

# UTAH STATE OFFICE OF EDUCATION

Leadership...Service...Accountability

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May 1, 2009

To the Members of the Model Licensure Act Task Force:

As the State Director of Special Education in Utah, I am writing in regard to my concerns with the proposed change to your Model Licensure Act. These changes have the potential to negatively impact the education of students with disabilities in our state by removing the exemption for school psychologists.

First, we believe the longstanding exemption appropriately reflects the right of our school psychologists who are licensed by the State Board of Education to use the term "school psychologist." This term accurately describes the level of training and supervised field-based experiences that school psychologists are required to achieve prior to serving children, youth, and their families.

Next, in Utah our school psychologists play a key role in schools as they support and assist classroom teachers in addressing the academic, social, and behavioral needs of students ages 3 through twenty-one. School psychologists serve on eligibility and IEP teams, ensuring that appropriate evaluations are conducted, and that services are aligned with individual student needs. In addition, these professionals play an important role in the "response to intervention" instructional process, aimed at preventing children from falling behind their peers.

Furthermore, school psychologists have had unique education, extensive training, and expertise in identifying and intervening with the behavioral, mental health, and learning needs of students in the areas of classroom management, behavior planning, crisis preventions and response, bullying, and violence. Providing counseling, consultation with staff and parents, case management, academic and behavioral assessment, school psychologists are critical members of school and district teams.

Finally, the Utah State Board of Education has adopted state standards for the licensing of school psychologists that are aligned with the well established National Association of School Psychologists Standards for Training and Credentialing of School Psychologists. Seeking additional school psychologists to fill the longstanding shortage in this state is a priority. Removing the exemption appears to have the potential effect of allowing even fewer services from highly trained and competent professionals to address the ongoing needs of children, youth, and their families in the areas of learning, behavioral, and mental health.

I urge the Task Force to continue the exemption for school psychologists in the APA Model Licensure Act. Thank you for the opportunity to provide comments on this important issue.

Sincerely,



Nan Gray  
State Director of Special Education  
Utah State Office of Education