

Jordan School District

A Full Spectrum of Educational Opportunities

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American Psychological Association
750 First Street NE
Washington, D.C. 20002

Subject: Model Licensure Act

Dear Model Licensure Act Task Force:

As superintendent of Jordan School District, Utah's largest school district, I ask that the Model Licensure Task Force reinstate the exemption for non-doctoral level school psychologists in the March 6, 2009 proposed Model Act for State Licensure of Psychologists. The proposed Model Act recommends to state legislatures that they disregard well-established, high quality credentialing standards for specialist level school psychologists without just cause or sound reasoning.

School psychologists are trained and qualified to provide psychological services and support to children, educators, and families to enhance the school performance and mental health of children and youth. They are practices for which school psychologists are credentialed by the Utah State Office of Education. The elimination of the exemption for specialist level school psychologists would restrict the practice of non-doctoral school psychologists in public schools without justification.

The exemption for specialist level school psychologists should also be maintained because school psychological services are defined and recognized in most state codes for the regulation of schools and educational services. In federal law and regulations, the expertise of school psychologists is recognized as a source of expert testimony for the purpose of establishing impairment. Substantial evidence exists that school psychology is an established practice area and specialist level school psychologists are appropriately prepared and credentialed to engage in school psychology practice.

APA's proposed Model Act would attempt to remove the *right of state education agencies* to choose a title for a credential that the state education agency issues and attempts to restrain states in its regulation of school based practices, both for the provision of school psychological services, and in its standards for providers of school

psychological services. I oppose a Model Act that would attempt to remove state education agencies' rights to regulation of title, credentials, and practices of school psychologists, who are highly valued professionals in schools.

I strongly advise the APA to reinstate the exemption for specialist level school psychologists in the Model Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry L. Newbold", with a long horizontal flourish extending to the right.

Barry L. Newbold, Ed.D.