

# Supporting Early Career Psychologists: Advocating for Licensure Upon Completion of Doctoral Degree

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## Introduction

The postdoctoral requirement for licensure is archaic, inappropriate, and not in the best interest of the profession of psychology and those we serve. Multiple groups have recommended entry-level licensure at the completion of the doctorate, including the 2000 Commission on Education and Training Leading to Licensure in Psychology and the 2004 APA Board of Directors Workgroup that reaffirmed the recommendations of the 2000 Commission.

More recently, in February 2006, the APA Council of Representatives voted overwhelmingly in favor of adopting the following statement as APA policy:

*The American Psychological Association affirms the doctorate as the minimum educational requirement for entry into professional practice as a psychologist.*

*The American Psychological Association recommends that for admission to licensure applicants demonstrate that they have completed a sequential, organized, supervised professional experience equivalent to two years of full-time training that can be completed prior or subsequent to the granting of the doctoral degree. For applicants preparing for practice in the health services domain of psychology, one of those two years of supervised professional experience shall be a predoctoral internship.*

*The American Psychological Association affirms that postdoctoral education and training remains an important part of the continuing professional development and credentialing process for professional psychologists. Postdoctoral education and training is a foundation for practice improvement, advanced competence, and inter-jurisdictional mobility.*

In adopting the preceding policy statements, the Council supports further development of competency goals and assessment methods in the professional education and training of psychologists.

This policy change has no binding effect on state licensure laws. However, it is intended to encourage State, Provin-

cial, or Territorial Psychological Associations (SPTAs) to work with the appropriate entities in their areas (e.g. licensure boards, law makers, etc.) to change licensure laws and/or regulations so that supervised postdoctoral hours are no longer required for licensure. Therefore, many SPTAs have begun to look at this issue in order to decide whether and how to pursue changing current licensure laws to be consistent with this policy. Washington and Utah have made the change, bringing the total number of states allowing licensure at the completion of the doctorate to three (Alabama never required postdoctoral training). Many other states including Maryland, Ohio, North Carolina, and Virginia are moving forward with implementation.

Dr. Warren Rice, FPA President, has identified that FPA is “not attracting the number of younger psychologists we need to sustain our growth in the years ahead.” Although current practitioners may share his concern, or may not desire additional competition from new graduates, Dr. Rice is astute to worry about Florida’s ability to maintain

an adequate supply of licensed psychologists to match the growing, increasingly more diverse, and multigenerational citizenry of Florida. It is interesting to note that only seven percent of APA’s early career members are also members of their SPTAs. By advocating for licensure law and regulation changes in Florida, FPA and its members could demonstrate a significant com-

mitment to and investment in students and early career psychologists, which would serve to attract new student and early career members to the association and help to build a loyal cohort of members and future leaders.

## Rationale for a Change in the Licensure Sequence

### Education and Training Issues

When the postdoctoral supervised experience requirement was initially recommended nearly 60 years ago, aspiring psychologists in most professional training programs received virtually no supervised experience prior to the internship. Since then, the length of time to obtain the doctoral degree has lengthened considerably, to more than six and half years on average. The supervised experiences that



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*APA's policy change reflects an understanding of the changing landscape of education and training...*

students in most training programs currently receive prior to the internship (a median of 2274 in 2006) is more than the amount of experience that the postdoctoral requirement was originally intended to provide. Many academic programs today also have in-house training clinics in which students are receiving more than the required amount of supervision. Yet, relatively few standardized, appropriately funded postdoctoral training experiences were created for new graduates while the profession proceeded to codify postdoctoral requirements into licensure laws over the past 30 years.

Today, there are only 40 APA accredited postdoctoral programs and 150 postdoctoral programs in APPIC, which in combination provide about 397 postdoctoral training slots in 2006, a paltry number when considering that about 2800 students complete internships each year.

Many early career psychologists (ECPs) are forced to cobble together clinical experiences, and sometimes to pay for supervision, with no oversight or accountability mechanism to adequately monitor quality of the training for entry level practice. This results in a postdoctoral year of supervised experience that is highly variable in quality, with many early career psychologists describing it as little better than indentured servitude. Furthermore, there is no objective evidence that this experience improves professional performance.

Some have expressed concerns about the relative quality of practicum hours compared to postdoctoral hours. However, while nearly all ECPs graduate from doctoral programs that must meet accreditation standards, very few obtain postdoctoral supervision through programs with formal oversight. Rather, most ECPs accrue postdoctoral hours in settings with no formal oversight or standardization. Therefore, the present education and training structure diffuses responsibility by rendering doctoral and internship programs less accountable for student outcomes.

In addition, the recently revised APA licensure policy is now consistent with APA education and training policies regarding the function of postdoctoral training. The 1987 APA Model Licensing Act, which suggested that postdoctoral training was necessary for independent practice, was in direct conflict with the APA Committee on Accreditation Guidelines and Principles of Accreditation (G&P), which state that doctoral training, including the predoctoral internship, prepares students for "entry level practice," while postdoctoral training is "preparation for entering

professional practice at the advanced level of competency." An integrated system of practicum experiences monitored by the graduate education programs and leading to an appropriately certified internship would make the graduate education and internship training programs mutually accountable for developing the competencies required for licensure at the entry level of practice. To assist in this effort, APA and allied groups are currently working to articulate a taxonomy of core competencies and assessment that can be introduced and applied at all levels of doctoral education and training.

Practice Issues

Psychology's policies regarding the unlicensed postdoctoral year are out of step with those of other health professions, whose members are legally authorized to practice upon completion of their terminal degree. Licensure at completion of graduate school allows for a smooth transition to practice, an uninterrupted flow of reimbursement, and clarifies that postdoctoral work is truly for advanced, specialty training, as it is for most of advanced health professions. If this model was utilized in psychology, licensed psychologists in advanced training would

then be eligible for third-party reimbursement and participation in numerous federally funded programs such as the National Health Service Corps that require licensure. Postdoctoral training programs would also have greater access to funding resources given that their postdoctoral psychology trainees would be licensed.



The current model places Psychology in the difficult position of having to explain to health systems, payers, members of other health professions, patients, and other stakeholders why psychologists are ineligible to be legally authorized health service providers, or to be called psychologists, when they have completed a doctoral degree and formal internship. Today, it is easier to seek reimbursement as a master's level provider than to be reimbursed for years of clinical training as a doctoral provider. Requiring that half the supervised training experience occur after completion of the doctorate also renders ECPs ineligible to participate in federal loan repayment programs, and imposes difficulties for those pursuing academic careers who also would like to be licensed—for example, in order to be legally able to supervise students or to function as an appropriate model—but who are forced to accrue the required supervised hours before they can focus on launching their academic careers. We believe licensure laws also present significant barriers to encouraging individuals from diverse backgrounds to pursue

professional or academic careers in Psychology.

Our profession has perpetuated an obsolete, unnecessarily burdensome, and at times abusive system that demands more and more for licensure (an average of more than 7 years of training if postdoctoral years are included) during a time when the number of professions competing to provide behavioral health services has exploded. Today, nurses, master's level providers, and, in some states, individuals with bachelor's degrees can be reimbursed for a range of mental health services, and sometimes with incomes comparable to psychologists. Worse, average salaries for psychologists are 1/3 those of dentists, psychiatrists, and physicians (\$48K median salary for compared to \$145K average for top three earning professions), even though psychologists are in school almost a third longer than these professions (132 months post high school for psychologists compared to 96 months for physicians and dentists, and 84 months for attorneys). Clearly, for psychology to survive and thrive as a health profession, many changes, including changes related to the sequencing of licensure eligibility, are necessary.

### Advocating for Changes at the State Level

Florida will need to pursue legislative and regulatory changes to allow licensure upon completion of the doctorate. Strategies pursued by other states include educating SPTA leadership; building a consensus on the issue; developing support among the membership of the association; educating members, the public, legislators, and the Board of Psychology; and then moving forward to work toward regulatory and legislative change to remedy this inappropriate obstacle for entry into the profession of psychology.

The American Psychological Association of Graduate Students (APAGS) and the APA Committee on Early Career Psychologists (CECP) advise their members to join SPTAs, become actively involved, and engage associations in dialogue and efforts to introduce new statutes and regulations to implement this licensure change. Further, all parties who support pursuing this change in Florida are offered the following suggestions for involvement:

- Write emails or letter to the FPA Executive Director and Board members asking them to endorse the APA Licensure Policy and pursue implementing the policy change locally
- Encourage FPA to build support from their general membership by creating a special section on the FPA website with information supporting the need for the statute/regulation change and asking for feedback through the website, mailings, and Conference events
- Work with students, FPAGS leadership, early career psychologists, and others to raise awareness about the impact such a change would make by compiling feedback and posting it on special section of FPA Website
- Form a special committee or task force to work with FPA leadership and FPA's Legislative Advocacy and Public Policy Board (LAPPB), through which the as-

sociation sets its legislative goals, to:

- Formalize the FPA's position on the Licensure policy, as FPA leadership will be essential in advocating for the licensure policy and working with the Florida Board of Psychology to understand and implement the APA Policy
- Outline the legislative and regulatory strategies for implementing the policy (e.g., submitting a bill and updating licensure regulations)
- Coordinate and manage legislative and political advocacy on this issue in Florida
- Ensure proposed bills or regulations are consistent with APA and ASPPB recommendations for legislative and regulatory language and procedures

### Conclusion

APA's policy change reflects an understanding of the changing landscape of education and training in preparation for practice, and a commitment to modernizing policies that benefit students and early career psychologists while serving and protecting the public. We hope that Florida psychologists and graduate students will follow suit and take a leadership role in advocating for this change on behalf of the next generation, as well as the future of the profession and of FPA. Ψ

### Executive Director's Note:

*The Florida Psychological Association has taken position on the issue of post-doctoral training. The publication of this article in no way infers that FPA either supports or opposes this issue.*



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