



# Douglas County School System

P.O. Box 1077 ~ Douglasville, GA 30133 ~ 770-651-2030 ~ [www.douglas.k12.ga.us](http://www.douglas.k12.ga.us)

Donald J. Remillard, Superintendent

May 11, 2009

American Psychological Association  
750 First Street  
Washington, D. C. 20002-4242

Dear Members of the American Psychological Association (APA) Model Licensure Act Task Force:

As the Superintendent of the Douglas County School System, it has come to my attention that the American Psychological Association (APA) proposes to make changes to the Model Licensure Act in an attempt to take ownership of the term psychologist. This change could significantly impact the services provided by the School Psychologists to children and families in our county, as well as our state.

I am concerned that removing the exemption, which allows non-doctoral level practitioners to use the term School Psychologist, would harm the legitimacy of the title earned by our School Psychologists through the Georgia credentialing process. To deny our practitioners the right to practice under their earned credentials would have a deleterious effect for over half of the school psychologists currently employed in the state of Georgia. The state of Georgia's Special Education regulations clearly designate School Psychologists as required members of evaluation teams for students with specific disabilities. Not only is taking away the title of School Psychologist wrong, but it is fiscally irresponsible. The deficit this act would create on the numbers of staff we employ would place a significant strain on our district's ability to comply in a timely fashion with respect to serving our students, including those with disabilities. In our county and state, the student comes first. Placing their learning at risk by being out of compliance is simply unacceptable. The strain on Georgia's school systems would definitely be felt by the colleges and universities that would seek to grant doctoral degrees to as many candidates as possible in order to meet the need that would result if the proposed Model Licensure Act was adopted by our state.

If the Model Licensure Act passes, the requirement to hire only doctoral level School Psychologists would be burdensome to our schools in cost and the lack of viable candidates to fill the positions lost by the proposed act. To currently earn the title School Psychologist, the credentialing process requires very rigid training specific to academics, learning, behavior, and mental health. This training extends beyond the Master's degree level ending in a Specialist degree in the area of School Psychology. The training includes a 1200 hour internship before the student is deemed ready to enter the school system for which they desire to work. Specialist level practitioners have

more than adequate training to provide prevention and intervention techniques in order to address the academic and mental health needs of our students. The proposed Model Licensure Act offers no insight into how services would improve for our families and students if the title exemption is removed. There is no research to date to suggest that doctoral level practitioners are any more equipped to handle the needs of our students with any greater success than the individuals already employed by our district and the state of Georgia. Therefore, I am in opposition to these proposed changes and strongly advise the APA to reinstate the exemptions proposed for all school psychologists.

Additional Information to consider: School Psychologists are critical to helping schools meet the educational and critical needs of students. They are highly qualified to determine special education needs and eligibility. School Psychologists are highly trained to address barriers to learning and to work collaboratively with other educational professionals. They have knowledge of school law and work to ensure that school IEP teams are compliant with federal and state guidelines. They are essential to our student support teams and provide/monitor interventions that are put into place for students. They provide assistance to general education teachers, as well as, special education teachers, parents and the students. School Psychologists are assessable, on a daily basis, to the school, staff and the community.

For the reasons listed above, I strongly urge the APA to continue the exemption for school psychologists in the APA Model Licensure Act.

Sincerely,

A handwritten signature in cursive script that reads "Donald J. Remillard".

Donald J. Remillard  
Superintendent