



May 1, 2009

Norman B. Anderson, Ph.D.
Chief Executive Officer
American Psychological Association
750 First Street, N.E.
Washington, D.C. 20002-4242

Dear Dr. Anderson:

On behalf of the Maryland State Teachers Association (MSTA), I am writing to strongly urge the Board of Educational Affairs of the American Psychological Association (APA) to continue the exemption for non-doctoral school psychologists, as currently included in the Model Act for State Licensure (MLA) of Psychologists. MSTA is a statewide association advancing the cause of public education that represents more than 70,000 members, comprised of teachers, school psychologists, and other educational professionals. Any action which significantly limits the title and practice of school psychology in Maryland would have a detrimental effect on our students, families, education professionals, and school systems.

School psychologists play a critical role in schools by assisting teachers in addressing the academic, behavioral, and social needs of students. School psychologists are important members of IEP, evaluation, and other school teams, working directly with students and providing consulting services to school staff. School psychologists trained at the specialist and doctoral levels are highly valued in the schools because of the unique combination of rigorous graduate training in psychology and education. Without the school psychologists' unique skills, obtained through school psychology graduate training programs and extensive "in-school" internships, teachers would not have access to this essential support.

School violence is increasingly a concern among our members. School psychologists are specifically trained to provide interventions when students are violent and/or disruptive. Such interventions can include behavioral assessment designed to determine the functions of such behaviors, usually resulting in the development of behavioral plans, counseling, and consultation with teachers and parents. Good mental health is essential to success in school and in life and schools need school psychologists in order to meet the growing needs of students in this area

School psychologists have had unique and extensive training concerning the special learning, behavioral, and mental health needs of students. This training specifically focuses on issues that are critically important in schools, such as: special education, crisis prevention and intervention, instruction, classroom management, learning and behavior, and mental health. To debase our school psychologists by removing their use of the title *school psychologist* would minimize their effectiveness and devalue the esteem with which they are held among our school faculties and staffs. In this regard, the title *school psychologist* accurately describes the level of training and supervised field-based experiences that school psychologists are required to achieve as they work to improve the outcomes for children, families, and schools.

Further, Maryland, like many states, is experiencing problems in the recruitment, training, and retention of qualified mental health professionals. This proposed change will further constrict the supply of qualified mental health professionals. 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. Therefore, the proposed change will cause an increased shortage and negatively impact students, families, education professionals, and school systems.

If the proposed changes to the MLA are enacted by states, they will cause confusion and impede the delivery of essential educational, behavioral, emotional, and social services to children and youth in school settings. Imposing a barrier by limiting available and essential personnel has the potential to cause harm to children. The proposed changes, especially at this time of great need in schools, and the unjustified removal of a title most associated with school-based practice has a high risk of harming children, families, and schools by creating barriers to the delivery of important psychological services in our schools. For many students, mental health services provided by the school psychologist in school present the only access to counseling and behavioral consultation available to them. Additionally, school psychologists sometimes facilitate the referral of families to private therapy in the community by licensed psychologists, a valuable complementary service. For these reasons, MSTTA urges the APA Board of Educational Affairs to maintain the exemption in Section J of the MLA for all school psychologists.

Thank you for your consideration of these comments,

A handwritten signature in cursive script that reads "Clara Floyd". The signature is written in black ink on a white background.

Clara B. Floyd
President