

Key Messages About the APA's Proposed Model Licensure Act January 2010

The National Association of School Psychologists (NASP) strongly opposes the American Psychological Association's (APA) Model Act for Licensure of Psychologists (MLA) that is proposed for consideration by APA's Council of Representatives. The proposed MLA changes the long-standing "school psychologist" exemption in terms that will seriously constrain the title of the majority of school psychologists and put at risk the provision of necessary services to children, families, and schools.

Specifically, the proposed MLA 2010:

- Restricts use of the title "school psychologist" or "certified school psychologist" to only those individuals who have a doctoral degree in psychology, are certified by the state education agency, and are using the terms only during their practice in the public schools
- States that individuals who are certified in school psychology by the state education agency or other statutory provisions but who do not hold doctoral degrees (that is, specialist-level school psychologists) would be permitted to use the terms "psychology" and "psychological" in their title, but not "school psychologist"
- States that these individuals are restricted in their practice to those settings under the purview of the state education agency and that these provisions become effective in five years following the MLA's adoption

There is no evidence that limiting the school psychologist exemption to only those holding the doctoral degree and restricting it for those at the specialist level will serve the public good. In fact it is likely to cause harm. The MLA exemption for the use of the terms school psychologist or certified school psychologist for all individuals credentialed by the state education agency carries a 40+ year precedent and a long history of successfully serving the needs of children, families, and schools. A change in title of school psychologists would create public confusion and potentially impact public perception about the important services provided by school psychologists. Access to the specialized services provided by highly qualified and credentialed school psychologists is critical to schools' ability to support students' diverse educational, psychological, and developmental needs. There is already a shortage of school psychologists and restricting the exemption threatens to further impede service delivery.

The title "school psychologist" is a truthful representation of the training and qualifications of doctoral- and specialist-level school psychologists. Both doctoral- and specialist-level school psychologists have earned the right to use the title "school psychologist" and engage in a wide range of school psychology practices for which they are credentialed and well-qualified. The title "school psychologist" accurately reflects the level of training and supervised field-based experiences in psychology and education for both specialist-level (a minimum of 60 hours of graduate education) and doctoral-level school psychologists. Approximately 75% of school psychologists hold the specialist-level degree and serve effectively in schools across the country.

School psychological practice and use of the title by both specialist- and doctoral-level school psychologists is well-established in law and regulation. Federal and state statutes, regulations, and authorities (e.g., IDEA, ESEA, U.S. Department of Education, U.S. Department of Labor) refer to the practice of school psychology and the title of "school psychologist" for important services for children in general and special education. Over 90% of state boards of education use the title "school psychologists" for credentialing of professionals in public schools. Use of title by both specialist- and doctoral-level school psychologists has been explicitly permitted by APA through the MLA since 1977.

Changing school psychologists' title infringes on the authority of state education agencies to credential and provide oversight for professionals who provide services in schools. This includes the right to use the title "school psychologist" in the SEA credential, regulate school-based practice by school psychologists, and establish standards regarding who may provide school psychological services. Such infringement also will cause unnecessary conflict between state agencies. This conflict may distract public officials and educators from more important issues such as providing needed school psychological services.

In itself, the MLA has no legal force; however, it can cause serious problems at the state level. APA's adoption of the MLA does not automatically trigger any statutory or regulatory changes. However, if APA's Council of Representatives adopts the MLA in its current form, it is expected to be introduced in states and the title of school psychologists and their mental health services will be at risk. This will result in state battles to retain our title and practice—an unfortunate and costly distraction for everyone.

The education community and school psychology community do not support APA's position. Many organizations have joined NASP in support of retaining the school psychologist exemption for individuals at the specialist and doctoral level, including other groups in the school psychology community, virtually every major education organization at the national level, many state professional organizations, and state boards of education. During two public comment periods, APA's MLA Task Force received approximately 30,000 comments from individual and organizations supporting the retention of the school psychologist exemption. Our colleagues and the people we service are quite clear that use of the title "school psychologist" by school psychologists is in the best interest of children, families, and schools.