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American Psychological Association  
750 First Street  
Washington, D.C. 20002-4242

To: Members of the Board of Educational Affairs and Model Licensure Taskforce

The Council of Administrators of Special Education (CASE), with approximately 5,000 members, is the nation's largest professional association specifically serving and representing special education leaders. Our members work closely with school psychologists and very often have them as staff members. On behalf of our members we strongly urge you to maintain the exemption for school psychologists in your Model Act for the licensure of psychologists. This exemption has contributed to the growth of Educational Specialist Level school psychologists, and these professionals provide valuable and essential services to schools. This exemption that has been in place for over 30 years allows school psychologists to use the professional title of school psychologist and practice the broad role of the school psychologist in their work in our schools. It should be noted no other professionals in school districts are required to have a doctoral degree in order to fulfill their educational roles.

School psychologists have had extensive training, including lengthy practicum experiences and internships, specifically in working with school aged and pre-school children and students. They have met rigorous university standards and have met state certification requirements as school psychologists. State and university standards for school psychologists have been established for some time. These are rigorous and based on the recommendations of the National Association of School Psychologists and the National Council on the Accreditation of Teachers. The training they receive and the standards they must meet focus on critical skills needed in our schools for student learning and behavior, classroom management, crisis intervention, teacher and parent consultations, and meeting the mental health needs of our school students. School psychologists are especially valuable to special education programs in our schools as they must stay abreast of federal, state, and local laws, regulations, rules, and policies regarding the implementation of IDEA and for helping to implement best practices in special education.

This training enables school psychologists to work with young children and school aged students to provide diagnostic assessments and psychological evaluations and interpretation of these assessments and evaluations for educators and parents. They are also able to assist teachers with academic and behavioral interventions, provide crisis counseling (such as grief and disaster counseling) and advise support teams of educators working to improve the achievement of all students. They are working to assist schools in meeting the implementation of response to intervention processes as delineated in the most recent re-authorization of the Individuals with Disabilities Education Act (IDEA), an early intervention process designed to assist struggling students and prevent over-referrals to special education. School psychologists work daily to improve outcomes for students, schools and families.

There is already a shortage of school psychologists to serve our schools, and the shortage has been growing in recent years. Withdrawing the 30 year plus exemption for school psychologists will only intensify this problem as  $\frac{3}{4}$  of practicing school psychologists are trained at the Educational Specialist Level. Removal of this exemption also disproportionately impacts minority and female school psychologists who are predominantly credentialed at the Educational Specialist Level. This would certainly be detrimental to our schools, educators, families and especially the students who attend our schools.

For all of the above reasons, CASE urges the Model Licensure Act Task Force and members of the Board of Educational Affairs of the American Psychological Association to continue the exemption for school psychologists who meet state certification requirements that allows them to use the title school psychologist and to serve in their unique specialized roles as psychologists in which they serve our schools and students so well.

Thank you for your consideration of our comments and concerns.

Sincerely,

Emily Collins, Ph.D.  
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