

May 14, 2009

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

Dear Members of the Model Licensure Act Task Force:

As the President of the Pennsylvania Education Association (PSEA), I am writing to you on behalf of the more than 191,000 members of our organization to urge you to reinstate the exemption language (Section J) in APA's Model Act, which permits school psychologists to retain the use of the professional title, "psychologist".

This long-standing provision has facilitated the delivery of high quality services by staff who have been appropriately credentialed by Pennsylvania's Department of Education. These services constitute high quality independent practice. In contrast, the proposed draft revisions would remove the exemption language and would have a serious adverse impact upon services for students, parents, teachers, and communities in Pennsylvania.

Specifically, in evaluating the proposed language, please consider the following points:

First, the exemption appropriately provides that our certified school psychologists have the right to use the term "psychologist". This exemption is appropriate because ample protections exist to ensure that these employees receive high quality training and provide high quality services. In addition, the title "school psychologist" accurately describes this high level of training and experience which both specialist and doctoral level school psychologists have and which have served the Commonwealth well. For over thirty years, both our state and the APA have deemed the level of training required for our certified school psychologists to be sufficient at the specialist and doctoral levels.

Second, school psychologists play a specialized role in schools by assisting parents and teachers in addressing academic, behavioral, emotional and social needs of students. School psychologists are critical members of the screening, evaluation, IEP and other school teams, work directly with students, and provide consulting services to parents and school staff. Moreover, under Pennsylvania regulations in many instances, the school psychologist is designated as a mandatory member of the evaluation and reevaluation team.

Third, school psychologists increasingly play an important role in the “Response to Intervention” process, an early intervening approach aimed at identifying and addressing instructional and learning needs of all students to ensure academic growth and provision of scientifically-based instructional practices. School psychologists are uniquely trained to participate in this process. Specifically, they are trained to identify the student, environmental, instructional and pedagogical variables which impact student learning and which must be defined for measurement in determining student learning rates.

Fourth, school psychologists have had unique and extensive training concerning the developmental, academic, behavioral, and mental health needs of school students ages 3-21. Graduate programs are regulated to provide specific training in education, psychology and mental health domains which render the practice of school psychology unique in its scope and function. This training specifically focuses upon applied learning and mental health principles which are critically important in schools and to student function, including special education, crisis prevention and intervention, pedagogy, and classroom management. School psychologists are specifically trained to use assessment tools which look beyond individual scores and match performance to classroom function and curriculum expectations; it is through this training that school psychologists possess the unique skills which enable them to fully understand student strengths and identify student needs.

Fifth, with regard to behavioral and mental health services, school psychologists are specifically trained to provide interventions when behavior renders a student a threat to self or others in the school setting. Interventions such as behavioral assessment, development/revision of behavior plans, student counseling, school-based consultation with staff and parents, case management, and measurement of progress, all require specific training in family, student and school variables. Mental health supports provided in the

school setting, with the unique focus on facilitating learning and school/social function, are essential to students and families, and school psychologists are essential in meeting the growing needs of students in this area.

Sixth, in contrast to the benefits which support a continuation of the exemption, the withdrawal of the exemption would not provide any public protections or benefits, and could serve to disrupt the system of delivery of school psychological services. Such a withdrawal would likely harm students, families and schools by stripping over 70% of practicing school psychologists of their title. This will add to an already critical shortage of practitioners truly qualified to provide psychological services in a school setting, and will create a barrier to public access to services.

The fact that specialist and doctoral level practitioners have been providing necessary services for the past thirty years, and that there is no evidence that establishes or even suggests that these professionals have failed to provide exemplary psychological services, indicates that removal of the exemption would be arbitrary and lacks a rational basis. Thus, the draft revisions to the Model Act would not provide public benefit and would not improve school psychological services.

Seventh, withdrawal of the exemption would place undue burden on our state's Department of Education, which would be required to revise a myriad of regulations and policies which mandate the services of certified school psychologists. In this regard, the regulatory review process in Pennsylvania can take months or even years to complete. Therefore, regulatory revisions would result in an unnecessary drain on state resources at the expense of student services.

Eighth, the proposed revisions require that doctoral level, licensed psychologists supervise anyone practicing psychology, including school psychologists. This type of supervision for the delivery of school psychological services is arbitrary and unnecessary and is in conflict with Pennsylvania's education regulations governing qualifications for supervision of educational employees. If included in the new Model Act, this particular requirement likely will be impossible to implement and is incompatible with the mission of education.

Ninth, state standards are already in place which ensure that school psychologists are well trained. These standards are based upon recommendations of established, reputable, professional organizations such as Pennsylvania’s division of your own organization (Division 16), the National Association of School Psychologists, the National Association of State Directors of Teacher Education and Certification, and the National Council on Accreditation of Teachers. By incorporating these recommendations, Pennsylvania has fulfilled its duty to ensure that specialist and doctoral-level school psychologists have the training needed to address the specific learning, behavioral, and mental health needs of students in elementary and secondary schools.

Tenth, specialist and doctoral level school psychologists are experts in psychology and education. Licensed psychologists trained in other disciplines may become certified school psychologists only when they have met the credentials outlined by the Pennsylvania Department of Education’s certification bureau. There has not been any change in circumstance and there is not any evidence which suggests that a change in this requirement is rational or appropriate.

For the reasons detailed above, the Pennsylvania State Education Association urges the Task Force to continue the exemption in APA’s Model Act for State Licensure of Psychologists (Section J), so that school psychologists at both the specialist and doctoral levels may continue to utilize the “psychologist” title and practice independently in schools.

Please feel free to contact me if you need additional information. Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "James P. Testerman". The signature is written in black ink and includes a long, sweeping horizontal line at the end.

James P. Testerman
President