

May 15, 2009

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

To the Members of the Model Licensure Act Task Force:

I am writing to express Delaware's opposition to the proposed change to the Model Licensure Act (Section J) that removes the exemption for non-doctoral level school psychologists to use the title "school psychologist." If this exemption is removed from the current Act, the lasting effects would negatively impact Delaware's children both immediately and for many years to come.

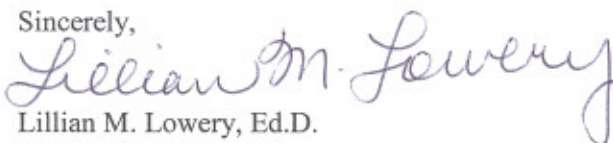
There are many reasons why Delaware is encouraging the American Psychological Association (APA) to maintain this current exemption for School Psychologists:

- 1) There are no data that would suggest this change is necessary or that services would improve if this exemption were to be removed.
- 2) To remove the exemption would affect more than 70% of all practicing School Psychologists currently working in Delaware's schools.
- 3) Such an action by the APA would create both additional costs and unnecessary demands on an already burdened educational system.
- 4) Such an action by the APA would have a detrimental impact upon the already insufficient mental health services for the children of Delaware.
- 5) School Psychologists are trained to understand the academic, social, emotional, and behavioral needs of students. School Psychologists must also know and understand the current and federal and state laws regulating the education of students with disabilities. To assume that **all** doctoral level psychologists have such background and training would be equally erroneous as assuming that **only** doctoral level psychologists can be trained to understand these issues.

School Psychologists have specific training and skills and use those within the boundaries of the educational setting. They are, as their name implies, uniquely trained and skilled to understand the educational and psychological needs (academic, social, emotional, behavioral) of students in Delaware schools.

I strongly request that the APA retain the current exemption for School Psychologists in the Model Licensure Act.

Sincerely,



Lillian M. Lowery, Ed.D.
Secretary of Education