



Kentucky Psychological Association

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APA Model Licensure Act Task Force
American Psychological Association
750 First Street, NE
Washington, DC 20002-4242

Attention: Lynn Bufka, Ph.D.

Thank you for the work that has been done in creating the latest version of the APA Model Licensure Act (MLA). We appreciate the effort of our national association in putting forth its thinking on the way in which psychology should be regulated in each of the states.

However, we must express our strong objections to the recommendation contained in the MLA regarding the title and functioning of school psychologists. The Kentucky Psychological Association (KPA) has enjoyed a long and productive history of collaboration and partnership with the KY Association of Psychology in the Schools (KAPS) and joins that organization in pointing out to the APA MLA Task Force and to the members of the APA Council of Representatives the negative effects of enacting these recommendations on access to needed psychological services in the schools for a state as poor, and as rural as Kentucky.

KPA has, over the past two years, undertaken an extensive study of our licensing statute (KRS 319) with the goal of revising that statute to incorporate the APA Council of Representatives' recommendation to change the doctoral sequencing of training. Our Board of Directors approved the recommendation to amend KRS 319 by continuing the requirement of two years of supervised professional experience for the doctorally-trained applicant, but to drop the requirement that one year of that experience be postdoctoral.

The KPA Board of Directors discussed the APA Model Licensure Act recommendation to remove the exclusion from licensure for school psychologists practicing in the schools, taking away that title and recommending supervision by licensed psychologists. The KPA Board did not support that aspect of the APA Model Licensure Act and is not recommending this change in KRS 319. We have previously communicated this decision to the KY Board of Examiners in Psychology (KBEP) and will continue to reiterate our position in the form of this letter.

We have a long (over 40 years) history in Kentucky of a dual system which has worked well: school psychologists who are employed by school districts are credentialed by the Education Professional Standards Board and their practice is limited to their duties as school employees. The Psychology Licensing Law in Kentucky, KRS 319, has a mechanism in place for such individuals to apply to the KY Board of Examiners in Psychology (KBEP) for licensure at the appropriate level, should these school psychologists wish to practice outside of their employment in the school system.

The revision to this system which is recommended by the APA MLA would cause unnecessary and harmful problems in the delivery of school psychology services by significantly reducing the availability of already-scarce school psychologists. Further, the loss of their title would lead to confusion in the minds of the public with others who may be less well-trained and who do not provide the quality or breadth of services that are provided by school psychologists. All psychology practitioners – whether in the schools or outside the school setting – would suffer as a result.

KPA has expressed these concerns to our Licensure Board (KBEP) and will continue to urge that the licensing law in Kentucky not incorporate such a revision to the title and practice of school psychology in this state. On behalf of the officers, Board and membership of the KY Psychological Association, we urge the APA Model Licensure Act Task Force to reconsider this recommendation and to delete it from the final version of the document.

Thank you for giving us this opportunity to provide feedback to the Task Force. We believe that it is critically important that the licensure statutes reflect the reality of available trained and educated personnel and the needs presented by the population of each state.

Please do not hesitate to contact me, should you have any questions.

Sincerely,



Robin Sublett, Ph.D., President

cc: KPA Board of Directors
KY Board of Examiners in Psychology
KY Association of Psychology in the Schools