

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

December 1, 2023

Dear Colleagues,

The *Standards of Accreditation for Health Service Psychology* (SoA) is a Commission on Accreditation (CoA) policy document that outlines training requirements for programs at the doctoral, doctoral internship, and postdoctoral levels. Correspondent to the SoA is the *Accreditation Operating Procedures* (AOP), which describes Commission processes and a set of Implementing Regulations (IRs), which are official policy documents that “elucidate, interpret and operationally define” the Commission on Accreditation’s (CoA) 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.

The Commission has reviewed distance education methods across all levels of education and is providing further clarification for accredited programs at the internship and postdoctoral residency levels. The CoA is proposing the creation of IR C-29 I to address compliance with the SoA by accredited internship programs as well as IR C-25 P to address compliance with the SoA by accredited postdoctoral residency programs regardless of delivery method.

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 sixty (60) day period of public review and comment. The comment period is scheduled to begin at **5:00 pm Eastern Standard Time on December 1, 2023 and will continue through 5:00pm Eastern Standard Time on January 30, 2024**. 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. On behalf of the CoA, thank you for your review and comments.

C-29 I. Delivery of Educational Activities
(Commission on Accreditation, October 2023)

For internship programs, educational activities are defined as including any didactic education and supervision provided by the program. 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.

C-25 P. Delivery of Educational Activities
(Commission on Accreditation, October 2023)

For postdoctoral residency programs, educational activities are defined as including any didactic education and supervision provided by the program. 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.