



**Richard C. Iannuzzi**, *President*  
**Alan B. Lubin**, *Executive Vice President*  
**Maria Neira**, *Vice President*  
**Kathleen M. Donahue**, *Vice President*  
**Lee Cutler**, *Secretary-Treasurer*

April 16, 2009

American Psychological Association  
750 First Street, NE  
Washington, DC 20002-4242

Dear Members of the Board of Educational Affairs and Model Licensure Act Task Force:

I am writing on behalf of New York State United Teachers (NYSUT) to strongly urge the Board to continue the exemption of non-doctoral school psychologists, currently included in the Model Act for State Licensure (MLA) of Psychologists. NYSUT is a statewide union of more than 600,000 members, comprised of teachers and other school professionals, including more than thirty-five hundred school psychologists.

We are deeply concerned that the proposed exemption would impose serious restrictions on the ability of school psychologists to provide psychological services to New York State's preschoolers and school-age students. NYSUT would strongly advocate against any change in our current state policy concerning the implementation of this proposed restriction in the practice of psychology in school settings.

New York state has a longstanding policy established in Education Law which authorizes the practice of psychology in schools by certified school psychologists. These master's degree-prepared professionals play a critical role in our schools, assisting teachers and other school personnel in addressing the academic, behavioral and social needs of students. The title of "school psychologist" in New York state accurately describes the level of preparation, including supervised clinical experiences, that school psychologists are required to successfully complete prior to engaging in a broad range of activities to improve outcomes for students.

School psychologists are the highest prepared mental health professionals in our schools. In addition to directly serving the mental health needs of our students, school psychologists play an important role as members of Individualized Education Program (IEP) Teams and district and/or building-level child study teams focusing on identifying and addressing the needs of preschoolers and school-age students in the least restrictive environment. School psychologists are also assuming prominent roles in the effective implementation of the "response to intervention" process, resulting from the 2004 changes in the Individuals with Disabilities Education Act.



The current preparation of school psychologists enables these professionals to address issues that are critically important in our preschool, elementary and secondary schools: special education, behavioral and academic presentation and intervention, classroom management, and student and family counseling. Positive social and emotional development is essential to success in our schools, and school psychologists are key professionals in meeting the mental health needs of students.

The proposed removal of the exemption from licensure for school psychologists would not only harm students but also families and schools by exacerbating an already severe shortage of school psychologists, especially in our rural and urban school districts. According to the most recent New York State Education Department data, approximately seventy-five percent of practicing school psychologists are at non-doctoral levels. The MLA's proposed restriction would eliminate the ability of three-quarters of school psychologists in New York state from providing psychological services in school settings. In addition, other state agencies that license or administer educational programs employing school psychologists would also experience immediate shortages.

Shortages would be especially acute in the area of bilingual psychological services for English language learners. Any national policy change that would result in significant difficulties for students and their families and educators to access school-based psychological services does not serve the public interest and will potentially have negative consequences for students who are most vulnerable to school failure.

Thank you for the opportunity to comment on the Model Licensure Act, and for the above reasons, we again urge the retention of the exemption for practice of psychology by certified non-doctoral school psychologists.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard C. Iannuzzi". The signature is written in a cursive, flowing style.

Richard C. Iannuzzi  
President

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