

Office of Program Consultation and Accreditation  
American Psychological Association  
750 First Street NE  
Washington, DC 20002

March 24, 2025

Dear Colleagues,

The *Standards of Accreditation for Health Service Psychology* (SoA) and *Standards of Accreditation for Master's Programs in Health Service Psychology* (SoA-M) are Commission on Accreditation (CoA) policy documents that outline training requirements for programs at the doctoral, doctoral internship, and postdoctoral levels. Correspondent to the SoA are Implementing Regulations (IRs), which are official policy documents that “elucidate, interpret and operationally define” the CoA’s policies and procedures. IRs are divided into several different sections (A through E), which are subject to regular review and revision by the CoA. Through this iterative process, opportunities for clarification have arisen regarding IRs in Section C, which relate specifically to the SoA and SoA-M.

Per Standard II.B.2 of the SoA-M and Doctoral Standard II.B.2 of the SoA, the CoA requires that master’s and doctoral programs describe their process that allows students to attain discipline-specific knowledge and each profession-wide competency. IRs C-10 M and C-11 D have been updated with a new requirement on the evaluation of distance education, elements noted for master’s programs, and/or self-study requirements for doctoral programs using distance education.

Per Internship and Postdoctoral Standard II.C of the SoA, the CoA requires that accredited programs provide learning elements or experiences to develop competencies. IRs C-29 I and C-25 P have been updated with the definitions of distance and electronically mediated education as well as a requirement of the evaluation of distance education.

In accordance with the APA "Policies for Accreditation Governance" and U.S. Department of Education regulations for notice and comment, the CoA will make the proposed revisions available for a ninety (90) day period of public review and comment. The comment period is scheduled to begin at **5:00 pm Eastern Standard Time on March 24, 2025 and will continue through 5:00pm Eastern Standard Time on June 22, 2025**. Information about the proposed standards and public comment is available at <http://apps.apa.org/accredcomment/>.

To promote thoughtful discussion, the CoA is providing an electronic-based form for public comment submission. Comments and other information including users' identities will be public, while email addresses used in the registration process will be kept confidential. The CoA will consider all comments received and make appropriate revisions should they be deemed necessary prior to approval of the final versions of the IRs.

Should you have any questions or concerns, please contact the Office of Program Consultation and Accreditation at (202) 336-5979 or [apaaccred@apa.org](mailto:apaaccred@apa.org). On behalf of the CoA, thank you for your review and comments.

## C-10 M. Distance Education

(Commission on Accreditation, April 2023; [revised for public comment February 2025](#))

Distance education utilizes technologies, such as the internet, transmissions through communication devices such as video teleconferencing or audioconferencing, distribution or receipt of recorded media, to provide instruction to students who are not in the same classroom or other in-person setting as the instructor or clinical supervisor. While such distance education may occur synchronously or asynchronously, it must involve *regular and substantive interactions* with the instructor or supervisor to constitute distance education (see [USDE-ED 34 CFR 600.2](#))<sup>1</sup>. Correspondence courses are not distance education and cannot be used to satisfy the curricular and other requirements of the Standards of Accreditation. A correspondence course offers educational experiences to students who are at different location separated from the instructor that does not involve regular and substantive interaction with the instructor.

Programs that offer any portion of their program through distance education must demonstrate compliance with all the Standards of Accreditation for masters' programs in its distance education components just as it must with education offered through any other modality. Depending on the way that distance education is offered, this may require unique, additional information over what a program provides for how it complies with the standards in any traditionally, face-to-face education it offers. Programs utilizing distance education must include in their self-studies sufficient information for CoA to determine how the standards are being satisfied in this modality. This information includes, but is not limited to, information in the following areas:

Authorization to Provide Distance Education: Programs that provide education by distance to students must attest that they are authorized to so by (1) their institutional accreditor, and (2) any pertinent jurisdictional authority such a state or province. Jurisdictional authorization is typically required when distance education is offered to students residing in states other than the one in which the program is located.

Verification of Student Identity: The program must (1) report the method, processes, and/or mechanisms it uses to verify the identity of students participating in distance education, and (2) describe how its student verification procedure protects student privacy.

Nature and Sufficiency of Regular and Substantive Interactions: The program must describe in its self-study how it provides and ensures regular and substantive interaction with students in any distance education experiences. This description must be sufficient for the CoA to determine the experience qualifies as distance education (as opposed to correspondence learning) and fulfills pertinent standards and program aims.

[Evaluation of Distance Education: All programs are expected to evaluate the effectiveness of any distance education modalities it uses to ensure that student learning outcomes are comparable with in person or other non-distance education modalities.](#)

Faculty Qualifications for Distance Education: In addition to the faculty qualifications in IR C-23 M, programs must indicate how its faculty are appropriately prepared and qualified to offer the distance education experiences they provide.

Program Disclosures Regarding Distance Education: The program must indicate how it clearly discloses to students all pertinent information regarding its distance education. Such disclosures must be sufficient for students to make informed decisions about the program. Examples of required disclosures include: the jurisdictions where the program is authorized to provide distance education, the method of verifying student identity in distance education experiences, and an explanation of any fees or other costs specific to the modality.

In accordance with the master's *Standards of Accreditation*, the CoA recognizes that some accredited master's program may elect to utilize distance and electronically mediated delivery formats (Section I.C.2). A master's program is a *distance program* if a student can complete over 50% of its curriculum through distance education. Distance programs, like all master's programs, must demonstrate that all the Standards of Accreditation for master's programs are met.

The following elements are specifically noted for all accredited and applicant master's programs:

- The CoA recognizes that the use of telehealth services in practicum settings may provide a valuable adjunct training experience for students. Telehealth practicum training is governed by both Implementing Regulation C-10 M (Distance Education) and Implementing Regulation C-12 M: Clinical Experiences Guidelines for Master's Programs.
- Telesupervision of students within practicum experiences is governed through Implementing Regulation C-13 M: Telesupervision.
- All programs are expected to follow generally accepted best practices and utilize evidence-based methods in distance education.

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<sup>1</sup> USDE-ED- §600.2 Definitions.

*The following definitions apply to terms used in this part:*

Academic engagement: *Active participation by a student in an instructional activity related to the student's course of study that –*

- (1) *Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;*
- (2) *Includes, but it not limited to –*
  - (i) *Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;*
  - (ii) *Submitting an academic assignment;*
  - (iii) *Taking an assessment or an exam;*
  - (iv) *Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;*
  - (v) *Participating in a study group, group project, or an online discussion that is assigned by the institution; or*
- (3) *Does not include, for example –*
  - (i) *Living in institutional housing;*
  - (ii) *Participating in the institution's meal plan;*
  - (iii) *Logging into an online class or tutorial without any further participation; or*
  - (iv) *Participating in academic counseling or advisement.*

Distance education:

(1) Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

(2) The technologies that may be used to offer distance education include—

- (i) The internet;
- (ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- (iii) Audio conference; or
- (iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.

(3) For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's accrediting agency.

(4) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following—

(i) Providing direct instruction;

(ii) Assessing or providing feedback on a student's coursework;

(iii) Providing information or responding to questions about the content of a course or competency;

(iv) Facilitating a group discussion regarding the content of a course or competency; or

(v) Other instructional activities approved by the institution's or program's accrediting agency.

**C-11 D. Distance ~~and Electronically Mediated~~ Education in Doctoral Programs**  
(formerly C-27; Commission on Accreditation, July 2010; revised November 2015, July 2023; revised for public comment February 2025)

~~The APA Commission on Accreditation (CoA) is recognized as an accrediting body by both the U.S. Department of Education and Council of Higher Education Accreditation. The CoA's recognized scope of accreditation does not include distance education. However, the CoA understands that the growth of technology has increased the options for how instruction can be delivered within psychology doctoral programs. Traditional methods of teaching and interaction in the same time and place are no longer the only available approach to instruction. The CoA recognizes that some accredited doctoral programs may elect to utilize distance ~~and electronically mediated~~ delivery formats in a supplemental or adjunctive role within their programs. Distance education utilizes technologies, such as the internet, transmissions through communication devices such as video teleconferencing or audioconferencing, distribution or receipt of recorded media, to provide instruction to students who are not in the same classroom or other in-person setting as the instructor or clinical supervisor. While such distance education may occur synchronously or asynchronously, it must involve regular and substantive interactions with the instructor or supervisor to constitute distance education (see ED 34 CFR 600.2)<sup>1</sup>. Correspondence courses are not distance education and cannot be used to satisfy the curricular and other requirements of the Standards of Accreditation. A correspondence course offers educational experiences to students who are at different locations separated from the instructor that does not involve regular and substantive interaction with the instructor.~~

~~The CoA defines distance and electronically mediated education in the following manner, consistent with definitions from the APA Task Force on Distance Education and Training in Professional Psychology (June 2002, page 4) as well as definitions specified by other higher education accreditation organizations.~~

~~**Distance education** is defined as a formal educational process in which the majority of the instruction occurs when student and instructor are not in the same place. Instruction may be synchronous (students and instructors present at the same time) or asynchronous (students and instructors access materials on their own schedule). Distance education may employ correspondence study, or audio, video, or computer technologies.~~

~~**Electronically mediated education** covers a wide set of electronic applications and processes such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. It includes the delivery of content via Internet, intranet/extranet (LAN/WAN), audio and videotape, satellite broadcast, interactive TV, and CD-ROM.~~

Although the *Standards of Accreditation* (SoA) do not set a pre-determined limit on the extent of distance education that is permitted, a doctoral program delivering education and training substantially or completely by distance education is not compatible with the doctoral SoA and could not be accredited. This is because face-to-face, in-person interaction between faculty members and students is necessary to achieve many essential components of the doctoral SoA that are critical to education and training in professional psychology, including socialization and peer interaction, faculty role modeling, and the development and assessment of competencies.

Programs that offer any portion of their program through distance education must demonstrate compliance with all the Standards of Accreditation for doctoral programs in its distance education components just as it must with education offered through any other modality. Depending on the way that distance education is offered, this may require unique, additional information over what a program provides for how it complies with the standards in the traditionally, face-to-face education it offers. Programs utilizing distance education must include in their self-studies sufficient information for CoA to determine how the standards are being

satisfied in this modality. This information includes, but is not limited to, information in the following areas:

Authorization to Provide Distance Education: Programs that provide education by distance to students must attest that they are authorized to do so by (1) their institutional accreditor, and (2) any pertinent jurisdictional authority such as a state or province. Jurisdictional authorization is typically required when distance education is offered to students residing in states other than the one in which the program is located.

Verification of Student Identity: The program must (1) report the method, processes, and/or mechanisms it uses to verify the identity of students participating in distance education, and (2) describe how its student verification procedure protects student privacy (see IR C-10 D: Positive Identification of Students Consistent with Higher Education Opportunity Act).

Nature and Sufficiency of Regular and Substantive Interactions: The program must describe in its self-study how it provides and ensures regular and substantive interaction with students in any distance education experiences. This description must be sufficient for the CoA to determine the experience qualifies as distance education (as opposed to correspondence learning) and fulfills pertinent standards and program aims.

Evaluation of Distance Education: All programs are expected to evaluate the effectiveness of any distance education modalities it uses to ensure that student learning outcomes are comparable with in person or other non-distance education modalities.

Faculty Qualifications for Distance Education: In addition to the faculty qualifications in IR C-23 D: Faculty Qualifications, programs must indicate how its faculty are appropriately prepared and qualified to offer the distance education experiences they provide.

The program must indicate how it clearly discloses to students all pertinent information regarding its distance education. Such disclosures must be sufficient for students to make informed decisions about the program. Examples of required disclosures include: the jurisdictions where the program is authorized to provide distance education, the method of verifying student identity in distance education experiences, and an explanation of any fees or other costs specific to the modality.

The following elements are specifically noted for all accredited and applicant doctoral programs:

- The CoA recognizes that the use of telehealth services in practicum settings may provide a valuable adjunct training experience for students. Telehealth practicum training is governed by both Implementing Regulation C-11 D (Distance ~~and Electronically Mediated~~ Education in Doctoral Programs) and Implementing Regulation C-12 D: Practicum Guidelines for Doctoral Programs.
- Telesupervision of students within practicum experiences is governed through Implementing Regulation C-13 D: Telesupervision;
- All programs are expected to follow generally accepted best practices and utilize evidence-based methods in distance education ~~and electronically mediated delivery~~;
- ~~All programs are expected to clearly describe to the CoA in their self-studies which aspects of their education and training utilize distance or electronically mediated delivery formats; and~~

~~All programs are expected to clearly disclose to the public which aspects of their education and training utilize distance or electronically mediated delivery formats. Programs delivering any amount of distance education or utilizing any electronically mediated formats are expected to describe to the CoA how they meet all standards of the SoA, as is true of all programs that are accredited or are seeking accreditation. In their self-studies, such programs are expected to pay particular attention to how distance or electronically mediated delivery is related to ALL parameters of the SoA.~~

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<sup>1</sup> ED - §600.2 Definitions.

The following definitions apply to terms used in this part:

Academic engagement: Active participation by a student in an instructional activity related to the student's course of study that –

(1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;

(2) Includes, but is not limited to –

(i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;

(ii) Submitting an academic assignment;

(iii) Taking an assessment or an exam;

(iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;

(v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or

(3) Does not include, for example –

(i) Living in institutional housing;

(ii) Participating in the institution's meal plan;

(iii) Logging into an online class or tutorial without any further participation; or

(iv) Participating in academic counseling or advisement.

Distance education:

(1) Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

(2) The technologies that may be used to offer distance education include—

(i) The internet;

(ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;

(iii) Audio conference; or

(iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.

(3) For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's accrediting agency.

(4) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following—

(i) Providing direct instruction;

(ii) Assessing or providing feedback on a student's coursework;

(iii) Providing information or responding to questions about the content of a course or competency;

(iv) Facilitating a group discussion regarding the content of a course or competency; or

(v) Other instructional activities approved by the institution's or program's accrediting agency.

### **C-29 I. ~~Delivery of Educational Activities~~ Distance Education**

(Commission on Accreditation, February 2024; revised for public comment February 2025)

For internship programs, educational activities are defined as including any didactic education and supervision provided by the program. The CoA defines distance and electronically mediated education in the following manner, consistent with definitions from the APA Task Force on Distance Education and Training in Professional Psychology (June 2002, page 4) as well as definitions specified by other higher education accreditation organizations.

**Distance education** is defined as a formal educational process in which the majority of the instruction occurs when student and instructor are not in the same place. Instruction may be synchronous (students and instructors present at the same time) or asynchronous (students and instructors access materials on their own schedule). Distance education may employ correspondence study, or audio, video, or computer technologies.

**Electronically mediated education** covers a wide set of electronic applications and processes such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. It includes the delivery of content via Internet, intranet/extranet (LAN/WAN), audio and videotape, satellite broadcast, interactive TV, and CD-ROM.

Programs are required to evaluate these components to demonstrate compliance with all Standards of Accreditation, regardless of the delivery method (e.g., in-person, hybrid, virtual) in the following areas:

**Authorization to Provide Supervision:** Programs must comply with any jurisdictional authority related to the provision of supervision. See IR C-13 I Jurisdiction of Licensure for Supervisors. See IR C-15 I for additional requirements for telesupervision.

**Verification of Student Identity:** The program must (1) report the method, processes, and/or mechanisms it uses to verify the identity of interns participating in educational activities, and (2) describe how its intern verification procedure protects student privacy. See IR C-9 I. Positive Identification of Interns Consistent with Higher Education Opportunity Act.

**Nature and Sufficiency of Regular and Substantive Interactions:** The program must describe in its self-study how it provides and ensures regular and substantive interaction with students in any educational activities. Descriptions of didactic education must be consistent with IR C-12 I. Internship Didactics, and sufficient for the CoA to evaluate the quality of didactic education and fulfill pertinent standards and program aims.

**Training Staff Qualifications for Educational Activities:** Programs must indicate in the self-study how training staff are appropriately prepared and qualified to offer the educational activities they provide. Programs must describe how it ensures that its training staff are trained in providing supervision and didactic education in the delivery method (e.g., in-person, hybrid, virtual) they utilize.

**Evaluation of Distance Education:** All programs are expected to evaluate the effectiveness of any distance education modalities it uses to ensure that student learning outcomes are comparable with in person or other non-distance education modalities.

In addition, the program must also indicate how it clearly discloses to interns all pertinent information regarding its distance education. Such disclosures must be sufficient for interns to make informed decisions about the program. Examples of required disclosures include: the jurisdictions where the program is authorized to provide distance education, the method of verifying intern identity in distance education experiences, and an explanation of any fees or other costs specific to the modality.



### **C-25 P. ~~Delivery of Educational Activities~~ Distance Education**

(Commission on Accreditation, October 2023; prepared for public comment February 2025)

For postdoctoral residency programs, educational activities are defined as including any didactic education and supervision provided by the program. The CoA defines distance and electronically mediated education in the following manner, consistent with definitions from the APA Task Force on Distance Education and Training in Professional Psychology (June 2002, page 4) as well as definitions specified by other higher education accreditation organizations.

Distance education is defined as a formal educational process in which the majority of the instruction occurs when student and instructor are not in the same place. Instruction may be synchronous (students and instructors present at the same time) or asynchronous (students and instructors access materials on their own schedule). Distance education may employ correspondence study, or audio, video, or computer technologies.

Electronically mediated education covers a wide set of electronic applications and processes such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. It includes the delivery of content via Internet, intranet/extranet (LAN/WAN), audio and videotape, satellite broadcast, interactive TV, and CD-ROM.

Programs are required to evaluate these components to demonstrate compliance with all Standards of Accreditation, regardless of the delivery method (e.g., in-person, hybrid, virtual) in the following areas:

Authorization to Provide Supervision: Programs must comply with any jurisdictional authority related to the provision of supervision. See IR C-13 P. Jurisdiction of Licensure for Supervisors in Postdoctoral Residencies. See IR C-15 P for additional requirements for telesupervision.

Verification of Resident Identity: The program must (1) report the method, processes, and/or mechanisms it uses to verify the identity of residents participating in educational activities, and (2) describe how its resident verification procedure protects resident privacy. See IR C-12 P. Positive Resident Identification Consistent with Higher Education Opportunity Act.

Nature and Sufficiency of Regular and Substantive Interactions: The program must describe in its self-study how it provides and ensures regular and substantive interaction with residents in any educational activities. Descriptions of didactic education must be consistent with IR C-11 P. Postdoctoral Residency Didactics, and sufficient for the CoA to evaluate the quality of didactic education and fulfill pertinent standards and program aims.

Training Staff Qualifications for Educational Activities: Programs must indicate in the self-study how training staff are appropriately prepared and qualified to offer the educational activities they provide. Programs must describe how it ensures that its training staff are trained in providing supervision and didactic education in the delivery method (e.g., in-person, hybrid, virtual) they utilize.

Evaluation of Distance Education: All programs are expected to evaluate the effectiveness of any distance education modalities it uses to ensure that student learning outcomes are comparable with in person or other non-distance education modalities.

The program must also indicate how it clearly discloses to residents all pertinent information regarding its distance education. Such disclosures must be sufficient for residents to make informed decisions about the program. Examples of required disclosures include: the jurisdictions where the program is authorized to provide distance education, the method of verifying resident identity in distance education experiences, and an explanation of any fees or other costs specific to the modality.