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**ABSTRACT**

Despite the Idaho State Board of Psychologist Examiners regulation that licensees must graduate from a program labeled "psychology", the board did not always enforce this regulation. Calls at the national level for a designation system of "psychology" programs, independent of American Psychological Association accreditation, coupled with the fact that there are no doctoral degrees granted in Idaho through any department or program labeled "psychology", underscored the need for additional information. In January, 1984, a mailing with a letter explaining the situation in Idaho, a survey, and a stamped, addressed envelope was sent to the psychology licensing boards in all 50 states and the District of Columbia. Responses (N=45) were received from all boards except those in California, Indiana, Massachusetts, Mississippi, Nebraska, and Vermont. Results of the survey showed that the states were divided almost equally in requiring a program labeled "psychology". It was also revealed that some state board offices did not know the provisions of their laws and regulations and that practice sometimes varied from the stated regulations. (A table summarizing the responses alphabetically by state is included.) (Author/NRB)

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Getting Licensed: Does What They Call  
Your Training Program Make a Difference?

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Running Head: Training Program Name

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## Abstract

On becoming a member of the Idaho State Board of Psychologist Examiners, the author learned that, despite a specific regulation requiring that licensees graduate from a program labeled "psychology", the Board did not always enforce this regulation. Calls at the national level for a designation system of "psychology" programs, independent of APA accreditation, coupled with the fact that there are no doctoral degrees granted in Idaho through any department or program labeled "psychology", underscored the need for additional information. In January, 1984, a mailing with a letter explaining the situation in Idaho, a survey and a stamped addressed envelope was sent to the psychology licensing boards in all fifty states and the District of Columbia. Forty-five responses were received. Those not reporting were California, Indiana, Massachusetts, Mississippi, Nebraska, and Vermont. Results show: (1) the states are divided roughly in half in requiring a program labeled "psychology", (2) evidence that at least some state board offices don't know the provisions of their laws and regulations, and (3) practice sometimes varies from the stated regulations. A table summarizing the responses is included.

Getting Licensed: Does What They Call  
Your Training Program Make a Difference?

Harold B. Robb III

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On becoming a member of the Idaho State Board of Psychologist Examiner's in July of 1983, I was directly confronted with applications from candidates who had not graduated from programs labeled "psychology" (AASPA, 1977). Despite Board regulations, which clearly state that licensees must graduate from a program labeled "psychology", I learned the Board regularly granted licenses to persons who had not met this requirement. Idaho law does allow licenses to be granted to persons with "equivalent training." Further, no doctoral degrees are currently granted in Idaho through any department of program labeled "psychology". However, two programs labeled "Counseling" or "Counseling and Guidance", and located in Colleges of Education, do grant doctoral degrees. These facts, coupled with calls at the national level for a designation system of "psychology" programs, independent of the APA accreditation system (APA 1983), and the continual barrage of questions from graduate and undergraduate students seeking the "truth" about licensing, further underscored the need for additional information in this area.

### Method

A mailing was sent in January, 1984, to the psychology licensing boards in all fifty states and the District of Columbia. The mailing included a letter explaining the situation in Idaho, a survey, and a stamped-addressed envelope. The survey contained three questions: (1) did the state's law or Board's regulations require a licensee to have graduated from a program labeled "psychology;" (2) was the requirement strictly enforced and (3) would the Board grant permission to publish the results.

### Results and Discussion

Forty-five responses were received. Mailings to Indiana and Mississippi were returned as undeliverable. No response was received from either California, Massachusetts, Nebraska, or Vermont. All responses were received in January or February of 1984, except the response from Washington D.C. It was received in November, 1984. No respondents refused permission to publish the survey results. Respondents from the states of Alabama, Arkansas, Delaware, Georgia, Kentucky, Louisiana, Main, Missouri, New Hampshire, New Mexico, New York, North Carolina, North Dakota, South Dakota, West Virginia, Wyoming, and Washington D.C. simply returned the completed questionnaire as requested. Other respondents included a copy of the state law and/or Board regulations, or the relevant sections of each (these states are indicated by italics type in Table 1).

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Insert Table 1 About Here  
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Respondents from the states of Arizona, Kansas, Michigan, and Tennessee did not directly address the first survey question, "Our law or regulations require a candidate to graduate from a program designated as a psychology program: \_\_\_yes \_\_\_no." Instead, they included a copy of the state law and Board regulations, or the relevant sections of each, and encouraged me to draw my own conclusions. In a similar way, the respondent from Utah did not return the questionnaire, but provided a letter. It stated their law allows for licensing of individuals completing "a program of studies whose content was primarily psychological..." The respondent then referred me to a copy of their rules and regulations which was enclosed. Finally, the respondent noted in the letter that graduates of programs which were not designated "psychology" programs might be eligible for licensure in Utah.

Turning to the rules and regulations, I examined the criteria for a program whose content was primarily psychological in nature. The criteria included being labeled as a "psychology program." Combining this statement of criteria and the statement in the letter that graduates of programs which were not designated "psychology" programs might be eligible for licensure in Utah; I conclude that the Utah Board, like the Idaho Board, sometimes ignores its stated requirement that a program of study be labeled "psychology".

Twenty-four of the forty-five states responding reported that either their law or regulations required a licensee to graduate from a program labeled "psychology." These states are: Alabama, Alaska, Arkansas, Colorado, Connecticut, Florida, Hawaii, Illinois, Kentucky, Louisiana, Maine, Missouri, Montana, Nevada, New Hampshire, New Mexico, New York,

Oklahoma, Pennsylvania, South Dakota, Virginia, Washington, West Virginia, and Wyoming (these states are indicated by a # mark in Table 1). All reported that this provision was strictly enforced. The twenty-one remaining states reported that neither their law or regulations requires that a licensee graduate from a program labeled "psychology."

Twenty-eight states provided copies of their laws and regulations. These were directly inspected. All the laws examined, excepting those of Connecticut and Virginia, specifically make provision for training programs which are not labeled "psychology" programs but provide equivalent training. In Connecticut and Virginia, the law specifically gives the Board the right to decide what constitutes satisfactory training (see Equivalency in Law Table 1.). The rules and regulations of ten states make specific reference to requiring that a program be labeled "psychology." These are: Connecticut, Florida, Hawaii, Idaho, Kansas, Montana, Nevada, Utah, Virginia, and Washington. Idaho and Utah, as noted above, report they do not rigorously enforce this requirement. Kansas, however, reported it did not even have such a requirement in the first place!

Colorado, Illinois, Maryland, and Texas do not have a requirement that a program be labeled "psychology," although Colorado and Illinois reported having this requirement. Instead, these four states require a program to publicly state that, "the program intends to train psychologists." Nevada and Kansas have this requirement in addition to requiring that the program be labeled "psychology."

Alaska, Oklahoma and Pennsylvania reported that their law, and/or regulations, require that a program be labeled "psychology." However, an

examination of their laws and regulations does not support this assertion. The Alaska law states that an approved program means, "a program which meets the requirements established by the American Psychological Association Education and Credentialing Committee in Psychology for an approved program, or its equivalent as determined by the Board." The Alaska rules do not specify equivalence, but the Board appears to require a program to be labeled "psychology" as a matter of practice. Oklahoma and Pennsylvania appear to have a similar practice. Oklahoma and Pennsylvania, as well as the majority of the remaining states, require evidence that a major portion of the program was psychological in nature, and many states specify particular areas of coursework (e.g. cognitive/affective basis of behavior).

Montana provided some interesting information on enforcement. Montana is a state with a law allowing for programs of equivalent training. Montana also has a regulation requiring that a program specifically be approved as a program in psychology by the relevant officers of an institution and by those individuals, boards and other supervisory groups charged with overseeing the institution. Montana reports several challenges to this regulation by persons who believe their programs were primarily psychological in nature, but whose programs were not labeled "psychology" programs. When these challenges have gone to an administrative hearing, the challengers have regularly received licenses.

There are two things to glean from these results. First, the states are divided roughly in half on the question of requiring a program to be labeled "psychology." Second, there is little wonder that people find this issue so confusing since there is: (1) variety among the states on

the issues; (2) evidence that at least some state board offices don't know the provisions of their laws and regulations; and (3) practice sometimes varies from the stated regulations.

As a member of a state licensing board, I am asked to look out for the interest of the public where the practice of psychology is concerned. In that capacity, I cannot help thinking of two responses which I received during this investigation. One was: "Of course the program has to be labeled 'psychology.' How else would you know they were psychologists." The other was: "The Board believes that limiting licensure to persons with psychology majors only denies licensure to persons with psychological training whose majors happen to be titled something other than psychology, which is not really protection of the public."

Surely folks clever and bright enough to complete a doctoral program, and I do believe the doctorate is the proper level of training for psychologists, can find ways of recognizing other people who are appropriately trained in psychology without having to ask what their training programs were labeled. Focusing on what was learned in a training program by reviewing course titles, course descriptions, course syllabi, course texts and even communicating directly with faculty, if necessary, seems to me a better way to protect the public than asking what the training program was called. I acknowledge such procedures are a pain in the neck for licensing boards, but they do protect the public from practitioners with insufficient training in psychology. I believe, in the long run, this will also prove best for psychology as well as the public.

REFERENCES

American Association of State Psychology Boards, Educational Standards and Accreditation Committee. Toward a Definition of Training in Professional Psychology, 1977.

American Psychological Association, Task Force on Education and Credentialing. Draft Report to the APA Board of Directors and the Council of Representatives, 1983.

TABLE 1\*

SUMMARY OF STATES REPORTING REQUIREMENT  
FOR TRAINING PROGRAM TO BE LABELED "PSYCHOLOGY"

State	Equivalency In Law	Statement In Rules
Alabama#	?	<u>requires program designated "psychology"</u>
Alaska#	yes	not defined in rules but note states that practice appears to be <u>clearly identified and labeled as a psychology program</u>
Arizona	yes	the applicant's transcripts show that of graduate courses taken for graduate credit, a minimum of 75% or 60 semester hours, whichever is least, are in subject areas within the field of psychology. The research and practicum activities of any such applicant must be considered as primarily psychological by the Board.
Arkansas#	?	<u>requires program designated "psychology"</u>
Colorado#	yes	substantial equivalence means they don't have to call the program "psychology" but they have to publicly state that the

\* \_\_\_\_\_

1. States in Italics type included relevant sections of law and/or rules.
2. # marked states said their law or rules require program to be designated "psychology."
3. Underlining denotes psychology program designation required.
4. Essay type denotes institution must state the intention of the program is to train psychologists.

<u>State</u>	<u>Equivalency In Law</u>	<u>Statement In Rules</u>
		program intends to train psychologists
Connecticut#	definition left to board	<u>clearly identified and labeled as a psychology program</u>
Delaware	yes	?
Florida#	yes	the letter says <u>psychology program is required</u> . This is apparently interpretation in the rules, a copy of which was not provided.
Georgia	yes	no requirement for a program designated "psychology"
Hawaii#	yes	<u>clearly identified and labeled as a psychology program</u>
Idaho	yes	<u>requires program designated "psychology"</u>
Illinois#	yes	the program must be

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State	Equivalency In Law	Statement In Rules
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		clearly identified and labeled as a program to education and train professional psychologists
Iowa	yes	1. (a) A clear statement from the Dean of an accredited school granting the degree, that the program of study was required by that institution as a program in psychology; <u>or</u> (b) A clear statement from the Department of Psychology of that college or university, affirming the coursework to be equivalent to work in psychology at that institution; and 2. course descriptions ...etc.
Kansas	yes	Board shall take into consideration the following... <i>(b) whether the program,...</i> is <u>clearly identified and labeled as a psychology program</u> and is clearly specified in pertinent institutional catalogs as having its

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State	Equivalency In Law	Statement In Rules
		intent to educate and train professional psychologists
Kentucky#	yes	<u>requires program designated "psychology"</u>
Louisiana#	?	<u>requires program designated "psychology"</u>
Main #	no	<u>requires program designated "psychology"</u>
Maryland	yes	substantially, equivience means they don't ahve to call the program "psychology" but they have to publicly state that the program intends to train psychologists
Michigan	yes	75% of the hours required for the degree shall be primarily psychological in content. The dissertation and internship are excluded from what is considered coursework. To be deemed psychological in content, a course shall satisfy at least 1 of the following (1) Coursework: the material taught is psychological; (2) Psychology department:

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<u>State</u>	<u>Equivalency In Law</u>	<u>Statement In Rules</u>
		the course is taught in a psychology department
Minnesota	yes	2/3 of coursework psychological in nature
Missouri#	?	<u>requires program designated "psychology"</u>
Montana#	yes	have specifically been <u>approved as a program in psychology</u> by the officres of the institution and by thsoe individuals, boards and other supervisory groups.
Nevada#	?	whether the program, ..., is <u>clearly identified and labeled as a psychology program</u> and is clearly specified in pertinent institutional catalogs as having its intent to educate and train professional psychologists
New Hamp.#	yes	<u>requires program designated "psychology"</u>
New Jersey	yes	dissertation of a psychological nature and coursework in specified areas
New Mexico#	yes	note says program must

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State	Equivalency In Law	Statement In Rules
		be primarily psychological in nature
New York#	?	<u>requires program designated "psychology"</u>
N. Carolina	yes	doctoral degree based on a planned and directed program of studies content psychological in nature, from an accredited institution (law)
N. Dakota	yes	no requirement that the program be designated "psychology"
Ohio	yes	organized program with a specified number of hours of coursework psychological in nature and divided into specified areas and dissertation committee proves credentials.
Oklahoma#	yes	organized program with a specified number of hours of coursework psychological in nature and divided into specified areas
Oregon	yes	organized program with a specified number of hours of coursework psychological in nature

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State	Equivalency In Law	Statement In Rules
		and divided into specified areas
Pennsylvania#	yes	2/3 of coursework psychological in nature and divided into specified areas
Rhode Is.	yes	organized program with a specified number of hours of coursework psychological in nature and divided into specified areas
S. Carolina	yes	the law calls for a program substantially equivalent to that prescribed in the AASPB guidelines and a written note says the emphasis is on organized program rather than name of program
S. Dakota#	?	<u>requires program designated "psychology"</u>
Tennessee	yes	<i>must prove that courses taken outside a department of psychology are "psychological" in content with the "burden of proof" being on the applicant</i>

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3. Underlining denotes *psychology program designation required*.
4. Essay type denotes institution must state the intention of the program is to train psychologists.

State	Equivalency In Law	Statement In Rules
Texas	yes	substantially equivilent means they don't have to call the program "psychology" but they have to publicly state that the program intends to train psychologists
Utah	yes	<u>clearly identified and labeled as a psychology program</u>
Virginia#	definition left to Board	<u>clearly identified and labeled as a psychology program</u>
Washington#	?	<u>clearly identified and labeled as a psychology program</u>
Wash. D.C.	yes	60 graduate hours in courses that are primarily psychological in nature
W. Virginia#	yes (doctoral)	M.A.+ 5 years supervised experience required that the M.A. program be designated "psychology" but doctoral licensing allows licensing if approximately 50% of the post M.A. credits are in psychology courses

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State	Equivalency In Law	Statement In Rules
Wisconsin	yes	organized program with a specified number of hours of coursework labeled "psychology" and divided into specified areas
Wyoming#	?	<u>requires program designated "psychology"</u>

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