, the statutes require that the Board restrict the practice of PA's to a speciality and identify the speciality on the license. The Board has not complied with all the statutes.

* The licensing requirements now in effect are more restrictive than the prior statutes. Since the enactment of Chapter 58 an applicant has already been denied by the Board to take the PA examination due to his lack of three years of experience. He would have been eligible under the old statutory requirements.

There are eighteen other states which issue licenses to applicants with Master's Degrees. In a comparison of these states' licensing requirements, we found:

1. Nine of 13 states (69%) which issue psychological associate licenses similar to Alaska, require that applicants have one year or less of postgraduate experience before being qualified.
2. Five states (Iowa, Minnesota, Missouri, Pennsylvania, and West Virginia) issue psychology licenses to applicants with Master's Degrees. These states require that applicants have more than two years experience (the average is four years). However, they allow licensees to independently practice psychology. Minnesota does require that the licensees meet once a year with a licensed psychologist with a doctoral degree. Also, they license applicants with Master's Degrees by endorsement.

The audit proposal is more liberal than SB 251.

There have never been any complaints filed against PA's in the State. Based on the evidence, we suggest that the statutory licensing requirements be changed to allow PA's to be licensed after one year of postgraduate experience. In addition, they should be allowed to practice independently within their specialty with an option that for the more complex psychological practices, supervision may be required. An alternative would be to allow applicants with Master's Degrees and four years of experience to be licensed as psychologists. Also we suggest that the Board be allowed to license PA's and/or psychologists with Master's Degrees by endorsement.

Prior Audit Recommendation No. 9

Legislation should be introduced requiring continuing education for psychologists and psychological associates.

A program of continuing education will assist in avoiding professional obsolescence and keep practitioners aware of changes taking place in the profession. Twenty-two of 28 psychologists responded to a Legislative Audit questionnaire that they believed continuing education should be required for their profession. In addition, the American Psychology Association endorsed the concept and had determined that 11 states required it.

Legislative Audit's Current Position

Chapter 58 SLA 1980 in part states: "The Board shall adopt regulations requiring proof of continued competency before a license is renewed." As of May 15, 1981, the Board has not held hearings on nor adopted continued competency regulations. However, they have discussed the need for these regulations in their meetings. We encourage them to begin the process of adopting regulations as soon as possible.

Prior Audit Recommendation No. 11

The Division of Occupational Licensing should develop a procedures manual for the licensing examiner supporting the Board.

In 1978 the licensing examiner supporting the Board had no procedures manual with which to guide his/her actions. There have been five license examiners for the Board from 1976 to 1978. With this high turnover, it is necessary that there are standard guidelines to help new and old employees.

ROBERT M. ARVIDSON
Box 258
Cardova, Alaska 99574

April 4, 1986

Rep. Mike Navarre, Ch. L&C.
P.O. Box V
Juneau, AK 99811

Re: CSSB 251 (HESS)

Dear Rep. Navarre,

This is a letter of support for CSSB 251 in its entirety as passed by the Senate April 2, 1986.

I am enclosing some back ground material for the Committee's information. It is my understanding that Senator Keritula's office will also be forwarding some of my testimony to your committee.

Although I did have some reservations as indicated in the enclosed copy of my March 14, 1986 letter, I now believe the remaining concerns can be properly addressed when the psychology board proposes regulations as stipulated in the Senate Letter of Intent for the bill.

It is my opinion that there is a compelling state interest for this piece of legislation (i.e., to enhance mental health delivery systems at no additional cost to the state). I urge the Committee to report it out with do pass recommendations.

Sincerely yours,
Robert M. Arvidson
Robert M. Arvidson

ENCs.

ROBERT M. ARVIDSON
Box 258
Cordova, Alaska 99574

February 22, 1986

Senator Jay Kerttula
Alaska State Legislature
P.O. Box V
Juneau, Alaska 99811

Re: Draft CSSB 251 (HESS): Number of graduate psychology programs in the U. S. A.
(may also include Canada).

Dear Senator Kerttula,

I am enclosing a copy of an article from the March 1985 apa Monitor that sheds some light on the number of graduate psychology programs in the USA. The article indicates that some 200 programs are accredited by the APA and 150 more could seek this type of endorsement. Another 250 programs could qualify for a form of recognition known as 'designation'. This would account for 600 of the 1200 programs referred to in the enclosed article by APA Staff Writer Jeffrey Mervis.

As the article notes, the APA approved program scheme has been subjected to debate and criticism over a ten year period, particularly by large research universities.

A review of AS 08.86.230(2) suggests why many major universities have criticized the APA stipulations. Often, practice acts, like Alaska's, are generic and include prohibitions against conducting research or applying psychological principles unless licensed. According to AS 08.86.230, it is actually against Alaska law to 'prevent' emotional or mental disorders without a license. Who wouldn't criticize this?


California licensure law (used as a model for SB 251) recognizes the problems inherent in requiring program approval by professional associations of psychologists such as the APA and specifically prohibits this as Alaska should through CSSB 251. The California regulations (re: my letter of Jan. 3, 1986 to Senate HESS) incorporate educational requirements (Reg. 1386, enclosed) based on APA criteria without denying access to licensure to qualified applicants who for various reasons have not attended APA approved schools.

It is difficult to determine exactly how many of the programs referred to in the enclosed article are clinical or counseling programs per se, but at least 600 of the programs obviously merit consideration for accreditation or designation. This still leaves another 600 programs that must have something to offer. Why should Alaska psychology licensure law exclude 1,000 programs?

I am enclosing a copy of a letter that indicates Alaska has one doctoral student studying psychology at Washington State University.

Best regards as always,

Sincerely,



Robert M. Arvidson

Encs.

cc: Senator Bettye Fahrenkamp, Ch: Senate HESS
Senator Joe Josephson, Co-sponsor, SB 251, Senator R. Eliason
Other interested parties



American Psychological Association

Council acts on designation, test standards, animal care guidelines

By Jeffrey Mervis
Staff Writer

WASHINGTON — A system to designate graduate programs in psychology has been approved by the American Psychological Association, capping five years of work by a special task force and nearly a decade of debate on the issue.

The action was taken last month by the Council of Representatives at its winter meeting here. In 2½ days of meetings, Council also approved revisions to the Joint Technical Standards for Educational and Psychological Testing, adopted interim Guidelines for Ethical Conduct in the Care and Use of Animals, and agreed to ask the membership again to change the association's bylaws in an attempt to ensure that there are ethnic minorities on Council.

As part of a lengthy agenda, it unanimously adopted a resolution on the impact of television violence on children, supported in principle the concept of a merger between the Association for the Advancement of Psychology and the association, and discussed various ways to change the annual convention to reduce its size, improve its substance and make its structure more accessible.

The report from the Task Force on Education and Credentialing was carried over from the last meeting as one of several items Council refused to discuss while the antitrust suit against APA and the Council for the National Register was pending. That self-imposed silence was lifted after a federal judge threw out the case in a summary judgment announced in January.

The task force used the additional



Asher Pacht
A tough job isn't over

time to revise its report to address persistent criticism from psychologists at several large research universities. The change in the section on criteria clarifies the process through which psychology programs at such institutions may achieve designation.

Three routes

The report describes three paths which programs can take to obtain designation. The first is through APA accreditation. The second is through an existing review process — site visitations and ongoing evaluation — of programs within recognized departments of psychology. The third is by meeting nine criteria that address such matters as regional accreditation, the role of psychologists in the program, the relationship of the program to the institution and the way it is portrayed to outsiders,

its students, its sequence of courses and requirements, and the content of those courses.

The majority of the graduate programs in psychology would need to follow the third, and most time-consuming, option to obtain designation. There are more than 1,200 programs listed in the biannual *Graduate Study in Psychology and Associated Fields* published by the association; slightly more than 200 are APA-accredited, and about 150 more could eventually seek such accreditation. There are by estimation of the task force, as many as 250 programs that could qualify under the second option.

The report emphasizes the difference between designation and APA accreditation. Designation, it declares, is meant to ensure "that the general educational requirements that characterize a graduate program

in psychology . . . are being maintained and implemented." Accreditation, on the other hand, "reflects additional evaluation of quality standards of advanced education and training as specified by the association."

The chair of the task force, Asher Pacht, was visibly relieved by the strong support given the report by Council. "I'm elated," he said. "It was vitally important that APA go on record to adopt a policy that contains these criteria for designation."

But a victory celebration is premature, he acknowledged. Council discussed but did not act on one important aspect of the task force's report, namely, how to implement such a designation system. It asked the Board of Directors to appoint a small, ad hoc group to study the cost of the three options the task force suggested, as well as their legal

implications.

Those options are: Having APA create and operate its own designation system; having APA join with other groups, for example, the National Register, the American Association of State Psychology Boards and the Council of Graduate Departments of Psychology, in operating such a system; or delegating responsibility for implementation to an outside group or consortium.

The ad hoc group was asked to submit its report in time for Council to act at its August meeting.

Page 3
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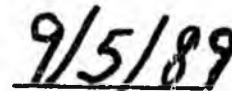


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