



Moving Forward

Bullitt County Public Schools

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May 7, 2009

APA Model Licensure Task Force
Attn: Lynn Bufka, PhD
American Psychological Association
750 First Street, NE
Washington, DC 20002-4242

To Whom It May Concern:

I am writing to you as a school superintendent.

It has come to my attention that the APA is proposing to change its Model Licensure Act by eliminating the exemption for specialist level school psychologists to use their titles and perform psychological services within their area of specialty (educational or school psychology). This letter is to voice **strong opposition** to the proposed changes, which are not in the best interest of children, families, and schools, for the following reasons:

- The standards for training of school psychologists developed by the National Association of School Psychologists (NASP) for non-doctoral practice are comprehensive and rigorous. These standards specify the specialist level of training, which exceeds the level of all other mental health professionals currently licensed in Kentucky, save doctoral psychologists and psychiatrists. Doctoral level and licensed school psychologists have not been found to have a level of psychological practice in schools that is of significantly higher quality than specialist level school psychologists. Specialist level school psychologists are highly valued in the schools because of the unique and rigorous graduate training in psychology and education that they obtain, and the invaluable services that they are subsequently able to provide.
- NASP recommends a school psychologist to student ratio no greater than 1:1000. Kentucky's current ratio is **1:2192**, which illustrates our existing need for school psychologists with specialized training in the areas of assessment, academic and school-related disabilities, and curriculum and school consultation. The pool of licensed, doctoral psychologists in the state is insufficient to serve Kentucky's 782,000 students (less than 17% of Kentucky's 360 school psychologists are trained at a doctoral level). Given that school psychologists in Kentucky are already in short supply, the removal of non-doctoral professionals from this field would be crippling to the well-being of our students, schools, and families. Each Kentucky school district averages 1.92 school psychologists. However this is

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deceiving, as **40.4%** of all districts in the state do not employ any school psychologists.

- If the specialist level school psychologists were no longer available to Kentucky schools, what would the children of Kentucky do? Allowing professionals who do not have the appropriate expertise to work with children in schools has the potential to cause harm, both by putting children at risk for receiving inappropriate services, and by putting these professionals in a position to give services in which they have not been adequately trained.
- The 2003 President's New Freedom Commission on Mental Health reported that the vast majority of children diagnosed with a mental disorder do not receive counseling or support for their problems. The Commission further emphasized that, of those children who do receive services, the majority are recipients within the school setting only. **Eliminating non-doctoral school psychologists would mean that even larger numbers of children would not receive psychological services of any sort – a consequence that could not result in higher levels of learning and behavioral problems and lower levels of academic success among our children.**

I urge you to withdraw this proposal immediately.



Keith Davis
Superintendent

KD/bn

cc: Monica Tharp, Director of Special Education
✓ Misty Lay, School Psychologist