



Association of Canadian Psychology Regulatory Organizations Association des Organisations Canadiennes de Réglementation en Psychologie



On behalf of the Association of Canadian Psychology Regulatory Organizations (ACPRO), the Canadian Council of Professional Psychology Programmes (CCPPP), and the Canadian Psychological Association Accreditation Panel (the CPA Panel):

The global COVID-19 pandemic has had an unprecedented impact on individuals, communities, our health care systems and on health providers themselves. We, ACPRO, CCPPP, and the CPA Accreditation Panel also recognize that this pandemic has had, and continues to have, a significant impact on the operation of professional psychology training programmes, and on their faculty, staff, and students.

Attached, you will find a statement from ACPRO containing their response to licensure concerns amid the COVID-19 pandemic, as well as a statement from the CCPPP and CPA Accreditation Panel regarding their responses to accreditation- and training-related concerns. With these statements, our organizations want to communicate our commitment – to the extent possible – to minimize the disruptions that the pandemic has on students' training, on programme operations, and ultimately on the availability of competent practitioners to meet the public need for mental health services at this time, while also maintaining the highest levels of integrity in our training, licensing, and accreditation processes. We also want to reassure our stakeholders of our commitment to maintaining an open dialogue among our organizations as this situation unfolds to ensure that we continue to be responsive to all of your needs.

Should you have any questions about the content of these statements, please do not hesitate to contact us at the coordinates below.

Wishing you all good health.

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#### **ACPRO STATEMENT ON COVID-19**

The member jurisdictions of the Association of Canadian Psychology Regulatory Organizations (ACPRO) are aware that the COVID-19 pandemic has impacted graduate training in psychology.

The Canadian Psychological Association (CPA) Accreditation Panel and the Canadian Council of Professional Psychology Programmes (CCPPP) have been in contact with ACPRO to inform us of the impact that the pandemic is having on training, particularly pre-doctoral internships. This occurred as part of their own discussions about how to manage any disruptions caused by COVID-19, and they flagged the issue of how this might impact the evaluation by regulators of applications for registration.

The engagement with CPA and CCPPP is a very positive one, and the issues raised impact the profession as a whole. ACPRO is pleased to contribute to this conversation by issuing this statement.

Registration requirements and legal frameworks differ to some degree across the country. All Canadian psychology regulatory bodies share two primary responsibilities: to focus on the public protection mandate and to ensure fairness and transparency in its processes.

Regulators are obligated, under law, to give fair and thorough consideration to all applications. As has always been the case, applications are considered on their own merit and a case by case assessment is conducted to determine what, if any, additional education, training and experience might be required in order to meet or become substantially equivalent to, the entry to practice requirements. Regulators are obliged to provide clear and well-reasoned feedback to applicants with regard to their applications, and applicants must be given the opportunity to provide additional information or clarification prior to any final decision being made on their application.

When appropriate and where possible discretion may be exercised to consider equivalency in circumstances where an applicant did not complete an internship or other requirement according to standards. This might mean evaluating other education, training and experience already obtained or requiring additional education, training and experience.

Future applicants are eager to understand how any variation from the planned program of study and/or internship imposed by the COVID-19 pandemic will impact on their eligibility for registration. As stated above, future applicants can and should expect that the regulator in each jurisdiction will, at the time of their application, transparently and fairly determine if any additional education, training or experience might be necessary to meet registration requirements.

# Canadian Council of Professional Psychology Programmes (CCPPP) and the Canadian Psychological Association Accreditation Panel (the CPA Panel) Statement.

As noted above, the global COVID-19 pandemic has had an unprecedented impact on individuals, communities, our health care systems and on health providers themselves. We, the CCPPP and the CPA Accreditation Panel also recognize that this pandemic has had, and continues to have, a significant impact on the operation of professional psychology training programmes, and on their faculty, staff, and students. We have received reports of students having had practicum placements or internships cancelled, others being encouraged to provide telepsychology and other services, and yet others being re-deployed to non-psychology roles to help their host institutions manage this crisis.

Through this statement, we want to assure all of our stakeholders that our organizations are working together to address the most pressing challenges associated with this pandemic. When possible, we will try to provide specific guidance; however, given the nature of psychology training and provincial licensing in Canada, we will only be able to speak in general terms on some issues. In addition, while we are committed to working together to address these concerns, please be aware that we can only comment on Canadian training. We understand that this may be frustrating for some with specific concerns, but it is necessary given the differences in circumstances that will exist as a result of COVID-19.

It is important to underscore that we as a group are also concerned with ensuring that those entering the profession are competent and ethical practitioners who are prepared to meet the challenges of practice, and that this protective function cannot be compromised even in times of crisis. With that said, the overarching message we hope to convey is one of reasonableness and flexibility for all involved, and that we are committed as a training community to being united, transparent, and consistent in our response to this pandemic going forward.

In order to address the myriad of concerns related to this pandemic, we have decided to focus our efforts on the three groups of students – and their associated programmes – that are likely to be most immediately affected by pandemic-related service interruptions. Those groups are: 1) students currently completing internships/residencies (in the 2019-2020 academic year), 2) students planning to apply for internships through APPIC in the Fall of 2020 to begin their internships in 2021, and 3) students planning to begin their internships/residencies in the Fall of 2020. While we recognize that students that do not fall into one of these categories may still have concerns related to course and practicum interruptions, we believe that it will be possible for doctoral training programmes to adjust to meet the needs of those students in the years to come.

### Students currently completing internships in the 2019-2020 training year

The completion of a degree in professional psychology is the key step for students moving toward independent practice; as such, we have agreed that the doctoral training programmes conferring those degrees will need to take a leadership role in order to ensure that students currently completing their internships/residencies are able to move toward licensure. The doctoral programmes have the ultimate authority for conferment of the degree. When

considering the completion of internship requirements, we strongly encourage doctoral programmes to focus on ensuring the competence of their students through a combination of practicum experiences already completed and the training students received during truncated or modified internships. In order to achieve this, we recommend that doctoral training programmes whose students' training has been affected by the COVID-19 pandemic begin by liaising with students' internship programmes to determine the extent of the disruption in their internship training and its effect on students' overall doctoral training.

In line with the above, internship programmes are reminded that the primary focus of predoctoral internships is the training of students, and as such, they are encouraged to provide any training opportunities available during regular service interruptions. With that said, we recognize that this will not be possible for some sites due to programme/site closures, redeployment of interns to other areas of host institutions, or other pandemic-related concerns; we urge programmes to be as creative and flexible as possible to ensure the safety of their interns in these cases. As noted in the ACPRO's statement, provincial regulators will continue to review applications on a case-by-case basis to determine what, if any, additional education, training and experience might be required in order to meet, or become substantially equivalent to, the relevant entry to practice requirements. The CPA Panel also assures programmes (both doctoral and internship) that they will not be penalized for demonstrating flexibility vis-à-vis the 1600-hour supervised practice requirement at the internship level, provided that they have been transparent and consistent about the application of these practices, and that any modifications to internship or doctoral programs have been thoroughly documented for review if needed. This level of transparency will be necessary when students apply for licensure.

### Students applying for internships in Fall 2020 (to begin in September 2021)

Internship/residency programmes that will be accepting applications through APPIC for their 2021-2022 training year are aware that practicum experiences have had to be cancelled or restructured due to the COVID-19 pandemic. To date, all internship programs that have responded to our query about the impact of reduced hours on AAPI and applicant reviews have indicated their intention to review applications with flexibility on hours requirements. The CPA Panel will also be flexible with respect to hours requirements for both doctoral programmes authorizing students to apply for internships, as well as internship programmes accepting those students. The CPA Panel encourages programmes to ensure that the minimum 600 hours are still met by students applying to internships, even if the composition of those hours vis-à-vis direct contact, supervision, and support activities are not exactly equivalent to the minimum prescribed by the CPA Accreditation Standards. The Panel also encourages doctoral programmes to consider the preparedness of students applying for internships as a function of competence and readiness in the event that the number of hours required are not met. As above, programmes will need to be transparent and consistent about the application of these practices, and any modifications will need to be thoroughly documented for review if needed. Again, this level of transparency will be necessary when students apply for licensure.

## Students beginning internships in Fall 2020

The impact of the pandemic on that timescale is not yet known. The CCPPP and the CPA Panel continue to meet on an ongoing basis – and consult with other stakeholders as necessary – and are prepared to respond to the needs of these students if internships/residencies are delayed in starting due to ongoing concerns with COVID-19.

Although it has been noted above, the unprecedented nature of this pandemic, and its impact on training, requires all stakeholders to be flexible and reasonable in the coming months. Our organizations want – to the extent possible – to minimize the disruptions that the pandemic has on students' training, on programme operations, and ultimately on the availability of competent practitioners to meet the public need for mental health services at this time, while also maintaining the highest levels of integrity in our training and accreditation processes.