

**American Psychoanalytic Association  
Task Force on Externalization  
Appendices to Final Report  
June, 2008**

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Appendix I

Alternative Routes to a Pluralistic Configuration

	-1-	-2-	-3-	Local Option ("Institute Choice")
	<p>"Externalized" CAB (assuming CAB adopts current BoPS "standards")</p> <p><b>THIS IS THE VERSION BEING STUDIED BY THE EXTERNALIZATION TASK FORCE.</b></p>	<p>BoPS Adopts IPA Standards for "Approving" Institutes. Institutes wishing to maintain traditional BoPS standards agree to do so among themselves.</p>	<p>IPA accredits Some of the "Approved Institutes" which cease to be represented on the BoPS.</p>	
Description	<p>Functions of Certification and Accreditation are placed in an external body. Approved Institutes not wishing to participate seek accreditation from IPA and do not belong to the CAB. (See Note 3)</p>	<p>BoPS adopts IPA standards as the baseline standards for "Approved Institutes." Institutes wishing to maintain the "traditional" BoPS standards would decide among themselves to do so. (A "compact.") (See Note 5)</p>	<p>The IPA agrees to accredit (if qualified) those Approved Institutes which wish to follow IPA standards instead of BoPS standards.</p>	<p>A new APsaA bylaw prohibits a BoPS-imposed certification requirement for TA appointments in Institutes. Institutes may maintain the certification requirement <u>if they wish.</u></p>
Decision Process (How this reconfiguration could be brought about.)	<p>Requires APsaA Bylaw changes (2/3 vote), Agreement from the IPA, presumably based on broad consensus in APsaA would also be required. (See note 1)</p>	<p>BoPS makes decision. No APsaA bylaw changes required. (See Note 2)</p>	<p>IPA makes decision. (Would have to be supported by broad consensus within APsaA.) No APsaA bylaw changes required.</p>	<p>Requires a 2/3 vote of APsaA Members (who vote.)</p>
Effect on the composition and size of the BoPS.	<p>Regulatory functions are transferred to the CAB. Other functions remain within APsaA as Committees of the Corporation, possible "joint committees" of APsaA and CAB. The CAB might have fewer Institutes than the current BoPS. (See Note 4)</p>	<p>Current U.S. IPA Institutes would be eligible to become "Approved Institutes" and to elect BOPS Fellows. The BoPS probably would have more Institutes participating than the current BoPS.</p>	<p>Current "Approved Institutes" which choose IPA accreditation will no longer be represented on the BoPS. The BoPS probably would have fewer Institutes participating than the current BoPS.</p>	<p>Requires a 2/3 vote of APsaA Members (who vote.)</p>
Certification Requirement for TA Appointment.	<p>Institutes which join the CAB will follow CAB rules including the certification requirement. Institutes which seek accreditation by the IPA will have no such requirement.</p>	<p>Institutes are not required to maintain the certification requirement. Institutes decide on an Institute-by-Institute basis whether to join a compact pledging to</p>	<p>Institutes continuing as BoPS Approved Institutes would have centralized vetting of TA appointments. Approved Institutes choosing IPA accreditation no</p>	<p>Institutes decide on an Institute-by-Institute basis whether they wish to continue the certification requirement.</p>

		maintain the requirement.	longer have certification requirement.	
Centralized Vetting of TA Appointments	Centralized vetting of TA appointments in CAB member-Institutes would continue. Institutes electing IPA accreditation would have no centralized vetting of TA appointments.	No centralized vetting of TA appointments in Institutes would be required. Institutes which join a compact to adhere to "traditional" BoPS Standards would continue centralized vetting.	Centralized vetting of TA appointments in BoPS Approved Institutes would continue. Institutes electing IPA accreditation would have no centralized vetting of TA appointments.	Centralized vetting of TA appointments by the BoPS would continue for all "Approved Institutes."
Funding of "regulatory functions."	Regulatory functions of the CAB will be paid for by Institute assessments, certification fees, and fees for other services provided by the CAB.	Uncertain. Perhaps some combination of APsaA member dues, fees from Institutes utilizing regulatory functions, and certification fees paid by applicants.	As at present, certification and accreditation activities of the BoPS will be paid for by a combination of general member dues (and/or voluntary member dues), APPROVED Institute assessments, and certification fees.	As at present, certification and accreditation activities of the BoPS will be paid for by a combination of general member dues, Institute assessments, and certification fees.
Periodic site visits to Institutes	CAB member-Institutes would continue to experience mandatory periodic site visits. IPA accredited Institutes could purchase site visit services from the CAB, if desired, but this would be optional.	Periodic site visits would continue for all Institutes. Institutes would be evaluated based on their adherence to the IPA standards. Additional requirements for those Institutes participating in the "compact" would be decided by "compact" signatories.	BoPS approved Institutes would continue to experience mandatory periodic site visits. IPA accredited Institutes could purchase site visit services from the BoPS, if desired, but this would be optional.	No change.
APsaA member control of BoPS Standards	APsaA members have no control over the CAB standards. The APsaA membership could be represented on the standard setting body of the CAB.	The IPA standards are the baseline standards. APsaA members could make the standards more stringent via bylaw amendments.	APsaA members continue to have ultimate control of BoPS standards. Control is exercised through APsaA bylaw amendments. BoPS standards do not affect Institutes choosing IPA accreditation.	APsaA members continue to have ultimate control of BoPS standards. Control is exercised through APsaA bylaw amendments.

## Notes

(1) A similar configuration could possibly be reached by way of the so-called "Institute Initiated" approach suggested by R. Michels. The actual change event would be the decision by a group of Institutes simply to create an external accrediting and certifying body whose standards would be determined by them. Presumably a period of negotiation would follow with APsaA and the IPA. The

resulting configuration could resemble the CAB concept, but would not be specified in advance.

(2) Whereas the APsaA bylaws require "certification" as a prerequisite for TA appointment, the definition of "certification" is left to the BoPS. This means that the bylaw requirement could be met through a change in the definition of "certification" without a need to amend the bylaws.

(3) As it would also be possible for ACAB to utilize more than one set of standards for accreditation, CAB could decide to accredit one group of institutes by the current APsaA (BOPS) standards and another group of institutes by IPA standards.

(4) If CAB elected to have more than one set of accrediting standards, it would be possible for one set of standards not to require centralized vetting of TA's.

(5) By analogy to the scheme described in Note 3, the BoPS could elect, without "externalization," to implement more than one accrediting standard. For example, one standard based on the current (traditional) standard and a second utilizing the current the IPA standards. This would require either a bylaw amendment or a change in the definition of certification as described in Note 2.

## **Appendix II: Facts and Implications for Selected Topics**

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

#### Facts

For many years there has been a philosophical and political conflict within APsaA that has resulted in disharmony.

This disharmony has resulted in dysfunction within APsaA.

This disharmony has also resulted in demoralization of members.

The Task Force on Externalization came into being at least in part to address that dysfunction and demoralization of members.

The CAB model attempts to address organizational dysfunction through externalization of accreditation and certification.

The CAB would require a bylaw change which could prove to be a major hurdle, given current disharmony among members. The Fact is "The CAB would require a bylaw change." The rest of this statement is Implication. -Bseelig 4/24/08 9:11 AM

#### Implications

It is hoped that externalization of accreditation and certification will help reduce the infighting within APsaA and improve harmony and functioning of the organization. The CAB no-longer would be a committee of the BOD, but would instead answer to institutes.

The philosophical and political conflict would continue to exist but would be removed to the local institute level, and then in turn to individual members of institutes.

Institutes would elect CAB, or remain affiliates of APsaA, to be accredited through the IPA, or some intermediary position.

Members of institutes would need to decide to remain with their institutes or change institutes, depending upon their preference for CAB or IPA accreditation. There might be greater disharmony at the local level for APsaA members.

The number of CAB institutes would decrease by approximately that number of institutes that decided to be accredited by IPA.

For those APsaA members of institutes that elected accreditation through IPA, financial support of CAB might become increasingly disharmonious and seen as a burden.

For those APsaA members of Institutes that elected CAB in the face of disassembly and disharmony about funding might decide to establish their own competing membership organization, while they still have the power to do so. Such a decision would not require a bylaw vote and may resemble Institute-initiated model.

If there were two membership organizations, based upon different philosophies/politics, instead of one, each would comprise fewer members than the current number of members in APsaA, but this might be offset by improved functioning and the possibility of attracting new members, based upon less controversial criteria.

The required passage of a bylaw enabling the CAB Model may represent a fundamental flaw in terms of improving harmony within APsaA.

## **2 . Impact on APsaA**

### **Facts**

Externalization of BoPS into CAB would remove certifying and accrediting functions from APsaA.

Non-regulatory educational programs currently sponsored primarily by BoPS would continue to be located within APsaA.

Scientific meetings, educational programs and JAPA would continue to be run by APsaA.

APsaA would continue to be a professional organization of psychoanalysts.

Membership in APsaA would be unchanged; members of both CAB-approved and IPA-approved institutes would be eligible for membership in APsaA, as is now the case.

### **Implications**

Institutes wishing to change from BOPS to IPA accreditation could do so.

Antagonisms presently being expressed in APsaA might be expressed at the level of societies and institutes.

APsaA will be seen more readily as a group of people united by their interest in psychoanalysis, participating in scientific programs and professional business opportunities (i.e. malpractice insurance, JAPA, etc.)

Study groups within APsaA could become more inclusive.

For some, the CAB Model can be seen as a way of safeguarding an existing standards-setting process.

APsaA may be seen as losing its uniquely defining blend of qualities (membership and standards) important to many members.

If standard setting and training functions are externalized, energies and loyalties may be divided between APsaA and CAB, leaving both entities 'weaker' apart than together. On the other hand, if APsaA and CAB collaborate effectively, both entities might be strengthened. -Bseelig 4/24/08 9:04 AM

Consultative functions of COI could be lost for those institutes who opt for IPA affiliation. While some institutes may want to be free of this involvement, others could ask to be site-visited (for a fee) by CAB.



### **3. Autonomy of Credentialing and accrediting process**

#### **Facts**

1. The membership of the Certifying and Accrediting Body (CAB) would establish the CAB's bylaws and would be free to modify them as it saw fit.
2. The CAB would be autonomous with respect to societies but would be responsive to its member institutes.
3. The credentialing and accrediting processes would be removed from APsaA and placed in the CAB. These processes would gain substantial autonomy from the "political" pressures (liberal, conservative, whatever) that are a normal and expectable part of a membership organization such as APsaA.
4. Applying to the CAB for accreditation or certification would be up to each institute, in the case of accreditation, or each analyst, in the case of certification.
5. The CAB could offer its accreditation and certification services to a wide range of psychoanalysts, including non-APsaA institutes and their graduates.

#### **Implications**

1. The CAB's membership would consist of institutes and these members would elect the CAB's board of directors.
2. The CAB's bylaws would spell out the makeup of the CAB's Board of Directors (CABBoD). Because Institutes would be the only "members" of the CAB, it is highly likely that each Institute would have a seat on the CABBoD. There might be other seats on the CABBoD specifically designated to represent other constituencies (see below).
3. CAB's bylaws could stipulate that there be a seat or seats on on the CABBoD for
  - a. A representative or representatives elected by the APsaA membership.
  - b. An officer or officers of APsaA.
  - c. APsaA's Executive Council (APsaA's Board of Directors).
  - d. A certain number of non-analysts, either voting or non-voting (advisory). These non-analysts might represent constituencies such as consumers of psychoanalytic services, academics, and specialists from other professions (e.g., the legal profession).
  - e. A designated number of seats could be selected by the CAB's BoD itself.
4. All standard-setting would be done by the CAB and therefore, depending upon its bylaws, the CAB could seek input from other groups but would not be obliged to seek or accept any such input.
5. The CAB could take on some sort of clearinghouse-like role for a wide range of Institutes, thus actively strengthening psychoanalytic education.
6. Depending on how the CAB's Bylaws were structured, the potential exists for the following:
  - a. Institutes could leave the CAB after joining it.
  - b. Institutes could initially decide not to join CAB and join it later.
  - c. Various IPA and independent Institutes (i.e., non-APsaA Institutes) might become members of CAB.

## **4. Effect on Societies, Institutes, and Centers**

### **Facts**

1. It is important to clearly 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". For the purpose of this discussion, the APsaA terminology will be used, unless otherwise indicated.

In actuality, at present, there is no such thing as an 'APsaA institute' because APsaA is a membership organization, not an organization of component institutes or societies. APsaA societies have representation on the Executive Council, the APsaA Board of Directors. Institutes do not. Under our present bylaws institutes have representation on the BOPS, however, the BOPS is legally a Committee of the Corporation."

2. The CAB model would enable institutes, currently approved by the APsaA, to choose whether to be a CAB approved institute, or an IPA approved institute ("IPA Component Society").

3. The process by which each APsaA approved institute would make this decision would be determined locally according to the bylaws of each institute. The process by which this takes place will have to be discussed, researched, and determined locally. At many institutes, a 2/3 vote or bylaws changes may be necessary.

4. APsaA affiliated societies would continue their present APsaA affiliation since their affiliation with APsaA is based upon the APsaA membership of the individual analyst members in each society.

5. Institutes choosing to be credentialed by CAB would continue to follow the standards as reflected in the APsaA "Standards Document".

6. Institutes choosing to be credentialed by the IPA would follow the IPA rules.

### **Implications**

1. Because each institute would determine individually whether to be under the standards of CAB or IPA, the choice could more closely reflect the local needs of each institute.

2. Some Members believe that Institutes choosing to be under the IPA rules could be strengthened by this autonomy. For example, by no longer having to adhere to the requirements of the "Standards Document", the ability of the institute to compete successfully with local non-APsaA training programs for candidates might increase.

3. Institutes choosing to be under the IPA rules would no longer have the consultative functions of the COI. Some members believe that this would be a loss. However CAB, if it so chooses, could decide to offer these functions for a fee to interested institutes that select the IPA credentialing.

4. Continuity for candidate education will have to be ensured by a carefully thought out transition.

5. Conflicts & schisms now being expressed at the national level may move to the local level as institutes go through the decision-making process. Institutes might not be able to marshal 2/3 of their members for either model. Institutes could become divided, or break apart.

6. Institutes could merge and unify.
7. Disaffected individual members may decide to leave one institute, and join another one, if available.
8. Minority members who decide to stay in an institute may be unhappy.
9. To alleviate the problem of analysts unhappy with their local Institute's choice of the approving organization, the rules for membership in institutes could be made more flexible in a variety of ways:
  - a. Perhaps the CAB could allow individual members or faculty members of non-CAB institutes, who so choose, to participate in CAB.
  - b. Perhaps individual members who are unhappy with their local Institute's choice of approving body could be given more opportunity to join another institute, even if in another geographic area.
  - c. Perhaps the CAB could allow like-minded individuals to form a CAB institute in the geographic area of a non-CAB institute. Similarly, APsaA could allow like-minded individuals to form a non-CAB institute in a CAB geographic area.
  - d. Perhaps an individual could be a member of more than one institute (e.g. an IPA institute & a CAB institute).
10. APsaA and IPA have standards for TA appointment, which differ from each other in important ways. These differences, over time, will create differences between CAB institutes and IPA institutes. See Appendix for the APsaA Standards Document rules for TA appointment and the IPA TA appointment standards.

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

### **Facts**

1. There will be more local control (by each Institute) over which set of standards it decides to adhere to. Individual APsaA institutes will have the opportunity to decide if they want to be accredited by CAB. If an institute does not want to be accredited by CAB, it could decide to be accredited by the IPA, by IPA standards. would not be autonomous from its member institutes
2. There will be more national control (by the autonomous new accrediting body) over standard setting and accrediting. However, CAB would not be autonomous from its member institutes.
3. The notion of 'standards' as presently used in APsaA covers three areas:
  - a. the standard for who can be a member of APsaA, specifically graduates of IPA accredited institutes and graduates of 'Approved' institutes (accredited by BOPS)
  - b. standards for the functioning of institutes (standards for accreditation)
  - c. standards for the certification of individual psychoanalysts
4. At present, the standards in #3a and #3b are established by BOPS which operates under APsaA's bylaws, and are detailed in the Standards Document. The standards for certification (3c) are also the responsibility of BOPS. These certification standards are administered by the Certification Examination Committee (CEC) and the certification standards as well as the process of certification is reviewed by the Certification Advisory Research and Development Committee (CARD).

### **Implications**

1. Some institutes presently accredited by APsaA may well decide not to be accredited by CAB. If an institute does not wish to be accredited by CAB, after making that decision, that institute will no longer have representation on CAB.
2. For any CAB proposal to work, any institute presently accredited by APsaA that decides not to be accredited by CAB, could choose to be accredited by the IPA, or could choose the option of not being accredited at all. in the latter, case graduates of such an Institute would not be eligible for membership in APsaA or the IPA under the current bylaws of those organizations . Accreditation of an APsaA "Approved Institute" by the IPA would require a change in (unwritten) IPA policy. Although it is highly likely that the IPA would take such action, there can be no certainty on this point unless and until the IPA agrees and sets forth the way in which such action would be taken.

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

### **Facts**

Creation of CAB would not, in itself, increase or decrease the pool of those eligible to become members of APsaA. At the present time, membership in the APsaA is limited to graduates and candidates of Approved (i.e. BOPS accredited) Institutes and members of the IPA.

The development of a CAB will not change the criteria for membership in APsaA. Provided that as part of the process of establishing the CAB, the APsaA bylaws are amended to recognize training accredited by the CAB (just as they presently recognize training accredited by the BOPS) membership eligibility would remain in place for all who are currently so eligible.

Any additional membership changes could come about only through specific amendments to the APsaA bylaws. Such amendments would be in addition to the bylaw amendments needed to allow creation of the CAB, and are not the subject of this report.

### **Implications**

Some members believe that sufficient member support for a bylaw amendment to broaden eligibility for APsaA members cannot be achieved so long as the standards of the BOPS are under the ultimate control of the APsaA membership. They believe that those APsaA members who believe that maintaining of the current BOPS standards is of paramount importance will not support the growth of a more diverse APsaA membership under the current governance structure.

If credentialing and accrediting functions were externalized (i.e. BoPS standards not modified by APsaA membership directives), APsaA could become a more diversified professional organization, unified by professional training in psychoanalysis, but with a broader spectrum of psychoanalytic training models defining membership criteria.

Membership expansion, reflecting diverse training standards, could affect the character of APsaA educational offerings. Including such diversity in APsaA meetings could impact the quality of both program development and implementation (i.e. difference in understanding of basic psychoanalytic tenets because of different clinical models for psychoanalytic practice), within COPE study groups (i.e. supervision), perhaps extending to JAPA. Some believe such diversity would enrich APsaA while others believe that diversity of this sort would dilute and weaken APsaA.

## 7. Impact on candidates

### Facts

Any action, change or not, will affect candidates.

New candidates must be informed of the decisions/stances of their institutes in regard to national training standards.

Candidates do not presently have representation on the APsaA BOD.

### Implications

The CAB Model would allow candidates an option for training at an institute that has adopted national standards for training. Candidates could count on the fact that their institute participates in site visits and that their training analyses are conducted by TAs who are vetted in some way by a national body.

Candidates in CAB institutes could still be members of APsaA, along, potentially, with candidates in institutes choosing to be approved by the IPA.

The CAB would be able to decide whether it would have candidate representation on its BOD. As previous discussions in various venues have stressed the importance of candidate input into educational matters, some members of this TF said they thought it would be highly likely that candidates would be given representation on the CAB.

Candidates probably will not have representation on the APsaA BOD because the APsaA BOD does not have designated seats. It would be possible for a candidate to run for a Councilor-at-Large position, but it would be the rare candidate who could prevail against more experienced people.

Perhaps a 10-year transitional period for training could parallel the 10-year financial transition period proposed in the original "External Corporation" plan. This is not currently part of the CAB Model, but if candidates in training in APsaA-sponsored institutes did not agree with the decision made by their institutes, those institutes could agree to let any candidates complete their training under the "rules" under which they matriculated (a safe-harbor clause).

- \* A committee may need to be formed to assist any institute in evaluating the decision to move to IPA status and to help them make the transition should they choose to do so.

- \* This could involve a "transition team."

- \* This could be made up of members of institutes that endorse the CAB and that endorse the IPA standards as well as candidates and members of current IPA institutes.

- \* Consultation from this team could be offered to each institute to help them in decision making. This could be a private service and would work to fully inform institutes of the consequences of their decisions.

- \* The purpose of such a team would be to help ensure continuity of training and care for candidates.

Candidates' training could be disrupted or candidates could experience anxiety and confusion during such a transition, and the Tf felt strongly that candidates' education needs to be safeguarded.

The details about the specifics of how a change such as this could affect training will need to be specified -- for instance, a candidate at an institute that votes for national standards would have to abide by those standards or change institutes and visa versa. In some places changing could be difficult as there may be only one choice of institutes in some cities.

On the other hand, there may be considerable consequences for candidates if institutes are not given a choice about whether or not they wish to endorse national training standards.

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

### **Facts**

1. Current non-regulatory educational functions of BOPS would remain within APsaA, (e.g., Committee on Education, COPE study groups).
2. Current regulatory (i.e., accrediting and certifying) functions of BoPS would be removed from APsaA and placed within the CAB.
3. The CAB's concerns regarding psychoanalytic education would be limited to issues related to the CAB's regulatory functions.
4. Educational committees within APsaA would not be able to directly affect the CAB's standards regarding accreditation or certification.
5. The CAB model does not include or preclude creation of new bodies within or across the two organizations (APsaA and the CAB).

### **Implications**

1. A broad range of non-regulatory issues regarding psychoanalytic education could be discussed in an 'Educational Division' of APsaA. These activities would no longer be identified as BoPS activities but instead would be seen as part of APsaA's continuing commitment to psychoanalytic education.
2. Discussions between committees of CAB and of APsaA would be truly joint collaborations; and committees composed of representatives from both organizations would be truly joint committees.
3. The line between 'regulatory' and 'pedagogical' educational committees is sometimes a fine one and this could lead to duplication of some committees across the CAB and APsaA. (For example, COPE supervision groups might be seen as fulfilling both (a) quality control and regulatory purposes for certified analysts and (b) 'continuing education' needs.)
4. The division of educational functions into non-regulatory (within APsaA) and regulatory (within the CAB) might weaken APsaA insofar as some committees that currently provide a vehicle for affiliation and involvement with APsaA might be externalized into the CAB.
5. Some see the richness of APsaA as derived from the importance it has given to issues of education, training and standard-setting. With regulatory functions externalized into the CAB, these members might feel that APsaA had become 'just' a professional organization.



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

### **Facts**

The word "standards" has sometimes been applied to both criteria for membership and standards for training.

- a. For the sake of clarity, we will use the terms "criteria for membership" and "standards for training." At the present time these standards for training are set forth in the APsaA "Standards Document."
  - b. Also for the sake of clarity, we will not use "standards" to refer to practice standards.
  - c. Also, we need to differentiate the above use of "standards" from standards for certification.
  - d. The TF decided that we would refer to "standards for training," "standards for certification," "practice standards," and "criteria for membership" as dictated by context.
2. Adoption of the CAB Model, i.e., creation of a corporation external to APsaA whose purpose would be credentialing (certification of individuals and accreditation of institutes), would have the following results:
- a. For those institutes choosing to be accredited by the CAB, the current "Standards Document" would remain unchanged, although the standards could be changed by CAB at some future time.
  - b. For those institutes choosing to be accredited by the IPA, IPA standards would apply.
  - c. Individual APsaA members who are graduates of institutes which are members of and accredited by the CAB and those institutes which choose IPA accreditation would continue to be eligible for membership in APsaA, as is now the case.
  - d. "Standards" for certification which are now determined by BOPS would be determined by the CAB.

### **Implications**

1. Indirectly, the impact of adopting the CAB Model might affect training standards in so far as some institutes might choose to seek accreditation as IPA institutes rather than from the new CAB and the training standards of IPA accredited institutes vary more widely than do the standards of institutes accredited under the Standards Document
2. In the future both the IPA and the CAB might change their training standards.
3. These changes to training standards could also take place if the CAB Model is not adopted.

## **10. Public credibility of Accrediting and Credentialing Process**

### **Facts**

In general, accrediting and credentialing functions are carried out by bodies which are autonomous from professional membership organizations. Where such separation is not in place, the public view is that accreditation and credentialing carried out by such bodies may lack integrity due to the potential of such functions being subject to undue influence through the political processes in the membership organization. For example the U.S. Department of Education recognizes accrediting bodies for the purpose of making students in accredited programs eligible for federal aid. The importance of autonomy is emphasized by professional accreditors. [See item IV(C) on the linked page below]

Similarly, credentialing of individual psychoanalysts from APsaA Approved Institutes consists of (1) the granting a certificate of graduation from an accredited training program and (2) in minority of graduates additional voluntary certification through a process maintained by the internal BOPS. Since the BOPS, itself, is composed only of representatives of the very programs whose graduates it certifies, the crucial element of autonomy of the second credentialing process is lacking.

"...in order to be recognized as a profession, a discipline must have a credentialing process that includes nationally recognized educational standards and a national, competency-based examination." [See: p. 147 here ]

### **Implications**

An arrangement in which the current APsaA functions were removed from APsaA and placed in a separate corporation not owned by APsaA would meet contemporary standards of accreditation which the current arrangement fails to satisfy. Beyond the fact that the credibility of the process would be enhanced, students at Institutes accredited by the autonomous body might eventually become eligible for federal student loans as a result of possible recognition by the Federal Department of Education. We have not investigated whether such eligibility would be of significance to future trainees. However, some may also feel that if other accreditors of psychoanalytic training programs meet these federal standards, and the process for "Approved Institutes" does not that the Institutes currently accredited by APsaA through the internal BOPS will lose prestige within a growing field of psychoanalytic training programs.

While we do not intend to suggest how an external body could be organized, it is possible that it could be constituted by representatives from a broader range of stakeholders, i.e., trainees, the public, and the non-academic segment of the profession. Such an arrangement could enhance the credibility of the accrediting and credentialing functions since the process would not be under the sole control of the very institutions it is evaluating.

Finally, with greater participation of a broader range of the profession in the structuring of the certification process, the external body could design a program which would have appeal to a greater number of applicants thereby possibly increasing the now dwindling percentage of practitioners who are certified, and essential element in making certification serve the public interest.

### **Note:**

Some organizations perform accreditation functions through in-house mechanisms. The American Psychological Association, which is one such organization, carries out accrediting functions through a Commission on Accreditation with wide representation from interested parties like educators, practitioners, graduate students, administrators, and lay members. These functions are under the ultimate control of the Board of Directors of APA. This elaborate model was not felt to be applicable to APsaA, where there is disagreement about who should be regarded as interested parties. Under these circumstances, CAB as a separate entity appears to have more potential for resolving differences and

creating opportunities for growth in membership as well as accrediting functions.

*"C. Autonomy from Parent Associations: Are you Emancipated?*

*Many accrediting bodies are not completely independent, freestanding entities but may be committees or subsidiaries of parent associations and may also be dependent upon the parent for funding and other resources. Lack of autonomy from the parent association can bring the credibility of accreditation decisions into question, and create potential liability for antitrust violations. A prime example of this problem can be found in the complaint brought against the American Bar Association by the federal government in 1995. In that lawsuit, the U.S. Department of Justice's antitrust division complained that the ABA had restrained competition through its law school accrediting committee by fixing compensation levels of professional personnel at ABA-approved schools and by acting in ways to limit competition from non-ABA-approved schools. As a result of the lawsuit the ABA agreed to limit the control it exercised over its accreditation arm.<sup>40</sup>*

*The issue of autonomy is considered to be of such importance that the U.S. Department of Education has expressly required it as part of its regulatory criteria for recognition under Title IV of the Higher Education Act of 1995.<sup>41</sup> Specifically:*

*"\* the accrediting body's decision makers must not be elected or selected by the board or CEO of "any related, associated, or affiliated trade association or membership organization;"*

*\* there must be at least one public member and at least one-seventh of the body must consist of public members;*

*\* the body must have established and implemented conflicts of interest guide lines;*

*\* dues paid to the agency must be paid separately from dues paid to a parent or affiliated organization;*

*\* the accrediting agency must develop its own budget without review or consultation by any other entity or organization; and, finally,*

*\* joint use of personnel, services, equipment or facilities must be paid for at fair market value, and must not compromise independence or confidentiality.*

*Even if your organization is not seeking recognition from D.Ed. the regulatory criteria are a good menu of best practices to*

*follow. As I mentioned earlier, failure to maintain autonomy from a parent organization can lead to a court finding that there is no difference between the parent organization and the accrediting body and each may be held liable for the other's wrongs."*

...Association of Professional and Specialized Accreditors

<http://www.aspa-usa.org/resources/capone.html>

## **11. Possibility of establishing a national certification body.**

### **Facts**

1. Currently an analyst must be a graduate of either an APsaA-approved institute or an IPA-approved institute in order to apply for certification by BoPS.
2. The CAB would have the option of expanding the certification process to analysts who have graduated from institutes outside APsaA or the IPA.
3. Members of the task force who are familiar with the Accreditation Council for Psychoanalytic Education (ACPE) believe that this would not be a problem with the Consortium. The ACPE's representative to APsaA has expressed support for an external certifying body with the potential to certify more broadly.

### **Implications**

1. The CAB could become a certifying body for analysts who are graduates of institutes with training standards similar to those of currently-approved institutes, but who currently cannot apply for certification because of BoPS' existing rules.
2. The Consortium would welcome a vehicle for the certification of ACPE-approved graduates, so this change could be integrative rather than competitive.

## **12. Mechanism and rules for appointing TAs**

### **Facts**

The charge to the Task Force on Externalization does not include consideration of the training analyst system. However, the proposed CAB model envisions significant changes in our current structure. Given the importance of the TA system to everyone, and the fact that it would continue under CAB as well as IPA, the task force felt it would be helpful to consider the possible effects of the CAB model on the mechanism and rules for appointing TAs.

Forming CAB to replace BOPS is motivated by those who wish to safeguard the current (and future) standard setting process, as well as by those who wish to free the membership from the regulatory functions of BOPS. The task force recognized the difference in viewpoints when considering the effects on TA appointments.

The task force concluded that the CAB model will not require a change in the mechanism and rules for appointing TAs for those institutes choosing to be under the umbrella of CAB. These institutes would follow the current BOPS mechanism & rules for TA appointment, and any decisions made in the future by CAB.

Those institutes that decide to be under the umbrella of the IPA would follow the IPA mechanism & rules for appointment of TAs. The IPA requirements and procedures for TA appointment are excerpted below. The full IPA document is appended to this report.

### **IPA Requirements for eligibility as a Training Analyst:**

To be considered for Training Analyst status within a Constituent Organisation or Institute, a member must have achieved or met the following requirements and be willing to be evaluated for Training Analyst status:

- \* Satisfactory completion of the formal requirements of an approved training programme, including an analysis with a Training Analyst
- \* Recognition by the Constituent Organisation or Institute of the ability to practise analysis without supervision.
- \* Completion of 5 years' experience of unsupervised psychoanalytic treatments after obtaining official qualification and election to membership in the Constituent Organisation or Institute. This experience should include the treatments of at least 4 cases of non-psychotic adults.
- \* A demonstrable interest in the practice of psychoanalysis as shown in the proportion of professional time devoted to it in the past as well as in the present.
- \* A demonstrable interest in and knowledge of psychoanalytical theories as evidenced by scientific writings, participation in scientific discussions, teachings etc.
- \* Compliance with the IPA's Principles of Ethics 2B 'For All Psychoanalysts and Candidates' listed in the IPA Procedural Code entry 'Ethical Principles and Procedures'.
- \* Qualification as a child and adolescent psychoanalyst and/or the psychoanalytic treatment of children or adolescents should be regarded as an additional advantage.

### **IPA procedures for selection of Training Analysts:**

- \* The Training Analyst function should be granted only by a group officially charged with this responsibility by the Constituent Organisation or Institute concerned. It is recommended that such a group should be composed of Training Analysts.
- \* The decision on the appointment of a Training Analyst should be based on an evaluation, which should include the following:
  - a. The quality and quantity of past and current clinical work as judged on the basis of a written summary of past and current psychoanalytical practice, including a statement indicating the proportion

of professional time devoted to it, and a presentation of detailed, in-depth clinical material as evidence of the quality of work.

b. Knowledge of psychoanalytical theories as demonstrated by a capacity to formulate and communicate theoretical ideas.

c. Knowledge of and capacity to comply with the IPA's Principles of Ethics

d. Indications of involvement in the psychoanalytical activities within the Constituent Organisation or Institute, including a willingness to accept administrative responsibilities.

### **Implications**

1. The TA system, a requirement of the IPA Eitingon model which is the IPA model applicable in the U.S., will continue under both CAB and IPA.

2. CAB will be able to operate in its TA appointment functions without undue pressure from a membership organization.

3. Those institutes which decide to be under the umbrella of the IPA would not be effected by, or involved with the TA appointment rules of CAB. Instead, they would follow IPA rules in appointing TAs.

4. Existing TAs in institutes choosing the IPA model would presumably be grandfathered by IPA. If not, a mechanism will need to be put in place to facilitate this as part of the CAB model implementation.

### **13. Political feasibility within APsaA**

#### **Facts**

1. Supermajority of 2/3rds required for Bylaws changes is a high hurdle for controversial initiatives.
2. Changes will be required in the relationship between APsaA and IPA.
3. The APsaA "Standards Document" will need to be changed.
  
4. The CAB idea is not the only idea which could lead to a pluralistic reconfiguration of accreditation and certification. See grid which examines 5 such ideas with respect to the description of each idea, the decision process by which such reconfiguration could be brought about, their effect on the composition and size of the BoPS, certification requirement and central vetting for TA appointment, funding of regulatory functions, periodic site visits to institutes, and APsaA member control of BoPS standards. See Appendix 1.

#### **Implications**

Members may vote against CAB or not vote at all for a variety of reasons, including but not limited to:

1. Misinformation or inability to understand the plan or the context.
2. Emotional preference to continue infighting.
3. Preference for other solutions. See grid.
4. Strong conviction about currently held position on accreditation and certification.
5. Strong conviction that current mix of membership and regulatory functions is important to continue.
6. Fear that CAB will not be financially or operationally feasible.
7. Belief that this or any idea for reconfiguring accreditation will not resolve tensions, but only shift them to the local level.
8. Fear of unintended consequences.
9. Opposition to any change.



CAB BUDGET if staff, space etc  
rented from APsaA

**NOTE BENE: Both revenues and expenses are approximations and may be incomplete**

**YEARLY REVENUES**

	INSTITUTE DUES	\$149,500	<p>assumes 23 institutes @ \$6,500 (currently 29 @ \$2,000) \$6,500 is what the CAB would have to charge institutes to survive financially assuming that 23 institutes signed on and assuming no financial contribution from APsaA assumes 25 new applicants per year @ \$1,000</p>
	CERTIFICATION FEES	\$25,000	
	ACCREDITATION FEES	\$16,000	<p>assumes 4 accreditations per year \$4,000 @ (currently there are 4 per year)</p>
	<b>TOTAL REVENUES</b>	<b>\$190,500</b>	

<b>EXPENSES</b>	<b>YEARLY</b>	<b>One time expenses</b>	<b>Explanation</b>
Expenses for EC Committees	\$45,170		Direct Expenses for BOPS Committees in 2006 (\$69,684) less Coordinating Committee expenses (\$24,154) = \$45,170 From 2006 APsaA budget From 2006 APsaA budget
Staff work for CAB committees	\$41,895		
Occupancy Allocations for BOPS Committees	\$8,759		
Office Rental, Maintenance	\$20,000		using same number as outside NYC estimate
Telephone	\$4,000		using same number as outside NYC estimate
Website expense	\$1,000		using same number as outside NYC estimate
Office Supplies	\$8,000		using same number as outside NYC estimate
Postage	\$4,000		using same number as outside NYC estimate
Computer repair, maintenance.	\$5,000		using same number as outside NYC estimate
Equipment, furniture	\$2,000		using same number as outside NYC estimate
Legal	\$8,000	\$7,500	\$8,000: using same number as outside NYC estimate \$7,500 represents cost to establish contractual arrangement
Accounting including filing 990's	\$15,000		using same number as outside NYC estimate
D and O	\$7,500		using same number as outside NYC estimate
Bank Charges	\$1,000		using same number as outside NYC estimate
Incorporation	\$0	\$20,000	using same number as outside NYC estimate
Miscellaneous: food, receptions, etc.	\$7,500		using same number as outside NYC estimate
<b>TOTAL EXPENSES</b>	<b>\$178,824</b>	<b>\$27,500</b>	
<b>REVENUE - EXPENSES</b>	<b>\$11,676</b>		

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# CAB BUDGET if established outside NYC

**NOTE BENE: Both revenues and expenses are approximations and may be incomplete**

## YEARLY REVENUES

INSTITUTE DUES	\$230,000	Assumes 23 institutes @ \$10,000 (currently 29 @ \$2,000). \$10,000 is what the CAB would have to charge institutes to survive financially assuming that 23 institutes signed on and assuming no financial contribution from APsaA
CERTIFICATION FEES	\$25,000	assumes 25 new applicants per year @ \$1,000
ACCREDITATION FEES	\$16,000	assumes 4 accreditations per year @ \$4,000 (currently there are 4 per year)
<b>TOTAL REVENUES</b>	<b>\$271,000</b>	

## EXPENSES

	YEARLY	One time expenses	Comment
Expenses for EC Committees	\$45,170		Direct Expenses for BOPS Committees (\$69,684) less Coordinating Committee expenses (\$24,154) = \$45,170
Office manager including benefits	\$75,000		assuming location outside NY
Assistant	\$60,000		assuming location outside NY
Associated Staff expenses (travel, etc.)	\$5,000		assuming location outside NY
Salaries for officers	\$0		
Office Rental, Maintenance	\$20,000		outside NY 1000 sq ft@ \$20/sq ft
Telephone	\$4,000		outside NY
Website expense	\$1,000		
Office Supplies	\$8,000		
Postage	\$4,000		
Computer repair, maintenance.	\$5,000		
Equipment, furniture	\$2,000	\$100,000	assuming location outside NY
Legal	\$8,000		
Accounting including filing 990's	\$15,000		
D and O	\$7,500		
Bank Charges	\$1,000		
Incorporation	\$0	\$20,000	
Miscellaneous: food, receptions, etc.	\$7,500		
<b>TOTAL EXPENSES</b>	<b>\$268,170</b>	<b>\$120,000</b>	
<b>REVENUE - EXPENSES</b>	<b>\$2,830</b>		

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<b>SAVINGS TO APSAA</b>		
<b>AT THE END OF TRANSITION (USING 2006 FIGURES)</b>		
		<b>2006</b>
		<b>Actual</b>
<b>SAVINGS as to expenses</b>		
	BOPS - Chair	17,511
	BOPS - Secretary	4,210
	Board On Professional Standards	7,891
	Comm on Institutes	45,351
	Comm on New Training Facilities	9,041
	Coordinating Committee w/Receptions	24,514
	Child & Adolescent Analysis	2,906
	Certification Examination	24,332
	Certification Advisory Research	0
	Research & Special Training	12,469
	Accreditation of Free-Standing Inst.	0
	Preparedness and Progress	870
	Psychoanalytic Education	0
	Membership Advisory	15
	Project for Innovation in Psy. Edu	0
	Research Education	0
<b>TOTAL SAVINGS as to expenses</b>		<b>149,110</b>
<b>SAVINGS as to expenses (broken down differently)</b>		
	Direct Expenses for BOPS Committees	69,684
	Staff Allocations for BOPS Committees	41,895
	Occupancy Allocations for BOPS Committees	8,759
		120,338
	BOPS-CHAIR	17,511
	BOPS-SECY	4,210
	COORDINATING RECEPTIONS/LUNCHES AT SEMI-ANNUAL MEETINGS	7,051
<b>TOTAL SAVINGS as to expenses</b>		<b>149,110</b>
<b>LOSS OF INCOME</b>		
(a) Each Institute pays APsaA \$2,000 annually?		
2006 total for such institute fees:		52,000
2006 total fees paid by individual applicants for certification		5,800
<b>TOTAL LOSS OF INCOME</b>		<b>57,800</b>
<b>NET SAVINGS TO APSAA</b>		<b>\$91,310</b>

## Letter from the IPA

Subject: To Don Rosenblitt and Paul Mosher

Date: Mon, 19 May 2008 11:57:11 -0300

Dear Drs. Don Rosenblitt and Paul Mosher

Considering the recent conversations between Drs. Hanly, Perdig o, Rosenblitt and Mosher it seems to us that the bottom line is the goal we all share which is to preserve and advance psychoanalysis. We are sure that we all trust our American colleagues to resolve whatever differences that have arisen in a way that will achieve this goal. We can assure you that the IPA has no interest in intervening in any way on either side of these differences.

Following the same goal of advancing psychoanalysis, we believe that the IPA will respond collegially and constructively to whatever recommendations APsaA may eventually bring forward.

Cordially,

Cláudio Laks Eizirik  
President of the IPA

Charles Hanly  
President-elect of the IPA

From the office of  
Dr. Cláudio Laks Eizirik  
President  
International Psychoanalytical Association

## Frequently Asked Questions

### 1. What is a certifying and accrediting body (CAB)?

The CAB would be an organization of psychoanalytic institutes completely independent of APsaA; its "members" would be institutes, not individual analysts. The CAB would accredit institutes and certify individual psychoanalysts.

APsaA would remain an organization of individual psychoanalysts. Although APsaA would still be concerned with psychoanalytic education, it would agree to give up all accrediting and certifying functions currently done by BOPS.

Graduates of institutes accredited by the CAB would automatically be eligible for APsaA membership just as are graduates of institutes currently designated "Approved" by APsaA. Graduates of institutes which choose not to join the CAB but, instead, to be accredited as IPA institutes, would continue to be automatically eligible for APsaA membership.

### 2. How is CAB different from "Local Option"?

"Local Option" was the shorthand name for proposed bylaw amendment proposed several years ago. Exactly the same amendment has been reintroduced and is being called "Institute Choice" or "Institute Choice about requiring Certification of TA's." This amendment would NOT externalize either accreditation of institutes or certification of individual analysts. Local Option does two things:

1. It prohibits BOPS from requiring that T/SAs be certified and the current "Standards Document" would need to be changed so as to comply with this prohibition; however, each institute would still have the option to require certification of its T/SAs.
2. It would permit institutes to select as their BOPS fellows members who are not certified.

Creation of a CAB would entail an agreement by APsaA to give up accrediting and certifying functions. It would also entail adequate assurances from the IPA that those institutes which do not want to join the CAB would be accredited by the IPA. The CAB would be a separate and completely autonomous corporation. (The CAB and APsaA would no doubt cooperate and might enter into contractual relations, e.g. were the CAB to rent office space from APsaA.)

The CAB and Local Option (aka Institute Choice) are similar in that each leads to a "pluralistic" result. If a CAB is created and/or if Institute Choice is adopted, each currently "Approved" institute would have more options including, notably, the choice of whether to use certification as a requirement for T/SAs.

### 3. How is CAB different from BOPS?

CAB functions would be the same as or quite similar to some current BOPS functions. The CAB would not be part of APsaA and so would not report to APsaA's Board of Directors. The officers and directors of the CAB would be determined by the CAB. Presumably, many of the officers and directors would be APsaA members but they would not be appointed by APsaA nor represent APsaA. The CAB might decide as a matter of CAB policy to have some of its directors be appointed by APsaA or automatically become directors of the CAB by virtue of holding an office in APsaA, but these matters would, necessarily, be a decision of the CAB itself. Among the first tasks of the CAB would be to set up a system of governance including specifying who is eligible to serve on the CAB's Board of Directors.

#### 4. I am a BOPS Fellow. How would the CAB Model affect me?

Central to the creation of a CAB is the simultaneous agreement of APsaA to give up all accreditation and certification functions, thus there would be a dramatic impact on BOPS fellows as BOPS fellows. Of course, BOPS fellows might become "fellows" of the CAB and thus might continue to do what they had been doing as BOPS fellows.

To be specific: all BOPS committees that had been involved in certification or accreditation, e.g. the COI (Committee on Institutes) and the CNTF (Committee on New Training Facilities) and CEC (Certification Examination Committee) would no longer exist as BOPS committees but probably each would be "reborn" as a CAB committee. COPE groups would not be affected. Of course, it is likely that the CAB would continue many of the BOPS committees, so current BOPS fellows could have the opportunity to continue their current committee roles.

#### 5. I am a member of a BOPS committee. How would the CAB Model affect me?

See Question #4 above. Many BOPS committees would cease to exist or would be radically changed as BOPS committees. However, many if not all such committees would be re-created as CAB committees. Thus members of those BOPS committees might choose to be involved with a CAB committee performing the same function.

Some BOPS committees which are not involved with certification or accreditation might be continued more or less unchanged e.g. COPE groups.

#### 6. How would CAB be funded?

Ultimately the CAB would be completely autonomous financially. Its income would come from dues paid by member institutes and fees paid by institutes for site visits and by individuals for certification. Initially, APsaA would contribute financial support - 'start up' money. During a ten-year transition period, financial support of the CAB by APsaA would be phased out (e.g. a reduction to 90% of the initial amount in year 2, 80% in year 3, etc.) In addition, the CAB might find cost savings by contracting with APsaA for specified services such a provision of meeting space, administrative support, and the like.

#### 7. If the BoPS is placed outside APsaA does that mean that APsaA will no longer be concerned with standards? How would APsaA in the future be able to fulfill its bylaws mandate "to advocate and maintain standards for the training of psychoanalysts and for the practice of psychoanalysis"?

APsaA itself would not establish standards for accreditation or for certification. Specifically, it would no longer maintain the "Standards Document". APsaA would no longer do the accrediting of institutes and certifying of individuals.

Currently APsaA uses and advocates standards in two ways which would not change:

1. APsaA has standards for who is eligible for membership, namely graduates of IPA accredited institutes and graduates of (or candidates at) BOPS accredited ("Approved") institutes. This would not change except that "CAB" would replace "BOPS" in the last phrase of the previous sentence.
2. APsaA advocates standards in its public pronouncements, its meetings, its publications and its committee reports. None of this would change.

#### 8. How would the proposed CAB relate to ACPE?

The CAB would offer accreditation services to institutes and thus as to accreditation (but not as to certification) the CAB's activities would fall in the same general area as the activity of the ACPE. Currently there are a number of important differences between how BOPS accredits institutes and how the ACPE accredits institutes. Both the method of accreditation and standards for accreditation have important differences. This would also be true of the CAB and the ACPE.

Just as there is no incompatibility between the work of the ACPE and the work of BOPS (recently the ACPE requested that some of APsaA's "Approved" institutes seek additional accreditation from the ACPE) so presumably there would be no incompatibility between accreditation by the CAB and accreditation by the ACPE - an institute might choose to pursue both.

It would seem likely that the CAB and the ACPE would seek to collaborate as much as possible.

# **Personal Statements of Task Force Members**

## **Paul Brinich**

There is no topic on ApsaA's listservs that will get me to "tune out" faster than that of "certification." Why, then, did I agree to serve as a member of the Task Force on Externalization (TFE)? My personal friendships with and respect for the TFE's co-chairs, Paul Mosher and Don Rosenblitt, are to blame. I also was intrigued by this unusual opportunity to work with a diverse and representative group of APsaA members whose views on "standards" covered the waterfront.

The charge that was given the TFE was, in my opinion, flawed insofar as it required us to consider accreditation of institutes and certification of individuals in tandem; the "externalization" we were asked to consider had to include both. I argued for separating the two but in the end the group chose to stick closely to the charge that had been given it.

I was glad that my estimation of the co-chairs proved to be well-founded: Don and Paul worked hard to maintain an even-handed approach to the work of the TFE. This resulted in some frank discussions in which people from one side or the other of the issues were heard to say things like: "I've never understood why you took that position before today, but now I can see what you're concerned about."

Unfortunately I do not have high hopes for the model we propose – that of a Certification and Accreditation Board (CAB) that is incorporated outside of APsaA but still linked to it. My skepticism is based upon the fact that such a CAB would require the endorsement of at least 67% of APsaA voters and I doubt it would get that much support from within the TFE.

I think it is important to separate the accreditation of institutes from the certification of individuals. The former can be an appropriate activity for a membership organization – for example, the American Psychological Association accredits graduate programs in psychology and the American Bar Association accredits law schools. Certification of individuals, like licensure, should be separated from membership organizations because of the inherent conflict of interests involved. Thus psychiatrists are "boarded" by the American Board of Psychiatry and Neurology (ABPN), not by the American Psychiatric Association, and psychologists are certified by the American Board of Examiners in Professional Psychology (ABEPP), not by the American Psychological Association.

APsaA has mired itself in a process – certification – that every other psychoanalytic organization in the IPA has eschewed. What is worse, it has tied that process to the psychoanalytic hierarchy – i.e., the training analyst system. The TFE was asked to investigate one possible route out of this bog. Our report lays out some of the considerations, steps and complications that might be involved in "externalizing" accreditation and certification. I hope that this report will serve to further educate our membership about these issues that have consumed so much of our organizational energy for decades and move us toward a compromise formation that is less symptomatic than that with which we've been living for far too long.

## **Ralph Fishkin**

Serving on the TFE has affirmed my belief in direct dialogue with political and ideological adversaries. A phobic reaction exists in APsaA that is echoed currently in presidential politics, equating such dialogue with the appeasement attributed to Chamberlain at Munich.

The participating members of our Task Force found that we could respect and understand each other,



even when we disagreed. If this kind of dialogue had been a feature of the discourse over certification, there might not have been a need for the TFE. Some will view this statement with suspicion and cynicism. Those who fearfully or intransigently reject the possibility of talking out disagreements are part of the problem, not part of the solution.

We have come up with a serviceable model for externalizing certification and accrediting. The credibility of our certification process has suffered from a number of problems, its internal location being only one. Adversaries have agonized for decades over the concerns, on one side, that the members as represented on the BOD will interfere with the prerogative of BOPS to set specific standards, both generally or specifically, and on the other side, that a self-perpetuating conservative oligarchy will never address the serious deficits of our current standards in a truly satisfactory way.

Ours is not the only model. A chart in the Appendix lists other solutions that also solve this stalemate in a "live and let live" way, providing a pluralistic solution that allows the present BOPS standards AND the IPA standards to be available for each institute to select.

My own personal hope is that the members will be presented with and will select a system that allows for:

1. Externalization of certification and accreditation.
2. A pluralistic situation that allows for all currently accredited APsaA Institutes, as well as any interested independent institute that endorses either of these two sets of standards, to become a member institute.
3. Ideally, a two-track intramural system should be permitted, so that local institutes can choose pluralism, thereby preventing the dissension that might lead to polarization, and unhealable splits. Certainly, institutes that choose the IPA route would be free to include additional standards (for some candidates) as an internal matter. Institutes that choose CAB could avoid internal dissension if the possibility of intramural tracks were to be addressed and incorporated into the design of the CAB.

These features would permit the external CAB to be accommodating to all institutes, would maximize its financial feasibility and the possibility that it could survive as a credible external entity.

### **Jonathan House**

I support both "Externalization" and "Local Option" (aka Institute Choice).

As described in this report, "externalization" would be a stronger, more extensive version of Local Option. Institute Choice is a good first step and can be achieved within a year. "Externalization" will require much discussion; consensus is uncertain, if achieved it will likely take several years.

Diversity and inclusion are good and necessary for psychoanalytic organizations. APsaA has been often slow to recognize the pluralism that is the reality of psychoanalysis nationally and internationally. I need not argue for inclusiveness as to theory or as to academic degree. A similar inclusiveness is called for as to how institutes manage their own affairs.

For the last few years, APsaA members have come both from "Approved", BOPS "accredited", institutes and from IPA accredited institutes. The former group have T/SAs who are certified, the latter have T/SAs who are not certified. It is now time to give each institute the choice as to whether or not to use certification. I hope it will soon be time to let each institute choose to follow either the "BOPS" standards or the less restrictive IPA standards.

## **Laura Jensen**

I support the externalization of the credentialing and accrediting functions from the APsaA membership corporation because I believe that externalization is the best option for candidate training now and for the retention and recruitment of candidates in the future.

The American Psychoanalytic Association is unique within the U.S. because it offers training by a group of institutes that have endorsed a national system of education. This system includes regular evaluation of how this system is working. In addition to regular site visits, the system includes national ethics support, study groups, guidance for new training facilities and more. This system also includes a requirement for training analysts to take a national examination and to meet other criteria. Simply eliminating one element of the national system that links the APsaA institutes, no matter how small that element, will dissolve the national system because each institute will endorse its own plan of educating candidates. If each institute trains in its own way, it will not be possible to evaluate against a set of criteria. An external corporation would make it possible for those institutes who do agree upon some kind of national system to evaluate training programs against an endorsed set of criteria (regardless of the criteria).

There are now around 800 people training at APsaA-accredited institutes. Many of these people had a choice about where to train. While there may be other options that would address the antipathy toward APsaA's training system, or parts of it, unless a national system is available as an option to candidates, the American Psychoanalytic Association has nothing unique to offer in its training programs. APsaA institutes would become just a group of institutes -- one more group of institutes among many in the U.S. Ultimately, candidate retention and recruitment will suffer as a result.

I have appreciated the opportunity to be a member of this task force. In individual ways, each member has been a catalyst in changing my thinking about psychoanalysis, APsaA, and organizations in general. For this, I am deeply grateful.

## **Miriam Medow**

I support the CAB model with some reservations.

APsaA is currently embroiled in an ongoing dispute that is hampering the organization as a whole, and is putting undue pressure on BOPS, threatening its ability to continue what, I believe, is the vital role that BOPS plays in maintaining the standards of our profession. It is hoped that the combination of separating the credentialing body from the membership organization, and giving the institutes the option to choose to be under either the standards of CAB or the IPA, would provide a solution that would diffuse the current dispute. Hopefully, this arrangement would also protect the regulatory functions currently in BOPS, by making the CAB autonomous from the membership organization, and also by the fact that CAB would have a self-selected membership of institutes, which are in agreement regarding the value of maintaining its educational standards. This organizational structure would also open fresh new possibilities for both APsaA & the CAB. For example, APsaA could create an educational division, offering a larger segment of the APsaA membership the opportunity to participate in educational activities. CAB could decide to expand eligibility for certification to analysts who are graduates of institutes with training standards similar to those of BOPS, but which are currently outside the existing rules of BOPS. This could be part of an integrative professional relationship with the Consortium.

My major reservations with the CAB model are whether CAB would be able to sustain itself financially over time, and the degree to which the strife currently at the national level would move to the local level as Institutes determine whether to go with the CAB or the IPA.

I have very much enjoyed working with my colleagues on this Task Force. We are a diverse group, coming from very different perspectives, but our work together was friendly and cordial. I thank our Chairs, Don & Paul, and my fellow TF members for making this such a fruitful and pleasant experience.

Overall, I think that this report meets our goal of being as even-handed as possible. However, there are two parts that I don't believe meet this goal: 1. The Introduction that summarizes the history of the current dispute, 2. The Table in the Appendix that does not include organizational models that are not pluralistic.

### **Bob Michels**

Our report is long and detailed, perhaps overly so. For me there are two basic questions-

- 1) should the academic monitoring functions of the profession be separate from the membership organization? and;
- 2) if so, how should we get there?

I believe the answer to the first question, for a mature profession, is clearly yes, and that the time for psychoanalysis in America is now. The reasons are outlined in the report. However the report does not really discuss the second question. It views it from the perspective of the American Psychoanalytic Association rather than from the more important perspective of the psychoanalytic profession. The focus is on how APsaA might develop an external organization. Since the primary function of such an organization is to serve the institutes, it should be created by the collective action of the institutes. This would remove any need for votes or bylaw changes. This option was discussed by the Task Force, but now appears only in Footnote 1 of Appendix I. It deserves full consideration by the profession.

### **Paul Mosher**

It's been a pleasure working with this Task Force and I want to thank all the participants. As a result of our discussions it is evident to me that a pluralistic approach is the best way for APsaA to move forward.

From my point of view, externalization of the BOPS (or more accurately its "regulatory functions") is not the most practical solution to our difficulties, and I would much prefer one of the alternative pluralistic approaches shown in columns 2 and 3 of Appendix 1. However, if it is too painful for the BOPS folks to accept and implement one of those approaches, which they could do with no further bylaw changes (if the "Institute Choice" bylaws proposal is adopted), then externalization rises to the top of the list of possible "compromises" -- a kind of "second best" solution.

The major problems that "externalization" would have to overcome are the complications of working out the new arrangement with the IPA, and the (probably) prolonged process that would be needed to bring about the establishment of the CAB. However, these do not appear to me to be insurmountable problems and so with enough determination, motivation, hard work, and leadership on the part of the supporters of complete BOPS "autonomy," I believe they could be solved and gain my support.

Finally, I hope we have demonstrated that conducting business of this sort "out in the open" is a healthier way for APsaA to proceed in addressing such controversial matters.

### **Dwarakanath Rao**

Externalization of credentialing and accrediting, which has been an integral part of APsaA, will be seen by many as a highly unusual course of action. They will demand convincing reasons for taking such a step, and ask if the benefits outweigh the costs. In my view, there are two main reasons for externalization: Externalization can protect accreditation and credentialing functions from undue pressures and allow changes to occur through deliberative processes via CAB rather than through the ballot box. Externalization is also seen as freeing APsaA to function in a more pluralistic way.

If we agree that these reasons are compelling, I believe we have shown that externalization is feasible and desirable. In the most favorable scenario, a national credentialing and accreditation system will remain intact and can become responsive to non-APsaA institutes. APsaA institutes will have a choice between CAB and IPA affiliation. It is hoped that as a result, strife will be reduced among members.

As to whether externalization is acceptable to 2/3 of our voting membership, it depends on whether the membership feels the costs are worth it. The task force report lays out some of the financial and organizational costs. The human cost is potential dissatisfaction among members who feel regulatory functions should remain within APsaA. Another concern is the possibility of national disputes moving to a local level. Given these potential costs, I think externalization is justifiable only if we can preserve the best of what APsaA has to offer, and change only what is necessary. From this point of view, externalization must ensure that current activities of BOPS are transferred unchanged to CAB, the financial future of CAB is fully supported in the new plan, and CAB is structured to receive appropriate input from APsaA membership.

### **Don Rosenblitt**

This task force has worked in a collegial and productive way, accomplishing a large chunk of work in a relatively short amount of time. Thank you for your good spirit and effective work.

As for myself, I have been involved in the workings and governance of the American Psychoanalytic Association for some time, particularly as Secretary and Chair of the Board of Professional Standards from 1994 – 2000. I have seen at close hand how our organizational structure has limited the ways in which APsaA is able work on behalf of psychoanalysis. Over the years, despite the limitations and frustration of our current structure, I had consistently been opposed to externalization of the regulatory functions of BOPS because I felt that the reasons in favor of maintaining our organization in its current configuration outweighed the rationale for externalization. However, reluctantly, in last year or two I have come to believe that the weight of the considerations has shifted and externalization of BOPS functions as described in this report is a better option than continuing our current course. My experience on this task force has reinforced my view.

### **Beth Seelig**

It is remarkable and heartening that this TFE, a tremendously diverse group of APsaA members, has been able to work together effectively to produce this report while simultaneously respecting each others very different perspectives. We owe great thanks to Paul Mosher and Don Rosenblitt for their outstanding leadership. They consistently fostered the full and open discussion that was essential to completion of our task.

We in APsaA have spent far too much of our precious energy wrangling over who determines the standards for education in APsaA-approved institutes and the certification requirement. These struggles have sapped individual and group creativity and also distracted us from the serious external challenges facing our profession.

I strongly support the CAB model and would also support the institute-initiated model proposed by

Bob Michels. Both the CAB model and the institute-initiated model would permit every institute to choose, if it so wishes, to join a new accrediting and certifying organization made up of institutes. An institute joining the new organization would agree to adhere to its standards. An institute choosing not to join the new organization could be accredited by the IPA directly. I strongly favor these two routes to institute choice. Either would strengthen APsaA, our membership organization. In contrast, I strongly oppose the recently proposed “institute choice” bylaw amendment, as it would seriously damage our organization. I am in favor of educational flexibility and diversity, as well as more than one track to TA and SA status. However, this proposed amendment would forbid the BOPS from requiring our one national examination, thus destroying APsaA’s present mechanism for maintaining national standards for education and for credentialing of both individuals and institutes, without providing any new option for maintaining national standards.

### **Graham Spriuell**

Thanks to Don Rosenblitt and Paul Mosher for their leadership in preparing this report. Thanks to the committee members for their hard work. This report does an excellent job in presenting the pros and cons of one of the models, the External Corporation model, in which CAB would be established versus maintaining a sad status quo. This report encourages members to come to their own conclusions about this approaching fork in the road.

I would mention that there are other possible options than the two that have been outlined. The Institute-initiated model, proposed by Robert Michels, is one. The Institute-initiated model would not require approval of a bylaw or a 10 years transition period. Conceivably other models could be considered if members were to find themselves in the position of not wanting to support either the External Corporation model through a bylaw amendment, or a status quo that has become intolerable.

The fact that the Task Force on Externalization is the fifth attempt to address this problem leads me to conclude that perhaps, if we don't want a sixth, we would be better off abandoning our current flawed arrangement and getting beyond this impasse.

### **Andrea Weiss**

I came to this task force with little knowledge of or prejudice regarding the possibility of externalizing APsaA’s regulatory functions. I hardly knew the Committee members. I soon found that the very structure and composition of the group, conceived and implemented by Paul and Don, introduced me to a rigorous and deep process of inquiry. Transparency, working on diversely constituted sub-committees, sophisticated computer pathways, and real-time communication were key. We worked to create an even-handed and non-partisan atmosphere – an achievement since the group is so diverse. It’s been a pleasure.

I strongly support the CAB idea. I even see it as having the most potential for protecting the American from chronic discord. It’s a uniquely constructive model, requiring coordination of many parts: the IPA, financial considerations, etc. Its strength lies in its respect for the strong philosophical underpinnings of our passionately held differences – no piecemeal solutions. Institutions are preserved intact, undiluted. For example, in a lateral move to CAB, current BOPS-national standards are preserved. Modifications evolve within CAB naturally with institutional components in place (i.e. certification, COI, PIPE). In the same way, institutes choosing not to require certification for T.A. follow IPA standards. The decision, not to certify, is structured within a highly developed philosophy and cohesive governance. Both pathways lead to membership in APsaA. APsaA remains a membership organization with its vital components intact, (i.e. Journal, Programs, COPE, outreach).

There’s longevity in this model. I’m particularly interested in the preservation of a certain

configuration of national standards -- CAB provides it. Others easily can forego CAB and still participate equally in the American. Institutes can change their minds about their choices.

My concern about the TFE report itself is that two aspects of the presentation, don't reflect the neutrality of our deliberations.

1. It reports the "history of APsaA conflicts" after TFE members had agreed that history is rarely objective and open to many interpretations.
2. It includes a 'table' of proposals largely not discussed by the group and excludes many that were discussed (i.e. Institute-Initiated Model proposed by Bob Michels)