

Nancy S. Grasmick
State Superintendent of Schools

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April 22, 2009

Dr. James H. Bray
Assistant Executive Director
Practice Research and Policy, Practice Directorate
American Psychological Association
750 First Street, N.E.
Washington, D.C. 20002

Dear Dr. Bray:

The revision of the *Model Act for State Licensure of Psychologists* proposed by American Psychological Association (APA) in March 2009 has serious and detrimental implications for Maryland's students, families, educators, school psychologists, and local school systems. If enacted, the proposed changes could eventually lead to significant limitations on the practice of school psychology in Maryland. We strongly urge APA to reinstate the long-held exemption for non-doctoral level school psychologists.

The proposed recommendations suggest that state legislatures disregard well-established, high quality credentialing standards for specialist level school psychologists. This recommendation lacks just cause. The elimination of the exemption for specialist level school psychologists would severely restrict the practice of non-doctoral school psychologists within school settings without justification. The portion of the proposed model act that defines "practice of psychology" essentially removes the right of non-doctoral school psychologists who are legitimately credentialed by a State Education Agency (SEA) to engage in these practices.

Currently, school psychologists are credentialed by state boards of education to perform activities they have been well trained to perform. The exemption for specialist level school psychologists should be maintained because school psychological services are defined and recognized in most state codes for the regulation of schools and educational services. These functions are recognized in a variety of sources including the following: *Standards for Training and Field Placement in School Psychology*, *Principles for Professional Ethics*, and *Guidelines for the Provision of School Psychological Services* published by the National Association of School Psychologists; requirements for the Nationally Certified School Psychologist credential; and the credentialing requirements of 49 state boards of education plus the District of Columbia.

APA's proposed *Model Act for State Licensure of Psychologists* would attempt to remove the right of SEAs to choose a title for a credential that the SEA has established authority to issue, and it attempts to restrain states in regulation of school based practices both for the provision of school psychological services and in its standards for providers of school psychological services. We strongly oppose a model act that would attempt to remove the authority of SEAs to regulate the title, credentials, and practices of school psychologists.

APA has a professional responsibility to recommend amendments to its state psychology licensing acts that are based on empirical, evidentiary grounds for the purpose of protecting the public. No such grounds exist in this case. There is no evidence that the professional practice of doctoral level and licensed school psychologists is of significantly higher quality than specialist level school psychologists. Specialist level school psychologists are highly valued in the schools because of the unique combination of rigorous graduate training in psychology and education. This unique combination of knowledge and training enables school psychologists to provide invaluable services that complement services provided by licensed psychologists.

Currently, there is a national shortage of qualified mental health providers and school psychologists. If approved by APA and then adopted by states, the proposed changes will severely exacerbate staffing shortages. The Maryland Mental Health Workforce Initiative, a collaborative effort of the Maryland State Department of Education and the Mental Hygiene Administration of the Maryland State Department of Health and Mental Hygiene, has conducted a mental health workforce survey that indicates pockets of training inaccessibility and unavailability in Maryland. Maryland, like many other states, is experiencing problems in the recruitment, training and retention of qualified mental health professionals to serve the State's children and youth with mental health needs and their families. Actions that will further constrict the supply of qualified mental health professionals to students must have compelling justification.

Within Maryland, fewer than 150 of the more than 750 currently employed school psychologists are licensed psychologists. The proposed change would remove the rights of the majority of current Maryland school psychologists to use the title for which they are legitimately credentialed. It would also limit the ability of these qualified personnel to deliver "psychological" services as defined by APA. Currently, the only APA approved training program for doctoral level school psychologists in Maryland is the program at the University of Maryland-College Park. During the past decade, there has been an average of 5 or 6 graduates from this doctoral program per year. In September 2008, Maryland school systems reported hiring 38 school psychologists in preparation for the 2008-2009 school year and reported hiring 154 school psychologists during the previous five years. Since many doctoral level psychologists pursue careers with adult populations or in settings unrelated to schools, the supply of license-eligible and doctoral level psychologists within Maryland is grossly inadequate to meet educational workforce needs.

The proposed change to the exemption would negatively impact students, families, educators, and school systems. By maintaining that school psychology is an area of specialization, the public is protected from being provided school psychological services by professionals who are not adequately trained in school psychology. If this proposed revision is enacted, it would allow licensed psychologists who lack education specific to school psychology and lack proper school-based competencies to work with children and youth in schools.

Because school psychologists who are credentialed through their SEAs practice in schools, SEAs currently require graduate preparation and internships in school settings. The proposed model act requirements are significantly less stringent than requiring the completion of graduate training or re-specialization in the area of school psychology. Licensed psychologists should not be granted the title of school psychologist without attending a graduate program of school psychology or completing re-specialization in school psychology. Licensed psychologists who have taken only one course in education do not have the necessary knowledge in critical areas including school law, instructional design, organization and operation of schools, and child and adolescent development. Allowing licensed psychologists, who have not had adequate training and experience in schools, to work as school psychologists will place students and families at risk for harm in direct violation of APA's published *Ethical Principles*.

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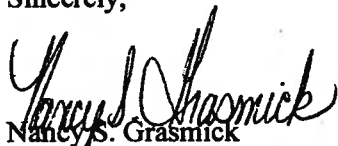
If the proposed changes to the model act are enacted by states, it will cause confusion and impede the delivery of needed educational, behavioral, emotional, and social services to children and youth in school settings. The proposed changes, especially at this time of great need in schools, and the untenable removal of a title most associated with school-based practice has a high risk of harming children, families, and schools by creating barriers to delivering important psychological services. Imposing a barrier by limiting available and essential personnel has the potential to cause harm to children. For the reasons stated above, the APA should reinstate the exemption in Section J of the *Model Licensure Act* for all school psychologists.

The task force developing the revisions to the model act has an obligation to provide evidence of harm that has been caused by the exemption for school psychologists in the existing act and evidence of potential benefits for consumers and the public if the exemption is removed. This evidence is lacking, and the claims are inconsistent with feedback from critical stakeholders including educators and school systems. I suggest the APA further consult and collaborate with key stakeholders including the state and local superintendents, family advocacy, and professional educational association stakeholders.

I strongly suggest the APA strike these revisions and specifically reinstate the exemption for all school psychologists. Furthermore, as many of these revisions would limit and change the practice of school psychologists without compelling justification, I strongly recommend that the APA revise these recommendations in a manner that recognizes and respects highly qualified and dedicated school psychologists and the psychological services that they provide.

I thank you for this opportunity to provide feedback on the proposed revisions. If you have any questions, please contact Brian J. Bartels, Specialist, Psychological Services, at 410-767-0294 or email bbartels@msde.state.md.us.

Sincerely,



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State Superintendent of Schools

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MLA letter 040109

c: Ann Chafin
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