



Texas Association of School Psychologists

May 14, 2009

The Texas Association of School Psychologists (TASP) is the state affiliate of the National Association of School Psychologists (NASP). We are writing this letter in response to the American Psychological Association's (APA) proposed revisions of the Model Licensure Act (MLA) that impact the practice of school psychology. The reasoning for changing the school psychologist exemption is unsound and unscientific. Doctoral level and licensed school psychologists have not been found to have a level of psychological practice in schools that is superior to or of significantly higher quality than specialist level school psychologists. Specialist and doctoral level school psychologists are experts in psychology and education. As professionals trained in school psychology, both at the doctoral and non-doctoral level, we play a vital role as part of school teams providing critical direct and consultative services to support the mental health and academic achievement of all children. We provide valuable assistance to teachers in helping students become academically and socially successful in school. We understand the school system, classroom instruction and management, learning and behavior, mental health, crisis prevention and intervention, and special education law. Overall, those who practice school psychology in Texas have a positive impact on outcomes for all members of the school community. We believe removing the exemption, which includes non-doctoral school psychology practitioners working in a public school setting using the term school psychologist in their title, would undermine services to children and families at a time of growing need and practitioner shortages. This would especially impact schools with significant needs related to individuals from minority and/or culturally and linguistically diverse backgrounds that have historically been underserved .

The practice of school psychology in the state of Texas provides a unique perspective related to licensure and practice issues because we are licensed by the psychology licensing board rather than the state board of education. As such, the state licensing board has already limited the use of the title "school psychologist." However, TASP remains committed to the advocacy efforts on behalf of school psychologists in our opposition to the proposed changes in the MLA regarding school psychology. In a time when less qualified professionals are being called in to address emotional, behavioral, and mental health needs, which is clearly not in the best interest of children, families, or teachers , the proposed changes in the Model Licensure Act have the potential to increase the shortage of these highly qualified

professionals. We believe the continued availability of high quality services to children and families is in the public interest. Titles other than “School Psychologist” unnecessarily confuse the public and other stakeholders about qualifications of practitioners of school psychology and the provision of school psychological services at a time when standards for graduate education and practice at the non-doctoral level are well established and being broadly implemented. Further, the shortage of supervisors for new practitioners is a growing concern across the nation. Changing the exempt status of school psychology would only exacerbate the shortage, especially for those with the specific knowledge necessary for ethical practice in schools.

In addition, TASP strongly opposes the proposed revision to section G (Limitation of Practice; Maintaining and Expanding Competence) of the MLA that changes school psychology from an area of specialization to a foundation of psychology. We strongly urge the APA to reject this proposed change and maintain that school psychology is an area of specialization.

With school psychology defined as an area of specialization, it is maintained that a professional with psychological training specifically in school psychology will practice within this area of specialization and will not practice in another area (e.g., experimental psychology) without the completion of a training program. If school psychology becomes a “foundation of psychology practice” this area would be added to a list of areas in which all psychologists are required to be trained. In order to demonstrate that an individual has met an APA psychological foundation in graduate programs, it is typical that one or more classes in this broad area would be sufficient, and it is probable that no additional experiences in school settings would be required. This is considerably less stringent than requiring the completion of graduate training or respecialization in the area of school psychology, and is in no way adequate to developing the knowledge and skills necessary to providing services in schools that genuinely support the mission and purpose of schools, which is learning.

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, this would allow for licensed psychologists who lack education specific to school psychology and proper school-based competencies to be able to work with children in schools as a school psychologist. Allowing professionals who lack proper specialization to work in schools with the vulnerable population of children is in direct violation of APA’s 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.” Additionally, allowing and promoting professionals who do not have the appropriate expertise to work with children in schools has the potential to cause harm by putting children at risk for receiving inappropriate services and by putting these professionals in a position to give services for which they have not been adequately trained. This 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.”

We appreciate the opportunity to comment on the proposed revisions to the Model Licensure Act, and we respectfully request that the members of this task force reconsider their recommendation to remove the exemption. We believe continuing the exemption which allows highly qualified non-doctoral school psychology practitioners to use the term school psychologist is consistent with APA's goal of ensuring the practice of psychology is in the public's interest.

On behalf of the executive board of Texas Association of School Psychologists,

Mindi Jeter, MS, LSSP
TASP President 2009
Minmjet28@gmail.com