



RHODE ISLAND SCHOOL PSYCHOLOGISTS ASSOCIATION
P.O. Box 7083 Warwick, Rhode Island 02887

**Response to the Model Act for State Licensure of Psychologists:
American Psychological Association Proposal, 6/02/09**

To Whom It May Concern:

The Rhode Island School Psychologists Association (RISPA) is the professional organization representing school psychologists practicing in Rhode Island. Our mission is to promote the professional development of our members and to advocate for optimal educational experience and mental health for all children in collaboration with schools, families, and communities. We work collaboratively with the Rhode Island Department of Education, our two Rhode Island school psychology training programs (University of Rhode Island and Rhode Island College), as well as other agencies and organizations representing schools, children, and families.

On behalf of RISPA, we are writing to urge you to reinstate the exemption for school psychologists in the Model Act for State Licensure (MLA) of Psychologists. It has been stated by the APA Task Force (2009) that this modification is “intended to affect title only”, but it is evident to us that one of the detrimental consequences of this proposal would be a significant reduction of mental health services in the schools for children across the country. Nationally, more than two-thirds of school psychologists hold the specialists’ level degree. If the exemption for school psychologists is removed, Rhode Island stands to lose approximately 70% of school psychologists because any non-licensed or non-exempt person would be prohibited from providing any services that fall within the school psychology definition. This would be devastating to our small state, and there would certainly not be enough licensed psychologists to fill the holes. Furthermore, removing the exemption for school psychologists will disproportionately affect women and school psychologists of multicultural backgrounds in that 70% of female school psychologists and 70% of school psychologists who identify as ethnic minorities hold non-doctoral degrees (NASP, 2008).

One of the reasons that has been given for the removal of the exemption for school psychologists is that it will help clear up public confusion of credentials. In actuality, if the MLA is passed as proposed, there will be unintended mass confusion in every state and district in the country, as state departments of education struggle to revise state regulations, change titles, decide on roles, and modify credentialing. This will seriously impinge on the ability of non-doctoral school psychologists to provide the services for which they are credentialed and qualified, as well as limit the availability of those services at a time of increasing need in schools. In addition, all school psychology training programs that award specialist level degrees would need to be revamped, or worse, eliminated. In Rhode Island, we have two excellent school psychology training programs at the University of Rhode Island and Rhode Island College. Both award specialist level degrees (URI also awards doctoral degrees); many of the specialist level graduates from these programs remain in Rhode Island to work as school psychologists.

Individuals trained in school psychology programs, whether at the specialist or doctoral level, undergo intensive education that combines the fields of psychology and education, culminating in a full-year, school-based internship. School psychologists are uniquely trained to integrate the

knowledge and skill base of psychology with their specific training in learning, child development, and educational systems. Given this broad training and experience, school psychologists are highly qualified to provide comprehensive, cost effective mental health services. School psychological services include but are not limited to consultation with faculty, staff, administrators, and parents; counseling with students; crisis prevention and intervention; classroom management; and assessment of students' and systems' needs. Furthermore, the standards for school psychology training are based on recommendations by professional organizations such as the National Association of School Psychologists (NASP) and the National Council on Accreditation of Teachers (NCATE).

We also oppose the revisions to section G of the proposed MLA that changes school psychology from an area of specialization to a foundational area of psychological education, effectively eliminating the necessity for full school psychological training in order to practice in schools. By maintaining that school psychology is an area of specialization, the public is protected from being provided school psychological services by a professional that is not adequately trained in school psychology. If this proposed revision to the MLA is enacted, it would enable psychologists with minimal training in school psychology and education to practice in schools and would put in jeopardy the quality of services for thousands of children and schools. The revised MLA will actually pull less trained individuals into the schools to work with our children. Furthermore, supervision has been added to the definition of the practice of psychology, essentially requiring all non-doctoral school psychologists to be supervised by a doctoral psychologist—without regard to whether or not they have training in school psychology. Allowing professionals who lack proper specialization to work in schools with the vulnerable population of children is in direct violation of APA's (2002) Ethical Principles of Psychologists and Code of Conduct, which under 2.01 Boundaries of Competence states that, "(a) Psychologists provide services, teach, and conduct research with populations and in areas only within the boundaries of their competence, based on their education, training, supervised experience, consultation, study, or professional experience."

We believe that the MLA will have devastating, albeit unintended, consequences for our children. Mental health services will decrease, and schools will be unable to address all the social-emotional and behavioral issues that arise. In sum, these proposed changes would seriously undermine services to children, families, and schools, as well as school psychologists' professional identity and practice. The Rhode Island School Psychologists Association strongly urges you to reconsider the proposed changes to the MLA, including Section G (Limitation of Practice; Maintaining and Expanding Competence), and reinstate the exemption in Section J for all school psychologists.

Thank you for considering our input on this issue.

Sincerely,



Kimberly Aguiar Pristawa, M.S., NCSP
Certified School Psychologist
RISPA President

&



Gail Mastropietro, CAGS
Certified School Psychologist
RISPA Legislative Chair

References

American Psychological Association (2002). Ethical principles of psychologists and code of conduct. Retrieved on May 31, 2009 from <http://www.apa.org/ethics/code2002.pdf>

American Psychological Association (2009). FAQ model act for state licensure of psychologists. Retrieved on May 28, 2009 from http://www.apapractice.org/apo/in_the_news/0.GenericArticle.Single.articleLink.GenericArticle.Single.file.tmp/FAQ%20Model%20Act%20for%20State%20Licensure%20of%20Psychologists.pdf

National Association of School Psychologists (2008). [Degree type of practicing school psychologists by gender and ethnicity.] Unpublished data from the 2004-05 NASP Membership Survey.