

## Statement in Support of SB 418-2

The Oregon Board of Psychologist Examiners (OBPE) has adopted rules that effectively deprive place-bound Oregon residents, such as mothers and fathers with children at home and working women and men, of the ability to pursue a PhD in psychology. These new rules require that all applicants complete an uninterrupted full academic year in residence at a degree-granting institution accredited by the American Psychological Association (APA) in order to apply for licensure and take the requisite licensing examinations. The APA is a trade association of psychologists that will not accredit institutions of higher education offering degrees with substantial online components. The APA's new Standards of Accreditation for Health Service Psychology, adopted in February 2015 to replace the APA's current Guidelines and Principles for Accreditation in Professional Psychology, state in no uncertain terms that the APA's standards "cannot be met in programs that are substantially or completely online."<sup>1</sup>

- Walden University is an institution of higher learning accredited by a regional accrediting organization recognized by the United States Department of Education. Walden offers a number of graduate degrees, one of which is a PhD in Clinical Psychology. Walden cannot obtain accreditation by the APA because substantial portions of its curriculum leading to a PhD in psychology are provided on line. Walden provides a hybrid program that requires students to complete a residential component but the in-residency requirement is fulfilled with a number of shorter segments of residency. This structure provides a superior learning environment and also permits non-traditional students, students who live in rural areas, and older students to pursue advanced degrees they would not otherwise have the wherewithal to pursue.
- Prior to adoption of these new rules, Walden University had met all laws and regulations of the state of Oregon and had offered PhD in psychology degrees in Oregon for many years. Walden still has students in the pipeline

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<sup>1</sup> <http://www.apa.org/ed/accreditation/about/policies/standards-of-accreditation.pdf>, page 9.

preparing to take the qualifying exams under transitional rules but has ceased accepting new students from Oregon. Walden students have an excellent record of passing the Oregon psychology exams. Oregon psychologists who obtained their PhD degrees at Walden have an excellent record of accomplishment in the state. We know of no disciplinary actions taken against Walden students by OBPE.

- Nationally, Walden’s student body is 48% ethnic minority and 75% women. 89% of Walden’s student body works part or full-time or is self-employed. Walden’s 3-year student default rate is significantly lower than the national averages of both public and private institutions. Many of Walden’s students are from rural areas and because they are already living in these areas, they are most likely to set up their psychology practices in those areas.
- SB 418-2 would require the Board of Psychologist Examiners to provide a pathway for students to pursue a PhD in Psychology that would not require students to abandon their families and jobs to do so. California has prohibited its regulatory counterpart to OBPE from limiting entry to the profession in the way OBPE’s new rule does by prohibiting its licensing body from denying entry to the profession of psychology to individuals who are educated by an educational institution “solely because its program is not accredited by any professional organization of psychologists...”<sup>2</sup> This pro-competition, pro-consumer, pro-student provision is contained in SB 418-2.
- Walden University has a stellar record, both in Oregon and nationally, of providing advanced educational degrees to students from a wide range of backgrounds, many of whom would not otherwise have the financial ability and logistical flexibility to commit to physical presence on campus over an extended period of time. Walden does not object to the Board’s imposition of educational standards or a qualitative evaluation of curriculum, but any such standards should be promulgated based on evidence-based review and evaluation of outcomes, not on the arbitrary imposition of a new

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<sup>2</sup> California Business and Professions Code, Section 2914.

accrediting standard which limits entry to the profession, especially when the imposition of such a licensing standard has the effect of excluding certain classes of students from pursuing a degree. This consideration is especially important at a time when Oregon confronts a chronic shortage of mental health professionals serving in rural areas.

**Submitted by Lynda & Jim Gardner, Gardner & Gardner, Attorneys, P.C.,  
on behalf of Walden University**