

**AMERICAN PSYCHOLOGICAL ASSOCIATION  
Commission for the Recognition of Specialties and Proficiencies  
in Professional Psychology (CRSPPP)**

**Recognition of Organizations that Provide Certifications  
in Specialties and Proficiencies in Professional Psychology  
Policies and Procedures Manual**

*Approved by the APA Council of Representatives in August 2012.  
Amended by the APA Council of Representatives in February 2016.*



**AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION**

Suggested citation:

American Psychological Association. (2016). *Recognition of Organizations that Provide Certifications in Specialties and Proficiencies in Professional Psychology: Policies and Procedures*. Retrieved from: <http://www.apa.org/ed/graduate/specialize/policies-procedures-manual.pdf>.

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**Policies and Procedures Manual**

2016

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**Preface**

Changes to the policies and procedures contained in this manual are recommended by the Commission for the Recognition of Specialties and Proficiencies in Professional Psychology (CRSPPP), the APA Board of Directors, and in some cases the Council of Representatives. Amendments with broad or major policy implications require approval by the Council of Representatives. Amendments to general policies and procedures may be approved by the Board of Directors on behalf of the Council of Representatives. Implementation and interpretation of the policies and procedures is based on the discretion and exercise of professional judgment of the CRSPPP.

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# **CRSPPP and the Recognition of Organizations that Provide Certifications in Specialties and Proficiencies in Professional Psychology**

## **Introduction**

The Criteria for the Recognition of Organizations that Provide Certifications in Specialties and Proficiencies in Professional Psychology (hereafter, *Criteria*) were adopted by the American Psychological Association (APA) as policy in 2011 to facilitate the listing of psychologists' credentials in the APA Membership Directory. The Commission for the Recognition of Specialties and Proficiencies in Professional Psychology (CRSPPP) was approved to be the governing body to undertake the task of determining which certifying bodies are appropriate for inclusion in the membership directory, based on the criteria.

The work of the CRSPPP in connection with review of **Recognition of Organizations that Provide Certifications in Specialties and Proficiencies in Professional Psychology** is kept confidential, with the following exceptions: (a) when information is shared, as needed, with APA's legal counsel; (b) when disclosure is legally advisable or required; (c) when the APA determines that information should be disclosed in connection with allegations by or about an applicant organization (hereafter, *Applicant*) or APA's review of an applicant; or (d) when approved confidential minutes of the CRSPPP's meetings are made available to the Executive Director of the Education Directorate, the APA Executive Officer, the Board of Directors, or the relevant APA staff and the CRSPPP's Chair determines that further dissemination is appropriate.

## **A. Procedures for Application Review**

### **How to Apply**

In order to obtain CRSPPP review and approval for the Recognition of Organizations that Provide Certifications in Specialties and Proficiencies in Professional Psychology, applicants must submit an application for review by the CRSPPP. The application, along with supporting materials, must be accompanied by a nonrefundable check covering the appropriate application fee. For application and renewal fees, <http://www.apa.org/ed/graduate/specialize/crsppp.aspx>

Applicants who would like assistance in completing the application may email or call the APA Staff Liaison, Dr Antoinette Minniti (at 202 336 6379 or [aminniti@apa.org](mailto:aminniti@apa.org)).

The CRSPPP reviews applications for approval once a year (See <http://www.apa.org/ed/graduate/specialize/crsppp.aspx> for application submission deadlines).

New and renewing applicants will be informed of the CRSPPP's decision following the meeting in which their application was considered. All decisions of the CRSPPP are by majority vote. The CRSPPP may also take action without an in-person meeting and any CRSPPP member shall have the right to request a conference call regarding the vote. Actions taken without an in-person meeting shall also be by majority vote.

### **Application Review Process**

APA staff assigned to support CRSPPP shall provide a preliminary review of the application to ensure that documentation is complete. If documentation is incomplete, such staff are authorized by the CRSPPP to so advise the organization and request additional documentation.

Once the application is judged to be complete, APA staff will post a public notice of the application on the APA website, affording opportunity for third party comment over a period of 90 days. If third-party comment is received, its substance will be shared with the applicant organization for comment.

At the time that public notice is given of the application, APA staff also will forward the application to the CRSPPP for its review.

Should a member of the CRSPPP be in actual or potential conflict of interest with respect to an organization under review, that member will be recused during discussion and decision making on that program.

### **Consideration of Applications**

The CRSPPP encourages applications from applicants whose mission and basic tenets are and remain consistent with APA policy. The CRSPPP may deny approval if it determines that the applicant's mission or basic tenets are not consistent with APA policy or an applicant is not in compliance with the *Criteria*. If the CRSPPP determines that any noncompliance is minor (or otherwise immaterial) or that full compliance will be achieved imminently, it may exercise its professional judgment to provide Approval.

In addition to the information and materials supplied by the applicant, the CRSPPP reserves the right to consult other sources of information as appropriate. CRSPPP members may consider this information, as well as their professional knowledge and experience, in the exercise of their professional judgment. If the CRSPPP relies on sources of information other than those supplied by the Applicant, Applicants will be notified by certified mail and given an opportunity to respond before a final decision is made to deny or terminate approval.

## **B. Types of Commission Actions**

### **Seven Year Approval**

Seven Year Approval is granted to applicants who have submitted an application that meets the *Criteria*. For renewing organizations, a full renewal application must be submitted by the application deadline, one year prior to the expiration date of recognition. Renewing organizations must also have satisfactorily addressed any concerns noted by the CRSPPP at the time of their last previous approval, and the application shall reflect any required changes.

### **Deferral**

In limited instances the CRSPPP may defer action on an application if more information is needed to allow the CRSPPP to make a decision about the applicant's compliance with the *Criteria*. In such cases the CRSPPP may request necessary information from the applicants, with a specified deadline for response in order to allow the CRSPPP to review the response at the next regularly scheduled meeting of the CRSPPP in which applications are to be reviewed.

The purpose of a deferral is to allow the CRSPPP to request clarification on procedures or to seek additional information on programs or materials submitted by the applicant. New procedures adopted subsequent to a deferral will not be considered during the CRSPPP's review of the response to deferral. If the requested information is not forthcoming by the specified deadline or is not satisfactory to address the CRSPPP's concerns regarding compliance with the *Criteria*, a new applicant will be denied and a renewal applicant will be terminated. Any request for approval at a later time will require a new application.

### **Denial**

Applicants who do not demonstrate that they meet the *Criteria* will not be approved. The reasons for denial will be described in writing to the applicant. A decision to deny can be made at any stage of the application or renewal process. Applicants will not be denied approval based on information from external sources without the applicant having been given an opportunity to respond to such information.

## **C. Listing in the APA Membership Directory**

The CRSPPP will notify the Membership Board annually when an applicant organization is approved or renewed so that it can include that organization's credential in the Membership Directory for those members seeking that recognition.

The CRSPPP will notify the Membership Board of adverse decisions of initial applicant organizations that do not qualify for recognition for listing in the Membership Directory.

For those organizations seeking renewal that are not reapproved for recognition, the CRSPPP will notify the Membership Board of the failure of renewal and the Membership Board can thus follow its procedures for de-listing that organization's credential in the Membership Directory. If an organization seeking renewal is not reapproved but seeks an appeal of the adverse action, the CRSPPP will notify the Membership Board of the final decision at the conclusion of that appeal process.

Organizations whose Credentials are currently listed in the Membership Directory will not be grandparented as a recognized organization and must apply as initial applicants given the policy requiring APA recognition of any organization whose credentials are listed in the Directory. Any such credential currently listed in the Directory will continue to be listed while the organization applies for formal recognition but no longer than one year from the initial date the CRSPPP begins the review process based on these Criteria. The Membership Board and CRSPPP will communicate this initial date to those organizations.

#### **D. Changes in Approval Status**

Approved organizations may be reassessed once approved and before the formal reapproval application time under the following circumstances:

1. Failure to comply with the Terms of Approval outlined in these Policies and Procedures.
2. Substantial changes in an organization's goals, activities or administration.
3. Indications or a complaint that an organization fails to substantially meet the requirements of the *Criteria*.
4. The structures, evaluation process or other procedures followed by the organization are substantially inconsistent with those described in the application.

Under any of these circumstances, the organization may be reevaluated and a decision as to continuation of approval will be made. Reassessment may result in probation or termination of approval. The reasons for and length of a probationary period will be described in writing to the organization. Although retaining approved status, the sponsor's activities will be closely monitored during this period. At the end of the period of probation, the organization must provide documentation of compliance with the issues raised in the notification-of-probation letter. If such documentation is not provided, approval will be terminated. If approval is terminated, the organization must submit a new application in order to regain approval status.

Withdrawal by an organization as a recognized organization shall be deemed termination of approval.

## **E. Procedures for Reconsideration and Appeal of Decisions**

Except as set forth in this Section, the following decisions made by the CRSPPP are considered adverse decisions for which the organization or applicant (“organization/applicant”) may request reconsideration by the CRSPPP or formal appeal in accordance with the procedures outlined below:

1. Denial
2. Termination of Approval

If the Denial or Termination of Approval is based on a failure to pay fees or provide materials requested by the CRSPPP in a complete and timely manner an applicant is not entitled to a Request for Reconsideration by the CRSPPP or a formal Appeal pursuant to the procedures outlined in the following sections. If the Denial or Termination of Approval is based on either of those grounds, any request for reconsideration shall be submitted to the Chair of the CRSPPP and the decision by the Chair for reconsideration shall be final and is not appealable.

### **Request for Reconsideration**

A decision by the CRSPPP of Denial or Termination of Approval shall be transmitted to the organization/applicant in a notification letter. The letter of notification shall include the basis for the adverse decision and inform the organization/applicant of the right to request reconsideration of the decision by the CRSPPP.

A request for reconsideration is required prior to formal appeal. If the CRSPPP votes to uphold its adverse decision following the request for reconsideration, the organization/ applicant will then have the right to request an appeal of the decision.

A written request for reconsideration or appeal that is timely filed by an organization/applicant shall stay the adverse decision until the reconsideration or appeal hearing by an appeal panel is completed. The approval status of the organization during the process of reconsideration or appeal shall remain as it was prior to the adverse decision.

If reconsideration of an adverse decision is desired, a written request for reconsideration (and the basis for requesting reconsideration) shall be submitted to the CRSPPP within 30 days following the date of receipt of the notification letter describing the basis for the adverse decision.

Reconsideration shall be based *only* on the information before the CRSPPP at the time of its initial decision. If the organization/applicant seeks to submit revised information in response to the CRSPPP’s concerns (e.g., changes in the organization or programs since the initial decision), a new application must be filed and a request for reconsideration will not be entertained.

The reconsideration will occur at the next regularly scheduled meeting of the CRSPPP and shall be at no additional cost to the organization/applicant. If, following the reconsideration, the CRSPPP upholds its initial decision, the organization/applicant may request an appeal.

### **Appeal**

If CRSPPP's decision is adverse, as defined in this document, the applicant will have a 30-day period upon receipt of the decision letter in which to appeal that decision

### 1. Filing an Appeal

The appeal must specify the grounds on which it is made, which must be either a procedural violation or substantive error by CRSPPP in its review of the program. If the applicant elects to appeal a decision, it will do so by filing a written letter of appeal to the APA President, to be forwarded for action to the APA body responsible for oversight of CRSPPP, the APA Board of Directors.

A nonrefundable appeal fee will be charged to the appellant, such fee to be submitted with the appellant's letter of appeal. If no timely request is received, the decision of the CRSPPP shall be considered final.

### 2. Appointment of an Appeal Panel

Within 60 days of receipt of the applicant's letter of appeal, the CRSPPP will provide the applicant with a list of three (3) potential appeal panel candidates from a list of potential panel members designated by the APA Board of Directors. None of the appeal panel candidates will have had a prior connection with the applicant or with the CRSPPP review process related to the applicant. Panelists need not have a particular specialty or be from a particular geographic location. Within 30 days, the applicant may challenge any of the designated panelists for good cause (e.g., conflict of interest, bias, or other prejudicial infirmity). If the applicant shows good cause why a named panel candidate is unacceptable, an alternative will be selected in the same manner as the initial three (3) panelists as a replacement. The replacement may also be challenged for due cause. If the applicant does not notify the CRSPPP of any objections within 30 days, the Board of Directors will designate these three members to serve on the appeal panel. The Board of Directors will designate one of the three panelists as chair of the appeal panel.

### 3. Appeal Hearing

An appeal hearing, requested in conformity with these procedures, will take place within ninety (90) days of the designation of the panel, unless that is impracticable, in which case the hearing will be scheduled at the earliest practicable date thereafter. The appellant shall be notified of the time and place of the hearing.

The appeal panel will convene a hearing via conference call at a date and time acceptable to all parties. In addition to the three members of the appeal panel, the appeal hearing will be attended by one or more applicant representatives, one or more representatives from the CRSPPP, and APA staff who work with CRSPPP. Separate legal counsel also may accompany either party.

In exceptional circumstances and at the discretion of APA, an in-person hearing may take place. If an in-person hearing is conducted, the appellant shall pay any expenses incurred in sending its representative (including counsel) to an in-person hearing. In addition, the appellant shall pay one-half of the expenses incurred by APA in the conduct of the hearing. Those expenses shall include travel, hotel accommodations, and meals for the three

Appeals Panel members, counsel for the Appeals Panel, and a representative from the CRSPPP.

#### 4. Scope and Conduct of Appeal

An appeal is not a *de novo* hearing, but a challenge of the decision of the CRSPPP based on the evidence before the CRSPPP at the time of its decision. CRSPPP's decision should be affirmed unless (a) there was a procedural error and adherence to the proper procedures would dictate a different decision; or (b) based on the record before it, CRSPPP's decision was plainly wrong or without evidence to support it. Accordingly, the appeal panel should not substitute its judgment for that of the CRSPPP merely because it would have reached a different decision had it heard the matter originally. If an issue requires a legal interpretation of the CRSPPP's procedures or otherwise raises a legal issue, the issue may be resolved by APA legal counsel instead of the appeal panel.

The procedural and substantive issues addressed by the appeal panel will be limited to those stated in the appellant's appeal letter.

Only the facts or materials that were before the CRSPPP at the time of its decision and information properly submitted as part of a request for reconsideration may be considered by the panel. The panel will be provided with only documents and information considered by the Committee in making its decision, the letter that notified the sponsor/applicant of the CRSPPP's decision (and denial of the request for reconsideration), the letter of appeal, a written brief submitted by the sponsor/applicant, and a reply brief submitted by the CRSPPP. The letter of appeal and written briefs shall not refer to information or materials that were not before the CRSPPP. Any additional information supplied by the applicant in the written briefs cannot describe new components of the applicant or changes made subsequent to initial review/action. Any such new information will not be considered by the appeal panel. All materials from the appellant, including its brief, must be provided at least 45 days before the date of the appeal hearing. All materials from the APA, including its reply brief, must be provided at least 15 days before the date of the appeal hearing.

When legal counsel for appellant attends and participates in the hearing, it is with the understanding that the proceedings are not a judicial forum, but a forum to review the Committee's decision in terms of procedural violations or substantive error.

APA's legal counsel also attends the hearing. In addition to advising APA, the counsel has responsibility to assure compliance with the Criteria and may resolve legal or procedural issues or can advise the panel. Additional counsel may also appear at the hearing on behalf of the Committee.

At the hearing, the sponsor/applicant's representative shall first present arguments regarding issues raised on appeal. The CRSPPP's representative shall then make the CRSPPP's presentation. (The applicant and the CRSPPP may decide what role, if any, counsel shall have in their presentations). The Appeal Panel may address questions, as appropriate, to either the applicant and/or the CRSPPP. Neither the sponsor/applicant nor the CRSPPP shall have the right to question each other directly, although either can raise issues or suggest questions that the Appeal Panel will have the discretion to explore. Following the initial presentations, and any questions by the Appeal Panel, the sponsor/applicant and then

the CRSPPP shall be allowed closing statements. The appeal panel may depart from this format should considerations of fairness so require.

The burden of proof shall lie with the applicant.

#### 5. Decision and Report of the Appeal Panel

The CRSPPP's decision should be affirmed unless a) there was a procedural error and adherence to the proper procedures would dictate a different decision; or, (b) based on the record before it, the CRSPPP's decision was plainly wrong or without evidence to support it.

The appeal panel shall have the options of:

- a) Upholding the CRSPPP's decision;
- b) Reversing the CRSPPP's decision with an explanation of the basis for reversal; or,
- c) Remanding the matter to the CRSPPP for reconsideration of its decision in light of the panel's ruling with regard to procedural violations or substantive errors.

The decision of the appeal panel shall be by majority vote.

The report of the appeal panel will state its decision and briefly describe the basis of that decision based on the evidence before the panel. The report of the panel will be addressed to the President of APA and sent within 30 days of the hearing. Copies will be provided to the applicant, the Chair of the CRSPPP, the APA staff working with the CRSPPP and the Membership Board Chair. The appeal panel decision may also be shared with the full CRSPPP, Membership Board, or the APA Board of Directors as the administrative agent of the Council of Representatives in certain circumstances.

If the appeal panel upholds an adverse decision, the appealing organization may file a further appeal to the APA Board of Directors, through the Office of Graduate and Postgraduate Education and Training. Appeals must be filed within 30 days of receipt of the report of the appeal panel. Such appeal shall be on the written record, with no hearing and subject to procedures adopted by the board.

## F. Complaint Procedures

In the event that the Office of Graduate and Postgraduate Education receives an inquiry and/or becomes aware of activity that may relate to a potential violation of the *Criteria* the following will be used to address the potential violation (hereby referred to as a complaint):

1. The APA Office of Graduate and Postgraduate Education staff will notify the Chair of the CRSPPP of the complaint; the nature of the complaint may be further clarified as necessary with the complainant.
2. The organization named in the complaint will be informed in writing of the nature of the complaint as it relates to the potentially relevant criteria and given the opportunity to respond within a specific time period.

3. Under these procedures, an approved organization is informed when an organization or individual brings a complaint against it.
4. Upon review of the response from the organization, APA staff may request any additional information that is needed.
5. APA staff will review the complaint and the response from the organization, and attempt to resolve any concerns with the organization. If the complaint cannot be resolved at this level, the staff will refer the complaint to members of the CRSPPP who are designated to review complaints. The subcommittee of CRSPPP will report its recommendations for action to the full CRSPPP.
6. The CRSPPP will make a determination of action to be taken regarding the complaint, and will notify the APA Office of Graduate and Postgraduate Education.
7. The APA Office of Graduate and Postgraduate Education, on behalf of CRSPPP, will forward a response to the sponsor that may include any of the following:
  - a) an educative letter, with documentation to the file. This may include a no-fault letter, a letter clarifying and explaining the criteria and issuing a warning, or a sanctions letter,
  - b) a reduction of the current approval period, or
  - c) loss of approval status which shall be appealable as an adverse decision under section E of this document.
8. The complainant will be notified by the Office of Graduate and Postgraduate Education of any final action related to the complaint.
9. In addition to processing received complaints, the CRSPPP reserves the right to independently pursue any inquiry or complaint that comes to its attention.
10. In considering renewal applications, the CRSPPP may take into account of the significant number or nature of complaints, and especially of unresolved complaints, in considering whether to renew approval status.