



COMMONWEALTH OF PENNSYLVANIA  
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April 3, 2009

SECRETARY OF EDUCATION

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Task Force on Model Licensure Act  
c/o Lynn Bufka  
American Psychological Association  
750 First Street NE  
Washington, D.C. 20002-4242

To the Members of the Model Licensure Act Task Force:

As the Secretary of Education in Pennsylvania, the proposed changes to your Model Licensure Act have come to my attention and I am responding to voice my concerns. As currently written, the Model Licensure Act has the potential to interfere with services School Psychologists currently provide to the children and families in our state.

My primary concern is the removal of the exemption allowing non-doctoral level practitioners to use the term School Psychologist, including when the right to that title is earned through the Department of Education credentialing process. To remove that exemption, thus denying the use of a legitimately earned title, would affect more than half of Pennsylvania's current practitioners. Within Pennsylvania's state Special Education regulations, School Psychologists are required members of evaluation teams for specific disabilities. Thus, simply changing a title for non-doctoral level practitioners is not an option in our state. The resulting lack of available staff would put our districts at risk of being out of compliance and not properly serving our students and families. Our universities could not produce enough doctoral level candidates to replace those who lose their title if this proposed Model Licensure Act is adopted in our state as written.

A requirement to hire only doctoral level School Psychologists would impose unnecessary burdens on our schools in both the additional cost and the lack of available candidates. To earn our School Psychologist credential requires very specific training in academics, learning, behavior and mental health issues for students that extends well beyond a masters degree. This training, along with a 1200 hour internship, has proven adequate in preparing specialist level practitioners to provide prevention and intervention activities addressing the academic and mental health needs of students. The proposed Model Licensure Act offers no indication of how services would be improved for our students, families and schools if the exemption is removed. To impose the additional requirement of a doctorate degree, with no empirical reason for the change, is unnecessary, intrusive and counterproductive.

Also of concern is the definition of practice of psychology found within the proposed Act. The extensive list of activities that would constitute the practice of psychology, including psychoeducational evaluation, would prohibit anyone but a doctoral level psychologist from fulfilling the very essence of a School Psychologist's role. Add to that the additional burden of requiring that any psychologist must be supervised by a licensed psychologist and the shortage of staff that we are currently experiencing will greatly increase.

I understand that Pennsylvania is the first state to credential School Psychologists. Non-doctoral level School Psychologists have been recognized and have practiced independently in Pennsylvania since 1933. APA has been recognizing specialist level practitioners through your current and previous Model Licensure Acts for over thirty years. These specialist level professionals provide invaluable services to our children, families and schools. Absent any evidence that a change is necessary or that services would improve, I do and will continue to strongly support maintaining specialist level School Psychologists.

Sincerely,

A handwritten signature in cursive script that reads "Gerald L. Zahorchak".

Gerald L. Zahorchak, D.Ed.