



260 Democrat Drive  
Frankfort, Kentucky 40601  
1-800-372-2962 • FAX: (502) 695-5451  
KSBA Web site: www.ksba.org

May 27, 2009

**BOARD OF DIRECTORS**

**President**  
Delmer D. Mahan  
Whitley County  
**President-Elect**  
Tom Blankenship  
Lincoln County  
**Immediate Past President**  
Ed Massey  
Boone County

**Directors-at-Large**

Tim England  
Barren County  
Dr. Jacqueline Pope-Terrence  
Bowling Green Independent  
Darryl Lynch  
Christian County  
Ronnie Holmes  
Gawea County  
Allen Kennedy  
Hancock County  
Linda Duncan  
Jefferson County  
Dunward Narramore  
Jenkins Independent  
Eugene Peel  
Jesseamine County  
Carl Wicklund  
Kenton County  
Ann Porter  
Mason County  
Dr. John Inman  
Meade County  
William White  
Pulaski County

**Regional Chairpersons**

Chris Watts  
Adair County  
Jeff Eaton  
Alien County  
Mike Combs  
Campbell County  
Lisa Hawley  
Cloverport Independent  
Jeff Skumbo  
Floyd County  
William Owens  
Lee County  
Fern Reed  
Montgomery County  
Marshall Jenkins  
Meigs County  
Larry Dodson  
Oldham County  
Jane Haase  
Owensboro Independent  
Dr Felix Akojie  
Pike County Independent  
Jeanette "Sissy" Cawood  
Pineville Independent

**EXECUTIVE DIRECTOR**

Bill Scott  
**ASSOCIATE EXECUTIVE DIRECTOR/  
GOVERNMENTAL RELATIONS**  
David A. Baird  
**BOARD TEAM DEVELOPMENT**  
Keri Schelling  
**CHIEF FINANCIAL OFFICER**  
Don Sewer  
**INSURANCE/RISK MANAGEMENT**  
Myron Thompson  
**LEGAL SERVICES**  
J. Stephen Kirby  
**MEMBER SUPPORT SERVICES**  
Brad Hughes  
**POLICY & PROCEDURES SERVICES**  
Daria Bass

**APA Model Licensure Task Force**  
**Attn: Lynn Bufka, PhD**  
**American Psychological Association**  
**750 First Street, NE**  
**Washington, DC 20002-4242**

**To Whom It May Concern:**

I am writing to you as the Executive Director of the Kentucky School Boards Association, a service organization for local school boards representing 174 school districts in Kentucky.

It has come to my attention that the APA is proposing to change its Model Licensure Act by eliminating the exemption for specialist level school psychologists to use their titles and perform psychological services within their area of specialty (educational or school psychology). This letter is to voice strong opposition to the proposed changes which are not in the best interest of children, families, and schools, for the following reasons:

- The standards for training of school psychologists developed by the National Association of School Psychologists (NASP) for non-doctoral practice are comprehensive and rigorous. These standards specify the specialist level of training, which exceeds the level of all other mental health professionals currently licensed in Kentucky, save doctoral psychologists and psychiatrists. Doctoral level and licensed school psychologists have not been found to have a level of psychological practice in schools that is of significantly higher quality than specialist level school psychologists. Specialist level school psychologists are highly valued in the schools because of the unique and rigorous graduate training in psychology and education that they obtain and the invaluable services that they are subsequently able to provide.
- NASP recommends a school psychologist to student ratio no greater than 1:1000. Kentucky's current ratio is 1:2192, which illustrates our existing need for school psychologists with specialized training in the areas of assessment. Academic and school-related disabilities and curriculum and school consultation. The pool of licensed, doctoral psychologists in our state is insufficient to serve Kentucky's 782,000 students (less than 17% of Kentucky's 360 school psychologists are trained at a doctoral level). Given that school psychologists in Kentucky are already in short supply, the removal of non-doctoral professionals from this field would be crippling to the wellbeing of our students, schools, and families. Each Kentucky school district averages 1.92 school psychologists. However, this is deceiving, as 40.4% of all districts in the state do not employ any school psychologists. Part of this is due to small school districts with limited resources.

APA Model Licensure Task Force  
Page Two  
May 27, 2009

- If the specialist level school psychologists were no longer available to Kentucky schools, what would the children of Kentucky do? Allowing professionals who do not have the appropriate expertise to work with children in schools has the potential to cause harm, both by putting children at risk for receiving inappropriate services, and by putting these professionals in a position to give services in which they have not been adequately trained.
- The 2003 President's New Freedom Commission on Mental Health reported that the vast majority of children diagnosed with a mental disorder do not receive counseling or support for their problems. The Commission further emphasized that, of those children who do receive services, the majority are recipients within the school setting only. Eliminating non-doctoral school psychologists would mean that even larger numbers of children would not receive psychological services of any sort — a consequence that could result in higher levels of learning and behavioral problems and lower levels of academic success among our children.

I urge you to withdraw this proposal immediately.

Sincerely,



Bill Scott, Executive Director  
Kentucky School Boards Association

19