

May 28, 2009

Task Force on Model Licensure Act
c/o Lynn Bufka
American Psychological Association
750 First Street NE
Washington, D.C. 20002-4242

To the Members of the Model Licensure Act Task Force:

The West Virginia Department of Education (WVDE) strongly opposes the proposed changes to the APA Model Licensure Act. Removing the exemption for specialist level school psychologists to use the title of “school psychologist” and the elimination of “school psychology” as an area of specialization will negatively impact services to students in West Virginia. The proposed change by APA will affect more than 90 percent of current school psychology practitioners in West Virginia, thereby resulting in a significant reduction of staff to provide psychological services to students and school districts.

As the educational credentialing agency for school psychologists in West Virginia, the WVDE has set rigorous standards for the certification of school psychologists at the specialist level. The WVDE currently recognizes the right of non-doctoral level school psychologists who meet the credentialing requirements to use the title of “School Psychologist,” and wishes to continue to recognize specialist level school psychologists in their current title and capacities. Moreover, APA’s proposed Model Licensure Act would attempt to remove the right of the State Education Agency (SEA) to choose a title for a credential that the SEA has established authority to issue. The APA Model Licensure Act also attempts to restrain states in regulation of school based practices. The WVDE firmly opposes a model act that would attempt to remove the authority of SEAs to regulate the title, credentials, and practices of school psychology practitioners.

The Marshall University School Psychology Program, the only school psychology training program in West Virginia, has received full approval from NASP to train school psychologists at the specialist degree level. Students completing the Ed. S. program meet all requirements for permanent certification as a “school psychologist” by the WVDE. If the exemption is removed, not only would West Virginia lose these qualified individuals as “school psychologists;” it would be impossible to replace them with doctoral level school psychologists. Marshall University’s training program does not train doctoral level school psychologists. For this reason, the APA Model Licensure Act places the WVDE at high risk for being repeatedly noncompliant with the child find requirements and evaluation timelines set forth by the Individuals with Disabilities

Education Improvement Act of 2004, although the potential student-level consequences associated with diminished services are certainly far graver.

Lastly, I have yet to see evidence within the scientific literature or within the practice of education in West Virginia that specialist level school psychologists, overall, provide substandard school-based psychological services, as compared to their doctoral level colleagues. Rather, specialist level practitioners have made meaningful differences by improving students' educational outcomes and emotional well-being in West Virginia. WVDE recognizes both specialist and doctoral level school psychologists as experts in psychology and education who are vital members of school and district level teams.

As the State Director of Special Education in West Virginia, I urge APA to retain the exemption for practice of school psychology by qualified specialist level practitioners.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn Boyer".

Lynn Boyer, Ph.D.
Executive Director,
Office of Special Programs, Early and Extended Learning
West Virginia Department of Education