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May 4, 2009

Dr. James H. Bray
Assistant Executive Director
Practice Research and Policy, Practice Directorate
American Psychological Association
750 First Street, N.E.
Washington, D.C. 20002

Dear Dr. Bray,

As Special Education Director for the Providence School Department, the proposed changes to the Model Licensure Act have come to my attention and I am writing to voice my concerns. As currently written, the Model Licensure Act will interfere with services school psychologists currently provide to the children of the Providence School Department.

My opposition is with the proposed change to section J of the MLA that removes the exemption for specialist level school psychologist to use their titles. I strongly urge APA to omit this change from the proposed revision and reinstate the long-held exemption for all school psychologists.

A requirement to hire only doctoral level school psychologists would impose unnecessary burden to our schools in not only the lack of qualified candidates but would allow licensed psychologists who lack education specific to school psychology and school based experience to work with some of our most neediest students and families in our schools. It will cause much confusion and impede the delivery of needed educational behavior and emotional services in our schools.

The role of school psychologists currently in our District is critical to the academic and social/emotional improvements of students. Our school psychologists have specialized training in academics, learning, mental and behavior health issues and provide prevention and intervention activities to meet the needs of our students. This proposed act offers no indication of how it would improve these services for our students and families. There is no justifiable need for this removal of exemption or for the removal of non-doctoral school psychologists to take place.

For the reasons stated above, I suggest that the APA strike these revisions and specifications and reinstate the exemption for all school psychologists.

Sincerely,

Lisa Vargas-Sinapi
Director Related Service