



Student Support Team Association for Georgia Educators, Inc.

5634 Atlanta Hwy., Ste. 300
Flowery Branch, GA 30542

Omar Rehman, Practice Directorate
APA Model Licensure Revision Task Force
750 1st Street, NE
Washington, DC 20002-4242

May 29, 2009

Dear Mr. Rehman:

We are writing to you on behalf of the Board of Directors of the Student Support Team Association for Georgia Educators. This professional association of over 600 school leaders includes members from nearly every school district in the state of Georgia. Our professional members incorporate a wide range of school and district level positions including assistant superintendents, principals, school psychologists, special education directors, curriculum coordinators, special and general educators, and staff involved with RTI.

Over the last year or so, we have been extremely concerned by the American Psychological Association's proposal to change its Model Act for State Licensure (MLA) to eliminate the exemption of school psychologists from state licensure. The MLA proposes to restrict the use of the title "school psychologist" to those trained at the doctoral level, and seeks to limit the scope of professional practice by school psychologists who are nondoctoral practitioners. We are in **strong opposition** to such an action. This proposal is not in the best interests of children, families or educators.

APA's proposal assumes that licensed independent doctoral level practitioners possess the prerequisites to not only practice school psychology, but to also supervise school psychologist practice in schools. This is a dangerous and faulty assumption. The Georgia Professional Standards Commission is but one of many states where we see the credentialing of school psychologists as requiring specialized training and a continuum of supervised experience in schools. The credentialing of school psychologists differs from those of licensed independent psychologists (e.g. Clinical, I/O, Counseling...) who are regulated by the Psychology Licensing Board. The practice of school psychologists in academic settings requires specialized knowledge, skills and expertise in evidence-based best practices in both psychology and education. School psychology practice is directed by federal and state educational law (i.e. NCLB, IDEIA, Georgia Educational Rules and Regulations...) and not by the DSM IV-TR, which often guides the practices of licensed independent psychologists. The practice of school psychologists bears little correlation to

those of independent psychologist practitioners who are appropriately regulated by the Psychology Licensing Board.

In our state and nation, school administrators are struggling to maintain current staff levels to avoid overwhelming teachers and support staff. Many of our districts in Georgia have laid off part-time and full-time staff this year for the first time in many years. Your action would jeopardize much needed services to general and special education children and educators who rely heavily on the expertise of the school psychologist in their school/district.

The APA MLA proposal would destroy or undermine schools' effort to implement Response to Intervention processes. Georgia's school psychologists are serving in leadership and advisory positions to bring about the change required by federal and state educational law. Their knowledge and specialization in school-based practices are essential to the new federal and state mandates. School psychologists are leading the dynamic change from ineffective past/traditional practices towards research/evidence-based practices in prevention, assessment, intervention, training and consultation in education. Without school psychologists readily available in our schools, this change in service delivery will not occur.

The Student Support Team Association for Georgia Educators (SSTAGE) respects, values and fully supports school psychologists. SSTAGE **strongly opposes** APA's MLA proposal; it is not in the best interests of children, families or educators.

We request that wiser minds prevail, and that you withdraw this proposal immediately.

Sincerely,

Paula Freer, Ph.D.
SSTAGE President

Lynn L. Pennington
SSTAGE Executive Director