

American Psychoanalytic Association
Task Force on Externalization
Final Report
June 2008

Introduction

This is the final report of the Joint Task Force on Externalization. The Joint Task Force was appointed following the June 2007 meeting of the Executive Council and was charged with the circumscribed task of exploring the "advisability and feasibility" of a change in the structure of APsaA by the creation of a second corporation. The first corporation (APsaA) would function solely as a membership organization; the second corporation would function solely as "an accrediting, certifying and standard setting body."

There has been a long standing dispute in the Association over the issue of whether control of the educational standards in the APsaA "Approved Institutes" is ultimately in the hands of the Board on Professional Standards, which is a body consisting of representatives of Institutes, or under the control of the entire APsaA membership through their representatives on the Executive Council, the APsaA Board of Directors. This is a decades-long disagreement which has recently been made more evident by political initiatives to change the APsaA bylaws taken by those APsaA members who wish to modify the standard requiring that all T/SA's be certified.

Those favoring the proposition that APsaA's educational standards should be under the control of the Board on Professional Standards favor an arrangement in which those standards are determined solely by Institutes and their faculties, through representation on BOPS. They would thereby be "insulated" from the will of the APsaA membership as it might otherwise be expressed through a change in the APsaA bylaws based on approval by 2/3 of all those APsaA members who vote.

In light of the fact that recent changes¹ in the membership standards of APsaA no longer exclusively recognize training under the BOPS standards for the Approved Institutes as the only training which leads to eligibility for APsaA membership, certain of the Approved Institutes have conducted internal discussions about implementing standards which do not comply with the current BOPS standards. This has led to the idea that some sort of endorsement of more than one training standard, a "pluralistic approach," might partially resolve APsaA's long standing dispute and bring the Association's structure into alignment with those standards.

The concept of a certifying and accrediting body external to the membership organization (referred to in this report as the "CAB") composed of those Approved Institutes which wish to continue to adhere to the

¹ In 2004, with the approval of the BOPS, determination of eligibility for membership for APsaA was transferred from the BOPS to the Executive Council through a bylaw amendment approved by 87% of the APsaA membership. Prior to that time, graduates of IPA programs were individually approved for APsaA membership by the BOPS. However, based on the BOPS determination that IPA trained psychoanalysts appeared equally qualified for membership in APsaA, all graduates of IPA programs are now deemed in the bylaws to be equally qualified for APsaA full membership, as are graduates of Approved Institutes. Therefore the *membership standards* for APsaA and the *education standards* of the BOPS are no longer congruent.

39 current BOPS Standards (which evolve in their own right,) but with a second equally valid accreditation
40 pathway for those Institutes which no longer wish to adhere to those standards, is but one of several
41 "pluralistic" ideas which have been discussed in the Association. Although we readily acknowledge the
42 plausibility of other approaches (see Appendix I) this Task Force, in accord with its limited charge, has
43 focused only on the model in which the current certifying and accrediting functions of the Board on
44 Professional Standards are placed in an external corporation.

45
46 In this "fact finding" report we will first provide a brief description of the External Corporation concept
47 followed by a discussion of the major issues raised by such an arrangement and by a summary of the
48 Task Force's analysis of the implications of these issues. We are providing this information for wider
49 discussion in the Association. This Task Force as a whole decided at the very beginning of its work that
50 it would not make recommendations: just offer facts and best analyses. We trust that this will stimulate
51 discussion that will result in the basis for a decision about the worthiness of the directions explored in
52 this report. The Task Force also decided that it might be of interest to provide our individual thoughts,
53 having all now studied the issue carefully, and these individual statements are offered as an appendix.

54 55 **Description of the Model**

56
57 **Big Picture:** APsaA would assist in the development of a separate, ultimately completely autonomous
58 corporation called, for example, the American Certifying and Accrediting Board (the CAB) which would
59 accredit psychoanalytic training programs and would certify individual psychoanalysts. Institutes
60 currently accredited by APsaA can choose approval (i.e., accreditation) by the CAB or approval by the
61 IPA. In either case, candidates and graduates would continue automatically to be eligible for membership
62 in APsaA. APsaA, itself, would no longer approve institutes nor certify individual analysts, except
63 indirectly through its endorsement of these activities by the CAB and the IPA.

64
65 **The CAB:** The CAB would be a membership corporation with its members being *institutes*. The CAB
66 would have *no individual psychoanalyst members*. For a limited period, each institute currently approved
67 by APsaA would automatically be eligible for membership in the CAB. The CAB's governing body
68 would include representatives from component institutes, and could, as well, include a significant
69 number of representatives from other constituencies (e.g., a certain number of seats on their BOD that are
70 appointed by APsaA and/or members from the public at large.) The CAB would carry out the same
71 functions of accreditation, institute development, and certification that BOPS now carries out, including
72 the continuation of the BOPS committees which relate to those functions (essentially, all committees
73 other than COPE committees.) The specific standards and procedures would be established by the CAB's
74 BOD, and might not be identical with current BOPS standards and procedures. Those institutes that do
75 not wish to become a member of the CAB could choose to apply for recognition by IPA.

76
77 **Transition Period:** There would be a ten-year transitional period during which the CAB would become
78 incorporated. APsaA would continue to support the CAB financially during the transition, phasing out its
79 support over this period of time. This relationship would be established contractually. During the
80 transitional period, the CAB would continue to use existing operational infrastructure including housing
81 the meetings of the CAB, in a manner analogous to what is now provided to BOPS.

82
83 **Contractual Agreement:** The transitional arrangement between the two corporations (APsaA and the
84 CAB) would be based on a contract between the two organizations. In addition, contractual arrangements
85 may be extended, at the option of both corporations, to formalize a relationship after the ten-year
86 transitional period. This relationship could include provision of administrative support from APsaA

87 Central Office and meeting space at an agreed upon price. Arrangement could also include collaboration
88 between the two corporations on various educational matters, such as the workshops, study groups, etc.
89 that would expectably continue within APsaA (i.e., COPE type activities).
90

91 Summaries of Topic Discussion of the Task Force.

92 **Introduction to Discussion Summaries**

93
94
95 We tried to identify as many salient issues bearing on the question of externalization of the accrediting
96 and certifying functions as we could in order to provide a framework for a deeper discussion of those
97 issues. Our first approach was to try to enumerate the “pros” and “cons” of externalization under each
98 topic. We soon found, however, that we could not formulate our thinking in that way since for many
99 issues what some people consider an advantage of externalization, others would see as a drawback. An
100 example would be the fact that externalization of these functions would place the standards under which
101 they are carried out beyond the direct reach of the APsaA membership through bylaw amendments or
102 actions of the Executive Council. For some APsaA members, such a change would be highly desirable,
103 but for others it would be a significant drawback.
104

105 We therefore decided instead to present our thoughts on these topics in a format which states, to the best
106 of our ability, the objective facts about each topic, and then to follow that statement with our view of the
107 implications of these facts -- without judgments as to the "pro" or "con" valence of these implications.
108 What follows here is a short summary for each of these topics. The full text of our rendition of the "Facts
109 and Implications" of each is in the appendix. Each APsaA members can read these and come to his or her
110 own conclusion as to the "pros" and "cons."
111

112 **1. Implications for greater harmony/disharmony within APsaA**

113
114 For many years a philosophical and political conflict has existed within APsaA as to whether the overall
115 membership of APsaA or a specifically designated group of member educators should determine and
116 assess training standards endorsed by APsaA. This conflict has resulted in disharmony and dysfunction
117 within APsaA, and demoralization of the APsaA membership. The Task Force on Externalization came
118 into being to address this problem.
119

120 If externalization were adopted, the standard and accrediting body would no longer be a Committee of
121 the Corporation of APsaA subject to oversight by the APsaA BOD and the APsaA Bylaws. Instead the
122 CAB would be answerable to its member institutes. Disagreements about standards would be within the
123 CAB, and would also be shifted to the local institutes and to the individual members of these institutes.
124

125 **2. Impact on APsaA**

126
127 The externalization of the BOPS regulatory functions would end the tensions within APsaA regarding
128 certification, local option, and other current highly charged issues. APsaA would become a group united
129 by its interest in scientific programs, professional business matters, the study of educational matters, and
130 representation of the profession in the public domain. Antagonisms existing at the local level, currently
131 absorbed in APsaA, may be expressed locally or within CAB. Some individuals value APsaA’s
132 regulatory functions/standards, believing that the organization has come to represent these high
133 standards. Some individual members may choose not to continue their current level of involvement with
134 APsaA because their primary allegiance to APsaA is with the BOPS' regulatory activities. On the other

135 hand, some APsaA members, or potential members, who have been disaffected because of the BOPS's
136 regulatory activities may find themselves more positively disposed toward APsaA following an
137 externalization of the regulatory functions.

138 139 **3. Autonomy of Credentialing and Accrediting Process and Locus of Decision Making**

140
141 Under CAB, the accrediting and certifying processes would not be subject to those interests of a
142 membership organization that might conflict with the interests of a regulatory and/or standard setting
143 entity. CAB would include only those institutes interested in being in such a body, rather than the current
144 situation in which some institutes are within BOPS only because they have no other option.

145 The CAB would be free to continue to function under its current rules. However, it would also have the
146 freedom, if its BOD so decided, to evolve to include other possibilities. For example, the CAB could
147 offer its services to institutes and individuals outside APsaA, thereby helping to unify psychoanalysis
148 nationally. Alternatively, as it would also be possible for the CAB to utilize more than one set of
149 standards for accreditation, the CAB could decide to accredit one group of institutes by the current
150 APsaA (BOPS) standards and another group of institutes by IPA standards. The interests of APsaA could
151 be addressed through representation on the CAB Board of Directors (e.g., a certain number of the
152 directors might be appointed by APsaA.)

153
154 Some consider the presence of credentialing/accrediting within APsaA as desirable. Although CAB
155 should take into account the needs of the profession as a whole, some may feel that it is less likely to do
156 so if not overseen by a membership organization.

157 158 **4. Effect on Societies, Institutes, and Centers.**

159
160 The CAB model would enable institutes, currently approved by the APsaA, to choose whether to be a
161 CAB approved institute, or an IPA approved institute ("IPA Component Society").² Each Institute would
162 decide this matter for itself through an internally determined process. In some instances an Institute
163 bylaw amendment could be required. APsaA Affiliate Societies would retain their current status as
164 Affiliate Societies.

165
166 Those Institutes choosing to be accredited by the CAB would continue to follow standards set forth in
167 the present BOPS "Standards Document" until that document is changed or replaced by the CAB.
168 Institutes choosing to be credentialed by the IPA would adhere to the IPA standards. Since CAB
169 standards would of necessity also be acceptable to the IPA, all Institutes would therefore meet or exceed
170 IPA accreditation standards.

²It is important clearly to define terms when discussing APsaA and the IPA because some important words, relevant for this discussion, have very different meanings in the two organizations. The word, "Society" is a case in point. The IPA defines the term "Component Society" as: "a group recognized by the IPA as being qualified to train students for the practice of clinical psychoanalysis and to determine their qualification as psychoanalysts in accordance with IPA Criteria". This corresponds more closely to the APsaA word, "Institute". However, an IPA Component Society also is a membership organization which in some respects would be more like what in some locales in the U.S. is called a "center." However, "Center" is not an official APsaA term. For the purpose of this discussion, the APsaA terminology will be used, unless otherwise indicated.

171 **5. Local vs. National power/standards**

172

173 Each local institute would control which set of standards, CAB or IPA, best suited its needs. The
174 autonomous new accrediting body, CAB, would have autonomy over standard setting and accrediting for
175 its member institutes. Institutes declining membership in CAB would not be represented, but could join
176 later. Each institute would be able to assess, from time to time, "What are we getting from our choice",
177 and "Have we made the right choice?"

178

179 **6. Potential for expansion of APsaA membership**

180

181 APsaA membership is currently limited to graduates of BOPS accredited Institutes and IPA members.
182 Some current members may oppose expansion of current membership criteria because of a concern that
183 psychoanalysts who do not share the BOPS's traditions might act through APsaA governance to alter
184 BOPS standards. If CAB were created, this concern would no longer exist, and therefore it would be
185 easier to expand APsaA membership than it is at present. APsaA members who view membership as a
186 "credential," might view any opening up of the APsaA membership as a disadvantage. They might view
187 the opening up of APsaA membership as leading to an undesirable diversity of theoretical and technical
188 practices within APsaA, e.g., APsaA might opt to extend membership eligibility to graduates of
189 programs which utilize a three sessions per week training model. Others would see this theoretical
190 diversity as an opportunity to invigorate our discourse and to enhance our political clout.

191

192 **7. Impact on Candidates**

193

194 The CAB provides candidates with an option to train at an institute governed by national standards³
195 including site visits by a governing body and candidates' analyses/supervision conducted by analysts
196 vetted by those upholding national standards. Candidates could continue to participate in APsaA as
197 members and potentially with candidates training in institutes using other models. Candidates would
198 likely get a seat/vote on the board of the externalized corporation, which cannot happen within the
199 current by-law structure of APsaA. There may be confusion and anxiety during the transitional period.

200

201 **8. Ability to Maintain and Continue All Educational Forums**

202

203 Under an external CAB arrangement, the current non-regulatory educational functions of BOPS would
204 remain within APsaA, (e.g., Committee on Education, COPE study groups). In addition, the CAB model
205 does not include or preclude creation of new bodies within or across the two organizations (APsaA and
206 the CAB). A broad range of non-regulatory issues regarding psychoanalytic education could be
207 addressed in an "Educational Division" of APsaA. These activities would no longer be identified as
208 BOPS activities but instead would be seen as part of APsaA's continuing commitment to psychoanalytic
209 education.

³ In this context "national standards" refers to a particular set of training standards adhered to by a subset of all those training programs in the U.S. which follow standards approved by the International Psychoanalytical Association." The term "national standards" as used here is not intended to imply that only those Institutes which are members of the CAB are subject to the standards of a superordinate organization or body. It means that such institutes adhere to a mutually agreed upon set of additional standards which go beyond the standards of the IPA (which they must also follow.)

210 **9. Impact on Criteria for Membership in APsaA and on Standards for Training in Approved**
211 **Institutes.**

212
213 Adoption of the CAB Model, i.e., creation of a corporation external to APsaA whose purpose would be
214 credentialing (certification of individuals and accreditation of institutes), would have the following
215 results:

216
217 For those institutes choosing to be accredited by the CAB, the current "Standards Document" would
218 remain unchanged, although the standards could be changed by CAB at some future time. For those
219 institutes choosing to be accredited by the IPA, IPA standards would apply. Individual APsaA members
220 who are graduates of institutes which are members of and accredited by the CAB and those institutes
221 which choose IPA accreditation would continue to be eligible for membership in APsaA, as is now the
222 case. "Standards" for certification which are now determined by BOPS would be determined by the
223 CAB.

224
225 **10. Public Credibility of Accrediting and Credentialing Process**

226
227 In general, accrediting and credentialing functions are carried out by bodies which are autonomous from
228 professional membership organizations. Where such separation is not in place, the public view is that
229 accrediting and credentialing may lack integrity due to the potential of such functions being subject to
230 influence by the political processes in membership organization. For example the U.S. Department of
231 Education recognizes only autonomous accrediting bodies for the purpose of making students in
232 accredited programs eligible for federal aid. The importance of autonomy is emphasized by professional
233 accreditors.

234
235 **11. Possibility of Establishing a National Certification Body**

236
237 Currently an analyst must be a graduate of either an APsaA-approved institute or an IPA-approved
238 institute in order to apply for certification by BOPS. The CAB would have the option of expanding the
239 certification process to analysts who have graduated from institutes outside APsaA or the IPA. The CAB
240 could become a certifying body for analysts who are graduates of institutes with training standards
241 similar to those of currently-approved institutes, but who currently cannot apply for certification because
242 of BOPS's existing rules. The Consortium would welcome a vehicle for the certification of graduates
243 from ACPE-approved institutes, so this change could be integrative rather than competitive.

244
245 **12. Mechanism and rules for appointing T/SAs**

246
247 The task force concluded that the CAB model will not require a change in the mechanism and rules for
248 appointing T/SAs for those institutes choosing to be under the umbrella of CAB. These institutes would
249 follow the current BOPS mechanism and rules for T/SA appointment, and any decisions about
250 mechanisms and rules for T/SA appointment would be made in the future by CAB.

251
252 Those institutes that decide to be under the umbrella of the IPA would follow the IPA mechanism and
253 rules for appointment of TAs. The IPA regulations for appointment of TAs is spelled out in an IPA
254 document appended to this report.

255
256 **13. Political feasibility within APsaA**

257

258 A super-majority of 2/3rds, which is required for APsaA Bylaws changes, is a high hurdle for
259 controversial initiatives. Members may vote against CAB or not vote at all for a variety of reasons,
260 including but not limited to: misinformation or inability to understand the plan or the context; an
261 emotional preference to continue infighting; preference for other solutions; strong conviction about
262 currently held position on accreditation and certification; concern that the CAB may not be financially
263 sustainable; and a strong conviction that current mix of membership and regulatory functions is
264 important to continue. Finally the CAB idea is not the only idea which could lead to a pluralistic
265 reconfiguration of accreditation and certification. (See Appendix 1)

266 **14. Financial Issues**

268 As to the financial implications of the creation of a CAB, three numbers are important:

- 270 1. The cost of running the CAB
- 271 2. The savings to APsaA at the end of the transition
- 272 3. The number of Institutes which choose to join and to remain members of the CAB.

273 We have estimated the cost of running the CAB, with two different assumptions:

- 274 A. Office space, staff time, and etc. are rented from APsaA
- 275 B. Office space, staff time, and etc. are not rented from APsaA and the CAB offices are
276 established outside of NYC.

277 As to the income side, for both (A) and (B) we have assumed 23 institutes join the CAB. The income
278 does not include any contribution from APsaA – i.e. the situation at the end of the transition. In each
279 case, we have adjusted the Institute dues so that the budget comes out without significant gain or loss. If
280 there were a contribution from APsaA which is phased out over a transition period, then the Institute
281 Dues could be reduced during the transition period.

282 We have attempted to err in a “conservative” direction, so that the amount of savings for APsaA is
283 estimated at the low end of probable savings while the cost of running a CAB is estimated at the high end
284 of probable cost.

285 There are three Excel spread sheets in the appendix:

- 286 A. CAB BUDGET if staff, space etc rented from APsaA
- 287 B. CAB BUDGET if established outside NYC
- 288 C. SAVINGS TO APsaA at the end of transition (using 2006 figures)

289 What are the implications of the numbers? We address only two of the many important questions that
290 could be asked: Would a CAB be able to sustain itself at the end of the transition period? Would the
291 savings to APsaA allow a reduction in member dues?

292 The two CAB budgets are constructed so that the CAB would be financially self-sufficient. There
293 are two key assumptions which make this possible: That 23 institutes will join and that the annual
294 institute dues will be \$6,500 (in budget A) or \$10,000 (budget B). (If either of the two key
295 assumptions is changed, the result might be different.)

296 The total savings to APsaA at the end of the transition would be about \$90,000 i.e. about \$30 per

306 member. Thus not enough for a meaningful reduction in APsaA dues, but a non-trivial addition to
307 APsaA's budget.
308
309

310 Conclusion

311
312 The issues involved in establishing CAB are complex. We have tried – to the best of our ability, and
313 within the relatively short time-line in our charge – to present those issues as objectively as possible. We
314 have done this without assigning weights to the issues we have identified, and without trying to integrate
315 the pieces into a "bottom line" recommendation. We, as a group of twelve APsaA members, are no more
316 qualified to do that than our fellow members of APsaA, and so we leave it to each APsaA member to
317 attach his or her own weights and to come to his or her own conclusions. In this spirit, we each have been
318 given an opportunity to add a brief personal statement to this report.
319

320 As you weigh the various "pros and cons" for externalizing the accrediting and certifying functions, and
321 perhaps think of other considerations for or against such a change, we feel impelled to state the obvious:
322 Our current situation is not a happy one, and has many pros and cons of its own. A decision against a
323 CAB (if that is, in fact, a decision to do nothing) may be equivalent to a decision to continue our very
324 flawed current arrangement. Is our existing arrangement more likely to serve psychoanalysis in the long
325 run than a leap into a new configuration, with its knowns and unknowns? Perhaps our flawed current
326 arrangement is still a better bet than the alternative we have considered.
327

328 Finally, our discussions led to the identification of several other options in addition to the two of (1)
329 staying put and (2) "externalization." Perhaps the wisest next step is to explore some of the alternative
330 possibilities. We have sketched out some of these options in the "pluralistic approaches table" in
331 Appendix 1. We thank you for the opportunity to study this matter and to provide you with some
332 information that should be helpful in thinking through this complex and increasingly urgent matter.
333

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340
341 June, 2008
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343 Appendices for this report are available at:

344 <http://www.apsa.org/TFOEappendix>
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