



Hong Kong Association of Doctors
in Clinical Psychology Limited
香港臨床心理學博士協會有限公司

Room 703, 7/F, Kowloon Building,
555 Nathan Road, Kowloon, Hong Kong
香港九龍彌敦道555號九龍行703室
Tel: 852-3705 4956 www.hkadcp.org.hk
Email: info@hkadcp.org.hk

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BY EMAIL ONLY [dcp@hkps.org.hk]

Dr. Rachel Poon
Chair of Division of Clinical Psychology
The Hong Kong Psychological Society Ltd

Re: Your Reply to HKADCP's Opinions regarding HKPS-DCP's Proposal on the Pilot Accredited Registers (AR) Scheme

Dear Dr. Poon,

We refer to your captioned reply on 8 November 2018. We cannot but disagree with your standpoints and feedback as they are mostly based on groundless allegations. Please refer to our recent letter to the Food and Health Bureau and Professor Yeoh regarding our position on the educational and professional requirements for the future AR Scheme. Your attention is particularly drawn to the items 2 & 3 where we have clearly explained the legitimacy of ASPPB and international standard for the competency-based model of on-site supervision as an optimal alternative to in-room supervision in clinical training.

We would again reiterate our objection to HKPS-DCP's insistent that only APA-accredited program will be eligible while the ASPPB/NR Designation status held by the CSPP-HK Program is inadequate. This claim is clearly arbitrary and questionable. According to the U.S. Department of Education, ASPPB (The Association of State and Provincial Psychology Boards), and not the U.S. Department of Education, is responsible for the training of professional psychologists (Note 1). As stated on the website of ASPPB, both APA-accredited programs and ASPPB/NR Designation programs satisfy the educational requirements leading to licensure in U.S. (Note 2). The graduates of ASPPB/NR Designation programs are described as graduates who "typically will meet the educational requirements for licensing" (Notes 3&4). Also, the qualifications of ASPPB/NR Designation programs are recognized by the National Register, the largest credentialing organization for psychologists in the U.S. (Note 5). The accreditation credentials of ASPPB and National Register are indeed well recognized internationally, such as by European psychological professional institutes and academic journals (See Notes 6&7).

In respect of clinical supervision, the school, California School of Professional Psychology has submitted extensive evidence on the advocacy of the U.S. model of supervisory training using the internationally accepted competency-based supervision model (Note 8, 9). The legitimacy of this model is evidence by membership of California Psychology Internship Council (CAPIC).

The CAPIC website clearly states that "CAPIC internships are comparable in training and supervision to APA-accredited and APPIC-member internships"; CAPIC is considered equivalent to APA in its designation for clinical psychology internship training (Note 10). CAPIC has reviewed the curriculum of CSPP-HK program, the coursework, the clinical training, and administrative structure thoroughly before granting membership.

As regards the promotion of in-room supervision by HKPS-DCP, we have to point out the differentiation of on-site and in-room supervision under the competency-based model. While HKPS-DCP insists on the adherence of the local standards and construes the meaning of on-site supervision narrowly to the exclusion of the competency-based training model adopted by the CSPP-HK program. The direct observation in the CSPP-HK program is performed through video/audio means, the local practice advocates immediate and direct intervention of trainees in front of the clients, either in therapy or in assessments. We consider that advocacy as undesirable as it violates the standards for administration of assessments. For instance, "IQ test," i.e., WISC and WAIS, the manuals explicitly state that only the assessor and the person taking the test should be in the same room. Take for the example of WISC test for children.

As a rule, no one other than you and the child should be in the room during testing. Try to administer the test to the child without an accompanying adult (e.g., parent or guardian) present. Some children may be unaccustomed to being alone with a stranger and may be fear or shy. On rare occasions, and at your discretion, an accompanying adult may be permitted in the room to facilitate testing. Advise him or her to sit quietly (preferably reading) in the background and out of the child's view. Instruct the accompanying adult to remain silent throughout the test and to refrain from urging the child and from repeating or rewording any questions. (Manual of WISC-V, p.27).

From the above, it can be seen that the presence of supervisor and the immediate intervention during the Weschler Tests would indeed be an abrogation of the test manual.

Furthermore, in a workshop on the competency-based supervision model held on 9 December 2018 in Hong Kong, Dr. Carol Falender, world's leading scholar in clinical supervision training stated that the correction of trainees by the supervisor in front of clients in therapy is only a local practice, not shared anywhere else in the world. She further stated that the practice is potentially harmful to the trainee's autonomy and client's trust to the trainee.

In summary, HKADCP very much regrets that HKPS-DCP's current proposal has dismissed our concerns, and has not taken into account the recognition of ASPPB/NR Designation status and fails to address the issue of supervision. To move forward to formulating a positive, inclusive and justifiable proposal for the profession under the Scheme, please accept our invitation to further discuss on the above-mentioned issues and consider inviting an independent third party panel with experts renowned in the accreditation of clinical psychology training programs for input in order to formulate a feasible and mutually acceptable proposal agreeable to both HKPS-DCP and HKADCP.

Yours sincerely,

For and On Behalf of
Hong Kong Association of Doctors
in Clinical Psychology Limited



Dr. Felicia Lee
Honorary Secretary

c.c. Director, JCSPHPC
(Attn. : Professor Yeoh Eng-kiong) [yeoh_ek@cuhk.edu.hk]

JCSPHPC
(Attn. : Dr. Carrie Yam) [carrieyam@cuhk.edu.hk]
(Attn. : AR Survey team, JCSPHPC c/o Ms. Carrie Yam)

Secretary for Food and Health
(Attn. : Professor Sophia Chan) [sophia_chan@fhb.gov.hk]

Principal Assistant Secretary for Food and Health
(Attn. : Mr. Chris Fung) [cpcfung@fhb.gov.hk]

Deputy Secretary for Food and Health (Health) 3
Mr FONG Ngai [ngai_fong@fhb.gov.hk]

Director of Health
(Att. : Dr. Ronald Lam Man Kin, AD (HealthAdm & Planning)) [adhap@dh.gov.hk]

Chairman, Panel on Health Services, Legislative Council
(Attn. : Dr. Hon. Pierre Chan) [REDACTED]

Legislative Council of Hong Kong, Health Services Committee [panel_
hs@legco.gov.hk]

Professor and Program Director, CSPP-HK, Alliant University
(Attn. : Dr. Liang, Tien) [liang.tien@alliant.edu]

Chairman, HKADCP
(Attn.: Dr. Joseph Siu) [REDACTED]

Note 1: The U.S. Department of Education website. Please refer:
<https://www2.ed.gov/about/offices/list/ous/international/usnei/us/ profrecog.doc>

Note 2: ASPPB Model Regulations for Licensure and Registration of Psychologist, educational requirements for licensure (p.5-8):
https://cdn.ymaws.com/www.asppb.net/resource/resmgr/guidelines/asppb_model_regulations_marc.pdf

Note 3: ASPPB/National Register Joint Designation
<https://www.asppb.net/page/JointDesignation>

Note 4: ASPPB/National Register Designated Doctoral Programs in Psychology
https://cdn.ymaws.com/www.asppb.net/resource/resmgr/mobility_/asppb_national_register_designated.pdf

Note 5: National Register Doctoral Degree Guidelines. Please refer website
<https://www.nationalregister.org/apply/credentialing-requirements/national-register-doctoral-degree-guidelines/>

Note 6: EuroPsy. Please refer
<https://www.europsy.eu/international/competent-authorities-outside-europe>

Note 7: Chinese Mental Health Journal. Please refer
<http://www.100md.com/html/paper/1000-6729/2008/02/22-1.htm>

Note 8: U.S. Competency-Based Model and the Hong Kong Apprenticeship Model of Supervision for Clinical Psychology
<http://www.scope.edu/Portals/0/progs/psyd/files/TheUSCompetencyBasedModelandtheHongKongApprenticeshipModel.pdf>

Note 9: Training Clinical Psychologists: United States Supervision Model (as used in the CSPP-HK PsyD Program)
<http://www.scope.edu/Portals/0/progs/psyd/files/TrainingClinicalPsychologistsUnitedStatesSupervisionModel.pdf>

Note 10: CAPIC website:
<https://capic.net/resources/internship-agencies/>