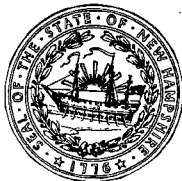


Virginia M. Barry, Ph.D.  
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Mary S. Heath  
Deputy Commissioner  
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June 1, 2009

Model Licensure Act Task Force  
American Psychological Association  
750 First Street NE  
Washington, DC 20002

To the Members of the Model Licensure Act Task Force:

I am writing to strongly oppose the revisions of the *Model Act for State Licensure* proposed by the American Psychological Association (APA) in March 2009. If enacted, the proposed changes would lead to significant limitations on the practice of school psychology and provision of supports to students. This action would impact the ability of local school districts to support the needs of our New Hampshire students.

School psychologists possess a unique combination of training and expertise that integrates best practices from the fields of education and psychology. They work to promote optimal learning and mental health for all students. If the new language is approved by the APA leaders and is subsequently adopted by state legislators, the integrity of the profession and quality of services specifically designed to improve outcomes for children and schools would be severely diminished. By maintaining school psychology as an area of specialization, the public is protected from the provision of school psychological services by professionals who are not adequately trained in school psychology and who lack proper school-based competencies to work with students in our schools.

The American Psychological Association's proposed changes would challenge the right of the Department of Education to designate a title for an appropriate credential that the Department has established authority to issue. The state credentialing standards for school psychology are well established and are designed to ensure the high quality of service in schools. The proposed recommendation by APA, suggesting that state legislators adopt language that disregards these standards, is without merit or justification.

New Hampshire shares in the national shortage of qualified mental health providers and school psychologists at both the specialist and doctoral levels of training. Our school psychologists perform a range of services that includes assessment, behavioral interventions, counseling, and consultation. A requirement to hire only doctoral level psychologists would impose unnecessary burdens on our schools in both additional costs and lack of available candidates.

I strongly urge the APA to not approve the proposed changes to the model act. Thank you for this opportunity to provide feedback regarding the proposed revisions.

Sincerely,

A handwritten signature in cursive script that reads "Mary S. Heath".

Mary S. Heath  
Deputy Commissioner of Education