

## 馮銀英博士提交的意見書

大家好。本人係香港臨床心理學博士協會的董事會成員，會就香港心理學會-臨床心理學組(以下會簡稱「學組」)所提的方案發表意見。「學組」的方案將香港城大與美國亞萊恩國際大學合辦的臨床心理學博士課程(以下會簡稱「AIU 香港課程」)視為不被認可的課程，本人並不同意。「學組」所持的理據有兩點：  
1) 「AIU 香港課程」不是由美國心理學會所認證，2) 美國心理學會是美國教育部認可的一個認證機構。現在我會就這些論點提出反駁：

第一、根據美國教育部網業指出，心理學家的專業訓練並不屬於美國教育部的範疇，而需要參考 ASPPB 的準則。ASPPB 是一個美加全國性的組織，由美國 50 個州以及全加拿大 10 個省份的法定心理學局所組成。它的功能包括指定合資格的心理學博士訓練課程，以及制定全國心理學家的執業考試。所以美國教育部與心理學家的專業訓練並無直接關係。

第二、ASPPB 指定的心理學博士訓練課程，除了美國及加拿大心理學會認證的課程之外，亦包括了 ASPPB 聯同國家註冊局合作審批的指定課程，而「AIU 香港課程」就是屬於這一個類別，資格等同美國心理學會的認證課程。  
*合資格等同於 ASPPB/NR Designation 的資格*

第三、美國心理學會係唔會認證在美國本土以外舉辦的課程，所以無美國心理學會的認證與「AIU 香港課程」質素是毫無關係。

第四、「AIU 香港課程」的學術及專業的資歷都有不同的獨立第三者認證，畢業生的資歷在香港資評局確認為相等於本地博士水平，普遍亦能夠取得美國、英國、澳洲、紐西蘭這些國家的執業資格，可以安全執業。

綜合來說，「AIU 香港課程」的資歷是受到廣泛的國際認可，而「學組」不承認資格的理據是完全不成立的。各位議員，臨床心理學嘅學術及專業資格，並唔係由一班人說了算。我哋協會都有提出咗更具包容性嘅建議，由獨立第三方的專家團隊去比較同判斷係最公道、公平嘅方法，亦可以維護整個註冊計劃。希望大家會認同我哋嘅建議。多謝。



**CSPP** CALIFORNIA SCHOOL OF  
PROFESSIONAL PSYCHOLOGY  
ALLIANT INTERNATIONAL UNIVERSITY

19 November 2018

Dr. POON-MAK Sui Man  
Chair, Division of Clinical Psychology, HKPS

Dear Dr. Poon-Mak,

Thank you for your letter dated 8 November 2018. Your letter does not clarify the specifics of Section 5.2.2.2 of the Accredited Register ("AR") Scheme document Membership Registration and Handling Policy of the Hong Kong Institute of Clinical Psychologists. I take this opportunity to point out a few factual items in regards to your response.

1. What does Department of Education say?

According to the Department of Education (P.1, note 1):

*The competent U.S. authority for recognizing previous education and qualifications, including licenses, in regulated professions is the appropriate state or territorial licensing authority that regulates the profession in the jurisdiction where you intend to live and work.*

In the area

- i. *There is no nationally recognized credential evaluation service or recognition process for the professional practice of psychology. Check with individual state boards for guidance.*
- ii. *Association of State and Provincial Psychology Boards (ASPPB) provides information on state boards, requirements for licensure, approved U.S. doctoral programs, and other matters.*

Hence, Department of Education listed APA as the accreditation body has no relevance to the "approved U.S. doctoral programs" for licensure in America. As indicated by Department of Education above, the authority to prescribe the criteria of approved U.S. doctoral program is vested in ASPPB.

Note 1:

International Affairs Office, U.S. Department of Education: Recognition of Foreign Qualifications: Professional Recognition. Please refer:  
<https://www2.ed.gov/about/offices/list/ous/international/usnei/us/profrecog.doc>

1. What is the Association of State and Provincial Psychology Boards (ASPPB)?

*The Association of State and Provincial Psychology Boards (ASPPB) is the alliance of state, provincial, and territorial agencies responsible for the licensure and certification of psychologists throughout the United States and Canada.*

*ASPPB was formed in 1961 to serve psychology boards in the two countries. Currently, the psychology boards of all fifty states of the United States, the District of Columbia, the U.S. Virgin Islands, Puerto Rico, Guam and all ten provinces of Canada are members of ASPPB. Much of the impetus for its founding was related to mobility for practitioners. By consensus, the first step was to create and maintain a standardized written Examination for Professional Practice in Psychology (EPPP). ASPPB has done so since 1965.*

Although different states and provinces may have different requirement in licensing of psychologists, ASPPB serves to support its member jurisdictions in fulfilling their goal of advancing public protection by offering standard licensing examination and credentialing programs.

Website of ASPPB. Please refer: [https://www.asppb.net/page/What\\_is\\_ASPPB](https://www.asppb.net/page/What_is_ASPPB)

2. What types of licence is required for clinical psychology to practice in U.S.?

According to the ASPPB Model Act for Licensure and Registration of Psychologists as proposed by ASPPB to the member states, clinical psychologist is fall under “Health Service Provider in Psychology”(HSP) where:

*A psychologist with appropriate training and experience as defined in the regulations of this Board who provides services within the health and behavioural health fields. This includes, but is not limited to, the delivery of direct and indirect preventive, diagnostic, assessment, and therapeutic intervention services to clients whose growth, adjustment, or functioning is actually impaired or is demonstrably at risk of impairment or the supervision of any of the above.*

Please refer:

[https://cdn.ymaws.com/www.asppb.net/resource/resmgr/guidelines/asppb\\_model\\_act\\_for\\_licensur.pdf](https://cdn.ymaws.com/www.asppb.net/resource/resmgr/guidelines/asppb_model_act_for_licensur.pdf) (p.5)

3. What is the Educational Requirement for Psychologist as Health Service Provider in Psychology (HSP)?

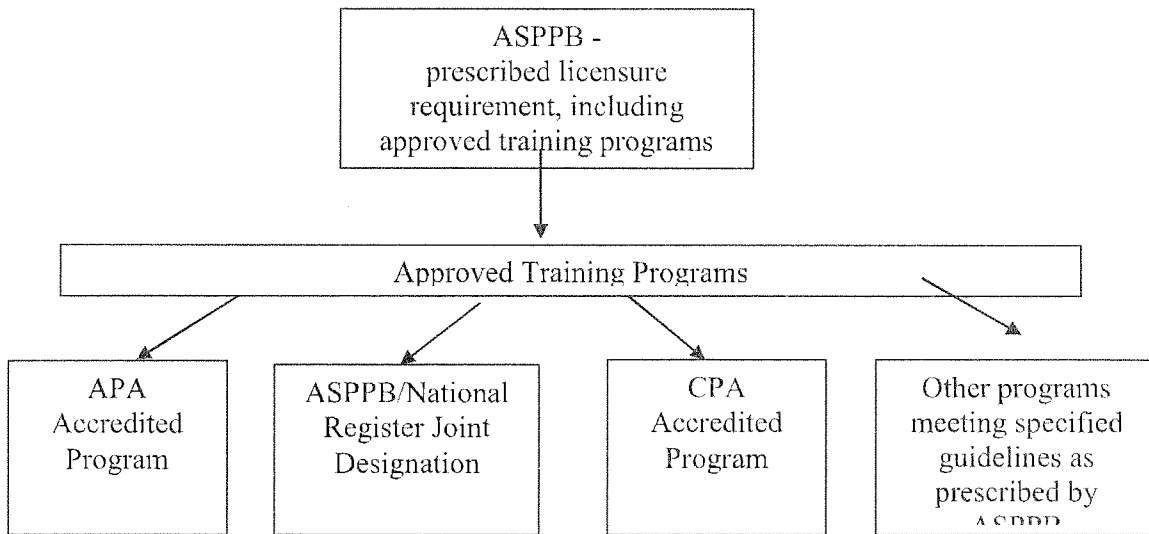
According to the ASPPB Model Regulations for Licensure and Registration of Psychologist, educational requirements for licensure with certification as an HSP requires:

*A doctoral degree in psychology must be obtained from an institution meeting the criteria described in MR-400.B.1.a-l below:*

*a) An institution of higher education that was, at the time the degree was awarded:*

- i. Regionally accredited by bodies approved by the Council for Higher Education Accreditation or the United States Office of Education, or recognized by Universities Canada, formerly known as Association of Universities and College of Canada;*

5. What is the relationship between APA accredited program versus ASPPB approved programs?



6. As CSPP -HK program is not accredited by APA, is it an unqualified program

CSPP – HK programs holds the following accreditations:

- i. Accredited by a regional association (WASC)
- ii. Accredited by APPIC
- iii. Approved program as published by NR
- iv. ASPPB/NR Designation

ASPPB has extended ASPPB/NR Designation as the same status as APA. Moreover, APA has mentioned the above accreditation of CSPP-HK, from i to iii, has the quality assurance of meeting the standard of the profession. Hence, CSPP-HK PsyD Program is fully recognized by ASPPB and being widely accepted in America and Canada as an approved doctoral psychology training program.

Sincerely,

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