



Delaware Association of School Psychologists

Response to the Model Act for State Licensure of Psychologists: American Psychological Association Proposal 5/15/09

To Whom It May Concern:

The Delaware Association of School Psychologists (DASP) is the statewide association representing school psychologists practicing in Delaware. Our mission is to serve our community by promoting the interface between psychology and education. We work closely with the Delaware Department of Education and other state and independent agencies that serve children, youth, and their families. DASP is concerned that the American Psychological Association's 2009 Proposed Model Act for State Licensure of Psychologists contains provisions that would, if adopted as proposed, restrict and deny school psychological services to thousands of children in Delaware.

The Delaware Association of School Psychologists supports the exemption from licensure regulations for school psychologists adopted by the APA governance in 1977. This exemption is consistent with the Delaware State code (24 Del.C 35.III §3519(d)) which reads as follows: "Individuals who have been certified as school psychologists by the Department of Education shall be permitted to use the term 'school psychologist' and/or 'certified school psychologist.' Such persons shall be restricted in their practice to employment within those settings under the purview of the Department of Education and the State Board of Education."

This exemption has worked well in Delaware. The majority of school psychologists in Delaware are non-doctoral level practitioners. They serve students from all parts of the state, including many who are culturally and linguistically diverse. The skills that these school psychologists possess serve the needs of this diverse population of students, including students with special needs. The number of licensed doctoral psychologists in Delaware cannot adequately respond to the number of school children that need to be served.

More specifically, licensed psychologists are not equipped in terms of training and experience to work in a school setting without additional training and supervision from a valid school psychologist. The skill set of a school psychologist differs substantially from a clinical psychologist. School psychologists are trained not only in psychology, but also education. It would seem to be contrary to ethical standards to have a school psychologist supervised by a psychologist whose training is not in the domain of the supervision needed.

Like other states, Delaware has a shortage of school psychologists. The number of graduates from school psychology programs in the area is inadequate to fill the vacant positions. Urban and rural areas seem to be equally affected by this shortage. The shortage of practicing school psychologists also creates a dearth of faculty and researchers in graduate training programs. In our 2006 membership survey, only 33% of respondents indicated that they were trained at the doctoral level. However, many of these school psychologists will be nearing retirement within the next decade. As the school psychology programs in the area graduate higher rates of specialist-level psychologists than doctoral-level psychologists, this percentage is only likely to decrease over the next 5-10 years. Limiting the scope of practice for specialist-level practitioners will only exacerbate the shortage of mental health providers in our state.

Removal of the exemption for school psychology will not only increase the ongoing shortage of school psychologists, but it will also disproportionately affect women and minority school psychologists. Nationally, female school psychologists account for 74% of practicing school psychologists, and 7 out of 10 hold non-doctoral degrees. Of the 7.3% of practicing school psychologists nationally who identify as ethnic minorities, 7 out of 10 hold non-doctoral degrees. This disproportionality is concerning, as it seems to indicate a bias against these subgroups.

School psychologists at the specialist level are well trained in all aspects of the profession. This means that they are competent in the areas of assessment, academic and school-related disabilities, curriculum and instruction, and school-based consultation and intervention. This training process includes practicum and internship requirements. This level of training is commensurate with other mental health professionals who hold state licensure and are considered experts in their field.

The proposed change to the Model Licensure Act eliminating the exemption for school psychology opens the door for divisive and unproductive legislative fights with our colleagues to preserve the title of School Psychologist for school-based, non-doctoral level practitioners. Such a fight will confuse the public, not protect it. And, more critically, it has the potential to cause harm to the children, families, and schools that we serve.

Again, the children, youth and families of Delaware will suffer the consequences should non-doctoral level school psychologists be restricted in practicing their profession. For a profession that already experiences a shortage of trained personnel it would be gravely irresponsible to further decrease the pool of competent professionals.

On behalf of the Delaware Association of School Psychologists, we respectfully request that the American Psychological Association continue to endorse its licensure exemption for non-doctoral School Psychologists practicing in public school settings and certified to practice by their state department of education. This exemption clearly benefits children in Delaware, as well as children around the country.

Sincerely,

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