



LONDONDERRY SCHOOL DISTRICT

May 12, 2009

Task Force on Model Licensure Act American
Psychological Association
750 First Street NE
Washington, D.C. 20002

To the Members of the Model Licensure Act Task Force:

As Superintendent of Schools for the Londonderry, New Hampshire School System, I strongly oppose the revisions of the *Model Act for State Licensure* proposed by the American Psychological Association (APA) in March 2009. If enacted, the proposed changes would lead to significant limitation on the practice of school psychology.

As a specialty within psychology, School Psychologists possess a unique combination of training and expertise in psychology and education. If the new language is approved by the APA leaders and then included in bills by state legislatures, the integrity of the profession and quality of services specifically designed to improve outcomes for children and schools would be severely diminished. By maintaining school psychology as an area of specialization, the public is protected from being provided school psychological services by professionals who are not adequately trained in school psychology and who lack proper school-based competencies to work with children and youth in schools.

APA's proposed revisions would attempt to remove the right of the State Education Department to choose a title for a credential that the state educational agency has established authority to issue. The state credentialing standard is well established and precisely sets forth a high quality of service in schools. The proposed recommendations by APA suggesting that state legislatures disregard these standards lacks just cause.

In addition to the national shortage of qualified mental health providers and School Psychologists, there are very few doctoral level school psychologists in New Hampshire. A requirement to hire only doctoral level School Psychologists would impose unnecessary burdens on our schools in both the additional cost and lack of available candidates. 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 are evident.

School Psychologists integrate best practices from the fields of education and psychology to promote optimal learning and mental health for all students. If the proposed changes to the model act are enacted, it will impede the delivery of systems models for prevention and intervention. Imposing a barrier by limiting available and essential personnel adds to the spectrum of obstacles schools are confronted with at this time.

I strongly urge the APA to strike the proposed revisions to the model act. Thank you for this opportunity to provide feedback regarding the proposed revisions.

Sincerely,

Nathan S. Greenberg
Superintendent of Schools