



STATE OF ARIZONA
BOARD OF PSYCHOLOGIST EXAMINERS
1740 WEST ADAMS STREET, SUITE 3403
PHOENIX, AZ 85007
PH: 602.542.8162 FX: 602.926.8095
WEBSITE: www.psychboard.az.gov

DISCLAIMER: No staff member is qualified to provide legal advice or interpretation of statutes and rules. If your question is relative to a statute or rule and how it applies to you, this constitutes a request for legal advice or interpretation of statutes. Please consult an Arizona attorney familiar with regulatory law for an answer to your questions.

Q: How can I determine if a non-APA accredited doctoral program leads to licensure in Arizona? Does the Board have a list of programs that meet the requirements for licensure?

Answer:

The Board of Psychologist Examiners does not have a list of programs that meet requirements for licensure. The Board does not have the authority in statute or rule to evaluate or pre-approve doctoral programs or otherwise consider the content of transcripts prior to the entire application file becoming administratively complete.

As part of the application for exam and/or licensure, it is the responsibility of the applicant to demonstrate to the Board that the doctoral program from which they graduated meets the requirements in [A.R.S. § 32-2071](#) and the [Arizona Administrative Code](#).

Regarding the doctoral program, [A.R.S. § 32-2071](#) states:

32-2071. Qualifications of applicant; education; training

A. An applicant for licensure shall have a doctoral degree from an institution of higher education in clinical or counseling psychology, school or educational psychology or any other subject area in applied psychology acceptable to the board and shall have completed a doctoral program in psychology from an educational institution that has:

1. Been accredited by one of the following regional accrediting agencies at the time of the applicant's graduation:

- (a) The New England association of schools and colleges.*
- (b) The middle states association of colleges and schools.*
- (c) The north central association of colleges and schools.*
- (d) The northwest association of schools and colleges.*
- (e) The southern association of colleges and schools.*
- (f) The western association of schools and colleges.*

2. A program that is identified and labeled as a psychology program and that stands as a recognized, coherent organizational entity within the institution with clearly identified entry and exit criteria for graduate students in the program.

3. An identifiable psychology faculty in the area of health service delivery and a psychologist responsible for the program.

4. A core program that requires each student to demonstrate competence by passing suitable comprehensive examinations or by successfully completing at least three or more graduate semester hours, five or more quarter hours or six or more trimester hours or by other suitable means in the following content areas:

(a) Scientific and professional ethics and standards in psychology.

(b) Research, which may include design, methodology, statistics and psychometrics.

(c) The biological basis of behavior, which may include physiological psychology, comparative psychology, neuropsychology, sensation and perception and psychopharmacology.

(d) The cognitive-affective basis of behavior, which may include learning, thinking, motivation and emotion.

(e) The social basis of behavior, which may include social psychology, group processes, cultural diversity and organizational and systems theory.

(f) Individual differences, which may include personality theory, human development and abnormal psychology.

(g) Assessment, which includes instruction in interviewing and administering, scoring and interpreting psychological test batteries to diagnose cognitive abilities and personality functioning.

(h) Treatment modalities, which include instruction in the theory and application of a diverse range of psychological interventions to treat mental, emotional, psychological and behavioral disorders.

5. A psychology program that leads to a doctoral degree requiring at least the equivalent of three full-time academic years of graduate study, two years of which are at the institution from which the doctoral degree is granted.

6. A requirement that the student must successfully defend a dissertation, the content of which is primarily psychological, or an equivalent project acceptable to the board.

7. Official transcripts that have been prepared solely by the institution and not by the student and, except for manifest clerical errors or grade changes, have not been altered by the institution after the student's graduation.

8. Given the student credit only for coursework that is listed on its official transcripts and that is obtained only at regionally accredited educational institutions as listed in paragraph 1 of this subsection and does not give credit for continuing education experiences or courses.

B. If the institution is located outside the United States, the applicant shall demonstrate that the program meets the requirements of subsection A, paragraphs 2 through 7 and subsections C through M of this section.

C. The applicant shall complete relevant didactic courses of the program required under subsection A, paragraph 4 of this section before starting the supervised professional experiences as described pursuant to subsection F of this section.

D. Each applicant for licensure shall obtain three thousand hours of supervised professional work experiences. The applicant shall demonstrate clearly how the applicant met this requirement. The applicant shall obtain a minimum of one thousand five hundred hours through an internship as described in subsection F of this section. The applicant shall obtain the remaining one thousand five hundred hours through any combination of the following:

1. Supervised preinternship professional experiences as described in subsection E of this section.

2. *Additional internship hours as described in subsection F of this section.*
3. *Supervised postdoctoral experiences as described in subsection G of this section.*

Subsection F of this section describes the requirements for an internship referenced in subsection C, above.

F. The applicant shall have one thousand five hundred hours of supervised professional experience, which shall be either an internship that is approved by the American psychological association committee on accreditation, an internship that is a member of the association of psychology postdoctoral and internship centers or an organized training program that is designed to provide the trainee with a planned, programmed sequence of training experience, the focus and purpose of which are to assure breadth and quality of training, and that meets the following requirements:

1. *The training program has a clearly designated staff psychologist who is responsible for the integrity and quality of the training and who is licensed or certified to practice psychology at the independent level by any licensing jurisdiction of the United States or Canada in which the program exists.*
2. *The training program provides at least two psychologists on staff as supervisors, at least one of whom is licensed or certified to practice psychology at the independent level by a licensing jurisdiction of the United States or Canada in which the program exists and at least one of whom is directly available to the trainee in case of emergency.*
3. *Supervision is provided by the person who carries clinical responsibility for the cases being supervised. At least half of the training supervision shall be provided by one or more psychologists.*
4. *Training includes a range of assessment, consultation and treatment activities conducted directly with clients or patients.*
5. *A minimum of twenty-five per cent of a trainee's supervised professional experience hours is in direct client or patient contact.*
6. *Training includes regular in-person, individual supervision conducted on a contemporaneous basis, with a minimum of one hour of in-person, individual supervision for each twenty hours of experience and with the specific intent of dealing with psychological services rendered directly by the trainee and at least two additional hours per week in other learning activities. The supervisor shall ensure that the telepractice supervision is conducted using secure, confidential real-time visual telecommunication.*
7. *The training program includes interaction with other psychology trainees.*
8. *Trainees have a title that designates their trainee status.*
9. *The applicant provides from the training organization a written statement that describes the goals and content of the training program and documents that clear expectations existed for the breadth, depth and quality and quantity of a trainee's work at the time of the supervised professional experience.*
10. *The supervised professional experience is completed within twenty-four consecutive months.*

Subsection H of this section adds an additional requirement related to supervised experiences:

H. In meeting the supervised preinternship professional experience as described in subsection E of this section and the

supervised professional experience as described in subsections F and G of this section, an applicant shall not receive credit for more than forty hours of experience per week.

Subsection K of this section describes the residency requirements for a doctoral program:

K. The applicant shall complete a residency at the institution that awarded the applicant's doctoral degree. The residency shall require the following:

- 1. The student's active participation and involvement in learning.*
- 2. Direct regular contact with faculty and other matriculated doctoral students.*
- 3. Eighteen semester hours or thirty quarter hours or thirty-six trimester hours completed within a twelve month consecutive period at the institution or a minimum of three hundred hours of student-faculty contact that involves face-to-face educational meetings conducted by the institution's psychology faculty and fully documented by the institution and the student. These meetings shall include interaction between the student and faculty and the student and other students and shall relate to the program content areas specified in subsection A, paragraph 4 of this section. These meetings shall be in addition to the supervised preinternship professional experience, clerkship or externship supervision hours or dissertation hours. On request by the board, the applicant shall obtain documentation from the institution showing how the applicant's performance was assessed and documented.*

Statutory requirements are further defined in the Arizona Administrative Code (A.A.C.) also referred to as the Rules. Regarding the doctorate, A.A.C. R4-26-210 states:

R4-26-202. Doctorate

A. The Board shall apply the following criteria to determine whether a doctoral program provided by an institution of higher education met the standards in A.R.S. § 32-2071(A)(2) at the time an applicant began the degree program:

- 1. The program is identified and labeled as a psychology program if there were institutional catalogues and brochures that specified the intent of the institution of higher education to educate and train psychologists;*
- 2. The program stands as a recognized, coherent organizational entity if there was an organized sequence of courses comprising a psychology curriculum; and*
- 3. The program has clearly identified entry and exit criteria within its psychology curriculum if there were specific prerequisites for entrance into the program and delineated requirements for graduation.*

B. The Board shall verify that an applicant completed the hours in the subject areas described in A.R.S. § 32-2071(A)(4). For this purpose, the applicant shall have the institution of higher education that the applicant attended provide directly to the Board an official transcript of all courses taken and verification of the dissertation or similar project.

- 1. The Board may require additional documentation from the applicant or from the institution to determine whether the applicant satisfied the requirements of A.R.S. § 32-2071(A)(4).*
- 2. The Board shall count five quarter hours or six trimester hours as the equivalent of three semester hours, as required under A.R.S. § 32-2071(A)(4). When an academic term is other than a semester, quarter, or trimester, 15 classroom contact hours equals one semester hour.*

C. To determine whether a comprehensive examination taken by an applicant as part of a doctoral program in psychology satisfies the requirements of A.R.S. § 32-2071(A)(4), the Board shall review documentation provided directly to the Board by

the institution of higher education that granted the doctoral degree, that demonstrates how the applicant's comprehensive examination was constructed, lists criteria for passing, and provides the information used to determine that the applicant passed.

D. The Board shall not accept as core program hours required under A.R.S. § 32-2071(A)(4) credit:

- 1. For workshops, practica, undergraduate courses, life experiences, continuing education courses, or experiential or correspondence courses;*
- 2. Transferred from institutions that are not accredited under A.R.S. § 32-2071(A)(1); or*
- 3. For seminars, readings courses, or independent study unless the applicant proves that the course was an indepth study devoted to a particular core program content area by submitting one or more of the following:*
 - a. Course description in the official catalogue of the institution of higher education,*
 - b. Course syllabus, or*
 - c. Signed statement from a dean or psychology department head affirming that the course was an in-depth study devoted to a particular core program content area.*

E. The Board shall count a course or comprehensive examination only once to satisfy a requirement of A.R.S. § 32-2071(A)(4).

F. An honorary doctorate degree does not qualify an applicant for licensure as a psychologist.

Regarding general supervision requirements, A.A.C. R4-26-209 states:

R4-26-209. General Supervision

A. Under A.R.S. § 32-2071(D), an applicant is required to obtain 3,000 hours of supervised professional experience.

B. A supervising psychologist shall not supervise a member of the psychologist's immediate family or the psychologist's employer or business partner.

C. Payment between a supervisor and supervisee.

- 1. A supervising psychologist may pay a monetary stipend or fee to a supervisee if the amount paid by the supervisor is not based on the supervisee's productivity or revenue generated by the supervisee;*
- 2. A supervising psychologist who accepts a fee for providing the supervisory service in Arizona may be subject to disciplinary action by the Board; and*
- 3. The Board shall look to the law of the jurisdiction in which the supervision occurred to determine whether to include as part of the 3,000 hours of supervised professional experience required under A.R.S. § 32-2071(D) hours for which an applicant paid the supervisor.*

D. A psychologist who supervises the professional experience of an unlicensed individual is professionally responsible for all work done by the individual during the supervised experience.

E. The Board shall include in the 3,000 hours of supervised professional experience required under A.R.S. § 32-2071(D), hours obtained through a training program only if the training program provides the supervision required under A.R.S. § 32-2071(F)(2).

Regarding preinternship (practicum) and internship supervised experiences, A.A.C. R4-26-210(A) & (B) state:

R4-26-210. Supervised Professional Experience

A. The Board shall use the following criteria to determine whether an applicant's supervised preinternship professional experience complies with A.R.S. § 32-2071(E):

- 1. The supervised preinternship professional experience was part of the applicant's doctoral program from an institution of higher education that meets the standards in A.R.S. § 32-2071(A);*
- 2. The applicant completed appropriate academic preparation before beginning the supervised preinternship professional experience. The Board shall not include any assessment or treatment conducted as part of the required academic preparation in the hours of supervised preinternship professional experience; and*
- 3. For each supervised preinternship professional experience training site, the applicant has a written training plan with both the training site and the institution of higher education at which the applicant is pursuing a doctoral degree that includes at least the following:*
 - a. Training activities included and the amount of time allotted to each activity,*
 - b. Goals and objectives of each training activity,*
 - c. Methods of evaluating the supervisee and the supervised preinternship professional experiences provided,*
 - d. Approval of all individuals providing supervision at sites external to the training site,*
 - e. Total number of hours to be accrued during the supervised preinternship professional experience,*
 - f. Total number of hours of face-to-face contact hours with clients or patients during the supervised preinternship professional experience,*
 - g. Total number of hours of supervision during the supervised preinternship professional experience,*
 - h. Qualifications of all individuals who provide supervision during the supervised preinternship professional experience, and*
 - i. Acknowledgment that ethics training will be included in all activities.*

B. The Board shall use the following criteria to determine whether an applicant's internship or training program qualifies as supervised professional experience under A.R.S. § 32- 2071(F):

- 1. The written statement required under A.R.S. § 32- 2071(F)(9): a. Was established no later than the time the applicant entered the internship or training program; and b. Corresponds to the internship or training program the applicant completed;*
- 2. A supervisor was directly available to the applicant when decisions were made regarding emergency psychological services provided to a client or patient as required under A.R.S. § 32-2071(F)(2);*

1. *The two hours a week of other learning activities required under A.R.S. § 32-2071 (F)(6) include one or more of the following:*
 - a. *Case conferences involving a case in which the applicant was actively involved,*
 - b. *Seminars involving clinical issues,*
 - c. *Co-therapy with a professional staff person including discussion,*
 - d. *Group supervision, or*
 - e. *Additional individual supervision;*
2. *The training program had the applicant work with other doctoral level psychology trainees and included in the written statement required under A.R.S. § 32-2071 (F)(9) a description of the program policy specifying the opportunities and resources provided to the applicant for working or interacting with other doctoral level psychology trainees in the same or other sites; and*
3. *Time spent fulfilling academic degree requirements, such as course work applied to the doctoral degree, practicum, field laboratory, dissertation, or thesis credit, is not credited toward the 1,500 hours of supervised professional experience hours required by A.R.S. § 32-2071 (F). This subsection does not restrict a student from participating in activities designed to fulfill other doctoral degree requirements. However, the Board shall not credit time spent participating in activities to fulfill academic degree requirements toward the hours required under A.R.S. § 32-2071 (F).*

In determining if a non-APA accredited or non-PCSAS accredited doctoral program meets Arizona's requirements, we hope the above statutes and rules are helpful. The statutes and rules quoted above are not the complete text. Please use the links provided at the beginning of this letter to go to the official publications of these documents.

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Arizona Board of Psychologist Examiners

Foreign Graduates and Arizona Licensure as a Psychologist

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Q. I obtained my doctorate outside of the United States and Canada. Am I eligible for licensure in Arizona?

Answer:

As part of the application for exam and/or licensure, it is the responsibility of the applicant to demonstrate to the Board that the doctoral program from which they graduated meets the requirements in [A.R.S. § 32- 2071](#) and the [Arizona Administrative Code](#).

In addition to the requirements provided in the previous page of this FAQ, foreign graduates must provide additional documentation relative to their official transcripts. A.R.S. Section 32-2071(B) states:

B. If the institution is located outside the United States, the applicant shall demonstrate that the program meets the requirements of subsection A, paragraphs 2 through 7 and subsections C through M of this section.

A.A.C. R4-26-211 provides further direction relative to this statute:

A. Under A.R.S. § 32-2071(B), an applicant for licensure whose application is based on graduation from an institution of higher education located outside the U.S. and its territories shall demonstrate that the applicant's formal education is equivalent to a doctoral degree in psychology from a regionally accredited educational institution as described in A.R.S. § 32- 2071(A).

B. The Board shall find that the institution of higher education from which an applicant under subsection (A) graduated is equivalent to a regionally accredited education institution only if the institution of higher education is included in one of the following:

- 1. International Handbook of Universities, published for the International Association of Universities by Stockton Press, 345 Park Avenue South, 10th floor, New York, NY 10010- 1708;*
- 2. Commonwealth Universities Yearbook, published for the Association of Commonwealth Universities by John Foster House, 36 Gordon Square, London, England, WC1H 0PF; or*
- 3. Another source the Board determines provides reliable information.*

C. The academic transcript of an applicant under subsection (A) who graduated from an institution included under subsection (B) shall be translated into English and evaluated by a member organization of the National Association of Credential Evaluation Services (NACES). The applicant is responsible for paying all expenses incurred to obtain a translation and review of the academic transcript. An applicant can find information about obtaining a professional credential review at www.naces.org.

D. When the credential review required under subsection (C) is completed, the NACES member organization shall submit the review report to the Board. The Board shall review the report and determine whether the applicant's education meets the standard in subsection (A).

E. Upon written request, the Board may waive the credential review required under subsection (C) for an applicant who graduated from a doctoral program that is accredited by the accreditation panel of the Canadian Psychological Association.

F. After the Board determines that the formal education of an applicant under subsection (A) is equivalent to a doctoral degree in psychology from a regionally accredited educational institution, the applicant shall provide evidence to the Board that the applicant has met all other requirements for licensure.