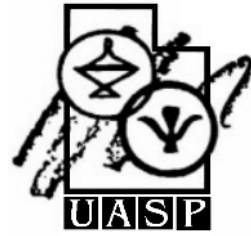


April 29, 2009

James H. Bray, President
American Psychological Association
750 First Street, NE
Washington, D.C. 20002-4242



Dear Members of the Model Licensure Act Task Force:

We the Board of the Utah Association for School Psychologists (UASP) strongly oppose the proposed change to section J of the MLA that removes the exemption for specialist level school psychologists to use their titles. We strongly urge APA to strike this change from the proposed revisions and reinstate the long-held exemption for all school psychologists.

We believe that the proposed change will negatively impact the services that students receive in the schools and community. Currently, school psychologists working in public school settings focus on meeting the emotional, behavioral, and academic needs of students. School psychologists are often the first mental health professionals to become aware of students needs and provide psychological services in a timely, efficient, and productive manner. By removing the exemption it is highly likely that fewer school psychologists will be available to meet the needs of youth.

There are no better trained professionals to address these needs. By promoting this removal of this exemption, we predict that youth, families, and schools will be negatively impacted in a variety of ways that will be most unfortunate. Community health agencies or psychologists in private practice are not prepared to provide comprehensive school-based services to youth. Providing these services on a contract basis with professionals who are not trained in educational law, policies and procedures or who do not understand and have experience in educational settings will be ineffective and possibly harmful to children and schools. Licensed psychologists who have taken one course in education are

not equipped or qualified to work in schools as school psychologists and they should not be granted the title without attending a graduate program or completing respecialization in school psychology. Allowing licensed psychologists, who have not had adequate training and experience to work in schools as school psychologists may put children at risk for harm. Again, this is in direct violation of APA's published Ethical Principles.

Furthermore, APA is not identifying the scientific or sound reasons for removing this exemption. Doctoral level and licensed school psychologists have not been found to have a level of psychological practice in schools that is superior to or of significantly higher quality than specialist level school psychologists. Non-doctoral level school psychologists provide high quality psychological and educational services in schools and improve the educational, behavioral, adaptive, social, and emotional outcomes of children and youth, enabling them to achieve in school and beyond. These specialized professionals are highly valued in the schools because of the unique combination of rigorous graduate training (in psychology and education) and the subsequent services that they are able to provide. This proposed change in the MLA exemption would unjustly remove the rights of more than 75% of practicing school psychologists (20,000+) to use the title for which they are legitimately credentialed and qualified.

APA has a professional responsibility to recommend to state legislatures, amendments to their state psychology licensing acts that are based only on empirical, evidentiary grounds for the purpose of protecting the public. No such grounds exist. Therefore, there is no justifiable need for this removal of exemption or for the removal of the title of non-doctoral school psychologists to take place.

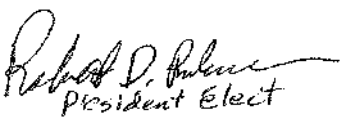

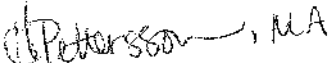
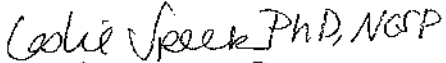


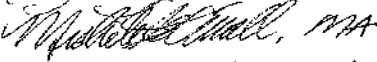
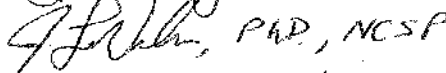
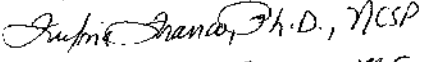
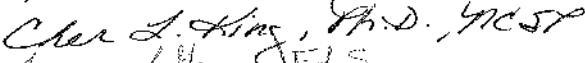
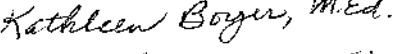


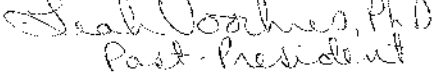
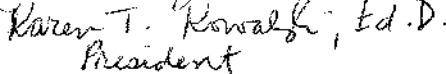
Implementing this change would inevitably have a negative impact on children and their education. If this proposed change in the MLA is enacted in states, conflict and increased expense would inexorably ensue. By nature, policy changes and implementation are complicated. In this case, multiple changes would occur and have a significant impact: 1. state and federal legislation (all laws and regulations that refer to "school psychologists"); 2. state boards of education (credentialing policies/procedures and funding mechanisms);

3. school districts (hiring and practice policies); 4. supervision practices in schools by professionals other than doctoral level school psychologists or licensed psychologists; and 5. individual specialist level school psychologists (disenfranchised from their title and professional identity). This will cause confusion and increased expense in every area mentioned above and will undoubtedly impede the delivery of needed educational, behavioral, emotional, and social (psychological) services to children, at a time when there is already a critical shortage of qualified personnel to provide school psychology services.

This needless change in the MLA exemptions, especially at this time of great need in schools, and the untenable removal of a title most associated with school-based practice has a high risk of hurting children, families, and schools by creating barriers to receiving services. Placing a barrier by limiting available—and essential—personnel has the potential to cause harm to children and is in direct violation of APA’s Ethical Principles of Psychologists and Code of Conduct under Principle A: Beneficence and Non-Maleficence, which states that psychologists “take care to do no harm.”

For the reasons stated above, we strongly advise the APA to reinstate the exemption in section J for all school psychologists.

Sincerely,

 Robert D. Palmer, NCSP, MA President Elect	 Candace C. Dee, Ph.D. NASP Delegate
 C. Peterson, MA	 Leslie Speck, Ph.D., NCSP
 Heidi Decker, M.S.	 Sherry E. Johnson, Ph.D.
 Michelle Small, MA	 J. Johnson, Ph.D., NCSP
 Aubrey Spencer, Ph.D., NCSP	 Cher L. King, Ph.D., NCSP
 Kathleen Boyer, M.Ed.	 Tommie Bear, Ed.S.
 Julie D. Johnson, Ed.S.	 Leah Voshell, Ph.D. Past-President
 Karen T. Kowal, Ed.D. President	

Utah Association of School Psychologists (UASP) Board