



Asociación de Psicólogos Escolares de Puerto Rico
School Psychology Association of Puerto Rico
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June 3, 2009

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

Dear Dr. Bray:

I write on behalf of the Asociación de Psicólogos Escolares de Puerto Rico (APEP) “*School Psychology Association of Puerto Rico*”, the organization that serves the school psychologists in the Island. The Association strongly opposes the language in the APA MLA that would potentially limit and change the practice of school psychologists, and we urge APA to revise the proposed changes in the MLA that may cause this problem, including the Preamble.

In Puerto Rico, the practice of school psychology has begun to gain a foothold in the past ten years. At the present time, many licensed school psychologists in the Island do not hold a doctorate due to the limited amount of doctoral school psychology programs. These professionals have been rigorously trained in graduate programs (62+ graduate credits) and provide a much needed service to the children, families and school personnel in a country like ours, with limited economic resources. Implementing this change would inevitably have a negative consequence on our children and their education.

To comply with APA’s mandates regarding the doctoral level for school psychologists would also deal a crushing blow to the developing specialty area in Puerto Rico, while placing a disproportionate impact on ethnic minorities in the United States and its territories. This proposed change in the MLA exemption would unjustly remove the rights of more than 75% of practicing school psychologists to use the title for which they are legitimately credentialed and qualified. It would also cause a shortage of services as it 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 our 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.”

In light of the potentially harmful impact on children and education in Puerto Rico resulting from proposed changes to the Model Act specific to school psychologists, we strongly suggest the APA strike these revisions, and specifically reinstate the exemption for all school psychologists. Furthermore, as many of these revisions would limit and change the practice of school psychologists without compelling justification, we strongly recommend that APA revise the MLA in a manner that conserves and respects highly qualified, skilled, and dedicated school psychologists and the psychological services that they provide in order to improve the outcomes of children and families.

If additional information is required, please feel free to call or write to us at (787) 764-7594 buzonapep@yahoo.com

Sincerely,

Pedro M. Nieves, M.A.
President
Asociación de Psicólogos Escolares de Puerto Rico

c: APA Model Act Task Force
c/o Lynn Bufka, Chair
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