



OVERVIEW OF NASP'S POSITION ON PROPOSED CHANGES TO APA'S MODEL ACT FOR STATE LICENSURE OF PSYCHOLOGISTS

OVERVIEW

The American Psychological Association (APA) is considering changes to its *Model Act for State Licensure of Psychologists*, its recommended prototype language for state licensing boards to use in developing regulations and legislation for licensing psychologists. Adopted in 1987, the current APA model act addresses a number of issues relevant to school psychologists and, as such the National Association of School Psychologists (NASP) has a significant interest in the outcome of the proposed changes.

NASP represents more than 25,000 school psychologists who work to improve outcomes for children, families, and schools. The vast majority of school psychologists are employed by public schools and credentialed by state education agencies. NASP is committed to ensuring the highest quality of training and practice for the profession and has well established, widely adopted standards that are defined in the NASP [Standards for Training and Credentialing of School Psychologists \(2000\)](#). Additionally, NASP supports and works with other organizations that share the commitment to provide quality services to meet the growing needs of children and families within the school setting.

NASP has positions on two proposed changes to the APA model that are relevant to school psychologists. NASP has stated positions on two proposed changes that may affect school psychological training and credentialing and, consequently, the availability of quality services for children and families.

a) NASP supports the change adopted by the APA Council of Representatives related to post doctoral experiences that are reflected in the draft revised APA model act. This change calls for admission to licensure for the professional practice of psychology after applicants have completed the equivalent of two years of full-time supervised practice training that could be completed before or after the granting of the doctoral degree rather than requiring this experience occur post doctorate. NASP concurs with APA's "commitment to modernizing policies that benefit psychology students while also serving and protecting the public."

b) NASP opposes the proposed change in the APA model act that removes the title exemption language for school psychologists. The exemption language in the current 1987 APA model act reflects long-standing recognition of the right of school psychologists practicing in public schools and credentialed by their state education agency to use the term "psychologist" in their title. The APA model act generally recommends very restrictive use of the title "psychologist" and seeks to reserve it for individuals with doctoral degrees who are licensed by the state psychology licensure board. The proposed language changes to the APA model act, which NASP opposes, removes the title exemption for school psychologists.

NASP supports school psychologists' long-standing right to use the term "psychologist" in their title and urges APA to maintain the exemption language in its model act. 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. The title of "school psychologist" has been widely recognized for both degree levels since the 1950s and specifically acknowledged by APA governance through the exemption language since 1977.

The current exemption within APA's model act has served the public interest well for 30 years. Removing it has no perceivable benefit to children, families, schools, or the profession. On the contrary, eliminating the exemption threatens to undermine both well-established credentialing standards at the state level and, most importantly, potentially limit access to quality services for children and families.

BACKGROUND AND RATIONALE

School psychologists provide critical services that support the mental health and academic achievement of all children. Mental health is integral to success in school and life. School psychologists are specially trained to implement prevention activities and to provide interventions for mental health and learning issues at the individual, group, and school-wide levels. This can include academic and behavioral interventions, resilience and wellness promotion, counseling, consultation with parents and teachers, case management, assessment, progress monitoring, as well as crisis prevention and intervention. Today there is significant recognition within the education and health communities of the importance of having school-employed professionals like school psychologists to provide these services in order to meet the growing needs of students.

The current APA model act serves the public interest by recognizing a title exemption for school psychologists. School psychologists were credentialed by state Boards of Education for many years prior to the establishment of licensure for psychologists. The exemption within APA's model act is a recognition of school psychologists' long history of contributing to schools and the field of education, and as a specialty area within psychology. Many recognizable benefits have resulted from the 1977 and current 1987 title exemption for school psychologists who are credentialed by their state education agency and practice in public school settings. School psychological services have been advanced, and most states (almost 90%) use "school psychologist" within the title of the credential from the state education agency. Over the years, the number of highly trained school psychologists has increased to well over 35,000 in the United States alone, which has directly improved the ability of schools to support academic and social-emotional success for *all* students, and has increased access to desperately needed services for children and families.

Removing the exemption could undermine services to children and families at a time of growing need. NASP sees 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 state education agencies, particularly at a time when there are shortages of school psychologists nationally. Shortages are severe in some under-resourced urban and rural school settings. The shortages are even more critical given a significant unmet need for individuals of minority and culturally and linguistically diverse backgrounds to serve in school settings. Adding barriers to these already challenging situations would not serve the public interest and could result in further shortages of school psychologists in school settings. The potential consequences would have a negative impact on important services for children and families.

State education agencies have stringent standards for the graduate education and state credentialing of school psychologists. State standards promote effective services by requiring well-trained school psychologists in schools. Graduate education and credentialing standards by state education agencies are influenced by national associations that promote strong consistent criteria, such as NASP, the National Association of State Directors of Teacher Education and Certification, and the National Council on Accreditation of Teacher Education (of which NASP is a specialty professional association). Credentialing practices by state education agencies ensure that highly qualified school psychologists are employed by schools and provide needed services to children. Further credentialing by state education agencies helps ensure alignment of standards with other highly-trained school personnel. State education agencies have a vested interest in the quality of school personnel and are typically empowered by state lawmakers to set these standards.

Proposed language changes could cause unnecessary confusion and conflict with well-established state laws and state department of education codes. Maintaining the current exemption within the APA model act would prevent potential conflicts between State Boards of Education and Psychology Licensing Boards for school-based practice. Laws and regulations for school psychology are well established in most states and have been under the purview of state boards of education for many years. The school psychologist title and

credential are recognized for school-based practice in almost 90% of the 50 states and the District of Columbia. The public is well protected and services to children and families in schools are strengthened by state laws and codes that regulate the practice and credentialing of school psychologists by state education agencies.

Removing the exemption in the APA model act could lead to time-consuming, unnecessary legislative battles at the state level. Although the APA model act is not an official law or regulation, state psychology licensure boards and others may use it when proposing their own acts for state licensure of psychologists. A revised APA model act that removes the exemption for school psychologists who are credentialed by their state education agency and practice in public school settings could result in future attempts in some states to modify title and/or credentialing of school psychologists. The potential conflict with state school code provisions for services provided within public schools has no benefit and could distract public officials, policymakers and professional leaders from other, more important matters related to providing needed services and resources to children, families, and schools.

NASP CONTRIBUTION TO STANDARDS AND CREDENTIALING OF SCHOOL PSYCHOLOGISTS

NASP supports and advances standards of training, practice, and credentialing that improve outcomes for children, families, and schools. NASP Standards for credentialing of school psychologists are aligned with both psychological best practice and the mission and functions of schools. (See [Standards for Training and Credentialing of School Psychologists \(2000\)](#)). NASP advances stringent standards that directly reflect the demands of working with children and families within a school setting and linking mental health to learning. These standards apply to both specialist- and doctoral-level school psychologists and have been in effect since 1972.

NASP represents the broad interests of specialist and doctoral school psychologists.

NASP is the largest organization of school psychologists in the world. Approximately 75% of school psychologists hold the specialist-level degree, or the equivalent to 60 hours (minimum) of graduate education, including a full year of supervised internship in the school setting. Approximately 6,000 of our 25,000+ members hold a doctoral degree.

NASP is working to encourage a revised APA model act that truly supports the best interest of children and families, as well as promotes the continued high standards and effectiveness of the school psychology profession. In its official capacity as a liaison to the APA Board of Education Affairs (BEA), NASP has submitted in writing formal comments on the proposed changes to the APA model act. (Available online at www.nasponline.org/standards/apamla.aspx) NASP is keeping national and state school psychology leadership and members informed and also reaching out to allied professional organizations that share the commitment to ensure high standards of practice within schools and mental health. In the near term, NASP will be supporting efforts of individuals and relevant organizations to provide input during APA's public comment period on the revised APA model act, which is expected to occur during summer 2007.

NASP believes that there would be many benefits for children, families, and schools by proposing a revised APA model act that NASP could strongly support, alongside APA. As stated above, NASP concurs with the change in language regarding post-doctoral training. However, NASP cannot support a revised APA model act promoting state psychology licensure acts that would attempt to take away from or alter the title of "school psychologist" for most of our 25,000 members.

For further information about NASP's position and actions related to the proposed revised APA model act please refer to the NASP website www.nasponline.org/standards/apamla.aspx and *Communiqué*. NASP will closely monitor the time frame for public response to the APA model act. When the time comes, communication will be sent to all of our stakeholder groups requesting immediate response to APA during the public commentary period.