November 13, 2019

Maureen O'Connor, Ph.D., J.D.
President
Palo Alto University
1791 Arastradero Road
Palo Alto, CA 94304

Dear President O'Connor,

At its meeting on October 17-20, 2019 the Commission on Accreditation (CoA) conducted a review of the doctoral Psy.D. program in Clinical psychology at the Palo Alto University, PGSP-Stanford Psy.D. Consortium. This review included consideration of the program's most recent self-study report, the preliminary review ("admin review"), the program's response to preliminary review, the report of the team that visited the program on May 20-21, 2019, and the program's response to the site visit report.

I am pleased to inform you that the CoA voted to reaffirm accreditation of the program, with its next site visit scheduled to be held in **2029**. This decision is based on the CoA's professional judgement that the program has demonstrated that it adheres to the *Standards of Accreditation in Health Service Psychology* (SoA). The current record indicates that a full review of the program is warranted within 10 years of the last site visit, including interim reporting, to ensure continued adherence to the Standards. The program will be listed among accredited programs in health service psychology on the accreditation web pages. The Commission encourages you to share information about your program's accredited status with agencies and others of the public as appropriate.

Drs. Eugene D'Angelo, Myron Hays, Gilbert Newman, Dawn Vo-Jutabha, Jason Williams, Stephanie Wood, Paula Shear, Mary Ann Norfleet, and Ann Lagges recused and therefore did not participate in the discussion and vote on your program.

The Commission recognizes the quality of training provided by the program and deems it in substantial compliance with the *Standards of Accreditation*. The Psy.D. program in Clinical psychology at the Palo Alto University PGSP-Stanford Consortium provides training that is sequential, cumulative, and graded in complexity. The program has acted to ensure a supportive and encouraging learning environment appropriate for the training of individuals who are diverse. Students from the program have been highly successful at matching at APA-accredited internships, gaining licensure, and securing employment in both applied clinical and research settings. Core faculty, drawn from Palo Alto University and the Stanford University School of Medicine's Department of Psychiatry and Behavioral Sciences, have the necessary training, credentials, and expertise to provide appropriate mentoring for their students' scholarly and applied training. Data provided for review is consistent with the SoA, and the program is described accurately in its public documents and maintains consistent communication with CoA.

Accreditation is a process that encourages improvement through continuous self-study and review. The CoA has identified items that represent areas that require additional attention. Please navigate to the Standards tab in the CoA Portal to respond to this feedback.

Standard II: Aims, Competencies, Curriculum, and Outcomes

II.B.1.a
In Table 2: Discipline-Specific Knowledge (Appendix II.B.1.a.1.2), the program indicates that the discipline-specific knowledge (DSK) area of advanced integrative knowledge is covered and assessed through the Biological Bases of Behavior Science Integration Assignment. This is a group assignment; therefore, it is not clear how the program can determine whether each student met the minimum level of achievement (MLA) for this DSK area. Furthermore, aspects of the grading rubric for this assignment are not relevant to the integration of different discipline-specific content areas (e.g., cohesiveness of the group, visual presentation). By **September 1, 2020**, the program is asked to explain how this assignment can be used to ensure that all students are capable of integrating various discipline-specific content areas, or consider an alternative way to present and assess the DSK area of advanced integrative knowledge.

Table 2: Discipline-Specific Knowledge (Appendix II.B.1.a.1.2) indicates STAT 704: Statistics & Research Methods as the coverage and assessment mechanism for the research methods DSK area. However, the syllabus for the STAT 704 course (Appendix II.B.2.1.1, page 297) indicates that it primarily covers statistical subject areas. Additionally, per Implementing Regulation (IR) C-7 D, the research methods DSK area requires primary source readings, which are not included in the course syllabus. In the professional judgment of the Commission, the current version of STAT 704 does not provide sufficient graduate-level training in the research methods DSK area. By **September 1, 2020**, the program is asked to demonstrate how it ensures that all students attain graduate-level knowledge in research methods and how this knowledge is assessed.

II.B.1.b
In the program's revised Table 3: Profession-Wide Competencies (Appendix II.B.1.b.1.2), the program only lists one element for the profession-wide competency (PWC) of supervision. Per IR C-18 D, accredited programs are required to operationalize competencies in terms of multiple elements. At a minimum, those elements must reflect the content description of each PWC defined in IR C-8 D, including the bulleted content, and must be consistent with the program's aim(s). Therefore, by **September 1, 2020**, the program is asked to demonstrate how it evaluates multiple elements for the supervision PWC and provide a revised Table 3 as necessary.

II.D.1.a
The program describes a minimum level of achievement (MLA) of 4 (high intermediate) for profession-wide competency (PWC) elements rated in supervisor rating forms (Standard II.B.1.b). However, the program's proximal data (Appendix II.D.1.a.1.2) indicates that it allows students to go on internship despite being rated a 3 (intermediate) on various elements. The program states that, resulting from a scaling issue, ratings of 3 are expected to occur occasionally. Therefore, it is unclear what the actual MLA is for PWC elements. By **September**

1, 2020, the program is asked to clarify what the MLA is for these supervisor-rated competencies, and how it ensures that all students have met these MLAs prior to internship.

Standard IV: Faculty

IV.B.5.a
While the program describes a comprehensive set of steps that it undertakes to recruit faculty who represent individual and cultural diversity, it is unclear how it formally evaluates its efforts. By **September 1, 2020**, the program is asked to indicate how it examines the effectiveness of its efforts to recruit faculty who are diverse and documents any steps needed to revise/enhance its strategies, consistent with IR C-21 D.

Standard V: Communication Practices

V.A.1:
The program is reminded that consistent with IR C-26 D, the program must provide information in its public materials regarding trainee admissions, support, and outcome data. Please note that the program's public information will be reviewed on or after October 1 of each year to ensure that the disclosure data has been updated and is in compliance with the IR.

The program's response to all Reporting Requirements must be submitted in the online CoA Portal. Please navigate to the "Follow-Up" tab to respond by the designated due date.

All Implementing Regulations are available on the accreditation website (www.apa.org/ed/ accreditation). The website also provides important updates and policy changes related to the accreditation process. As an accredited program, we encourage you to periodically visit the website to remain current on all new accreditation policies. The Commission on Accreditation would also like to remind you that all accredited programs must inform the accrediting body in a timely manner of changes that could alter the program's quality (see Implementing Regulation C-27 D: Notification of Changes to Accredited Programs). Such updates should be submitted via the CoA Portal under the "Substantive Change" tab.

In closing, on behalf of the Commission on Accreditation, I extend congratulations to the faculty and students of the program for their achievements. The Commission also expresses its appreciation for your personal commitment, and the corresponding support of your administration, to develop and maintain the best possible quality of graduate education and training in psychology. If the Office of Program Consultation and Accreditation may be of service at any time on administrative matters of accreditation, please call upon us.

Sincerely,

Jacqueline Remondet Wall, Ph.D.
Director, Office of Program Consultation and Accreditation

cc: James Breckenridge, Ph.D., *Vice President for Institutional Effectiveness, Analysis, and Planning*
Kimberly R. Hill, Ph.D., *Director of Clinical Training*
Allison Thompson, Ph.D., *Co-Associate DCT*
Robert Holaway, Ph.D., *Co-Associate DCT*

C-27 D. Notification of Changes to Accredited Programs
(formerly C-19; Commission on Accreditation, February 2005; revised October 2006, November 2015)

In accordance with Standard V.B.2 of the *Standards of Accreditation* (SoA) and Section 8.7 D of the *Accreditation Operating Procedures* (AOP), all accredited programs whether under a single administrative entity or in a consortium, must inform the accrediting body in a timely manner of changes that could alter the program's quality.

The Commission on Accreditation (CoA) must be informed in advance of major program changes such as changes in degree offered, policies/procedures, administrative structure, faculty resources, supervision resources, area of emphases, or tracks/rotations. In the case of doctoral programs, this includes changes in the areas of emphasis.

Programs must submit to the Office of Program Consultation and Accreditation a detailed written description of the proposed change(s) and the potential impact upon the relevant accreditation standards. The CoA will review the program change(s) and may request additional information or a new self-study. In the case of a substantive change (such as a change in consortium membership), the Commission may also determine that a site visit is needed to assess whether the revised program is consistent with the SoA. Upon completion of this review, the Commission will note the proposed change and include the information in the next scheduled review or inform the program of any needed immediate additional actions.

The only exception to the policy of informing the Commission *in advance* is the occurrence of an unavoidable event beyond the reasonable control and anticipation of the program (e.g., educational/training site unexpectedly withdrawing from a consortium because of financial crisis; resources affected by a natural disaster). In such circumstances, it is incumbent upon the program to immediately inform the CoA in writing of the change and to include in its notification a proposed plan for maintaining program consistency with the SoA. The CoA will then proceed as above.

Consultation on program changes is available from the Office of Program Consultation and Accreditation.