



CALIFORNIA  
DEPARTMENT OF  
EDUCATION

**JACK O'CONNELL**  
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

June 2, 2009

James H. Bray, President  
American Psychological Association  
750 First St. NE  
Washington, DC 20002

Dear Dr. Bray:

I am writing to express my concerns regarding the proposed changes to the American Psychological Association's (APA) Model Licensure Act (MLA). As proposed, the MLA has the potential to interfere with services school psychologists currently provide to the students, families, and school communities in California.

My primary concern is the proposal to remove the exemption allowing non-doctoral level practitioners to use the term school psychologist, including when the right to that title is earned through the Department of Education credentialing process. To remove that exemption would affect most of California's practitioners. California's Education Code specifically designates that school psychologists are required to perform specific duties when evaluating students for special education. The resulting lack of available staff to perform these duties would put our districts at risk of being out of compliance and would surely disrupt important services to our students and families.

A requirement to hire only doctoral level school psychologists would impose unnecessary burdens on our schools in both the additional cost and the lack of available candidates. The school psychologist credential requires very specific training in academics, learning, behavior and mental health issues. This training, with a 1,200-hour internship, has proven adequate in preparing specialist level practitioners to provide prevention and intervention activities addressing the academic and mental health needs of students. It is not clear how services would be improved for our students, families and schools if the exemption is removed. I believe imposing the additional requirement of a doctorate degree is unnecessary and counterproductive. Our universities could not produce enough doctoral-level candidates to replace those who would lose their title if the proposed MLA is adopted in California.

Non-doctoral level school psychologists have been recognized and practicing in California for more than 60 years. The APA's special recognition of specialist level practitioners has been in effect for more than 30 years. These specialist level professionals have proven to provide invaluable services to our children, families and schools. Without evidence of a need to change the MLA or how services would be improved, I will continue to support maintaining the current specialist level school psychologist.

Sincerely,

A handwritten signature in blue ink that reads "Jack O'Connell".

JACK O'CONNELL

JO:mz