



March 30, 2009

APA Model Licensure Revision Task Force  
ATTN: Practice Directorate, Ronald S. Palomares, PhD  
American Psychological Association  
750 1st Street, NE  
Washington, D.C. 20002-4242

Dear APA Model Licensure Revision Task Force Members:

This letter is to urge the Task Force to reinstate the exemption for school psychologists in the APA Model Act for State Licensure of Psychologists. This long-standing provision provides an exemption to the licensure act for school psychologists who are appropriately credentialed by their respective state board of education to hold the title "school psychologist" and to practice independently in school settings.

As a school superintendent, I see the positive impact that school psychologists in my school district have on the students and families that we serve in our school community. They provide valuable assistance to teachers in helping students become academically and socially successful in school. They are an important 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, it is my position that adding barriers to practice by removing the exemption 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 a part of the 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 our current state policies and law to ensure the quality of services provided by school psychologists credentialed by their state boards of education. In Georgia they are regulated by a separate agency, the Professional Standards Commission.

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

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 school-wide 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.

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.

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.

Being a superintendent of a low income rural school system, I already find it extremely difficult to find school psychologists. The elimination of the exemption is not necessary and it will only make it more difficult, if not impossible for us to find qualified personnel. I find your decision to eliminate this exemption self serving and not in the best interest of our children and families.

Again, I urge the Task Force to reinstate the school psychologist exemption into the APA model licensure act in the interest of children, families, and schools. Thank you for the opportunity to provide commentary on this important issue.

Sincerely,

*Carol L. Lane*

Carol L. Lane, Superintendent