

PROCEDURES FOR RECOGNITION OF SPECIALTIES AND SUBSPECIALTIES IN PROFESSIONAL PSYCHOLOGY

Approved by the APA Council of Representatives August 2020

Section A: Background

(1) Introduction

These procedures describe the process by which the American Psychological Association (APA) and its Commission for the Recognition of Specialties and Subs specialties in Professional Psychology (CRSSPP) will consider petitions for initial and renewed recognition of specialties and subspecialties in professional psychology.¹ The procedures will be reviewed periodically by CRSSPP, and any proposed changes will be subject to a period of public comment prior to consideration for adoption. Adoption and implementation by CRSSPP shall be subject to review by the Board of Directors in accordance with APA Association Rule 90-4.

(2) Basis of Review and Evaluation for Recognition

CRSSPP recommendations pertaining to initial and renewed recognition will be based on criteria set forth in the APA policy documents, *Principles for the Recognition of Specialties and Subs specialties in Professional Psychology*, approved by the Council of Representatives.² Decisions by CRSSPP in that process are made on the basis of the collective professional judgment of its members. Should a member of CRSSPP have a potential conflict of interest with respect to the review of a petition, that member will disclose the nature of this potential conflict to the other commissioners. For the purposes of this policy, “potential conflict of interest” means circumstances that could be perceived by a reasonable third party as creating an apparent conflict of interest and consistent with the CRSSPP Conflict of Interest Policy. The Commissioners, by majority vote, will determine the nature and extent of participation in which that member should engage for purposes of discussion and voting on the petition.

(3) CRSSPP Membership and Meeting Procedures

Members of CRSSPP will be elected in accordance with provisions of the governing APA Association Rules. Their meetings will be open except for sessions concerned with the review and evaluation of petitions for recognition, and the resulting formulation of actions by CRSSPP members. Other procedures regarding open and closed sessions will be in accordance with APA policy governing such matters. Minutes of sessions that pertain to petition reviews will only reflect the formal actions taken by CRSSPP.

1 The Association’s actions in conferring recognition are not intended to, nor shall they constrain, the general and broad practice of psychology by any psychologist duly licensed to practice who is acting (a) in conformity with relevant statutes and administrative rules and (b) within the Association’s ethical principles. In addition, and unless required by statute or by administrative rule, recognition does not create a duty for a psychologist to secure any credential beyond licensure as a condition for practice.

2 This policy document can be found at APA (CRSSPP) website <http://www.apa.org/ed/graduate/specialize/specialties.aspx>

(4) Liaisons to CRSSPP

APA divisions, boards, and committees, as well as professional education, training, and credentialing organizations outside the APA, may request a liaison relationship with CRSSPP, whose decision it will be to honor such a request. Liaisons may attend all open sessions of CRSSPP meetings at the expense of their sponsor organizations and, with concurrence of the CRSSPP chairperson, may speak to items on the meeting agenda.

(5) Public Information and Records of the Recognition Process

The APA maintains official records in accordance with its policies on the recognition process. It provides information on its CRSSPP website (<http://www.apa.org/ed/graduate/specialize/specialties.aspx>) about the specialty and subspecialty recognition processes for access by the public. CRSSPP also periodically notifies its membership and others of the public about its activities via listserv communications and in the *APA Division Digest Newsletter*. Other information about the specialty and subspecialty recognition process will be provided upon request.

Section B: Recognition Procedures

(1) Petition for Initial Recognition

The annual deadline for submission of a petition will be January 1st of each year to allow for an efficient review process. The deadline for submission will apply to all petitions for initial and renewed recognition of specialties and subspecialties in professional psychology.

Petitioners for initial specialty or subspecialty recognition will submit petitions to CRSSPP using a form developed by CRSSPP, requiring petitioners to demonstrate how the criteria for recognition are met.³ Petitioners are encouraged to consult with the APA Education Directorate for the purpose of maximizing the clarity and comprehensiveness of their petitions, and particularly with regard to the Commission's definition of "specialty" and "subspecialty" and the criteria applied by the Commission regarding recognition as a specialty or subspecialty.

During the term of his/her appointment to CRSSPP, and for a period of three years thereafter, no member of CRSSPP shall offer any consultation service or individual guidance to anyone in a petitioning group (reimbursed or non-reimbursed) for the purpose of assisting that group in seeking or renewing recognition status.

Prior to consideration by CRSSPP, petitions will be reviewed by APA staff to determine whether all required components are present. If a petition is not complete, the petitioner will be notified in writing of the additional information required. When a petition is determined to be complete, it will be forwarded by APA staff to CRSSPP.

(2) Public Notice of the Petition

3 Petition forms can be found at the APA (CRSSPP) website: <http://www.apa.org/ed/graduate/specialize/specialties.aspx>

CRSSPP will acknowledge receipt of the petition in writing to the petitioning organization(s). At the same time, it will issue public notice of the same to the APA governance bodies, divisions, and other national organizations responsible for education, training, and credentialing in professional psychology by direct written communication to those groups and organizations. General public notice of the petition will generally be given through the APA (CRSSPP) website.

(3) Request for Public Comment

Public notice about the petition will offer access to copies of the petition and request third-party comment to inform the deliberations of CRSSPP. The deadline date for submission of comments will be stated in the notice and will be not less than 60 days after the public notice posting of the petition. All public comments to the petition will be submitted electronically. Copies of public comments will also be provided to petitioners for informational purposes.

(4) Replies to Comments

Copies of public comments on a petition will be provided to the petitioner(s) as soon as received and will be made available for public review and comment. The APA (CRSSPP) website will generally be the means for this public disclosure. Replies to comments may be submitted by interested parties. All replies to comments will be available for review by petitioners and other interested parties during the 60-day public comment period. Petitioners may provide CRSSPP with a written response to public comments; however, amended petitions will not be considered.

(5) CRSSPP Review and Evaluation of Petition and Comments

At its next scheduled meeting subsequent to the end of all public comment periods, CRSSPP will review the petition(s) and all comments and replies to comments. In its review, CRSSPP will evaluate the extent to which the criteria for recognition are met, as specified in Section A, Paragraph (2) of this document. CRSSPP may seek additional information as it deems appropriate. If two or more complete petitions for the same specialty or subspecialty are received, CRSSPP will contact the petitioning organizations and encourage them to develop a single petition. If the organizations are unable to develop a single petition within six months, CRSSPP will proceed with succeeding steps in its procedures.

(6) Options for Action by CRSSPP

On the basis of its evaluation of a petition and the comments received, CRSSPP will elect one of the following three options for action:

- a. If the criteria for recognition are met sufficiently by the petition and any criterion-related public concerns received are appropriately addressed, CRSSPP will recommend that the Council of Representatives grant recognition of the specialty or subspecialty and will recommend a date by which renewal of recognition should be petitioned.

- b. If the criteria for recognition are not met sufficiently, CRSSPP will not recommend recognition by the Council of Representatives. In the case of a decision not to

recommend recognition, the petitioning organization(s) will be provided with written notice by CRSSPP specifying the criteria that have not been met. Petitioner(s) will be advised that they may re-petition, but not for one year after the date of the CRSSPP decision.

Reconsideration: CRSSPP will notify petitioners that they may request reconsideration by CRSSPP of an adverse decision. Petitioner(s) may request reconsideration by CRSSPP of an adverse decision in writing within 30 days from receipt of the decision, which shall include a rationale for the reconsideration. The rationale should be based on either a procedural violation or substantive error by CRSSPP in its review of the petition. CRSSPP in turn will review and respond to the request for reconsideration within 30 days. If the reconsideration is accepted, CRSSPP will then review the petition and rationale at the next regularly scheduled meeting in which petitions are to be reviewed.

c. If the petition materials, including comments, raise questions that do not permit making a reasoned judgment about one or more of the criteria for recognition, including but not limited to the criteria for determining whether recognition should be granted as a “specialty” or as a “subspecialty”, CRSSPP may defer its action to recommend or not recommend recognition and request of the petitioner(s), in writing, that additional information or clarification as needed.

(7) Council of Representatives Action

If CRSSPP forwards a recommendation for recognition of a specialty or subspecialty to the Council of Representatives, it will do so with: (a) a description of the specialty or subspecialty and how it meets the recognition criteria; (b) the date recommended by CRSSPP for renewal of recognition of the specialty or subspecialty; and (c) notation of any recognition criteria that CRSSPP recommends be given particular attention at the time of the petition for renewal of recognition. The full text of the petition(s) on the basis of which CRSSPP is recommending Council recognition also will be made available by notice to members of the Council, in the form of APA (CRSSPP) website posting.

If the Council adopts the CRSSPP recommendation, the specialty or subspecialty will be considered recognized until the recommended date for renewal of recognition. If Council rejects the CRSSPP recommendation, petitioner(s) for recognition of the same specialty or subspecialty may not petition again until the next available petition due date after the date of the Council’s action (e.g., the next January 1 due date).

(8) Notification of Council Action

CRSSPP will notify the petitioning organization(s) of the action taken by the Council. If Council rejected the CRSSPP recommendation, CRSSPP will explain the basis of that decision to the petitioning organization(s). In the case of a decision to recognize a new specialty or subspecialty, petitioners will be advised of the date Council has adopted for the review of a petition for renewal of recognition and of any recognition criteria to which CRSSPP will pay particular attention at that time. In addition, the action of Council to recognize a specialty or subspecialty will be made public by posting on the APA (CRSSPP) website.

(9) Petition for Renewal of Recognition

Each APA-recognized specialty and subspecialty in professional psychology will be reviewed for renewal of recognition at a time recommended by CRSSPP and confirmed by the Council of Representatives on the occasion of the Council's most recent prior recognition decision. In no instance will the period between the most recent and next review dates be greater than seven years. In exceptional circumstances, *e.g.*, if there is reason to believe that substantial change has occurred in the status of a specialty or subspecialty, CRSSPP or the petitioning organization(s) of recognized specialties or subspecialties may seek an earlier review than that previously specified by Council. The following procedures pertain to renewal of recognition.

One year in advance of the expected renewal review, CRSSPP will notify the prior petitioning organization(s) with instruction on how and when to file the petition for renewal of recognition. Upon request, the petitioning organization(s) will be provided a copy of the prior petition, a copy of the public description of the specialty or subspecialty, a copy of the current criteria for recognition, and a copy of the letter previously sent by CRSSPP communicating the Council's prior recognition decision, including a notation of any criteria to which particular attention should be given in the petition for renewed recognition. A complete petition will be required for renewal of recognition. In addition, the petitioning organization(s) will be instructed to highlight within each criterion area significant changes in the specialty or subspecialty that have occurred, if any, since the prior petition.

All other procedures governing receipt of a petition for renewal of recognition, the process of public notice and comment, CRSSPP review and evaluation of the same, and the actions of CRSSPP and the Council of Representatives, will be the same as for an initial petition for recognition, as specified in Section B, Paragraphs (1)-(7), with the following exceptions:

Should CRSSPP not receive a petition for renewal of recognition, or if a petitioning organization chooses to not submit a petition for renewal of recognition, on or before the date specified in its notice to the petitioning organization(s), CRSSPP will notify the petitioning organization that failure to submit a petition within a period of time designated by CRSSPP will result in a recommendation by CRSSPP to the Council of Representatives that the APA recognition of that specialty or subspecialty in professional psychology be discontinued. In addition, if a petitioning organization chooses to withdraw a petition for renewal of recognition during the process of review by CRSSPP, the Commission will give public notice on the APA (CRSSPP) website of the withdrawal of the petition, and provide opportunity for comment or to submit a substitute petition by interested parties via electronic means.

If the criteria for recognition are met sufficiently and any criterion-related public concerns that may have been submitted are addressed appropriately, CRSSPP will recommend that the Council of Representatives renew recognition of the specialty or subspecialty with specification of the date for the next scheduled review.

If the petitioning organization's petition is unclear about meeting one or more of the recognition criteria, CRSSPP will defer a decision to recommend renewal of recognition to obtain more information. If the effective period for recognition established by Council will expire before CRSSPP can reach a decision in such instance, CRSSPP will recommend that the Council of Representatives renew the recognition for a period of one year, by the end of which time the

petitioning organization(s) will be required to address the basis of the CRSSPP deferral or have its recognition discontinued. If extenuating circumstances warrant, CRSSPP may choose to recommend to the Council of Representatives the extension of the recognition beyond the period of one year.

(10) Notification of Council Action on Petition for Renewal of Recognition

Procedures followed for notification of Council action on a petition for renewal of recognition will be carried out by CRSSPP in the same manner as for Council action in the case of initial recognition, as specified in Section B, Paragraph (8).

Section C. Public Description of a Recognized Specialty or Subspecialty

CRSSPP will maintain for the public a description of each recognized specialty and subspecialty. The description will include the name of the specialty or subspecialty and a brief definition. Specialty descriptions will also include a brief account of the distinctive ways in which professional practice in the specialty is defined according to the specialized knowledge, populations served, problems addressed, and skills and procedures employed. Subspecialty descriptions will address the specialized knowledge, skills, and attitudes employed.

As a part of the petition process, CRSSPP will ask the petitioning body to provide on the petition form, in a format developed by CRSSPP, a description of the specialty or subspecialty in plain language easily understood by the public. CRSSPP will review the description provided by the petitioning body and publish the final public description upon recognition or renewal of recognition of the specialty or subspecialty. CRSSPP will ensure that the public description of a specialty or subspecialty granted renewal of recognition is accurate and reflects any changes that may have occurred since an initial public description was developed. After initial recognition and prior to submission of a petition for renewal of recognition, CRSSPP will grant requests to modify the approved public description of a recognized specialty or subspecialty if petitioners provide sufficient rationale for the need to make such changes outside of the regular renewal process. Such rationale must include supporting evidence for the need for the requested change and must fall within the parameters of the most recent petition for recognition.