

August 13, 2004

Jonathan H. Sandoval, Ph.D.  
Chair, Board of Educational Affairs  
American Psychological Association  
750 First Street, NE  
Washington, D.C. 20002

Dear Dr. Sandoval,

The following are the formal comments from CDSPP in response to your letter of March 30<sup>th</sup>, 2004 inviting comments on the *BEA Advisory Council on Accreditation's Interim Report*. First, we want to thank the BEA for inviting comments prior to the *Council's* final report and the BEA's scheduled meeting in November. The openness of this process increases its credibility. CDSPP will have a representative (Dr. Antoinette Miranda) at the 2004 Education Leadership Conference who will present CDSPP's comments at the scheduled open forum. Our written comments follow.

CDSPP recognizes that the issue of CoA's current overwhelming workload is critical and must be addressed if the high quality of CoA's work is to be maintained. CDSPP fully endorses the *Interim Report's* recommendation that CoA form separate and, perhaps, multiple panels for the review of doctoral training programs, pre-doctoral internships, and post-doctoral training sites, as needed, and that such panels would "...review all materials relevant to an accreditation review... and formulate and propose a recommendation based on that review to [CoA]" (*Interim Report*, p. 17). CDSPP believes that the review panels should be appointed by CoA and include a balance of members representing the five major domains as presently articulated in APA policy and reiterated in the *Interim Report* (p. 18, 19), and should include both members and non-members of CoA, thereby distributing the workload beyond the current CoA membership. CoA should appoint panel members such that a program in any of the current three substantive areas, or combination thereof, will be reviewed by a panel that includes at least one reviewer from that substantive area. Members of review panels should *primarily* be psychologists who have served as site visitors and whose performance as site visitors or site-visit team chairs has received positive review by CoA.

Given the urgency of addressing the workload issue, CDSPP strongly recommends that a procedure for using review panels be implemented as soon as feasible without waiting for the resolution of other governance-related issues. Instituting a panels system does *not* require first settling other governance-related issues.

The *Interim Report* and Council of University Directors of Clinical Psychology's 7/4/04 comments on the *Interim Report* both pointedly raise the issue as to whether the accreditation organization should remain as a committee of APA or become an independent or inter-organizational entity. Until this larger question is resolved, changes in the *governance* structure of CoA are premature. Accordingly, CDSPP recommends that the current governance structure (i.e., the composition of CoA) remain until the organizational entity question is settled. However, with regard to possible governance structure changes, CDSPP's position is as follows:

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- CDSPP takes no position at this time as to whether the accrediting body should continue within APA or be an independent or semi-independent organization.
- CoA currently accredits doctoral training programs in “substantive areas.” Training programs from each substantive area included at any given time by CoA should have *guaranteed* representation on CoA. At present, CoA accredits doctoral training programs in the substantive areas of clinical, counseling, and school, or a combination thereof. Future changes in substantive areas in which programs may seek accreditation, or changes in the basic concept of “substantive areas,” may require accompanying changes in representation in CoA governance.
- Consistent with previous CDSPP comments submitted to BEA, CDSPP recognizes that the organizational constituencies that might be legitimately represented in CoA governance may change over time. However, constituencies should be limited to those that represent broad, rather than narrow, interests.

Thank you for your consideration of CDSPP’s views. As the representative organization of training programs of one of the three currently recognized substantive areas (or combinations thereof) for doctoral training, CDSPP looks forward to working with the BEA and CoA to strengthen the APA accreditation process.

Sincerely,

William Strein  
Immediate Past Chair (2003/04)  
Council of Directors of School Psychology Programs