



Florida Association of School Psychologists

Comments on the Model Act for State Licensure of Psychologists: American Psychological Association Proposal 05/20/2009

The Florida Association of School Psychologists (FASP) is the statewide association representing over 2000 school psychologists practicing in Florida. The mission of FASP is to promote and advocate for the mental health and educational development of Florida's children, youth and families in educational systems and communities, and to advance the profession of school psychology in the state. We work closely with the Florida Department of Education, the Florida Psychological Association, the Florida State Legislature, and many other national and statewide associations to represent the perspectives and interests of school psychology in our state. Many FASP members are also members of APA and FPA, working in the schools and teaching in colleges and universities. We are deeply concerned that the American Psychological Association's 2009 proposed Model Act for State Licensure of Psychologists contains provisions that would, if adopted in Florida law, restrict school psychological services to many children in Florida.

Our primary concern is APA's proposal to modify the exemption from licensure regulations for school psychologists working in schools, which was originally adopted by the APA governance body in 1977. This exemption is a part of Chapter 490 (490.014) of the Florida Statutes defining psychological services. The proposal does not appear to serve the best interests of Florida's children, parents, and teachers and would not protect them from unqualified practice. Instead the proposal would entail preventing hundreds of qualified school psychologists from providing school psychological services. Such services are mandated by federal and state law to be provided by qualified professionals with the title of "school psychologist." The proposed modification of the exemption would shift the responsibility to the few (approximately 500) who are licensed as school psychologists and to those with a doctorate in psychology who are credentialed by the Florida Department of Education (less than 100), not all of whom are available to work in the schools. Moreover, there are not nearly enough licensed psychologists in Florida who are trained as school psychologists or who are willing to respecialize for work in the schools, particularly not in rural districts.

Current State of Practice and Training

Less than 25% of Florida's 2084 school psychologists are trained at a doctoral level, leaving a significant number of non-doctoral school psychologists who could be considered ineligible for delivering psychological services in the schools if the exemption is modified as proposed. The National Association of School Psychologists recommends a school psychologist to student ratio no greater than 1:1000. The current average ratio in Florida of school psychologists to students is

1:1970, further illustrating that Florida is in need of highly qualified school psychologists trained in the areas of assessment, academic and school-related disabilities, and curriculum and school consultation. The idea that licensed, doctoral-level psychologists could fill the void is frankly untenable, not only because they would be practicing in a specialty area for which they are not qualified, but also because there are not enough of them available in many areas of the state. There are currently 4182 licensed psychologists in Florida. Fifty-two percent of these professionals reside within the metropolitan areas of Central Florida (Orlando-Tampa) and South Florida (Miami- Ft. Lauderdale), thereby serving only eight of Florida's 67 counties (each county in Florida is a school district). Of the remaining counties, 26 have 10 or fewer licensed psychologists, and seven counties have no licensed psychologists at all. The pool of licensed, doctoral-level psychologists in our state is simply insufficient to serve Florida's 2.7 million schoolchildren. In addition, as previously mentioned, licensure as a psychologist would not ethically or legally allow for providing comprehensive school psychological services without further training and respecialization for most of Florida's psychology licensees.

Florida currently has only two APA accredited doctoral programs in school psychology and one APA accredited combined program (counseling/school psychology). Yet the state's need for school psychologists far exceeds the capacity of these three programs to produce doctoral graduates at a rate that can meet projected nationwide shortages of school psychologists. Hiring enough qualified faculty to expand doctoral programs is very unlikely, **as positions in school psychology training programs remain vacant each year due to a serious shortage of qualified candidates**. Even if there were enough qualified faculty, obtaining funding for additional faculty members is virtually impossible in the current economic climate.

Highly Qualified Professionals

The standards for training of school psychologists have increased during the 30 years since the inception of the exemption for school practice in APA's model act. Current standards for non-doctoral practice are comprehensive, rigorous, and widely accepted. These standards specify the specialist level of training, which exceeds the level of all other mental health professionals currently licensed in Florida, save doctoral psychologists and psychiatrists. There are currently eight school psychology training programs in Florida preparing school psychologists at the specialist level (inclusive of the three programs also offering doctoral level training).

If the specialist level school psychologists were no longer available, what would schools do? While members of Florida's other non-doctoral, licensed mental health professions (social workers, marriage and family therapists, and mental health counselors) are all prepared at a master's level, none have the necessary training in assessment, academic and school-related disabilities, and curriculum and school consultation that makes school psychology a distinct and substantive specialty area of psychology. It is, therefore, difficult to rationalize the elimination of the exemption as setting a higher standard for qualification, when licenses are available for other mental health professionals to practice in any setting at the master's, rather than the specialist level.

Needs of Children

Missing from the rationale for the changes in the Model Licensure Act is any mention of how the restrictions on non-doctoral school-based psychologists would impact children, families, and schools. The 2003 President's New Freedom Commission on Mental health reported that the vast majority of children diagnosed with a mental disorder do not receive counseling or support for their problems. This conclusion has been bolstered by more recent studies, such as that of Columbia University's National Center for Children in Poverty (2006). The Commission further emphasized that of those children who do receive services, the majority are recipients within the school setting only. **Eliminating non-doctoral school psychologists will mean even larger numbers of children will not receive psychological services of any sort – a consequence that could result in higher levels of learning and behavioral problems and lower levels of academic success among our children.** It can also be predicted that shortages would not be distributed equitably, as children in poor urban neighborhoods or rural areas and from culturally diverse or minority backgrounds are more likely to rely on schools as the sole provider of psychological services and school support services.

Increasing Minorities into the Profession of Psychology

The APA, like many other organizations, continually makes strides in enhancing diversity in the workplace. Recent publications from the APA (e.g., Levitt and Goshow, 2009) document the increasing need to have better representation of racial and ethnic minorities in the field. Current data in the field of school psychology indicate that of the 7.3% of practicing school psychologists who are ethnic minorities, 7 out of 10 hold non-doctoral degrees. Furthermore, a significant proportion of practicing minority school psychologists hold non-doctoral degrees: 9 of 10 American Indians or Alaska Natives, 7 of 10 Latinos, 6 of 10 Asians or Pacific Islanders, and 5 of 10 African Americans (NASP, 2008). Removing the exemption for non-doctoral school psychologists would have a devastating effect on the retention of ethnic minorities in the field of school psychology and on the delivery of services to minority students.

State Credentialing

This challenge to the well-established systems for credentialing school psychologists can be predicted to result in determined opposition from state education departments. Implementing the proposed model would require tremendous effort and expense legislatively in all states, changing numerous statutory provisions. And what end would such changes serve - to reduce services to needy children, their families, and the school community? FASP will continue to make our colleagues in the Florida Department of Education and in the Department of Health aware of these issues and of our strong opposition to the elimination of the exemption for non-doctoral school psychologists practicing in the schools as part of the current Department of Education certification system. In fact, because of the vicissitudes of the legislative process, as long as the model act contains the provision for removal of the exemption, we will vigorously oppose opening the Florida licensure act for modifications of any sort.

We appreciate the opportunity to comment on the Model Licensure Act, and we urge the Board of Directors and the Council of Representatives to retain the exemption for the use of the title “School Psychologist” and the practice of “school psychologist” by appropriately qualified and credentialed non-doctoral practitioners in schools.

On behalf of the Florida Association of School Psychologists,

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