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Dear Dr. Bray,

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Having worked for many years as a doctoral-level school psychologist in a public school system and as director of a NASP-approved graduate program in school psychology, I am writing to express my great concern regarding the revised wording of the Model Licensure Act (MLA) proposed by the American Psychological Association.

In my role as graduate program director, I often review transcripts from individuals who have completed doctoral-level training in clinical psychology and who wish to become certified as school psychologists. What is readily apparent is the minimal overlap in required coursework and field experiences for these two professions. For example, it is possible to receive a doctoral degree in clinical psychology without having completed coursework in child or adolescent development, curriculum or instruction, special education law, or the organization and operation of schools. Supervised experience providing services in a school setting is rarely, if ever, required. These are but a few of the critical training areas for professionals wishing to provide psychological services in school settings.

I also wish to highlight the rigorous standards set by the National Association of School Psychologists for programs to become "approved" and for individuals to become nationally certified as school psychologists. Programs must ensure that graduates have the knowledge and skills to prevent academic and behavioral problems, and to intervene early and effectively to address problems when they arise. Nationally approved programs must provide evidence that their graduates make a positive impact on the students, families, and school staff with whom they work. Importantly, nationally certified school psychologists are trained to intervene, not only at the individual level, but at a system level. This is critical to address systemic issues such as underachievement, disproportionality, drop-out rates, bullying, school violence, and youth suicide.

Nationally, there is a critical shortage of school psychologists. This situation will worsen as those hired during the 1970's to meet the requirements of P.L. 94-142 continue to retire. At the same time, children and adolescents face more challenges than ever before. It is clear that minimizing the number of qualified providers in public schools will have a direct and adverse impact on children and youth in our public schools.

Finally, I wish to speak to concern that use of the term "school psychologist" by professionals who have received training at the specialist level is confusing to parents or other constituents. In the 30 years that I have been providing services to students and their families and in my research that focuses on family/professional collaboration in schools, I have not once heard this expressed by any family member as a point of confusion. Rather, parents have expressed appreciation of the high quality services provided by school psychologists that might otherwise not have been available to their children. It should also be noted that, as part of our ethical guidelines and responsibilities, school psychologists recognize the strengths and limitations of their training and experience, and refer children and families to other professionals when needs are identified that are outside the professional competencies or scope of the school psychologist.

As a trainer of school psychologists, I urge the Task Force to continue the exemption for school psychologists in the MLA so that these well-trained individuals can continue to serve the children and youth in our public schools, their families, and educators.

Sincerely,



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