May 3, 2013

Judy Bonner, Ph.D.
President
Office of Academic Affairs
University of Alabama at Tuscaloosa
254 Rose
Administrative Box 870114
Tuscaloosa, AL 35487

Dear President Bonner,

At its meeting on April 4-7, 2013 the Commission on Accreditation conducted a review of the doctoral Ph.D. program in Clinical Psychology at the University of Alabama-Tuscaloosa. This review included consideration of the program's most recent self-study report, the preliminary review of January 17, 2012 and the program's response to the preliminary review on March 1, 2012, the report of the team that visited the program on April 16-17, 2012, the program's response to the site visit report on June 21, 2012, the program's deferral for information letter dated August 15, 2012, the program's first deferral response on January 20, 2013, the program’s second deferral response received on March 19, 2013, and the program’s third deferral response received on March 25, 2013.

On the basis of this review, the Commission voted to award accreditation to this program. In so doing, the Commission scheduled the next accreditation site visit to be held in 2015. During the interim, the program will be listed annually among accredited programs of professional psychology in the American Psychologist and on the Accreditation web pages. The Commission also encourages you to share information about your program's accredited status with agencies and others of the public as appropriate.

The program received a three-year term of accreditation (calculated from the date of the last site visit) based on concerns that remain on several domain-related issues. The Commission would like to provide the program with a summary of the review which led to the decision to accredit for three years. This is provided below according to each of the accreditation domains. While concerns remain, the Commission believes the issues cited in this letter can be corrected in the near future.

Drs. Kim Dixon, Victoria Follette, Carlen Henington, Elizabeth Klonoff, and Steve McCutcheon, recused and therefore did not participate in the discussion and vote on your program.

Dr. Susan Zlotlow, Director of the Office of Program Consultation and Accreditation, recused and therefore was not present for the discussion on your program.
The Commission would like to provide the program with a summary of its review. This is provided below according to each of the accreditation domains. At the end of the letter, the program will be provided with an itemized list of any actions that the program needs to take prior to the next accreditation review.

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**Domain A: Eligibility**

*As a prerequisite for accreditation, the program's purpose must be within the scope of the accrediting body and must be pursued in an institutional setting appropriate for the doctoral education and training of professional psychologists.*

The Clinical Psychology doctoral program at the University of Alabama-Tuscaloosa focuses on educating and preparing students for the practice of professional psychology. The program is well established and highly regarded within the university and is clearly represented within institutional budgets. It operates within the Department of Psychology, which is an administrative unit within the College of Arts and Sciences. The University of Alabama is accredited by the Commission on Colleges of the Southern Association of Colleges and Schools. The program serves an integral role in the departmental and broader institutional missions. (self-study [SS], p. 1). The program is distinct from the experimental psychology program, which is also housed in the Department. The program requires at least three full-time years of academic study. In addition, at least two years of full-time residence are required at the university, along with completion of a year-long full-time doctoral internship.

Program, department, and institutional policies and practices reflect strong respect for and understanding of cultural and individual diversity. In addition, written policies are readily available addressing graduate student admission and degree requirements, financial and administrative support for students, student performance evaluation processes including minimal levels of acceptable achievement, and due process and grievance procedures for students and faculty.

The program is consistent with the provisions of this domain.

**Domain B: Program Philosophy, Objectives and Curriculum Plan**

*The program has a clearly specified philosophy of education and training, compatible with the mission of its sponsor institution and appropriate to the science and practice of psychology. The program's education and training model and its curriculum plan are consistent with this philosophy.*

The program implements a scientist-practitioner training model. The philosophy and training approach align well with the mission of the university as a comprehensive doctoral institution. The education provided to students is sequential, cumulative, and graded in complexity, while also valuing individualization of the paths students take to their degree, in relation to the choice of one of four areas of clinical concentration (clinical child, clinical geropsychology, clinical health, or psychology and law), and in relation to career aspirations (SS, p. 5; response to
preliminary review [RPR], pp. 2-3; site visit report [SVR], Domain A). The goals, objectives, and competencies are consistent with the training model.

In the deferral letter the CoA raised several concerns about the program’s curriculum plan and asked for clarification about issues related to assessment of Goal 1 competencies. The program’s response to the deferral addressed and resolved many of those issues. However, the CoA has several remaining concerns about the curriculum plan which will be addressed in detail below.

It is unclear how students are exposed to graduate level training in history and systems of psychology consistent with Implementing Regulation (IR) C-16 (attached). In the response to deferral letter, the program identified “PY 671 History and Systems” which is a new course that is required for students who did not complete a course in history and systems as an undergraduate (deferral response [DR], p. 5). The “Clinical Psychology Curriculum Requirements” also outlines this new requirement (DR, Appendix A). If PY 671 is required only for students who did not have an undergraduate course in history and systems, it is unclear how the program ensures all students attain graduate level competence in history and systems consistent with IR C-16. It also remains unclear how coverage in the history of psychology is evaluated. In its response to preliminary review, the program provided a revised Table B.2, which identified “Students will demonstrate an in-depth understanding and knowledge of the history of the discipline of psychology” as a competency for Goal 1. The program uses the comprehensive exam to evaluate attainment of this competency. In the deferral letter (DL) the CoA asked the program to “thoroughly document how this competency is systematically assessed for all students” (DL, p. 2). In response, the program provided a broad overview of what appears to be a conscientious process for assessment of student performance and progress throughout training (DR, pp. 1-2). However, the response does not address how this particular competency is systematically and rigorously assessed through the comprehensive exam. While the comprehensive exam is an acceptable assessment tool, the program has not provided evidence that the exam effectively evaluates this particular competency. In the next self-study, the program should clarify how it ensures graduate level education in history and systems for all students. The program is also asked to document the specific content of the comprehensive exam that corresponds to the history of the discipline of psychology.

It also remains unclear how the program ensures all students are exposed to appropriate graduate level training in affective aspects of behavior. In the program’s most recent response to the deferral letter, the program states that “PY 658 Psychopathology,” a course required for all clinical students, has been modified to more specifically “incorporate affective neuroscience research to provide a better understanding of affective and emotional bases of behavior” (DR, p. 4-5). The response also suggests that the syllabus for the revised course was attached in Appendix B. However, the attached syllabus is PY 358 Psychopathology (DR, Appendix B, p. 1), which appears to be an undergraduate level course. In the next self-study, the program should document how it consistently ensures graduate level exposure for all students to the current body of knowledge in affective aspects of behavior.
The Domain B.2 table indicates that the program uses EPPP scores for student-level assessment of developmental, biological, cognitive/affective, and social aspects of behavior (RPR, Appendix B). In the deferral letter (p. 2) the CoA noted a lack of a systematic and rigorous way to use EPPP scores to assess competency; however, in its response the program did not directly address how these scores are used to evaluate competence in these areas. More specifically, the program has not documented how it makes use of this information to measure individual student-level minimum thresholds of achievement for the competencies in question. The EPPP scores referenced by the program are typically presented in aggregate form, rather than by individual test taker. In addition, EPPP examinations are typically taken after program graduation and are not directly pertinent to demonstration of competencies while in a program. There are many factors, such as intervening post-graduation training experiences, that may impact performance. If the program proposes to use EPPP scores for student-level evaluation of competency attainment, in the next self-study the program should clearly document how it uses these scores to assess individual students while they are progress through the program.

In Appendix A of the response to the deferral letter, the program provided a revised B.3 Table, a document summarizing Clinical Psychology Curriculum Requirements, and a set of four documents constituting the curriculum checklist for each of the program’s four areas of clinical concentration (clinical child, clinical geropsychology, clinical health, or psychology and law). The curriculum summary document and the checklists parallel the narrative response in clearly depicting required and elective academic/training activities. However, the CoA is concerned that the revised B.3 Table does not accurately depict the required courses for the Domain B.3 curriculum areas. For example, the course listed in the B.3 Table as providing coverage in biological aspects of behavior (PY 651 Physiological Psychology) does not accurately reflect the recent program changes as detailed in the narrative response and other documents. Further, throughout the B.3 Table some courses listed as required are quite clearly electives, at least for some students (e.g., PY 693, PY 693, PY 693, etc.). In the next self-study, the program should ensure that its B.3 Table accurately reflects any curriculum changes.

Finally, the self-study indicates that the program encourages students to individualize their curriculum plans, which involves students proposing course substitutions or waivers for required coursework. The deferral letter asked the program to provide CoA with a more complete description of the criteria and processes used to evaluate and potentially approve such requests, and the procedures used by the program to document how substitutions or waivers still ensure student completion of curriculum requirements that are in compliance with Domain B.3(a-e) of the G&P and IR C-16. The program’s response indicated that course substitution decisions rest on the recommendation of the instructor in the department who teaches the comparable course and not necessarily in the psychology department. Specifically, the response indicates that “If in the opinion of the instructor there is substantial content overlap between the previously taken course(s) and the course offered here, the psychology department will recommend to the Graduate Registrar that the student be credited with the UA course” (DR, pp.5-6). This response does not adequately address the CoA’s concern, in that it does not identify the role of program faculty in exercising judgments about the appropriateness of proposed substitutions for courses pertinent to accreditation requirements. In the next self-study, the program should specifically
describe the criteria and processes used to evaluate substitutions or waivers, while still ensuring student completion of curriculum requirements relevant to accreditation.

**Domain C: Program Resources**
The program demonstrates that it has resources of appropriate quality and sufficiency to achieve its education and training goals.

The program has a committed, highly qualified, and talented group of core faculty, augmented by the strong contributions of accomplished and committed associated program faculty and a large number of other important faculty contributors. The core faculty function as a unit, and they serve effectively as role models and mentors for students, consistent with the scientist-practitioner model.

The program is successful in recruiting targeted numbers of highly qualified students with interests that match the training model. The program admits between 10-15 students each year, resulting in student cohorts at different levels of matriculation sufficient in number to allow for meaningful peer interaction and socialization. The program has appropriate space, equipment, financial, and support resources for students and faculty.

The program is consistent with the provisions of this domain.

**Domain D: Cultural and Individual Differences and Diversity**
The program recognizes the importance of cultural and individual differences and diversity in the training of psychologists.

The program has documented systematic, long-term efforts to attract and retain students and faculty from diverse backgrounds. A number of focused departmental and institutional initiatives have supported these efforts in relation to student and faculty recruitment and retention, and the Department’s Minority Recruitment and Retention Committee serves a key role in coordinating recruitment and retention of minority students. In addition, the program has documented a strong commitment to creating an inclusive, supportive learning environment and to training in cultural and individual diversity, reflected by formal coursework, infusion throughout the curriculum, role modeling by faculty, and practicum training opportunities afforded to students.

The program is consistent with the provisions of this domain.

**Domain E: Student-Faculty Relations**
The program demonstrates that its education, training, and socialization experiences are characterized by mutual respect and courtesy between students and faculty and that it operates in a manner that facilitates students' educational experiences.

The program recognizes the rights of students to be treated with courtesy, respect, collegiality, and ethical sensitivity, including a strong commitment to respect for cultural and individual diversity. The site visit report concluded that student-faculty relationships reflect "a high level of collegiality" (SVR, Domain E). It also is clear to the CoA that faculty are accessible to students
for guidance and supervision, and they serve as effective role models. Program requirements, performance expectations, and remediation, continuance, and termination procedures are made available to students through clear and accessible written policies and procedures. In addition, students are provided regular written feedback on their progress, along with guidance for remediation as needed.

The program is consistent with the provisions of this domain.

**Domain F: Program Self-Assessment and Quality Enhancement**

*The program demonstrates a commitment to excellence through self-study, which assures that its goals and objectives are met, enhances the quality of professional education and training obtained by its students, and contributes to the fulfillment of its sponsor institution's mission.*

The program has reported a commitment to ongoing self-assessment and quality enhancement. In addition, the program is demonstrating a commitment to review of its training of clinical psychology doctoral students in relation to evolving scientific and professional knowledge, and national, regional, and local standards and needs (SS, pp. 33-34).

**Domain F.1(a): Outcome Data**

*The program, with appropriate involvement from its students, engages in regular, ongoing self-studies that address its effectiveness in achieving program goals and objectives in terms of outcome data (i.e., while students are in the program and after completion).*

The program has three training goals, with numerous associated objectives and competencies, and evaluation tools, outcomes, and minimum thresholds for assessment of the competencies associated with each training objective. However, in the self-study, and in response to the preliminary review of the self-study, the program did not provide aggregate data on students while they are in the program (proximal) tied directly and specifically to the training objectives and competencies. In addition, the program did not provide systematically collected data from students after they have completed the program (distal) tied directly to the training goals and objectives. The program's response to the deferral did not adequately address these concerns, as requested.

In its response to the deferral the program provided narrative summaries of proximal and distal data by embedding them in a B.2 Table (DR, p. 8-14). However, the B.2 Table used as the template for this data presentation is the original version of the B.2 submitted in the self-study, rather than the revised version submitted in response to the CoA's preliminary review of the self-study. In other words, the presentation of proximal and distal data is aligned with a conceptualization of goals, objectives, and competencies about which the CoA had raised significant concerns, and which the program re-conceptualized and submitted in response to the preliminary review of the self-study. Also, the many elements of the proximal and distal data are presented in a highly aggregated form, which makes it difficult for the CoA, and the program, to examine effectiveness on the level of training objectives and/or targeted competencies. In the next self-study, the program is asked to: 1) ensure that aggregate proximal data are linked
directly, systematically, and clearly to the program’s **current** training goals, objectives and competencies. The program should also indicate how it is using these outcome data to inform continuous quality improvement; 2) provide aggregate distal data tied more directly, systematically, and clearly to the program’s **current** training goals and objectives; and, 3) provide a clear and detailed narrative summarizing its ongoing strategy for using both proximal and distal outcome data to inform continuous quality improvement of training.

Please note, in October 2012 the CoA approved a new Implementing Regulation, IR C-32 (attached), which offers some guidance for doctoral programs related to outcome data, beyond information contained in the G&P. In addition, staff in the Office of Program Consultation and Accreditation are available to provide consultation.

**Domain G: Public Disclosure**

*The program demonstrates its commitment to public disclosure by providing written materials and other communications that appropriately represent it to the relevant publics.*

The program accurately depicts its accreditation status in its public documents. The program’s IR C-20 data are up to date and are clearly accessible on the website. Throughout the accreditation process the program has made substantial changes and more may occur as a result of the issues outlined in this letter. These changes have not been incorporated into the program’s public documents. By **September 1, 2013**, the program is asked to provide documentation that all public materials have been updated to accurately reflect the changes made to the program.

Please note that Implementing Regulation C-20 (Disclosure of Education/Training Outcomes and Information Allowing for Informed Decision-Making by Prospective Doctoral Students) has been recently revised by the CoA. The most current version of IR C-20 is attached for your information.

**Domain H: Relationship with Accrediting Body**

*The program demonstrates its commitment to the accreditation process by fulfilling its responsibilities to the accrediting body from which its accredited status is granted.*

The program maintains a good, working relationship with the Commission. However, the Commission is concerned about the incompleteness of the program’s response to the deferral letter, particularly the program’s failure to address serious concerns about the adequacy of proximal and distal outcome data. In the future, the program should respond in a timely and complete manner to requests from the Commission.

The program is consistent with the provisions of this domain.

In order to keep the Commission informed of the program’s commitment to the ongoing self-study process, the program is asked to address the following issues in a narrative response by **September 1, 2013**:
• Provide documentation to demonstrate that public materials are updated to reflect changes to the program

The accreditation website (www.apa.org/ed/accreditation) provides important updates and policy changes related to the accreditation process. As an accredited program, we encourage you to periodically visit the website to remain current on all new accreditation policies. The Commission on Accreditation would also like to remind you that all accredited programs must inform the accrediting body in a timely manner of changes that could alter the program’s quality. A copy of Implementing Regulation C-19 (Notification of Changes to Accredited Programs) is attached for your information.

In closing, on behalf of the Commission on Accreditation, I extend congratulations to the faculty and students of the professional psychology program for their achievements. The Commission also expresses its appreciation for your personal commitment, and the corresponding support of your administration, to develop and maintain the best possible quality of graduate education and training in psychology. If the Office of Program Consultation and Accreditation may be of service at any time on administrative matters of accreditation, please call upon us.

Sincerely,

Betsy Horrocks Reed
Assistant Director, Office of Program Consultation and Accreditation

cc: Robert Olin, Ph.D., Dean
    Beverly E. Thorn, Ph.D., ABPP, Program Chair
    Martha Crowther, Ph.D., Director of Clinical Training
    Mark Roberts, Ph.D., Chair of Site Visit Team
    Bruce Rybarczyk, Ph.D., Member of Site Visit Team
    Barbara Winstead, Ph.D., Member of Site Visit Team
C-16. Evaluating Program Adherence to the Principle of “Broad and General Preparation” for Doctoral Programs
(Commission on Accreditation, November 2001; revised July 2011)

The Guidelines and Principles for Accreditation of Programs in Professional Psychology (G&P) stipulate, in Section II, B.1, that preparation at the doctoral level should be broad and general. According to the G&P:

"This preparation should be based on the existing and evolving body of knowledge, skills, and competencies that define the declared substantive practice area(s) and should be well integrated with the broad theoretical and scientific foundations of the discipline and field of psychology in general."

The purpose of this broad and general training is preparation for entry level practice (Section II, B.1) consistent with local, state/provincial, regional, and national needs for psychological services (Section III, Doctoral Graduate Programs, Domain F.2(c)). Thus, the Commission on Accreditation (CoA) believes that all graduates from accredited doctoral programs, regardless of substantive practice area, should develop competence in the breadth of scientific psychology as part of this preparation for entry-level practice. The CoA evaluates a program’s adherence to this provision in the context of the G&P, Domain B.3 (reprinted, in part, below) using the following guidelines:

“In achieving its objectives, the program has and implements a clear and coherent curriculum plan that provides the means whereby all students can acquire and demonstrate substantial understanding of and competence in the following areas:

(a) The breadth of scientific psychology, its history of thought and development, its research methods, and its applications. To achieve this end, the students shall be exposed to the current body of knowledge in at least the following areas: biological aspects of behavior; cognitive and affective aspects of behavior; social aspects of behavior; history and systems of psychology; psychological measurement; research methodology; and techniques of data analysis;

(b) ... individual differences in behavior; human development; dysfunctional behavior or psychopathology; and professional standards and ethics.”

This Implementing Regulation refers specifically to all of the content areas specified in Domain B.3(a) (biological aspects of behavior; cognitive and affective aspects of behavior; social aspects of behavior; history and systems of psychology; psychological measurement; research methodology; and techniques of data analysis) and two of the content areas in Domain B.3(b) (individual differences and human development).

Accredited programs must ensure students’ understanding and competence in these specified content areas, including the history of thought and development in those fields, the methods of inquiry and research, and the applications of the research in the context of the broader domain of doctoral training in the substantive area(s) in which they are accredited (e.g., clinical, counseling, or school psychology, or combinations thereof). Thus, the CoA looks toward the program’s specific training model and goals to determine the breadth needed to provide quality training, and as such, acknowledges that programs may use a variety of methods to ensure students’ understanding and competence and that there are multiple points in the curriculum sequence at which these experiences may be placed. Of note is that the term “curriculum” is used broadly and does not refer only to formal courses. However, the CoA also considers several aspects of training to be necessary to meet the provisions of these aspects of the G&P.
**Broad theoretical and scientific foundations of the field of psychology in general.** This requirement addresses breadth of training both **across** and **within** multiple areas in the field of psychology, as described below.

**Across:** Breadth across areas of psychology is addressed via the provision that the curriculum plan include biological aspects of behavior; cognitive and affective aspects of behavior; social aspects of behavior; history and systems of psychology; psychological measurement; research methodology; and techniques of data analysis, and human development. The CoA understands that these content areas may be addressed in separate places in the curriculum or in an integrative manner within the curriculum.

**Within:** Within each specified content area, it is understood that the “current knowledge in the area” is continually changing; as such, breadth and depth are seen as involving coverage of current knowledge in the area, as well as history of thought and development in the area, its methods of inquiry and research, and the evolving nature of the area. A curriculum plan that includes coverage of one or a few aspects of a content area must provide clear and convincing evidence that the specific topics are used as a vehicle by which students develop understanding and competence in the broader content area, including its history of thought, methods of inquiry, and current and evolving knowledge base.

The following definitions are provided to assist programs with understanding the CoA’s interpretation of several areas of Domain B.3(a-b). The CoA acknowledges that these lists are **not** checklists that reflect comprehensive lists of required topics. Rather, they are **examples** of the sorts of topics included in each area, but are not exhaustive and are expected to be fluid, reflecting the evolution of the field.

- **(B.3a) Biological aspects of behavior:** The CoA understands this to include multiple biological underpinnings of behavior, and may include topics such as the neural, physiological, and genetic aspects of behavior. Although neuropsychological assessment and psychopharmacology can be included in this category, they do not by themselves fulfill this category.

- **(B.3a) Cognitive aspects of behavior:** The CoA understands that this area may include the study of topics such as learning, memory, thought processes, and decision-making. Cognitive testing and cognitive therapy do not by themselves fulfill this category.

- **(B.3a) Affective aspects of behavior:** The CoA understands that this area may include topics such as affect, mood, and emotion. Psychopathology and mood disorders do not by themselves fulfill this category.

- **(B.3a) Social aspects of behavior:** The CoA understands that this area may include topics such as group processes, attributions, discrimination, and attitudes. Individual and cultural diversity and group or family therapy by themselves do not fulfill this category.

- **(B.3a) Psychological measurement:** The CoA understands this to mean training in psychometric theory and application beyond applied assessment.

- **(B.3b) Individual differences:** The CoA understands that this may include topics such as personality, diversity, measurement issues, psychometrics, psychopathology, intelligence.

- **(B.3b) Human development:** The CoA understands this to include transitions, growth, and development across an individual’s life. Curricula limited to one developmental period is not sufficient.
Although the G&P specifies that preparation in the substantive practice area(s) should be well-integrated with broad theoretical and scientific foundations, exposure to the specified content areas should not be presented solely within an applied context. Rather, they should be addressed as sub-disciplines in the field of psychology in their own right, as developed and understood by researchers and scholars within these areas. In other words, demonstrating that the program is consistent with the G&P in this regard would preclude coverage only of the application of these aspects of the content area to practice problems or settings (such as cognitive therapy, group therapy, multicultural counseling).

**Faculty qualifications.** Because coverage of the specified content areas is intended to provide exposure to specified sub-disciplines of psychology, the curriculum plan in these content areas should be developed, provided, and evaluated by faculty who are well qualified in the content area. Faculty may be considered qualified by degree (e.g., major or minor area of concentration) or other educational experience (e.g., respecialization, ongoing professional development or other systematic study, current research productivity in the area). It is the program’s responsibility to specify clearly articulated procedures for ensuring appropriate faculty qualifications.

**Graduate level understanding and competence.** Accredited programs should clearly document how the curriculum plan ensures graduate-level understanding and competence. The CoA will look for certain pieces of evidence in evaluating graduate level, including students’ exposure to a curriculum plan that utilizes primary source materials (including original empirical work that represents the current state of the area), emphasizes critical thinking and communication at an advanced level, and facilitates integration of knowledge in the breadth areas with the program’s substantive area(s) of practice. For example, if the program uses a course to satisfy an aspect of Domain B.3 of the G&P, it may be appropriate in some instances to use textbooks that target undergraduate audiences as a minor part of the course (e.g., as foundational reading to introduce the subject area to students) if the majority of the course involves graduate level readings. Programs must also document that students have substantial opportunities to acquire and demonstrate graduate level understanding and competence, as defined above. If a program elects to use students’ prior education or experiences to partially satisfy breadth requirements, the program must also document how each student demonstrates graduate-level understanding and competence in the relevant content areas.

**Flexibility in curriculum plans to ensure student understanding and competence in specified content areas.** As with all aspects of accreditation review, the CoA recognizes that programs may meet the provisions of the G&P using a variety of methods. For example, programs may provide courses or other educational experiences within their program, may allow students to use prior experiences to demonstrate exposure to the content areas, or may use students’ performance on specified outcome measures to demonstrate understanding and competence. The curriculum plan should be documented in sufficient detail so that a reviewer or site visitor can readily understand how the relevant areas are included in the overall educational process in the program, what activities students must engage in to achieve competency and understanding in each area, and how the resulting understanding and competency are evaluated.

If the program chooses to supply courses directed to cover these areas within its required curricular offerings, then it must ensure that the courses provide all students with exposure to the current and evolving knowledge in the relevant area(s), are taught at the graduate level, and are delivered by qualified faculty (as specified above). Where elective courses can be used to satisfy the requirements, the program must clearly explain how it ensures that all students demonstrate substantial understanding of and competence in the required areas, regardless of what course the student chooses to take. Likewise, if the
program chooses options other than courses to satisfy the requirements, the program must clearly explain how the experiences and activities allow all students to demonstrate substantial understanding of and competence in the required areas.

Doctoral programs that admit students who begin the program with demonstrated competence in the breadth of psychological science may satisfy these requirements by providing more focused coverage of these domains consistent with program goals and objectives. Programs that elect to meet the broad and general requirements through this more focused approach must explain how, for each student, the combination of prior coursework/experience and the graduate curriculum provided is consistent with the content areas provided in B.3(a), as well as individual differences, and human development [B.3(b)].

NOTE: Programs that elect to meet the broad and general requirements through a combination of prior educational experiences and more focused graduate instruction in those areas must still ensure that their curricula are appropriate in relation to local, state/provincial, regional, and national needs for psychological services, such as licensure, consistent with Domain F.2(b) of the G&P.
C-19. Notification of Changes to Accredited Programs  
(Commission on Accreditation, February 2005; revised October 2006)

In accordance with Domain H.2 of the Guidelines and Principles for Accreditation (G&P) and Section 4.7(b) of the Accreditation Operating Procedures (AOP), all accredited programs (doctoral, internship and postdoctoral residencies) whether under a single administrative entity or in a consortium, must inform the accrediting body in a timely manner of changes that could alter the program's quality.

The Commission on Accreditation (CoA) must be informed in advance of major program changes such as changes in model, degree offered, policies/procedures, administrative structure, faculty resources, supervision resources, area of emphases, or tracks/rotations. In the case of doctoral programs, this includes changes in the areas of emphasis. For internship/postdoctoral programs, this includes new, additional, or eliminated rotation or training sites. For example, consortium programs must inform the CoA of any substantial changes in structure, design or training sites.

Programs must submit to the Office of Program Consultation and Accreditation a detailed written description of the proposed change(s) and the potential impact upon the relevant accreditation domains. The CoA will review the program change(s) and may request additional information or a new self-study. In the case of a substantive change (such as a change in consortium membership), the Commission may also determine that a site visit is needed to assess whether the revised program is consistent with the G&P. Upon completion of this review, the Commission will note the proposed change and include the information in the next scheduled review or inform the program of any needed immediate additional actions.

The only exception to the policy of informing the Commission in advance is the occurrence of an unavoidable event beyond the reasonable control and anticipation of the program (e.g., educational/training site unexpectedly withdrawing from a consortium because of financial crisis; resources affected by a natural disaster). In such circumstances, it is incumbent upon the program to immediately inform the CoA in writing of the change and to include in its notification a proposed plan for maintaining program consistency with the G&P. The CoA will then proceed as above.

Consultation on program changes is available from the Office of Program Consultation and Accreditation.
C-32. Outcome Data for Doctoral Programs
(Commission on Accreditation, October 2012)

The United States Department of Education (USDE) requires recognized accrediting bodies (such as CoA) to collect and monitor data-driven outcomes, especially as they relate to student achievement. In making an accreditation decision on a program, CoA must demonstrate that it reviews student achievement through review of the program’s outcome data. Therefore, CoA requires all accredited programs to provide outcome data on the extent to which the program is effective in achieving its goals, objectives, and competencies. This Implementing Regulation clarifies the type of data CoA needs to make an accreditation decision for doctoral programs.

As stated in the Guidelines and Principles (G&P) for doctoral programs (F.1a):

The program, with appropriate involvement from its students, engages in regular, ongoing self-studies that address:

(a) Its effectiveness in achieving program goals and objectives in terms of outcome data (i.e., while students are in the program and after completion);

Accredited doctoral programs specify their goals, objectives, and competencies as part of Domain B. It is each program’s responsibility to collect, present, and utilize: (1) aggregate proximal outcome data that are directly linked to program goals, objectives, and competencies, including the content areas specified in Domain B.3, and (2) aggregate distal outcome data that are directly linked to program goals and objectives.

Definitions and Guidelines:

Proximal data are defined as outcomes for students as they progress through and complete the program, that are linked to the program’s goals, objectives, and competencies.

- Proximal data typically include evaluations of students’ performance by others (e.g., by course instructors, thesis/dissertation committees, supervisors) and may also include more objective performance indicators (e.g., numbers of peer-reviewed presentations, publications).

- These data are most easily evaluated by CoA when evaluation methods clearly parallel the program’s goals, objectives, and competencies. For example, individual rating scale items might include language that parallels the program’s stated goals, objectives, and competencies. Some evaluation methods may be broader than a specific competency (e.g., course grades or dissertation defense pass/fail outcomes); or may be relevant to multiple competencies (e.g., successful dissertation defense may relate to competencies in scholarly literature, research methods, data analysis methods). In these instances, the program should describe how the evaluation method is specifically linked to the relevant goals, objectives, and competencies.
• Although student self-ratings of either *satisfaction with training*, or *attainment of program competencies*, may be a part of proximal assessment, these ratings are not considered sufficient outcome data in this context because the ratings do not address the program’s success in achieving its goals, objectives, and competencies beyond the student’s own perspective.

• Completion of an *unevaluated activity* (attendance at a class or seminar, completion of a manuscript, completion of practicum hours) is not considered sufficient proximal outcome data. Rather, the program must provide evaluative data (e.g., course outcomes/grades, supervisor evaluation of practicum performance, dissertation defense outcome, acceptance of a peer-reviewed presentation or publication) that demonstrate that the program is achieving its goals and objectives by ensuring that students are achieving expected competencies.

**Distal data** are defined as outcomes for students *after they have completed the program*, which are linked to the program’s goals and objectives.

• Distal data typically include information obtained from alumni addressing former students’ assessments of the degree to which the program achieved its goals and objectives in its training of them. Distal data may also include graduates’ professional activities and accomplishments (e.g., licensure, employment activities and products, professional memberships and affiliations).

• However, the data that are requested in the required self-study Table 9, *Program Graduates: Employment*, are insufficient alone because it is unlikely that they fully reflect achievement of all of a program’s goals and objectives.

• Distal data are most easily evaluated by CoA when evaluation items clearly parallel the program’s goals and objectives. For example, individual alumni survey items might include language that parallels the program’s stated goals and objectives. For evaluation methods that may not be as clearly linked to specific objectives and instead may be broader, explanation of how the evaluation method is linked specifically to the relevant goals and objectives can facilitate CoA’s evaluation of the extent to which distal data reflect the program’s effectiveness in meeting its goals and objectives.

• Although alumni surveys assessing former students’ overall *satisfaction* with the training program may be an important component of a program’s ongoing self-study process, these surveys are not considered sufficient outcome data in this context because the program’s success in achieving its goals and objectives is not addressed. However, as noted above, former students’ perceptions of how well the program achieved its goals and objectives with respect to the former students’ training could be considered appropriate distal data.
• Although CoA does not specify the interval at which distal data should be collected, the program should demonstrate that data are collected regularly and in an ongoing and timely manner such that the program can use the data to make needed changes consistent with requirements of Domain F.

Aggregate data are compilations of proximal data and compilations of distal data across students, which may be presented by cohort, program year, or academic year. Aggregate data demonstrate the effectiveness of the program as a whole, rather than the accomplishment of an individual student over time.

• To the extent possible, data should be presented in table form using basic descriptive statistics (e.g., sample sizes, means, percentages). The program should choose statistics that best demonstrate the program’s success in meeting its goals and objectives, and how students are acquiring competencies in relation to the program’s defined minimal levels of achievement. For example, presenting percentages of students achieving a competency is clearer than simply presenting numbers of students achieving a competency (i.e., without a denominator). Similarly, some data are useful for understanding general student performance (e.g., means), but do not clearly indicate that all students are reaching minimal levels of achievement for all competencies. The program should provide meaningful data in such a way that the CoA can determine that by the time of program completion, all students are reaching these minimal levels of achievement.

• If data are aggregated over a number of years (i.e., not presented by cohort or academic year), the program must demonstrate how aggregating the data in this way facilitates the program’s self-improvement.

Specificity of Data:

CoA recognizes that programs vary widely in the specificity of their goals, objectives, or competencies. It is expected that an accredited program will provide data at a level of specificity sufficient to allow the program and CoA to assess the program’s effectiveness in achieving its outcomes.

If a program describes broad competencies like the foundational or functional competencies presented in the competencies benchmark document (Fouad et al., 2009), then data should be provided at the competency level. If a program lists these broad competency areas as objectives and then for competencies, lists specific skills related to the broad competency areas, the program may prefer to aggregate the data across the particular skills reflective of each competency.

For example:
• Program A identifies an objective to train versatile professionals who are competent in areas of assessment, intervention, research and consultation. This program might then list each of these areas (i.e., assessment, intervention, research and consultation) as the
application process. To ensure readability and understanding for prospective students, Internship Placement-Table 1 and Internship Placement-Table 2 must be presented separately.

4. Attrition

Programs must report the number and percentage of students who have failed to complete the program once enrolled. These data should be calculated for each entering cohort by dividing the number of students in that cohort who have left the program for any reason by the total number of students initially enrolled in that same cohort. These data should be provided by cohort for all students who have left the program in the last seven (7) years or for all students who have left since the program became initially accredited, whichever time period is shorter.

5. Licensure

Reporting of program licensure data is an expectation of the US Secretary of Education’s National Advisory Committee on Institutional Quality and Integrity for program accreditors, including the APA Commission on Accreditation. As such, programs must report the number and percentage of program graduates* who have become licensed psychologists within the preceding decade. In calculating the licensure percentage:

- The denominator number is the total number of program graduates in the past 10 years, minus the number who graduated in the past 2 years (i.e., the total number of graduates between 2 and 10 years ago).
- The numerator is the number of graduates who became licensed psychologists in that same 8 year period (i.e. between 2 and 10 years ago).
- The licensure percentage, then, is calculated by dividing the number of graduates who became licensed psychologists in the 8 year span from 2 to 10 years ago by the number of doctoral degrees awarded by the program over that same period. For example, the figures reported by a program for 2012 would be number of graduates from the program between 2002 and 2010 who have achieved licensure divided by the total number of students graduating from the program during that same 8-year period.

Programs may clarify their licensure rate for the public in light of their training model and program goals and objectives.

*Please refer to footnote on first page of this Implementing Regulation for definition of graduates.
The following formatted tables are required to be placed in your public materials for data due October 1, 2013. These tables must be updated each subsequent year.

### Time to Completion for all students entering the program

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</thead>
<tbody>
<tr>
<td>Total number of students with doctoral degree conferred on transcript</td>
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<td>Mean number of years to complete the program</td>
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<tr>
<td>Median number of years to complete the program</td>
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<tr>
<td><strong>Time to Degree Ranges</strong></td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
</tr>
<tr>
<td>Students in less than 5 years</td>
<td>b</td>
<td>g</td>
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<td></td>
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<td></td>
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<tr>
<td>Students in 5 years</td>
<td>c</td>
<td>h</td>
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<tr>
<td>Students in 6 years</td>
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<td>i</td>
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<tr>
<td>Students in 7 years</td>
<td>e</td>
<td>j</td>
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<td></td>
<td></td>
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<tr>
<td>Students in more than 7 years</td>
<td>f</td>
<td>k</td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: \((b+c+d+e+f) = a\) each year; \((g+h+i+j+k) = 100\) each year

Also, please describe or provide a link to program admissions policies that allow students to enter with credit for prior graduate work, and the expected implications for time to completion. Please indicate NA if not applicable:
C-20. Disclosure of Education/Training Outcomes and Information Allowing for Informed Decision-Making to Prospective Doctoral Students

(Commission on Accreditation, May 2006; revised November 2006; July 2007; July 2010; March 2012; April 2013)

Domain G of the Guidelines and Principles for Accreditation of Programs in Professional Psychology (G&P) requires that doctoral graduate programs provide potential students, current students, and the public with accurate information on the program and on program expectations. This information is meant to describe the program accurately and completely, using the most up-to-date data on education and training outcomes, and be presented in a manner that allows applicants to make informed decisions about entering the program.

The CoA requires accredited programs to update the data tables annually and post the information in its public materials (e.g. website) by October 1 each year. Failure to update the information is as much of a concern as failure to provide the necessary information in the required format. After October 1, the Commission will review programs’ compliance with the below requirements and that the data provided are consistent with the program’s data from the Annual Report Online (ARO).

Presentation of Required Information

To ensure that the required information for each program is available to the public in a consistent fashion, the following three provisions are effective September 15, 2012:

- The information must all be located in a single place and be titled “Student Admissions, Outcomes, and Other Data”;
- If the program has a website, the information must be located no more than one-click away from the main/home doctoral landing page; and (see update to this provision below)
- The data must be presented in tables consistent with those listed at the end of this regulation. Programs may choose to provide other data to supplement the requirements of this regulation, but these tables must be provided. If the program chooses to provide supplemental information, it should be provided below the corresponding required tables.

In addition to the provisions already in effect, two additional requirements are effective September 15, 2013:

- The link from the main/home doctoral landing page to the required information must also be titled “Student Admissions, Outcomes, and Other Data”;
- Table cells should not be left blank; instead, please enter a “0” if not applicable

Because the information required should include those education and training outcomes that will allow applicants to make informed and comparative decisions, the Commission requires that all doctoral programs minimally provide the following to prospective students in its public materials, including its website, if it has one: 1) time to program completion; 2) program costs (tuition and fees) and fellowships and other funding available; 3) internship acceptance rates; 4) student attrition rates; and 5) licensure outcomes. These are defined as follows:

*For the purposes of this Implementing Regulation, only students that have had their doctoral degrees conferred on their transcripts are considered “graduates.” “Time to completion” is the amount of time between the date of entry into the program and the date of program completion on the official transcript.*
1. Time to Completion

Time to completion must be presented in two ways:

- First, programs must provide the **mean** and the **median** number of years that students have taken to complete the program from the time of first matriculation. These data should be provided for all graduates* in each of the past seven (7) years.
- Second, the program should provide the percentage of students completing the program in fewer than five years, five years, six years, seven years, and more than seven years.

In a text box below the table, programs must also note any admissions policies that allow students to enter with credit for prior graduate work and the expected implications for time to completion.

2. Program Costs

Programs are expected to make available the total costs per student for the current first year cohort. This information should include full-time student tuition, tuition per credit hour for part-time students, and any fees or costs required of students beyond tuition costs. For example, if a program requires students to travel to attend a mandatory component of the program, the estimated costs of this travel should be included as well. Programs may also provide information regarding current adjustments to tuition including, but not limited to: financial aid, grants, loans, tuition remission, assistantships, and fellowships. Even if program cost information is provided elsewhere on another university or other site, it must be provided in the doctoral program’s materials as well.

NOTE: Please enter discrete dollar values in the Program Costs table and not percentages. For instance, if the program covers students’ full costs within a category, please enter “$0” in that cell.

3. Internships

Programs are expected to provide data on students’ success in obtaining internships. The program is required to report for each of the past seven (7) years:

- The total number of students who sought or applied for internships
- The number and percent of total who obtained internships
- The number and percent of total who obtained APA/CPA-accredited internships
- The number and percent of total who obtained APPIC member internships that were not APA/CPA-accredited (*if applicable*)
- The number and percent of total who obtained other membership organization internships (e.g., CAPIC) that were not APA/CPA-accredited (*if applicable*)
- The number and percent of total who obtained internships conforming to CDSPP guidelines (school psychology programs only) that were not APA/CPA-accredited (*if applicable*)
- The number and percent of total who obtained other internships that were not APA/CPA-accredited (*if applicable*)
- The number and percent of total who obtained paid internships
- The number and percent of total who obtained half-time internships (*if applicable*)

NOTES: In calculating the above percentages, the program must base these on the **total number of students** who sought or who applied for internship in each year, including those that withdrew from the program.
## Program Costs

<table>
<thead>
<tr>
<th>Description</th>
<th>2013-2014 1st-year Cohort Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuition for full-time students (in-state)</td>
<td></td>
</tr>
<tr>
<td>Tuition for full-time students (out-of-state)</td>
<td></td>
</tr>
<tr>
<td>Tuition per credit hour for part-time students (if applicable)</td>
<td></td>
</tr>
<tr>
<td>University/institution fees or costs</td>
<td></td>
</tr>
<tr>
<td>Additional estimated fees or costs to students (e.g. books, travel, etc.)</td>
<td></td>
</tr>
</tbody>
</table>
### Internship Placement - Table 1

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
<td>N</td>
<td>%</td>
</tr>
<tr>
<td>Students who sought or applied for internships*</td>
<td>a</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Students who obtained internships</td>
<td>b</td>
<td>h</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Students who obtained APA/CPA-accredited internships</td>
<td>c</td>
<td>i</td>
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<td></td>
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<tr>
<td>Students who obtained APPIC member internships that were not APA/CPA-accredited <em>(if applicable)</em></td>
<td>d</td>
<td>j</td>
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<tr>
<td>Students who obtained other membership organization internships (e.g. CAPIC) that were not APA/CPA-accredited <em>(if applicable)</em></td>
<td>e</td>
<td>k</td>
<td></td>
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<tr>
<td>Students who obtained internships conforming to CDSPP guidelines that were not APA/CPA-accredited <em>(if applicable)</em></td>
<td>f</td>
<td>l</td>
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<tr>
<td>Students who obtained other internships that were not APA/CPA-accredited <em>(if applicable)</em></td>
<td>g</td>
<td>m</td>
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</tbody>
</table>

*This includes students that withdrew from the internship application process
Note: \( h = \frac{b}{a} \times 100; \ (c+d+e+f+g) = b \) each year; \((i+j+k+l+m) = h \) each year

### Internship Placement - Table 2

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<thead>
<tr>
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<tbody>
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<td>N</td>
<td>%</td>
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<td>N</td>
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<td>N</td>
<td>%</td>
</tr>
<tr>
<td>Students who obtained internships</td>
<td>b</td>
<td>h</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Students who obtained paid internships</td>
<td>n</td>
<td>p</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Students who obtained half-time internships* <em>(if applicable)</em></td>
<td>o</td>
<td>q</td>
<td></td>
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</tbody>
</table>

*Cell "o" should only include students that applied for internship and are included in cell "a" from "Internship Placement - Table 1."

Note: \( p = \frac{n}{a} \times 100; \ q = \frac{o}{a} \times 100 \)
### Attrition

<table>
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</thead>
<tbody>
<tr>
<td>Students for whom this is the year of first enrollment (i.e. new students)</td>
<td>$a$</td>
<td>-</td>
<td>-</td>
<td>$b$</td>
<td>$e$</td>
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<tr>
<td>Students whose doctoral degrees were conferred on their transcripts</td>
<td>$c$</td>
<td>$f$</td>
<td></td>
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<tr>
<td>Students still enrolled in program</td>
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<tr>
<td>Students no longer enrolled for any reason other than conferral of doctoral degree</td>
<td>$d$</td>
<td>$g$</td>
<td></td>
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<td></td>
<td></td>
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</tbody>
</table>

Note: $(b+c+d) = a$ each year; $(e+f+g) = 100$ each year

### Licensure

<table>
<thead>
<tr>
<th>Outcome</th>
<th>2003-2004 to 2010-2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of students with doctoral degrees conferred on transcript in time period</td>
<td>$a$</td>
</tr>
<tr>
<td>Number of students with doctoral degrees conferred on transcripts who became licensed doctoral psychologists in time period</td>
<td>$b$</td>
</tr>
<tr>
<td>Licensure percentage</td>
<td>$c$</td>
</tr>
</tbody>
</table>

Note: $c = b/a \times 100$