



STATE OF IOWA

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DEPARTMENT OF EDUCATION
JUDY A. JEFFREY, DIRECTOR

April 27, 2009

Task Force on Model Licensure Act
c/o Lynn Bufka
American Psychological Association
750 First Street NE
Washington, D.C. 2002-4242

To the Members of the Model Licensure Act Task Force:

I am writing to express Iowa's opposition to the proposed change to the Model Licensure Act (Section J) that removes the exemption for non-doctoral level school psychologists to use the title "school psychologist." If this exemption is removed from the current Act, the lasting effects would negatively impact Iowa's children both immediately and for many years to come.

There are many reasons why Iowa is encouraging the American Psychological Association (APA) to maintain this current exemption for school psychologists:

- 1) There are no data that would suggest this change is necessary or that services would improve if this exemption were to be removed.
- 2) To remove the exemption would affect more than 80% of all practicing school psychologists currently working in Iowa's schools.
- 3) Such an action by the APA would create both additional costs and unnecessary demands on an already burdened educational system.
- 4) School psychologists in Iowa must be licensed by the Board of Educational Examiners. All candidates for licensure approval must have graduated from an APA or National Association of School Psychologists (NASP) approved program.
- 5) At a minimum, non-doctoral school psychologists in Iowa are required to have *at least* 60 graduate credit hours that include 600 hours of practicum and 1,200 hours of internship experiences. This is a high standard for any non-doctoral level program.

School psychologists are trained to understand the academic, social, emotional, and behavioral needs of students. School psychologists must also know and understand the current federal and state laws that regulate the education of students with disabilities. To assume that *all* doctoral level psychologists have such background and training would be as equally erroneous as assuming that *only* doctoral level psychologists can be trained to understand these issues.

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School psychologists have specific training and skills and use them within the boundaries of the educational setting. They are, as their name implies, uniquely trained and skilled to understand the educational and psychological needs (academic, social, emotional, behavioral) of students within the school setting.

I strongly request that the APA retain the current exemption for school psychologists in the Model Licensure Act.

Sincerely,

A handwritten signature in cursive script that reads "Judy A. Jeffrey". The signature is written in black ink and is positioned above the printed name and title.

Judy A. Jeffrey
Director of Education
Iowa Department of Education