



Dr. James H. Bray  
Assistant Executive Director  
Practice Research and Policy and Practice Directorate  
American Psychological Association  
750 First Street, NE  
Washington, DC 20002-4242

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As an organization, the Association of School Psychologists of Pennsylvania strongly opposes both the proposed revisions that change school psychology from an area of specialization to a foundation of psychology and removes the exemption for specialist level school psychologists to use their titles. ASPP urges APA to eliminate these changes from the proposed revisions and maintain that school psychology is an area of specialization and reinstate the long-held exemption for all school psychologists.

The current Model Act has been in place since 1987 and its predecessor from 1977 had in place an exemption for non-licensed individuals (doctoral and specialist level) trained as school psychologists to be referred to as “school psychologist” and permitted to practice “school psychology.”

Currently in Pennsylvania, school psychology credentialing, title, and school-based practices is regulated by the *Pennsylvania Department of Education (PDE)* not the PA State Board of Psychology. This has been the case in Pennsylvania since the 1930’s, more than 30 years before psychologists could become licensed as independent providers of health care.

School psychologists implement prevention activities and provide interventions for mental health and learning issues at the individual, group, and school-wide levels. Today there is significant recognition within the education and health communities of the importance of having school psychologists to provide these services in order to meet the growing needs of students.

By maintaining that school psychology is an area of specialization, the public is protected from being provided school psychological services by a professional that is not adequately trained in school psychology. If this proposed revision to the MLA is enacted, this would allow for licensed psychologists who lack education specific to school psychology and proper school-based competencies

to be able to work with children in schools as a school psychologist. Allowing professionals who lack proper specialization to work in schools with the vulnerable population of children is in direct violation of APA's Ethical Principles of Psychologists and Code of Conduct.

The removal of the exemption would seriously impact current practice of School Psychology by curtailing the use of the title "school psychologist" and the delivery of school psychological services by non-doctoral personnel.

More importantly, this change would severely limit the availability and accessibility of school psychological services to students because there are not enough doctoral level school psychologists to meet the current needs and demands for these services. In Pennsylvania, nearly 75% of school psychological services are delivered by educational specialist level school psychologists.

The Association of School Psychologists of Pennsylvania is joined in its opposition to APA's Model Act by Secretary of Education Zahorchak, the Pennsylvania Psychological Association (APA's state affiliate), the Pennsylvania State Education Association, the Bucks County Autism Coalition to name a few.

ASPP opposes these changes because they are unnecessary and:

- ❖ There is no benefit to the public, to students and families, schools, or to the profession of psychology to change this exemption for school psychologists credentialed by PDE, particularly at a time when there are shortages of school psychologists in PA. (e.g., urban and rural school settings).
- ❖ PDE already has stringent standards for the graduate education and state credentialing of school psychologists which protect the public.
- ❖ PDE has a vested interest in the quality of school personnel and its credentialing practices ensures that highly qualified school psychologists are employed by schools and provide needed services to children.
- ❖ Proposed language changes would cause unnecessary confusion and conflict with Chapter 14 and 16 regulations and the PA School Code.
- ❖ School psychologists (doctoral and specialist levels) are trained to understand the complex rules and culture unique to schools and psychologists in other disciplines do not have this critical specialty training.
- ❖ It would require LEA's to contract/hire professionals other than doctoral level school psychologists or licensed psychologists for supervision in schools

which is potentially a significant cost and inadequate in terms of appropriate supervision.

In order to achieve the goals of our school districts, those of the Pennsylvania Department of Education, NCLB, and the Individuals with Disabilities Education Act it is critical to respond to children's social, emotional, behavioral, and academic needs by making sure that there are school-employed mental health professionals who are trained to support students, teachers, and school administrators in removing barriers to learning accessible in every school. Therefore it is imperative that APA's Model Licensing Act not be amended to exclude school psychologists.

Thank you for the opportunity to comment on the Model Licensing Act.

Sincerely,

**The Association of School Psychologists of Pennsylvania's Executive Board**