Dear Model Licensure Act Task Force Members:

As an APA member, I am writing to urge the Task Force to reinstate the exemption for school psychologists in the APA Model Act for State Licensure of Psychologists (see lines 510 to 517 of the July 3, 2007 draft of the model act). This long-standing provision provides an exemption for school psychologists who are appropriately credentialed by their respective state board of education to hold the title “school psychologist” and to practice independently in school settings. The proposed change to the model act has major implications for the specialty of school psychology.

School psychologists at both the specialist and doctoral levels have practiced independently in schools since at least the 1950s. Most practicing school psychologists, including those trained at the doctoral level, are credentialed by State Boards of Education. Removal of the exemption has potentially serious implications for the status of my credential and that of many of my colleagues. For example, changes in the jurisdiction of credentialing from a State Board of Education to a Board of Psychology possibly would:

- Create an incongruent credentialing system in which school psychologists would work under licensure regulations intended for the independent practice of psychology, not the public practice of school psychology in school settings, in which most professionals are credentialed by a state board of education.
- Increase substantially the yearly cost of credentialing and make credentialing for public service prohibitive for many school psychologists working in the schools.
- Impose continuing professional development requirements developed originally for private practice clinical psychologists and not necessarily appropriate to school-based practice.
- Unnecessarily confuse the public and other stakeholders about the provision of school psychological services at a time when standards for training and practice are well-established and being broadly implemented.

The school psychology exemption has been a part of the APA model licensure act for over 30 years and has served the public interest well. There is no public benefit to removing it now. I work with many outstanding specialist level school psychologists who provide quality, evidence-based services and make significant contributions to the children and families we serve. Ample protections already exist to ensure the quality of services provided by school psychologists credentialed by their state boards of education. Removing the exemption actually poses real harm to children, families, and schools by putting at risk the availability of school psychological services.

The following reasons support reinstating the school psychology exemption in the APA model licensure act:

1. **School psychologists provide critical services that support the mental health and academic achievement of all children.**

   - School psychologists are trained at both the specialist Level and doctoral Level to implement evidence-based prevention activities and to provide interventions for mental health and learning issues at the individual, group, and school-wide levels.
Today there is significant recognition within the education and health communities of the importance of having school-employed professionals like school psychologists to provide these services in order to meet the growing needs of students.

- The 1987 title exemption for school psychologists benefits consumers who rely on access to mental health and academic support services offered through the schools.
- Research demonstrates that providing mental health services in schools removes common access barriers, such as transportation, cost, trust, and comfort level, resulting in increased numbers of students and families receiving needed services.

2. **Removing the exemption undermines mental health and academic support services to children and families at a time of growing need and current shortage, especially in schools in rural and urban areas.**

- There is a shortage of school psychologists nationally and limiting the ability of specialist and doctoral level school psychologists credentialed by state education agencies to practice independently in schools seriously risks curtailing needed mental health and academic support services while providing no public benefit.
- Shortages are severe in many under-resourced urban and rural school settings.
- The shortages are even more critical given a significant unmet need for individuals of minority and culturally and linguistically diverse backgrounds to serve in school settings.
- Removing the exemption will worsen this situation by adding potential barriers for those who seek specialist level entry to school-based practice.
- APA should be working to find ways to expand, not restrict, the availability of appropriately trained school psychologists who can provide high quality services to the children, families and schools who need them the most.

3. **The public is well protected and services to children and families in schools are strengthened by state laws and codes that regulate the practice and credentialing of school psychologists by state education agencies.**

- State education agencies already have stringent standards for the graduate education and state credentialing of school psychologists, which protect the public.
- Removing the school psychologist exemption from the APA model licensure act creates potential conflict within state legislation and regulation that has served the public, particularly schools, well.
- Removing the exemption for school psychologists is a guild issue that would only benefit licensed psychologists and does harm to consumers who cannot afford to lose access to the free mental health and academic support services provided by school psychologists in the school setting.

Again, as a member of APA, I understand the goal to ensure the integrity of the psychology professions; however, removing the exemption from the model licensure act does nothing to accomplish this. It is counter-productive for all school psychologists. I cannot support undermining our important specialty and urge the Task Force to reinstate the school psychologist exemption into the APA model licensure act in the interest of children, families, and schools. Thank you for the opportunity to provide commentary on this important issue.

Sincerely,