



CONNECTICUT ASSOCIATION OF SCHOOL PSYCHOLOGISTS

AFFILIATED WITH THE  
NATIONAL ASSOCIATION OF  
SCHOOL PSYCHOLOGISTS



May 14, 2009

Board of Educational Affairs and Model Licensure Act Task Force  
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:

On behalf of the members of the Connecticut Association of School Psychologists (CASP), we are writing to urge the Board and Task Force to continue the exemption of non-doctoral school psychologists currently included in the model licensure act (MLA). CASP is the statewide association representing more than 500 school psychologists practicing in the State of Connecticut.

School psychologists are one of the most highly prepared mental health professionals in our schools. In addition to directly serving the mental health needs of students, school psychologists play an important role as members of the Individualized Education Plan (IEP) team, child study teams, and crisis teams. School psychologists also play an important role in regard to the recent changes to the Individuals with Disabilities Education Improvement Act (IDEIA) regarding response to intervention (RTI), a new early intervening approach aimed at identifying and addressing learning and behavioral needs of students before they have been identified for special education services.

Community health agencies or psychologists in private practice are not prepared to provide comprehensive school-based services to children. Providing these services on a contract basis with professionals who are not trained in educational law, policies and procedures, or who do not understand and have experience in educational settings will be ineffective and possibly harmful to children and schools. Licensed psychologists who have taken a few courses in education are not equipped or qualified to work in schools as school psychologists and they should not be granted the title without attending a graduate program or completing respecialization in school psychology. Allowing licensed psychologists to practice in the school setting as school psychologists without the adequate training and experience to work in schools may put children at a risk for harm, a direct violation of APA's ethical principles.

State standards are already in place that ensure school psychologists are well-trained. These standards are based upon recommendations of established, reputable, and professional organizations such as the National Association of School Psychologists, the National Association of State Directors of Teacher Education and Certification, and the National Council on Accreditation of Teachers. By incorporating these recommendations, Connecticut has fulfilled its duty to ensure that school psychologists have the training needed to address the specific learning, behavioral, and mental health needs of students from birth to 21 years of age.

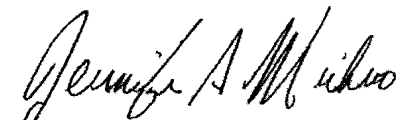
The proposed MLA offers no indication of how services would be improved for our students, families, and schools if the exemption is removed. To impose the additional requirement of a doctorate degree, with no

empirical reason for the change, is unnecessary. Doctoral-level and licensed school psychologists have not been found to have a level of psychological practice in schools that is superior to or of significantly higher quality than specialist-level school psychologists. Both provide high quality psychological and education services in schools and improve the educational, behavioral, adaptive, social, and emotional outcomes of children and youth, enabling them to achieve in school and in life.

Given the shortage of trained school psychologists available to provide these services, we believe that adding barriers to practice by removing the exemption for school psychologists from the MLA will have a direct and negative impact on children, families, and schools. The removal of the exemption for school psychologists would not only harm students, but also families and schools by exacerbating an already severe shortage of school psychologists, particularly in a number of rural and urban districts. Shortages would be especially acute in the area of bilingual psychological services. These shortages have a significant impact on minority students and students with limited English proficiency (both with and without special education needs). Any changes that make it even more difficult for students to access school psychological services will not serve the public interest and will likely harm students who are the most vulnerable to school failure and to those mental health problems that have a negative impact upon school success.

In the interest of children, families, and schools, the Connecticut Association of School Psychologists urges the Board and Task Force to continue the exemption for school psychologists in the APA model licensure act. Thank you for considering our comments.

Sincerely,



Jennifer Michno, M.S.  
CASP President



Jennifer Mitchell Robinson, M.S. Ed, NCSP  
CASP Legislative Chair