

# OBPE Special Edition Newsletter

---

December 5, 2011

This special edition of the OBPE newsletter addresses the two primary issues that have emerged since the Board passed the Administrative Rule changes on 9-27-11:

- Changes in educational requirements for licensure and
- Confusion regarding *two paths* to the *one generic* psychology license (Clinical and applied).

## **NEED FOR UPDATING EDUCATIONAL REQUIREMENTS**

The educational requirements for licensure as a psychologist in Oregon were last updated in 1989. Since that time, many changes have occurred in training paradigms in both “bricks and mortar” and distance learning. Along with these changes, the OBPE staff encountered an increasing number of challenging questions regarding the adequacy of the educational preparation of some applicants for licensure. In response to these realities, in the late Fall of 2009, Debra Orman McHugh, Executive Director of the OBPE, invited a subgroup of Board members to begin the process of re-evaluating the applicable rules and recommending revisions where needed.

## **PROCESS AND HISTORY**

Since January 2010, a painstaking and publicly transparent process has been unfolding. Early on, it became clear that the *educational requirements* for psychologists differed, depending on the particular area of anticipated practice. In addition, a precedent for expanding the paths to licensure has been set in other states and is contained in both the APA and ASPPB model licensing acts.

Thus, the work of the committee necessarily involved incorporating this reality into the proposed changes. A two-pronged effort to update the rules for the practice of psychology in Oregon resulted:

- *Educational Requirements* Re-visiting and updating the 1989 training required for all psychologists practicing in Oregon.
- *Paths to Psychology Licensure* Creating an avenue for licensure for non-health care (“applied”) providers of psychological services to the public wherein educational requirements would be appropriate for their education and supervised experience.

The education committee began its work in both areas above by requesting input from various experts and “stakeholders” at the doctoral level of psychology education, including Oregon based institutions and distance/on-line educators.

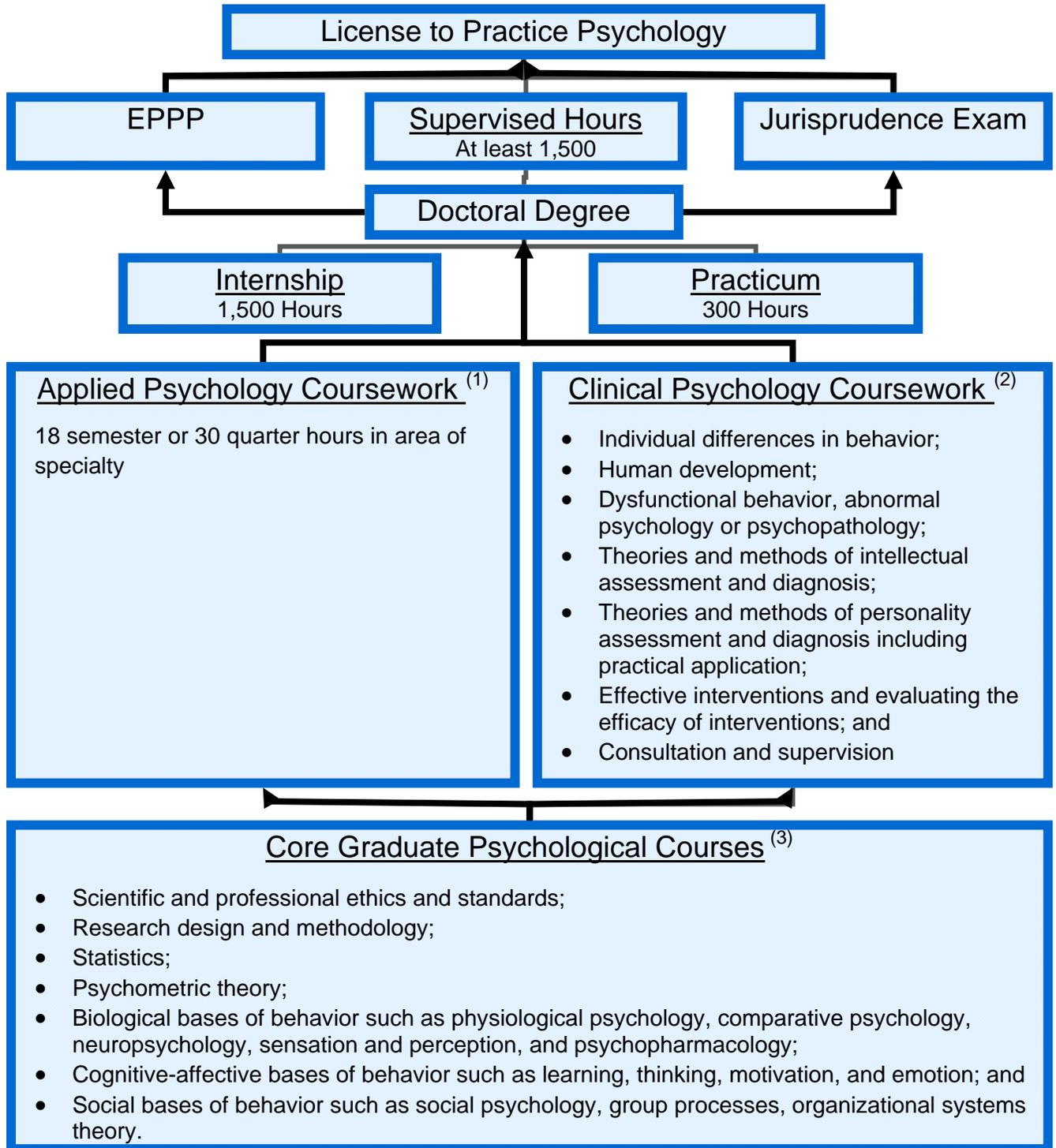
### Educational Requirements

- Initially, input on the general educational requirements for psychologists was solicited from the University of Oregon, George Fox University, Fielding Institute, and Pacific University.
- An invitation was issued to all Oregon licensed psychologists, as well as all psychology department administrators and faculty in Oregon, to participate in an education forum on Nov. 5, 2010 in Wilsonville. The forum sought input and ideas from all of the above-mentioned constituents.
- Various individuals have written emails and attended public sessions of the OBPE meetings to give input and feedback.
- OPA has sent a liaison (Scott Pengelly, Ph.D.) to the public portion of OBPE meetings to keep the Board apprised regarding the ongoing feedback from Oregon psychologists.
- Shane Haydon, Ph.D. (current Chair of OBPE) has been the liaison to OPA giving updates on the progress of the work of the education committee.

### Paths to Psychology Licensure

- The education committee reviewed the model licensing acts of the APA and the Association of State and Provincial Psychology Boards (ASPPB).
- Information and input was personally solicited from educators and researchers at Portland State University, Eastern Oregon University, Southern Oregon University, University of Oregon, Western Oregon University, and Willamette University.
- In keeping with national trends in psychology, the education committee created two avenues (“paths” or “tracks”) for psychology licensure. Individuals who hold a doctoral degree (in any area of psychology), whose practice does not involve the direct provision of health care (clinical services), but whose education and supervision have prepared them for psychology practice in applied fields, have an opportunity to pursue psychology licensure Oregon.
- The diagram on page 3 illustrates this:

# Paths to Psychology Licensure in Oregon



1) 858-010-0011(4)

2) 858-010-0010(4)

3) 850-010-0010(2)(m) & 850-010-0011(2)(m)

After the May 27, 2011 Board meeting the committee was ready to put the rule changes out for public comment. This was postponed until July 2011 after Walden University administrators requested a meeting with OBPE representatives to discuss issues that had arisen with some of their graduates attempting to gain licensure in Oregon. To ensure that Walden, a distance educator, had a fair chance to give input, that meeting was held in Portland in early July. The final version of the rules changes were approved and sent out for public comment after the OBPE meeting on July 7, 2011.

### **Feedback Results:**

Helpful input was received during the public comment period from July 23, 2011 to September 23, 2011. While there has been much support for the changes, considerable confusion and misunderstanding were evidenced, particularly about the clinical “health care provider” and applied “non-health care provider” tracks. The education committee acknowledges that its emphasis on the titles of the two tracks (clinical and applied), as opposed to their precise meaning, caused some of the uncertainty. As stated previously we are writing this special edition of the newsletter to respond to some of the questions and clarify some of those issues. Because of the overlap, we have grouped similar questions together.

## **Frequently Asked Questions**

### **1. Does Oregon now have two licenses to practice psychology? What do we call ourselves?**

- There is, and will continue to be, only ONE generic license for psychologists.
  - Psychologists who are health care providers pursue an educational path (track) that prepares them for clinical service. Once licensed, they are called PSYCHOLOGISTS.
  - Psychologists who are non-health care providers pursue a path (track) in their education and supervision that prepares them for applied service. Once licensed, they are also called PSYCHOLOGISTS.
  - Note that under Oregon law, it is not appropriate to call oneself a “licensed neuropsychologist” or a “licensed clinical psychologist”. We are all simply “licensed psychologists” with no designations as to the specific area of practice (See OBPE Winter Bulletin, 2011, pg 5).

### **2. How are the two different “tracks” related to scope of practice issues?**

- The 2002 APA Ethical Principles of Psychologists and Code of Conduct mandates that psychologists practice only within the boundaries of their competence, based on their education, training, supervised experience, consultation, study or professional experience. (APA Code, Standard 2.01).

- Accordingly, if a psychologist working in an industrial/organizational area wishes to begin providing health care services (psychotherapy), he/she does not need to get another license, but rather to undertake “relevant education, training, supervised experience, consultation, or study” in this new area. (APA Code, Standard 2.01). The burden of proof is upon the psychologist to show he s/he is practicing within her/his education, and supervised experience.

**3. Why did the Board create the two “tracks” to licensure? What is the benefit?**

- The “two tracks” (applied track and clinical track) simply provides a parallel path to attain licensure for both health care and non-health care practitioners of psychology. The two “tracks” or “paths” to licensure acknowledge that these two broad areas of practice have different sets of skills, knowledge, education, and supervision settings.
- Having an “applied track” as a path to psychology licensure acknowledges the many and varied ways that psychology services are rendered to the public, in addition to offering direct health care (clinical) services. It protects the public against unqualified practitioners, it publicly attests to the credibility and qualifications of the practitioner, and it makes non-clinical psychology services to the public accountable to OBPE.

**4. What are the similarities and differences in the educational requirements to attain psychology licensure in the two “tracks”?**

- All those accepted for licensure as psychologists in Oregon will hold a doctoral degree (according to OAR 858-10-0010), pass the EPPP, pass the jurisprudence exam, and complete the required supervised work experience. Their education and supervised work experience will reflect differences, depending on which track they pursue to become a licensed psychologist in Oregon.

**5. Is the Board discriminating against on-line/distance institutions by enacting the revised rules for education and eliminating the “equivalency” clauses?**

- The Oregon Board of Psychology Examiners (OBPE) is not discriminating against on-line/distance institutions. It is simply honoring its primary mission to protect the consuming public of Oregon in the specific area of services offered by psychologists. Related to this is the mandate to promote the integrity of the profession.

- The most significant way that the Board carries out its responsibilities is by insuring that applicants for licensure have been adequately prepared for entry into the profession, thus enabling them to engage in practice that is professional, competent, and ethical. The new rules attempt to do that with a greater level of certainty.
- Licensure represents the capacity for independent and autonomous functioning by the psychologist. It offers assurance to the public that the applicant has met all required standards of training and is now able to practice with no further required supervision. Thus, granting a license to practice psychology is a task the Board takes with utmost seriousness.
- The Board is convinced that the language of “equivalency” (i.e. “...or its equivalent...”) creates the possibility of “lowering the bar” in the rigorous academic preparation of psychologists. Equivalencies, particularly in the critical areas of course requirements, sequence of coursework, primary academic settings, residencies and internships, are notoriously difficult to define with the precision that allows actual comparison and measurement. Equally challenging is the time it requires to evaluate, much less monitor, the multiple forms of equivalent possibilities. With “equivalencies” the responsibility of the institution to the student are at risk of being compromised.
- The Board recognizes that some courses that prepare psychologists lend themselves to various forms of electronic education and we are supportive of them. However, we have not been persuaded that multiple weekends, or short-term gatherings held periodically in different locations can adequately substitute for an academic year in residence that typically includes more advanced academic coursework, intensive acculturation into the profession and pre-doctoral internships.

The Board has had occasion to examine the curricula and syllabi content of some of the coursework counted as “residential” and has not found it to be timely, up-to-date nor of a level or complexity that normally would count as “graduate” caliber. We believe that licensure based upon such experiences would significantly compromise the standard of care that the residents of Oregon deserve.

**6. Why has the Board not allowed for “grandfathering” with the new rules changes?**

- “Grandfathering” clauses are a short-term solution that temporarily reduces or eliminates requirements for a few students. While it might benefit the students involved, it does not satisfy the OBPE’s obligation to protect the public.
- The education committee and the Board take seriously, all constituent feedback regarding the new rule changes. The education committee continues to explore solutions and gather information on this issue.

The education committee ultimately included Robin Shallcross, Ph.D., ABPP, Roger Carlson, Ph.D., Linda Sherman, Ph.D. and Fran Ferder, Ph.D. The Oregon psychologists who have contributed to this process are too numerous to mention and thank, but represent Assistant Deans and Directors of Programs, Directors of Clinical Training, Internship Directors and Post-doctoral psychologist resident program Directors and Supervisors, and college and university Psychology Department chairs and faculty.