



Office of the State Superintendent of Schools

Kathy Cox, State Superintendent of Schools

November 1, 2007

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

To Whom It May Concern:

It has come to our attention that the American Psychological Association (APA) is proposing to change its Model Licensure Act by eliminating the exemption from licensure for school psychologists. This letter is to voice our strong opposition to such an action.

Make no mistake about it: the action that APA proposes would not only disenfranchise a professional specialty in Georgia, but it would cause immediate and extensive harm to school children and their families by denying and delaying needed services in the schools. Many of these services are required by federal law and state regulation. Such a destructive action would be utterly unacceptable and will be opposed by the Georgia Department of Education with all actions and resources available to it.

In Georgia, the Psychology Licensing Board exists to regulate the *independent* practice of psychology. School psychology is regulated by a separate agency, the Professional Standards Commission, which provides credentialing for all professionals in education. School psychologists are specifically funded in the public schools and are already extensively regulated. This includes rigorous university training programs, long internships, strict credentialing, regular renewal of certificates and daily supervision. School psychologists in Georgia have been functioning effectively for 40 years. It is preposterous and unsupportable to suggest that they suddenly need to be regulated by a state board that licenses private practice.

APA's argument that there is "public confusion" as to exactly who is a psychologist might have had some credence in the early 1970's. But that argument is long dead as it pertains to school psychologists. Next week is officially "School Psychology Week in Georgia," as proclaimed annually by Georgia's Governor. These specialists are a fundamental and respected part of public education.

APA would be well advised to reconsider its proposed action. It is unneeded, unwise and unwelcome.

Sincerely,

Kathy Cox