



Sociedad Interamericana de Psicología, Inc.  
Sociedade Interamericana de Psicologia  
Interamerican Society of Psychology, Inc.  
Soci t  Interam ricaine de Psychologie

September 30, 2008

Dr. Merry Bullock  
Office of International Affairs  
Dr. Susan Zlotlow  
Education Directorate  
American Psychological Association  
750 First Street N.E.  
Washington DC 20002 USA

Dear Drs. Bullock and Zlotlow,

On behalf of the Interamerican Society of Psychology, known by its acronym in Spanish, SIP (for *Sociedad Interamericana de Psicolog a*), we would like to express our collective appreciation for your thoughtfulness in sharing with us the Report of the Board of Education Affairs & Committee on International Relations in Psychology (BEA/CIRP) Task Force on APA's Role in International Quality Assurance: *APA as a Learning Partner*. We are particularly appreciative of your invitation to provide comments to the report on SIP's behalf.

About SIP and the Diversity and Disparities in the Region

As you know, SIP is a nonprofit, scientific, academic, and professional organization with members throughout North, Central, and South America and the Caribbean. Founded in 1951, SIP is a democratic organization committed to: 1) foster scientific and professional collaboration among persons concerned with psychology and related fields while promoting an understanding and appreciation of cultural similarities and differences in the Americas; and 2) aid in the development of psychology as a science and as a profession in all of the countries of the Americas.

SIP seeks to honor the ample ethnic, linguistic, cultural, social, political, educational, and economic diversity within and throughout the different countries of the region. There are marked disparities in the countries' abilities and successes in promoting equity in economic, social, educational and scientific development that have impacted the establishment of psychology as an independent discipline and profession. Thus, in going forward, careful attention must be given to these diverse realities to foster equitable partnerships that lessen the prevailing disparity.

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#### On the Contributors to this Letter

The following observations, comments, and recommendations are a synthesis of extensive consultations with many SIP members who have served our Society in multiple and diverse capacities over time. I would like to acknowledge the following colleagues who contributed meaningfully and significantly through their own reactions and reflections: Cristina Di Doménico, María del Pilar Grazioso, Maria Regina Maluf, Wanda Rodríguez, Irma Serrano-García, José Toro Alfonso, Julio Villegas, and Carlos Zalaquett.

#### On APA & SIP

This letter has been composed in the spirit of mutuality, partnership and goodwill between our organizations. We also offer the following reflections with vested interests as educators, scientists, and practitioners residing and/or working in multiple countries, which could be directly impacted by the answer to the Task Force's charge. You may find that in honoring the diversity of the opinions received, the letter may not always speak in one voice.

#### On Quality Assurance

We are quite mindful that the complexities of quality assurance and the parameters to be used to assess it grow exponentially when considered internationally. Nevertheless, the sheer complexity of the matters at hand ought not to prevent a thoughtful undertaking of them, even when humbled by their sizable nature. If the field of psychology has managed to arrive at a Universal Declaration of Ethical Principles for Psychologists, we must be able to advance cooperatively on international quality assurance for psychology education and training.

The fact that we are concerning ourselves with international quality assurance for psychology education and training is perhaps a sign of psychology's maturity. It is indeed high time to seek an understanding of what psychology and psychologist mean across and throughout the world, from the point of view of education and training, and from the point of view of our associations and its members (lines 85-87). Yet such understandings need to be accompanied by the point of view of the powers-that-be, through the laws, regulations, and funding supporting our discipline and profession, and by the public, the people, organizations and processes we seek to study and be of help to, through their social representation of our discipline and profession (lines 847-850).

#### On the Charge to the Task Force

It is our understanding that the charge of the Task Force is to provide guidance to the Council of Representatives on what ought to be APA's role in international quality assurance for psychology education and training. We join with the Task Force in agreeing that the answer to such question cannot be done by the Task Force or by APA alone, and therefore we applaud the Task Force's decision to not only include an initial ad hoc international advisory group of 14 colleagues, including colleagues from five Latin American countries, but also to make the document available for public input while inviting national and international organizations to participate as well.

## On the Report

We congratulate the Task Force for having developed such an excellent working document. We also applaud APA for concerning itself with international quality assurance, a crucial matter to psychology as a discipline, to psychologists as researchers, academics, and practitioners, and to, ultimately, the people of the world who benefit from our research and services and who expect to be aided meaningfully by our discipline.

## On the Conclusions

We cannot overstate our agreement with the conclusions reached by the authors of the report. In short, we believe that APA can indeed be an important information source among many, a convener among others, and a cooperative agent of capacity building in quality assurance and leadership development; it must not be an international accreditor (not on its own), precisely for the reasons articulated in the report. Having stated that, APA can collaboratively join forces with other national and international organizations in “the development of international mechanisms for quality assurance” (lines 615-616) while providing “its expertise in international efforts toward quality assurance” in psychology (lines 965-966). Furthermore, we believe that these roles are superbly framed by the expression *APA as a Learning Partner*, and by the values of collaboration, inclusion, mutual learning (and mutual recognition, if we may add), respect, focus on enabling mechanisms, commitment to enhancing capacity, sensitivity and respect for multiple contexts, and multiple approaches to quality assurance and education and training standards (lines 173-176). We agree wholeheartedly on the importance of “sustained collaboration” (line 181) over time. The matters at hand are not ones that can be settled easily; indeed they are ones that require a long-term commitment to not only see them through but to appreciate and evaluate their outcomes. We would like to suggest for the Task Force to consider adding a point to the three articulated in lines 182-185 that more clearly operationalizes the expression *APA as a Learning Partner*, such as the ones articulated in lines 193-194 and 197-198.

## On Concrete Steps: Summit, Forum, Dialogue North-South

We want to join with the authors of the report and highlight one of the many proposals already present in it. In lines 912 through 926, the report puts forward the examples of convening an international summit on quality assurance in psychology and a forum on opportunities and challenges in developing universal standards or benchmarks for psychology education and training. We agree wholeheartedly with these examples and believe that it would be particularly important if APA were to emphasize a North-South, bidirectional dialogue, to complement the ongoing East-West dialogue. We emphasize a bidirectional dialogue, as at times the report is somewhat short on possibilities and opportunities for APA to learn from others (lines 774-775).

As the report indicates, there are several, ongoing efforts taking place in the Americas such as the Southern Common Market (MERCOSUR) and the North American Free Trade Agreement (NAFTA). In the spirit of *APA as a Learning Partner* there is much to be learned about the challenges and achievements within the MERCOSUR with respect to curriculum standardization, and the concerted efforts towards facilitating access to knowledge, a critical component of all education and training. Four important examples of facilitative, democratic access to knowledge can be found in the *Biblioteca Virtual en Salud* (Virtual Library on Health, <http://regional.bvsalud.org>), the Scientific Electronic Library Online (SciELO, [www.scielo.org](http://www.scielo.org)), the International Network of Information and Knowledge Sources for Science, Technology and

Innovation Management ([www.scienti.net](http://www.scienti.net)), and the *Red de Revistas Científicas de América Latina y el Caribe, España y Portugal* (The Network of Scientific Journals from Latin America and the Caribbean, Spain and Portugal, <http://redalyc.uaemex.mx/>).

A concrete way in which the report could advance the North-South, bidirectional dialogue emphasized here is by working from references in languages other than English, and/or references that honor the contributions made throughout the Americas on the topic at hand. Towards that dialogue, we have taken the liberty to include a sample of relevant publications, some of which have been carried out by SIP's Task Force on Education and Training. In the spirit of highlighting what maybe the changing times in our midst, our efforts in 2001 to have PscINFO incorporate to its database SIP's first volume on education and training were unsuccessful.

Among the many concerns identified in these volumes, one that figures prominently in relation to international quality assurance is the proliferation of private, for profit educational institutions throughout Latin America, many of which are satellite outfits of USA based, private universities. The *business* of education and training in Latin America has grown exponentially in the last few decades. Such growth has taken place with minimal if any regulation and oversight, challenging the very nature of quality assurance in education and training, let alone the social relevance of the knowledge received, and the cultural relevance of the competencies acquired.

#### On Qualifications

As APA engages in a North-South, bidirectional dialogue it must be prepared to deal with not only the diversity of educational levels, credentials, and trainings but also with the ever ongoing, domestic debate of the doctoral degree as a requirement for psychologists. Furthermore, while the report identifies the range of educational requirements and degrees in countries around the world (e.g., lines 595-599) such as doctoral, master's and bachelor's degrees, it could benefit from specifying an important degree in Latin American, the *licenciatura* (line 1103) which must not be equated with a bachelor's degree. This matter is closely related to transnational mobility, the reciprocity and comparability of training and credentials, but most importantly, of demonstrable competencies. We believe demonstrable competencies, in other words, the acquired learning outcomes, rather than the degree themselves, can establish an important base for transnational dialogue on quality assurance, and for comparing and contrasting educational and training models within and across nations. Such undertakings cannot only facilitate the mobility of USA-trained psychologists but also that of those trained overseas now residing in the USA (see for example, [www.e-welcomeback.org](http://www.e-welcomeback.org)).

#### On Scientific Standards

There is yet another important matter that APA will have to contend with in international quality assurance that parallels domestic debates. It concerns the recognition of the diversity of psychology as a scientific discipline, diversity that is significantly challenged when the arguments of sound science are reduced to a discourse that is exclusively organized around evidence-based practices. While all professional disciplines must contend with the evidences that support their practices, psychology must embrace a broad definition of evidences. It is particularly perilous when exclusionary discourses that discount complexity are associated with influential associations such as APA. We are reminded of the debate that ensued within and

between APA divisions concerning empirically validated and, more contemporary, empirically supported treatments, between some factions of APA's divisions 12, 17, and 29. International quality assurance in education and training must embrace complexity in the definition of evidence-based practices, acknowledging systematically the sizable body of literature on efficacy but the markedly limited body on effectiveness (Seligman, 1995; Whaley & Davis, 2007). Furthermore, the very definition of evidence is inevitably and inherently culturally bound, historically situated, and therefore requiring a thoughtful consideration of emic and etic dimensions in it.

#### On Cultural Competence

Figuring prominently among demonstrable competencies in psychology is cultural competence. We agree with the authors of the report when they affirm, "... the practice of psychology is embedded within a social and cultural framework. Unlike many other professions, appropriate psychological practice also requires in-depth knowledge of the social norms, structures, values, traditions, history, and local practices of cultural groups within each specific society." (lines 438-441; see also lines 719-723). Yet this is not exclusive of professional psychology. As three well-known psychologists wrote, "when all of psychology finally takes into account the effects of culture on human behavior (and vice versa), terms like cross-cultural and cultural psychology will become unnecessary" because of their redundancy (Segall, Lonner, & Berry, 1998, p. 1101). We must labor to bring about a time when speaking of cultural competence will be indeed redundant.

Closely related to cultural competence are multilanguage abilities. We believe that a discipline that is as language driven as psychology is (see line 861), education and training ought to emphasize multilanguage skills that permit its scientists and practitioners to respond better to national and international realities.

#### On Psychology as an Independent Discipline

We join with the authors of the report in emphasizing the importance of advancing psychology as an independent discipline and profession. As the report indicates, this is not a reality in some countries, while in many other countries there is still much to be done to arrive at a soundly organized, fully recognized discipline and profession. Together with the International Union of Psychological Science (IUPsyS), APA can serve a very important role as an advocate for the discipline and profession elsewhere, joining forces with national boards and associations to advance an organized discipline and profession in all countries. Operationalizing the expression of *APA as a Learning Partner*, APA has a sizable capital of accumulated knowledge and expertise that it ought to share as a socially responsible member of and partner in the international community, while doing so in a collaborative and respectful manner with organizations such as IUPsyS and SIP, national boards and associations, as well as broader organizations such as UNESCO, OAS, and WHO.

#### On the Scope of the Report

While the report mentions high school and undergraduate education as well as basic and applied science, the bulk of it seems focused on the professional segments of the psychological discipline (stated outright in line 686 of the report). In this respect, the report does seem a bit unbalanced, perhaps not honoring entirely the opportunity to be a sound advocate for the broad spectrum of

the discipline and its contribution to the advancement of science. This matter is considerably relevant to the Americas, particularly Latin America, where psychology has been influenced not only by USA psychology but also by continental Europe and shaped by indigenous movements seeking to describe and transform the social realities of its populations (e.g., psychology of liberation).<sup>1</sup> Quality assurance acquires a different meaning in such contexts, stretched by the cultural diversity of the psychological processes psychology and psychologists must contend with, and the urgent quality of the matters the discipline and profession must address.

#### On Partnering with Governmental Organizations

The authors of the report and several of the respondents in the international advisory group seem to have a strong stance against governmental organizations establishing standards for the profession, favoring discipline specific associations in charge of setting those standards; associations that are, in turn, governmentally sanctioned as the accreditors (e.g., see lines 207-209, 420-424). Perhaps the authors may want to make more explicit the rationale informing their preferred stance while being mindful that such stance may collide with those favored in other countries. Some of us believe that governmental organizations and socially responsible associations must come together in partnerships to set national and international agendas that will inform educational curricula and training programs so as to not only prioritize the ever so limited resources available, but to also grow scientists and professionals equipped to address the urgent needs of larger segments of the population, while developing and implementing practical knowledge for the improvement of people's quality of life and well-being.

We join with the members of the Task Force in expressing our shared concern with actions that subsume quality assurance for psychology exclusively into the health care sector. While some professional aspects of psychology find their home in the health care sector, to equate psychology with the health professions is grossly understating the breadth of psychology as comprehensive discipline.

And finally, if we may, we would like to comment on a few details:

- We believe the sizable length of the report merits an index that makes explicit its structure, an introductory paragraph that reveals its organization, followed by an abstract or executive summary. Similarly, the document could benefit from a glossary of terms. Perhaps the draft status of the report may have prevented such undertakings, saving the incorporation of such elements when a final version is achieved.
- We agree with the authors of the report in that it would be most helpful to consider the development of a database identifying accreditation units or agencies and licensing boards in different countries expressed in a world map, these among others dimensions (see lines 886-906; 990-991).
- With utmost respect, may we state that we find the “three criteria judging each potential course of action” the weakest aspect of the report (lines 216-226). The definition of each criterion does not seem to follow: having “long-lasting effects” does not define

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<sup>1</sup> We would like to suggest that the word “preservation” on line 160 of the report be replaced by the word “affirmation” when referring to indigenous psychologies.

*sustainability; cultural flexibility* must be defined in the affirmative rather than by a double negative; *leverage of available resources* seems to gut the project altogether from the start, and contradict somewhat one of the operating principles (lines 201-202), though we agree on the importance of “collaborating with other countries in use of resources.”

- The section on “Quality Assurance in the United States” may benefit from articulating more clearly that boards, such as the Board of Psychology in California, reside within the larger umbrella of Consumer Affairs, seeking to assure and protect the public (lines 284-285).
- The concluding sentence of section 5. Competency-Based Recognition, line 549, could benefit from the addition of the word lawful to those already stated (“adequate and ethical practice”).
- The section on Barriers and Challenges (line 789 & ss.) seem to simultaneously endorsed a reactive approach, captured in the expression “APA action to provide models, advice or input on quality assurance issues needs to be carefully crafted” (lines 794-795) and a proactive one, expressed in “APA action needs to be one of collaboration, not export of models, approaches or assumptions” (lines 798-799). Needless to say, we favor the latter.

#### In Closing

It is our belief, born out of our collective experience, that as APA engages further in learning about quality assurance in the rest of the world (lines 774-775) it will conclude that this is a common, shared aspiration by educators, scientists and practitioners (i.e., local scientists) alike. Of course differing models or mechanisms of quality assurance are to be found around the world. Many of these variations reflect varying levels of development of the discipline and profession in a specific country, the number of graduates, the resources available, etc. (lines 606-613). Nonetheless, we believe the common, shared aspiration is to ensure quality in education and training in our discipline and profession. In light of this, the Task Force may want to consider revising the statement found in lines 621-622, “while developing countries have a tendency to ignore quality issues in the professions altogether.” While this may or may not be accurate, it is typically the case that more pressing needs get in the way of quality assurance mechanisms, though the interest is there. In sum, the global trend is towards quality assurance, a common goal that may help overcome some of the barriers identified by the report.

Although we have stated the following at other points of the letter, we would like to state it here, once more. International quality assurance for education and training in psychology must contend with the serious, grave needs of the people, organizations, and institutions we seek to help, as scientists and professionals. Education and training, be at the basic, applied or professional level must honor its social responsibility to the common good, seeking to provide responses to the most challenging of circumstances faced by our populations (e.g., poverty, human rights abuses, the consequences of natural and human-made disasters, etc.) while systematically affirming and advancing their strengths, hardiness and resourcefulness.

We have the utmost respect and the greatest appreciation for your efforts and offer our best wishes for further success with this important undertaking. We renew our interest and commitment to be of help in going forward while we all become the learning partners our discipline merits, our constituents expect, our privileged circumstances demand, and the world deserves.

We thank you once again for your invitation to SIP; we hope you will find this letter of use.

Most respectfully,



Andrés J. Consoli, Ph.D.

On behalf of Cristina Di Doménico, María del Pilar Grazioso, Maria Regina Maluf, Wanda Rodríguez, Irma Serrano-García, José Toro Alfonso, Julio Villegas, and Carlos Zalaquett, representing the Interamerican Society of Psychology

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