

May 11, 2009

Dear Members of the APA Model Licensure Act Task Force:

On behalf of the Colorado Society of School Psychologists (CSSP), we are writing to comment on specific issues related to the March 2009 draft of the revised Model Act for State Licensure of Psychologists (MLA) that have a direct impact on the practice of school psychology.

As representatives for over 900 school psychologists in the state of Colorado, CSSP strongly urges the Task Force to maintain language related to school psychologists that appears in the current 1987 MLA. The MLA has recognized the need to provide an exemption within its language for school psychologists who are licensed by the Colorado Department of Education and who practice in public school settings. For over thirty years, this exemption has served the public well, contributed to the development of school psychology, and helped make psychological services accessible to millions of children and families. Furthermore, it has contributed significantly to the right of students to receive a Free and Appropriate Public Education (FAPE). Through this arbitrary recommendation to remove the exemption for school psychologists, the APA potentially compromises the integrity of all of the recommendations of the Model Act. Given the language of this most recent draft, APA is running the risk of lowering the standards of school-based practice. Redefining school psychology as a “foundation of practice” from a “specialty” of psychology may very well result in substandard school-based psychological services and compromise the ethical standard of *do no harm*. Because of this, legal battles will almost certainly ensue and could potentially fracture APA’s national unity as a profession.

The majority of school psychologists practicing in the state of Colorado are specialist level school psychologists (minimum 60 graduate psychology hours plus practicum and full-time internship). Approximately twenty-five percent of Colorado's school psychologists are doctoral level. They provide many valuable services that impact children, families and schools.

The Colorado Department of Education has high standards for the graduate education and state credentialing of school psychologists. These standards are influenced by national associations such as the National Association of State Directors of Teacher Education and Certification, the National Council on Accreditation of Teacher Education, and the National Association of School Psychologists which promote strong and consistent criteria. The state of Colorado's credentialing practices ensure that highly qualified school psychologists are employed by schools and provide needed services to children.

The title, "School Psychologist," correctly describes the professional preparation and daily activities of school psychologists performing Section II, 108-120 services. School psychologists in Colorado, like the other 35,000 school psychologists nationwide, daily perform psychological testing, counseling/behavioral analysis, diagnosis/identification, treatment, psycho-educational evaluations, consultation with health care professionals, and consultation to schools and community organizations. Furthermore, for decades, the use of the term "school psychologist" has provided the community with a clear understanding of what services are available for their children in the school setting. Changing this language now could serve to confuse, disenfranchise and alienate children and their families in need. Surely this is in direct opposition to your mission and vision as a professional organization.

CSSP sees no benefit to the public, to students and families in schools, or to the profession of psychology to change this exemption for school psychologists licensed by the Colorado Department of Education. This is particularly true at a time when there are shortages of school psychologists in our state. Given the rural nature of much of our state, school psychologists are often the only providers of the majority of mental health services in those communities. Adding barriers to the provision of these services by school psychologists would not only fail to serve the public interest, but could also result in further shortages of school psychologists in school settings, with many children being denied access to critical mental health and prevention services.

CSSP feels that the language changes regarding the removal of the school psychology exemption are in direct conflict with state laws and state education departments that regulate the delivery of school psychological services in public school settings.

The language changes in the proposed, revised MLA state that “This exemption should not be determined on the basis of work setting or place of primary employment, but on the basis of the purpose of the activity as defined in Section B3 (Practice of Psychology). The exemption should not be allowed if the individual engages in the direct delivery of psychological services to individuals or groups of individuals in any setting.”

This language is in direct conflict with our state school code provisions for services provided within public schools by school psychologists licensed by the Colorado Department of Education. Maintaining the current exemption within the MLA would prevent potential conflicts between CDE and the Department of Regulatory Agencies which maintains the Psychology Licensing Board. Laws and regulations for school psychology are well established in Colorado. The public is well protected and services to children and families in schools are strengthened by these state laws and

codes that regulate the practice of school psychologists in the state of Colorado.

CSSP cannot support a revised MLA which promotes state psychology licensure acts that would attempt to take away from or alter the title of “school psychologist” for the school psychologists in Colorado. APA has a professional responsibility to recommend to state legislatures amendments to their state psychology licensing acts that are based only on empirical, evidentiary grounds for the purpose of protecting the public.

Sincerely,

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