



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

January 30, 2017

Ms. Kathleen McGettigan
Acting Director
U.S. Office of Personnel Management (OPM)
1900 E Street, NW
Washington, D.C. 20415

Mr. Mark Sandy
Acting Director
Executive Office of the President
Office of Management and Budget (OMB)
725 17th Street, NW
Washington, DC 20503

Dear Acting Directors McGettigan and Sandy:

We are writing to you on behalf of the American Psychological Association (APA) to express our concern about the impact of the January 23rd Presidential Memorandum Regarding the Hiring Freeze on our nation's public health. APA is the largest scientific and professional organization representing psychology in the United States. APA's membership includes 115,700 researchers, educators, clinicians, consultants and students.

Clear and explicit guidance is needed immediately from agencies that provide critical physical, mental and behavioral health services to our most vulnerable populations and training for health professions students, postdoctoral fellows and residents. We encourage the Office of Management and Budget, Office of Personnel Management, and relevant agency leaders to immediately exempt all positions responsible for providing health care services, including health professions training positions, as frontline caregivers to millions of Americans across this country.

As the Presidential Memorandum stated, "The head of any executive department or agency may exempt from the hiring freeze any positions that it deems necessary to meet national security or public safety responsibilities." We strongly believe that a hiring freeze on health professions personnel would pose a risk to the public safety of our country.

Recognizing the importance of addressing the health care needs of our nation's Veterans, the Department of Veterans Affairs issued a memorandum on January 27th exempting positions, "that provide direct patient care without which the safety and welfare of Veterans are at risk." The VA further acknowledged the critical role of the VA in training health providers and made clear that health professions training programs and residencies at the VA would also be exempted. We urge the Departments of Health and Human Services and Justice to issue guidance that is consistent with this policy and do the same without delay.

For more than 40 years, the Federal Bureau of Prisons (Bureau) has trained doctoral-level health service psychologists to address the needs of prison populations. According to the Bureau of Justice Statistics, more than half of all inmates have some kind of mental health problem, often with co-occurring substance use disorders. Data indicate that 45 percent of federal prisoners report mental health concerns.¹ Individuals with serious mental illness are more likely to be in a jail or prison than in a mental health facility. Health service psychologists, doctoral interns, and postdoctoral residents provide evidence-based treatments across the Bureau's corrections health services system.

Across the Department of Health and Human Services, health service psychologists, doctoral interns, and postdoctoral fellows are providing mental and behavioral health services to communities in need, including through training programs funded by the Indian Health Service. American Indian (AI) and Alaska Native (AN) communities continue to be disproportionately affected by a vast range of health and social challenges, including alcohol and substance use disorders.

The suicide rate of AI/AN populations is 1.7 times higher than the U.S. all-races rate — and AI/AN women have one of the highest reported rates of domestic violence, with an estimated 39 percent of AI/AN women experiencing intimate partner violence.ⁱⁱ

Without explicit guidance exempting health professions training positions, doctoral candidates in health service psychology who are currently in the process of applying to complete their clinical training at the Bureau or the Indian Health Service through the annual national internship match may be unable to serve at psychology internship positions across the HHS and Department of Justice. This would ultimately further restrict access to much-needed mental health care services to high need populations with elevated rates of mental disorders.

As the selection process for the next round of internships begins on February 1st, we urge you to make clear that these critical mental health profession training programs and vacancies are exempt from the hiring freeze as soon as possible. Please contact Karen Studwell, Associate Executive Director for Education Government Relations, at kstudwell@apa.org or 202.336.5585 if you have further questions. We look forward to hearing from you and thank you for your attention to this public health issue.

Sincerely,



Antonio E. Puente, PhD
APA President



Cynthia D. Belar, PhD, ABPP
Interim Chief Executive Officer

cc: Sally Yates
Acting Attorney General
U.S. Department of Justice

Thomas R. Kane, PhD
Acting Director
Federal Bureau of Prisons
U.S. Department of Justice

Norris Cochran
Acting Secretary
U.S. Department of Health and Human Services

Rear Admiral Chris Buchanan
Acting Director
Indian Health Service
U.S. Department of Health and Human Services

ⁱ James, D.J., and Glaze, L.E. (2006). *Mental Health Problems of Prison and Jail Inmates*. Washington, DC: U.S. Department of Justice, Bureau of Justice Statistics.

ⁱⁱ U.S. Department of Health and Human Services, Indian Health Service (2015). Behavioral health fact sheet. Retrieved from <https://www.ihs.gov/newsroom/factsheets/behavioralhealth/>