



STATE OF NEW MEXICO  
PUBLIC EDUCATION DEPARTMENT  
300 DON GASPAR  
SANTA FE, NEW MEXICO 87501-2786  
Telephone (505) 827-5800  
[www.ped.state.nm.us](http://www.ped.state.nm.us)

DR. VERONICA C. GARCIA  
SECRETARY OF EDUCATION

BILL RICHARDSON  
Governor

June 5, 2009

Ms. Lynn Bufka  
Task Force on Model Licensure Act  
American Psychological Association  
750 First Street NE  
Washington, D.C. 20002-4242

Dear Ms. Bufka:

As the Secretary of Education in New Mexico, I would like to take the opportunity to voice my concern about the proposed changes to the American Psychological Association's (APA) Model Licensure Act. My concern is about the impact of the proposed changes on students and their families in this state, as well as educators, school psychologists, and local school systems.

The APA proposal to remove the exemption, currently allowing non-doctoral level professionals to use the title School Psychologist, would impact the majority of School Psychologists in New Mexico. Currently, the New Mexico Public Education Department has a well-established procedure that ensures high quality credentialing standards for specialist level school psychologists consistent with the national standards provided by the National Association of School Psychologists.

School Psychology must be maintained as a profession and an area of specialization so that our education community is assured that school psychology services are provided by adequately trained practitioners. It is a unique practice that requires expertise in developmental psychology, educational systems, special education law, behavioral and academic interventions, and cultural diversity. Licensed psychologists without the rigorous level of specialized training in school psychology lack the proper school based competencies needed to work with children in schools. Permitting licensed psychologists to perform the duties that are currently the responsibility of specialist-level school psychologists simply because they are doctoral-level psychologists, could place students and their families at risk for harm, which is in direct violation of APA's published *Ethical Principles*.

There is both a national and a state shortage of qualified mental health workers and school psychologists. School psychologists are required members of multidisciplinary teams for specific disabilities and if enacted, the proposed changes would seriously limit the number of professionals who could provide needed and required services, and would further exacerbate staffing shortages. Given that approximately 75% of school psychologists who are currently licensed in the United States are specialist-level rather

than doctoral-level, indicates how significant the disruption of needed educational, behavioral, emotional, and social services to students throughout the United States would be. The practice of school psychology for non-doctoral level school psychologists would also be severely limited even though they have met the rigorous standards for licensure and have the competencies required to practice.

Specialist-level school psychologists are highly valued in the state of New Mexico. They perform a number of invaluable tasks including psycho-educational and psychological evaluations. The elimination of the exemption for specialist-level school psychologists would prevent school psychologists from providing any service that is considered a "psychological" service as defined by APA, including assessments.

I strongly support the continued practice of credentialing school psychologists through the State Education Agencies (SEA). Removing the authority of the SEA to regulate the title, credentials, and practice of school psychologists will allow licensed psychologists who don't have training specific to school psychology and who lack essential school-based competencies to work with students in our schools. The task force developing the revisions that would prevent specialist-level school psychologists from providing the "psychological" services that they are currently delivering and allow licensed psychologists to perform such tasks even though they might not have the needed training, are urged to strike these revisions and reinstate the exemption for specialist-level school psychologists.

Truly,



Veronica C. Garcia, Ed.D.  
Secretary of Education

VCG/mo

cc: Ms. Ellen Krumm, New Mexico Delegate, National Association of School Psychologists  
Dr. Catherine Cross Maple, Deputy Secretary, Learning & Accountability  
Dr. Mary Rose CdeBaca, Assistant Secretary, Educator Quality Division