

Professional Student: Clinical Psychology Doctoral Degrees
RISE Negotiated Rulemaking Committee

Submitted by Deborah Lilly (Student Loan Borrowers Constituency)
6 November 2025

Regulatory Citations: 34 CFR §685.102(b)

The Department of Education (ED) has revised the definition of *Professional student* and expanded the list of eligible professional degrees to recognize Clinical Psychology, with only the Psy.D. credential cited in the parenthetical notation.

Current Language

(b) * * *

- (2) A professional degree may be awarded in the following fields:
- (i) Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry (D.P.M., D.P., or Pod.D.), Theology (M.Div., or M.H.L.), and Clinical Psychology (Psy.D.).

Proposed Policy Addendum

Revise the parenthetical credential for Clinical Psychology to include both Ph.D. and Psy.D., clarifying that these degrees are treated equivalently under the professional degree framework.

Proposed Amendatory Text: Matter in red reflects new language.

(b) * * *

- (2) A professional degree may be awarded in the following fields:
- (i) Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry (D.P.M., D.P., or Pod.D.), Theology (M.Div., or M.H.L.), and Clinical Psychology (Ph.D. or Psy.D.).

Rationale

The American Psychological Association (APA) Commission on Accreditation accredits both Ph.D. and Psy.D. programs in Clinical Psychology. Accreditation ensures that programs meet rigorous quality standards to provide a more consistent and recognized education, and it is often a critical prerequisite for professional licensure and practice.

Conversely, non-accredited programs lack this formal review, which can create barriers to professional opportunities and licensure. Accordingly, this proposal focuses exclusively on accredited programs.

Although ED does not appear to intend the exclusion of Ph.D. students, omitting the Ph.D. risks signaling preference for one credential over the other. This unintended hierarchy is inconsistent with the APA's accreditation framework, which recognizes Clinical Ph.D. and Psy.D. programs as equivalent. Ph.D. programs typically combine research training with clinical practice, whereas Psy.D. programs generally place greater emphasis on clinical training. However, both degree types require students to demonstrate knowledge and competencies in evidence-based professional practice (APA, 2023).

According to the APA's 2024 accredited program list, there are 262 Clinical Psychology programs, excluding combined programs and withdrawn accreditation statuses. Of these, 181 programs (69.1%) award the Ph.D., while 81 programs (30.9%) award the Psy.D. Referencing only the Psy.D. in regulatory text could inadvertently suggest preference for one degree over the other, even though Ph.D. programs represent roughly two-thirds of the accredited training pathways.

Ph.D. programs account for the majority of accredited Clinical Psychology programs, while Psy.D. programs often enroll larger cohorts of students. Each pathway serves a distinct yet complementary role in preparing practitioners, and neither should be emphasized over the other. Recognizing both credentials ensures alignment with how Clinical Psychology programs are treated by their accrediting organization, eliminates any suggestion of unequal treatment, and reflects the realities of professional practice.

Importantly, this proposed revision does not expand eligibility beyond Clinical Psychology, as the language remains discipline-specific. By citing both the Ph.D. and Psy.D., the regulation promotes clarity, avoids any conjecture of a potential hierarchy between the two credentials, and affirms ED's intent to recognize Clinical Psychology as a professional degree field within the defined scope.

Supporting Data

The analysis applied select parameters to restrict consideration solely to accredited programs, which produces a more conservative estimate in alignment with the regulation's emphasis on professional-practice preparation.

Methodology:

- Extracted all APA-accredited doctoral programs derived from American

Psychological Association (2024) into the embedded workbook.



APA_Accredited_Doctoral_Programs_2024.x

- Filtered to include only “Clinical” programs, excluding all combined programs of study (e.g., Clinical-Counseling; Clinical-School) and other programs in health service psychology.
- Filtered to include only programs in an “Accredited” status, excluding “Withdrawn.”
- Counted programs by Degree Type (Ph.D. or Psy.D.).

TABLE 1: Accredited Clinical Psychology Doctoral Programs by Degree Type

Degree Type	Number of Programs	Percentage of Total
Ph.D.	181	69.1%
Psy.D.	81	30.9%
Total	262	100.0%

References

American Psychological Association. (2023, June 20). *Standards of accreditation for health service psychology and accrediting operating procedures*. APA Commission on Accreditation.

<https://irp.cdn-website.com/a14f9462/files/uploaded/standards-of-accreditation-062023.pdf>

American Psychological Association. (2024). *Accredited doctoral program for training in health service psychology: 2024*. APA Commission on Accreditation.

https://irp.cdn-website.com/a14f9462/files/uploaded/2024_APA_Accredited_Doctoral_Programs-f64c182f.pdf