

Office of Special Education and Student Services
Department of Student Services
Psychological Services Unit
MONTGOMERY COUNTY PUBLIC SCHOOLS
Rockville, Maryland

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Board of Educational Affairs and Model Licensure Act Task Force
American Psychological Association
750 First Street, NE
Washington, DC 20002-4242

To whom it may concern:

As supervisor of psychological services for the Montgomery County Public Schools, I am acutely aware of the daily and long term, positive impact that the doctoral and specialist level school psychologists in my school district have on the students and families that we serve in our school community. They provide valuable support to teachers in helping students become academically and socially successful in school. They are an integral part of school teams that provide both direct and consulting services in the context of the school setting. School psychologists understand the school system, classroom instruction and management, learning and behavior, mental health, crisis prevention and intervention, and special education.

Given the shortage of trained school psychologists available to provide these services, I believe that adding barriers to practice by removing the school psychology exemption from the model licensure act poses real harm to children, families, and schools. School psychologists at both the specialist and doctoral levels have practiced independently in schools since the 1950s. The school psychology exemption has been part of the American Psychological Association (APA) model licensure act for over 30 years and has served the public interest well. There is no public benefit to removing it now. Moreover, ample protections exist in current state policies and law to ensure the quality of services provided by school psychologists credentialed by their state boards of education.

The proposed changes in the MLA exemption would also allow licensed psychologists to bypass the credentialing requirements of State Education Agencies (SEAs), and permit them to use the title of "school psychologist" or "certified school psychologist" without having met the requirements established by the SEA. SEAs require that school psychologists have completed a comprehensive three year graduate program in school psychology, including a 1200+ hour internship. Because school psychologists who are credentialed through their SEAs practice in the schools with children, it is justifiable that SEAs require graduate preparation and internships in school settings before practice in the schools. Licensed psychologists who have taken one course in education are not equipped or qualified to work in schools as school psychologists and they should not be granted the title without attending a graduate program or completing

respecialization in school psychology. Allowing licensed psychologists, who have not had adequate training and experience to work in schools as school psychologists may put children at risk for harm. Again, this is in direct violation of APA's published Ethical Principles.

The reasoning for changing the school psychologist exemption is unsound and unscientific. Doctoral level and licensed school psychologists have not been found to have a level of psychological practice in schools that is superior to or of significantly higher quality than specialist level school psychologists. Specialist and doctoral level school psychologists are both experts in psychology and education. They provide high quality psychological and educational services in schools and improve the educational, behavioral, adaptive, social, and emotional outcomes of children and youth enabling them to achieve in school and in life. These specialized professionals are highly valued in the schools because of the unique combination of rigorous graduate training (in psychology and education) that they work diligently to attain, and the subsequent invaluable services that they are able to provide. This proposed change in the MLA exemption would unjustly remove the rights of more than 75% of practicing school psychologists (20,000+) to use the title for which they are legitimately credentialed and qualified.

Implementing this change would inevitably have a negative impact on children and their education. If this proposed change in the MLA is enacted in states, conflict would inexorably ensue. By nature, policy changes and implementation are complicated. In this case, multiple changes would occur and have a significant impact: 1) state and federal legislation (all laws and regulations that refer to "school psychologists"); 2) state boards of education (credentialing policies/procedures and funding mechanisms); 3) school districts (hiring and practice policies); 4) supervision practices in schools by professionals other than doctoral level school psychologists or licensed psychologists; and 5) individual specialist level school psychologists (disenfranchised from their title and professional identity). This will cause confusion in every area mentioned above and will undoubtedly impede the delivery of needed educational, behavioral, emotional, and social (psychological) services to children. This needless change in the MLA exemptions, especially at this time of great need in schools, and the untenable removal of a title most associated with school-based practice has a high risk of hurting children, families, and schools by creating barriers to receiving services. Placing a barrier by limiting available—and essential—personnel has the potential to cause physical or emotional harm to children and is in direct violation of APA's Ethical Principles of Psychologists and Code of Conduct, which under Principle A: Beneficence and Non-Maleficence states that psychologists "take care to do no harm."

The following reasons further support reinstating the school psychology exemption in the APA model licensure act:

1. All school psychologists provide critical services that support the mental health and academic achievement of all children.

- School psychologists are trained at both the specialist level and doctoral level to implement evidence-based prevention activities and to provide interventions for mental health and learning issues at the individual, group, and schoolwide levels.
 - Today there is significant recognition within the education and health communities of the importance of having school-employed professionals like school psychologists to provide these services in order to meet the growing needs of students.
 - The 1987 title exemption for school psychologists benefits consumers who rely on access to mental health and academic support services offered through the schools.
 - Research demonstrates that providing mental health services in schools removes common access barriers, such as transportation, cost, trust, and comfort level, resulting in increased numbers of students and families receiving needed services.
2. Removing the exemption undermines mental health and academic support services to children and families at a time of growing need and current shortage, especially in schools in rural and urban areas.
- There is a shortage of school psychologists nationally, and limiting the ability of specialist or doctoral level school psychologists credentialed by state education agencies to practice independently in schools seriously risks curtailing needed mental health and academic support services while providing no public benefit.
 - Shortages are severe in many under-resourced urban and rural school settings.
 - The shortages are even more critical given a significant unmet need for individuals of minority and culturally and linguistically diverse backgrounds to serve in school settings.
 - Removing the exemption will worsen this situation by adding potential barriers for those who seek specialist level entry to school-based practice.
 - Policymakers and professional organizations should be working to find ways to expand, not restrict, the availability of appropriately trained school psychologists who can provide high quality services to the children, families and schools who need them the most.
3. The public is well protected, and services to children and families in schools are strengthened by state laws and codes that regulate the practice and credentialing of school psychologists by state education agencies.

- State education agencies already have stringent standards for the graduate education and state credentialing of school psychologists, which protect the public.
- Removing the school psychologist exemption from the APA model licensure act creates potential conflict within state legislation and regulation that has served the public, particularly schools, well.
- Removing the exemption for school psychologists is a guild issue that would only benefit licensed psychologists, and does harm to consumers who cannot afford to lose access to the free mental health and academic support services provided by school psychologists in the school setting.

In the interest of children, families, and schools, I urge the Task Force to reinstate the exemption for school psychologists in the APA Model Act for State Licensure of Psychologists. Thank you for the opportunity to provide commentary on this important issue.

Sincerely,

Matthew J. Kamins
Supervisor of Psychological Services