



COLORADO DEPARTMENT OF EDUCATION

201 East Colfax Avenue • Denver, Colorado 80203-1799
303.866.6600 • www.cde.state.co.us

Dwight D. Jones
Commissioner of Education

Robert K. Hammond
Deputy Commissioner

Kenneth R. Turner
Deputy Commissioner

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

Dear Members of the Board of Educational Affairs and Model Licensure Act Task Force:

As the Senior Consultant representing School Psychology and Mental Health at the Colorado Department of Education (CDE), I am writing to urge you to retain in the American Psychological Association's Model Licensure Act the current exemption for specialist level school psychologists to be able to use the title of School Psychologist

If APA were to eliminate the longstanding exemption that allows non-doctoral School Psychologists to use the title of School Psychologist during the time that they are practicing in the schools, this action could potentially cause complications with current policies and regulatory provisions that have been employed successfully for a long period of time in Colorado.

In Colorado, approximately 70% of School Psychologists who are currently licensed by CDE have an Ed.S. Degree. These individuals have been well trained by accredited school psychology programs with a minimal of 60 semester hours of graduate training, including a 1200 hour internship. To earn CDE's School Psychology License an individual must have very specific training in learning, behavior and mental health issues. This training has prepared Ed.S. level practitioners to provide prevention and intervention services that address the academic and mental health needs of students. It is not feasible for all school psychologists serving Colorado students to have a doctoral degree as we are already concerned about shortages. Furthermore, there is no empirical evidence supporting the requirement of a doctoral degree.

During the 32 years that the current exemption has guided our regulatory practice, no public harm has occurred in Colorado as determined by a study conducted by the Department of Regulatory Agencies (DORA). Nor has public confusion occurred regarding the practice of School Psychologists, who are licensed by CDE to practice only within the schools, and other professional psychologists who practice in our state and are licensed by DORA.

By continuing the current exemption for the title of School Psychologist within its current Model Licensure Act for more than 30 years, APA has established a practice with which Colorado regulations are consistent. Changing this longstanding waiver gives the impression that APA is acting in a counterproductive and protectionist manner, rather than from a more appropriate collaborative stance. It would be unfortunate if this action were to limit the availability of services at a time of increasing need in schools.

Of primary concern is that the removal of the current exemption may cause public confusion and disrupt the services that school psychologists, licensed by CDE, currently provide to children and their families. These specialist level school psychologists provide valuable services for our students, their families and their schools.

I strongly urge you to continue the exemption for non-doctoral level school psychologists. The result will benefit schools, students and their families.

Sincerely,

Barbara Bieber, Senior Consultant