



May 31, 2009

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As the current president of the Wyoming School Psychology Association, I speak for the organization and its executive board when I say that we strongly oppose the American Psychological Association's recommended removal of the exemption for school psychologists from the *Model Act for State Licensure of Psychologists*. WSPA urges APA to reinstate the long-held exemption for all school psychologists.

The Wyoming School Psychology Association firmly believes that:

- The exemption in the current *Model Act* has served the youth and families of Wyoming very well for the past thirty years and should remain in the revised *Model Act*.
- Comprehensive standards for the preparation, credentialing, and professional practice in school psychology that are consistent with the National Association of School Psychologists standards provide a coherent framework for the practice of school psychology in Wyoming. These are the only standards specific to the training of school psychologists that are approved by the National Council for Accreditation of Teacher Education (NCATE).
- There is no empirical evidence that there is any need for such a proposed change.
- Although currently meeting the needs of children in both rural and urban settings across the vast state of Wyoming, it is clear that removal of the exemption would seriously undermine the availability of school psychological services throughout the state and cause immediate serious harm to children, youth, and their families. Rural communities typically have difficulty attracting licensed, doctoral level practitioners for therapeutic services. Requiring public schools to utilize licensed, doctoral level psychologists in rural settings would put a severe strain on the availability their services.

- The practice of school psychology is firmly established in federal law, Wyoming law, the State Department of Education regulations and its governing agency, the Professional Teaching Standards Board (PTSB). Proposed changes will cause unnecessary disruption in the delivery of services statewide. The proposed MLA suggests that only those who meet the APA criteria for the title of psychologist may engage in the practice of psychology, which includes, but is not limited to, psycho-educational evaluations, intelligence testing, cognitive testing, adaptive behavior analysis and therapy, social and emotional evaluations, and consultation with physicians and other health care professionals regarding available treatment options. These are tasks that school psychologists have engaged in for over forty years with only positive impact on public health, safety, and welfare.
- It is an improper restraint of trade to prevent our qualified and appropriately credentialed school psychologists from using the title “school psychologist” granted to them by the Wyoming Professional Teaching Standards Board.

The stated purpose of the Wyoming School Psychology Association is to serve the mental health and educational needs of all children and youth. We urge the American Psychological Association Task Force to reinstate the school psychologist exemption in the *Model Act* so we are able to fulfill our purpose and goal. We recommend this in the name of the children, youth, families, and schools with whom we work.

Sincerely,

Carol Kramer
WSPA President