



May 11, 2009

Norman B. Anderson, Ph.D.
Chief Executive Officer
American Psychological Association
750 First Street, N.E.
Washington, D.C. 20002-4242

Dear Dr. Anderson:

As Assistant Superintendent for Student Support Services for Anne Arundel County Public Schools (AACPS), I am responsible for oversight of the delivery of school psychological services to our 74,000 students. Daily I am apprised of the positive impact that the doctoral and specialist level school psychologists in my school district have on the students and families that we serve in our school community.

I am writing to strongly urge the Board of Educational Affairs of the American Psychological Association (APA) to continue the exemption for non-doctoral school psychologists, as currently included in the Model Act for State Licensure (MLA) of Psychologists. The revisions to remove the exemption affecting the title *School Psychologist* in MLA proposed by APA would present a serious impact to the school psychological services as they are provided to the students of AACPS.

Our Maryland State Department of Education (MSDE) applies strict credentialing standards to the certification of School Psychologists. School psychologists have had unique and extensive training concerning the special learning, behavioral and mental health needs of students. The title *school psychologist* accurately describes the level of training and supervised field-based experiences that school psychologists are required to achieve as they work in our schools. To debase our school psychologists by removing their use of the title *school psychologist* would minimize their effectiveness and devalue the esteem with which they are held among our school administrators and school staffs.

We presently have 68 school psychologists on our Student Services staff, 15 of which are trained at the doctoral level. We make absolutely no distinction in the assignment of their duties based on their graduate degree and see no difference in their effectiveness across all their services provided to students, families, and staff.

The proposed APA Model Act requirements are significantly less stringent than requiring the completion of graduate training or re-specialization in the specialty area of School Psychology. Licensed psychologists who have not been afforded the opportunity of a full graduate study in the field of School Psychology are not properly trained to provide the complete array of school psychological services that we require of our school psychologists in our school district.

School psychologists play a critical role in schools by assisting teachers in addressing the academic, behavioral, and social needs of students. School psychologists are important members of IEP,

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evaluation, and other school teams, working directly with students and providing consulting services to school staff. School psychologists trained at the specialist and doctoral levels are highly valued in the schools because of the unique combination of rigorous graduate training in psychology and education. Without the school psychologists' unique skills, obtained through school psychology graduate training programs and extensive "in-school" internships, teachers would not have access to this essential support.

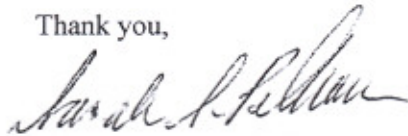
There is presently a shortage of practitioner school psychologists across the country and the 2 NASP-approved training programs in our state (University of Maryland, College Park; Towson University) cannot supply the numbers of qualified applicants that we have needed over the years. Presently, here in AACPS, we have specialist-level and doctoral school psychologists who have been trained in NASP-approved programs from over 18 states. The School Psychology program at the University of Maryland – College Park is the only APA approved doctoral training program in the state and they produce on the average 4 or 5 graduates each year, several of whom pursue research and university positions.

School violence and behavioral disruptions are increasingly a concern among our students. I oversee the Alternative Education opportunities provided to students with behavioral problems in AACPS. School psychologists are specifically trained to provide interventions when students are violent and/or disruptive. Such interventions can include behavioral assessment designed to determine the functions of such behaviors, usually resulting in the development of behavioral plans, counseling, and consultation with teachers and parents.

If the proposed changes to the MLA are enacted here in Maryland, they will cause confusion and impede the delivery of essential educational, behavioral, emotional, and social services to children and youth in school settings. Imposing a barrier by limiting available and essential personnel has the potential to cause harm to children. The proposed changes, especially at this time of great need in schools, and the unjustified removal of a title *school psychologist*, most associated with school-based practice has a high risk of harming children, families, and schools by creating barriers to the delivery of important psychological services in our schools. For many students, mental health services provided by the school psychologist in school present the only access to counseling and behavioral consultation available to them.

For these reasons, I urge the APA Board of Educational Affairs to maintain the exemption in Section J of the MLA for all school psychologists.

Thank you,



Sarah S. Pelham
Assistant Superintendent of Schools

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