

MASSACHUSETTS SCHOOL PSYCHOLOGISTS ASSOCIATION
575 Washington Street
Braintree, MA 02184

June 1, 2009

James H. Bray, Ph.D.
APA President
American Psychological Association
750 First St. NE
Washington, DC 20002

Dear Dr. Bray:

On behalf of the Massachusetts School Psychologists Association as well as the school psychologists we serve, I write to protest to the changes proposed in sections J and G of the Model Licensure Act which would remove the exemption for specialist level school psychologists to use their titles and restrict their practice. There is no evidence to support such a change.

There are approximately 1,500 school psychologists in this state. Approximately 75% of the working school psychologists work at the specialist level. Not only would these school psychologists be personally affected but also the school systems, children, and parents they serve.

To propose such a change strikes a note of disbelief, as specialist level school psychologists have been actively embedded in schools for over forty years and are acknowledged as vital service providers. "School Psychologist" is the title individuals receive after completing their comprehensive three year post graduate training and it is recognized by the Department of Elementary and Secondary Education (DESE) in Massachusetts as a distinct specialty. The proposed change would remove the right of the DESE to regulate the title, credentialing, and practice of school psychologists. It would also, without any justification to do so, threaten the recognition of the "Nationally Certified School Psychologist" for those receiving this additional credential.

In addition, I strongly oppose the proposed revision to section G (Limitation of Practice; Maintaining and Expanding Competence) as credentialing in Massachusetts to be a school psychologist mandates specific and focused requirements across multiple domains established by the National Association of School Psychologists and the DESE. School psychologists train and acquire a knowledge base specific to children and education and use best practice for effective school based solutions. Course work is pertinent to a school setting and includes specific learning and behavioral and mental health needs of

students. In combination with field supervised internships and rigorous testing mandated by the state, competent and effective services by school psychologists are assured.

School psychologists work within a highly developed specialization of school based mental health services. To remove these services is reprehensible, as good mental health services, often to the neediest population, will be truncated. Second, in this time of financial need, to replace specialist level school psychologists with licensed psychologists is a prohibitive cost to school systems.

In total, the proposed changes in sections J and G will result a needless disruption to mandated and ancillary services. Thus, I urge the Task Force to reinstate the exemption for non-doctoral level school psychologists in the proposed Model Act for State Licensure of Psychologists. There is ample and ongoing evidence that specialist level school psychologists provide worthy services. There is every intention of specialist level school psychologists to continue their practice and to continue to do it well.

Sincerely yours,

Susanne Toomajian Almeida, CAES, NCSP
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