

# **COUNCIL OF DIRECTORS** *of School Psychology Programs*

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October 2007

To Whom It May Concern:

I am responding to the Task Force's request for comments on the proposed revisions to the Model Licensure Act on behalf of the Council of Directors of School Psychology Programs. Our organization consists of 95 APA-approved School Psychology training programs, as represented by their directors. The proposed revisions have generated much discussion within our organization, primarily related to removal of the exemption for non-doctoral, school-based practitioners to use the title "school psychologist." These individuals are credentialed in most states by state boards of education to practice in schools.

The majority of our members oppose removing the exemption. Their primary concern is that to do so will have a deleterious impact upon the provision of psychological services by non-doctoral school psychologists who are appropriately credentialed to work in schools. The membership is concerned that limiting the use of the title "school psychologist" to doctoral-only practitioners will restrict the access of many children who are currently served in schools. There is a concern that state licensure boards would attempt to remove the oversight of school-based practice from state boards of education which must conform to a different set of federal and state regulations and standards regarding school-based practice. These members don't believe the public is harmed by retaining the title "school psychologist" by non-doctorally trained individuals whose practice is limited to schools. We encourage the Task Force to use data to inform its decision regarding whether children are harmed by use of the title "school psychologist" in school-based practice. Furthermore, many of our members are concerned that we retain good working relationships with the National Association of School Psychologists, the professional organization that represents school-based practitioners, the majority of whom are non-doctoral.

A minority of our members support removing the exemption. It is their belief that APA needs to be internally consistent in its representation of the traditional practice specialties and that removing the exemption clarifies APA's commitment to parity between the specialties. They believe the title "psychologist" should be limited to doctorally-trained personnel. These members believe that removing the exemption protects the public from any potential confusion caused by using the term "school psychologist" for non-doctorally trained practitioners.

Our members overwhelmingly believe that the exemption, or some other language that recognizes non-doctorally trained personnel's right to practice in schools when appropriately credentialed by state boards of education, be included in any revised language.

Respectfully submitted

Jean A. Baker, Ph.D, Chair

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