



ILLINOIS SCHOOL PSYCHOLOGISTS ASSOCIATION

Illinois School Psychologists Association
P.O. Box 664
Wheaton, Illinois 60189-0664
(630) 871-0670
ilispa@sbcglobal.net

May 15, 2009

James H. Bray, President
American Psychological Association
750 First Street NE
Washington, D.C. 20002-4242

Dear Dr. Bray:

On behalf of the Illinois Schools Psychologists Association (ISPA), we strongly urge the American Psychological Association (APA) to continue the exemption of non-doctoral school psychologists, currently included in the Model Act for State Licensure of psychologists. ISPA represents more than 2,000 doctoral and non-doctoral school psychologists within the State of Illinois. ISPA's mission is to serve the educational and mental health interests of all children and youth.

School psychologists hold a prominent place here in Illinois in regards to serving the educational interests of children and youth. Our members have and continue to serve important roles in educational initiatives of the Illinois State Board of Education (ISBE). Recently we were asked to give input on state guidelines regarding the inclusion of Response to Intervention (RtI) in relation to special education eligibility/entitlement. ISBE identified ISPA as a one of only ten key stakeholder associations which was asked to offer input on clarification and training. School psychologists in Illinois also hold a prominent place in Illinois in regards to serving the mental health interests of children and youth. Our association is one, and the only one representing psychology, among the 25 associations that comprise the Illinois Children's Mental Health Partnership. This position is appointed by our governor. School psychologists played a significant role in the drafting of legislation leading to the Illinois Children's Mental Health Act and one of the subsequent mandates of the Act, the writing of Social Emotional Learning Standards for Illinois schools. Illinois is the only state with such learning standards.

ISPA is deeply concerned that the proposed exemption, removal of the right of non-doctoral school psychologist who are credentialed by ISBE, would impose serious restrictions on the ability of non-doctoral school psychologists to provide psychological services to the children and families within the State of Illinois.

School psychologists are credentialed by state boards of education to perform activities in which they have been well trained to perform and recognized in most educational state codes for the regulation of schools and educational services. Such is the case in Illinois. School psychologists' competence is enhanced by professional standards developed by ISBE. These standards are part of our school code and are intended to drive professional development. School psychologists are required to show evidence of

continuing education for certificate renewal every five years. Currently in Illinois there is NO such requirement for continuing education for licensed clinical psychologists. APA's proposed Model Act for State Licensure of Psychologists would attempt to remove the right of state educational agencies to choose a title for a credential that the state educational agency has established authority to issue. Moreover, the Model Act attempts to restrain states in the regulation of school-based practices both for the provision of school psychological services and in its standards for providers of school psychological services.

School psychology has its own knowledge base, curriculum, and performance standards as well as a national credential and performance standards through the National Association of Schools Psychologists e.g. Nationally Certified School Psychologist (NCSP). The American Psychological Association's Board of Directors recognized and approved continuance of school psychology as a specialty area of psychology at its February 20, 1998 meeting in Washington D.C. Specialty and proficiency recognition is important to the profession of psychology because it informs the public about the nature and scope of services that psychologists can provide, as well as the knowledge base of practice they have. The American Psychological Association recognized, at that time, school psychology as a specialty area, with demonstrated distinctiveness with respect to the population school psychologists serve, the issues they address, and the techniques, interventions, and educational strategies that we provide.

As an illustration of the unique techniques, interventions, and educational strategies provided by school psychologists in Illinois as compared to licensed clinical psychologists, I point to Illinois' recent adoption of Response to Intervention as a regular education initiative mandated in every school in Illinois beginning in 2009. School psychologists have served as consultants, facilitators, implementers, and in other roles in assisting school districts to meet this new requirement. Beginning with the 2010-2011 school year, all districts must include RtI in making special education eligibility/entitlement decisions. The eight school psychology programs in Illinois have been addressing this trend over the past few years as they train students entering our field. Moreover, certified school psychologists have had ample training provided them through our association. No such education and training, I fear, is evident in other psychology training programs in our state. Protection of children and youth is paramount in the minds of concerned citizens. This is just one example of the limited training which occurs outside of school psychology programs which may compromise the protection of students. Child protection is at the heart of the Illinois School Code (and other state school codes) where ISBE has already established requirements for qualified providers of school psychological services.

The Illinois School Psychologists Association would strongly oppose any attempt to remove the authority of state educational agencies, like ISBE, to regulate the title, credential, and practices of school psychologists.

Respectfully,



Rosario C. Pesce, Ph.D., NCSP
President, Illinois School Psychologists Association
Member, American Psychological Association since January, 1985