

Senator Rafferty
Representative Brennan
Members of the Educational and Cultural Affairs Committee

RE: LD 1189 An Act to Amend the Teacher Certification Statutes

Dear Senator Rafferty, Representative Brennan, and Members of the Educational and Cultural Affairs Committee:

We, members of the Advisory Committee on School Psychologists for the Maine Department of Education, appreciate the opportunity to offer testimony both **in support and in opposition** to the proposed amendments pertaining to the certification of school psychologists. The Advisory Committee on School Psychologists, hereby referred to as “the committee,” was established within the department for the purpose of (a) advising the state board in the adoption of rules, ethics, and practice standards for school psychologists and (b) assisting the commissioner in certifying school psychologists and investigating alleged violations of practice standards, code of ethics, and certification rules (20-A MRSA §13022, sub-§7). Committee membership consists of two certified school psychologists, two licensed psychologists, one faculty member from a graduate program in school psychology, one educational administrator, and three parents of school-aged children.

School psychologists collaborate with students, families, educational professionals, and community partners to improve learning, behavior, and mental health for school-aged children and adolescents. The National Association of School Psychologists (NASP) advocates for a ratio of one school psychologist for every 500 students in order to ensure high quality, comprehensive services (2020). However, within the state of Maine, the ratio of school psychologists to students exceeds 1:1500. This means that many Maine school administrative units (SAUs) experience challenges securing sufficient personnel to support students’ school psychological service needs.

The committee recognizes that current requirements for the school psychologist certificate (093) established by Chapter 115, Part II contribute to challenges recruiting and retaining qualified school psychologists within the state of Maine. In recent years, the committee has encountered situations in which experienced school psychologists from other states and recent graduates from state-approved school psychology programs have been unable to obtain and/or renew the 093 certificate due to coursework and internship requirements in Chapter 115 that were modeled on the standards for graduate training in clinical psychology and do not reflect current standards for graduate training in school psychology. Accordingly, the committee has collaborated with stakeholders, including the Maine Association for School Psychologists, to recommend revisions to the Chapter 115 rules pertaining to the certification of school psychologists. These proposed rule revisions, which were shared with the Higher Education and Certification Committee of the Maine State Board of Education and fully align with current statutory requirements, explicitly aim to remove barriers that have prevented qualified professionals from obtaining and renewing the 093 certificate, while simultaneously upholding high professional preparation standards. The committee contends that LD 1189 includes some amendments that support these aims and some amendments that significantly contradict these aims.

The committee **supports** the following aspects of LD 1189:

1. Sec. 11. 20-A MRSA §13022, sub-§1, ¶A
 - a. The committee appreciates the continued alignment of the definition of the role of school psychologists with the practice standards established by the National Association of School Psychologists. These practice standards emphasize the role of school psychologists in facilitating collaborative, data-based problem-solving to promote equitable school-based services that support academic progress and mental and behavioral health for all students.
2. Sec. 12. 20-A MRSA §13022, sub-§3, ¶A
 - a. The committee supports the recognition of school psychology training programs approved by the Maine Department of Education as meeting the academic and preprofessional requirements for the 093 certificate. The University of Southern Maine offers the only graduate program in school psychology in the state. This program is currently approved by the department and offers a curriculum aligned with the graduate training standards established by the National Association of School Psychologists; yet graduates of the program are required to submit to a transcript review process by the department before being recommended for certification. The recognition of department-approved programs within statute would eliminate this additional step.
3. Sec. 12. 20-A MRSA §13022, sub-§3, ¶C
 - a. The committee appreciates the clarity that competency in the area of school psychology shall be demonstrated through “training and experience.”
4. Sec. 13. 20-A MRSA §13022, sub-§4
 - a. The committee supports removal of the additional requirements for supervisors of first-year school psychologists in order to expand the potential pool of qualified supervisors.

The committee **opposes** the following aspects of LD 1189:

1. Sec. 12. 20-A MRSA §13022, sub-§3, ¶A
 - a. The committee opposes removal of a graduate degree in school psychology from a program accredited by the American Psychological Association from the list of minimum academic and preprofessional requirements for 093 certification. The American Psychological Association Commission on Accreditation is recognized by the secretary of the U.S. Department of Education and the Council for Higher Education Accreditation as a national accrediting authority for education and training in professional psychology.
2. Sec. 12. 20-A MRSA §13022, sub-§3, ¶B
 - a. The committee **strongly opposes** striking the section of statute that permits individuals who have completed graduate programs substantially similar to those approved by the National Association of School Psychologists (NASP) to obtain the 093 credential. This section of statute is critical for granting the committee flexibility to recommend applicants for credentialing when they graduated from non-NASP approved programs that included rigorous academic and internship requirements in line with NASP recommendations for graduate preparation. These include many reputable state-approved school psychology training programs that have opted not to pursue approval by NASP due to high financial and administrative burdens. By striking this section of statute, two important pathways for certification outlined in Chapter 115 would be nullified: (a) Pathway 1, which allows the committee to offer certification recommendations to individuals with a valid Nationally Certified School Psychologist certificate and (b) Pathway 4, which allows the committee to offer certification

recommendations to individuals who have completed a 60+ credit graduate program in school psychology (which included specific coursework) and a 1500+ hour supervised internship (which included at least 750 hours of supervised experience in schools). These represent the most common pathways to credentialing in Maine; therefore, striking this section of statute would impose additional barriers to certification and exacerbate shortages of school psychologists in Maine.

Given that the committee's primary opposition to LD 1189 pertains to the proposal to strike Sec. 12. 20-A MRSA §13022, sub-§3, ¶B from statute, we offer two possible solutions: (a) maintain ¶B as written or (b) replace ¶B with two additional options:

1. Holds a valid Nationally Certified School Psychologist certificate issued by the National School Psychology Certification Board.
2. Has completed a graduate preparation program that is determined to meet the minimum professional standards established by the National Association of School Psychologists.

The inclusion of these options in statute would retain high standards for the credentialing of school psychologists in Maine, while removing significant barriers that prevent diverse professionals from choosing to practice in our state. The Nationally Certified School Psychologist (NCSP) credential reflects a high standard of preparation, knowledge, and skills, and "33 states explicitly acknowledge, recognize, or accept the NCSP credential as either meeting or partially meeting requirements for the state school psychologist credential" (NASP, 2020). However, the committee believes this option must be supplemented with the more flexible option to review applicants' academic and training experiences for equivalency with national standards in order to recruit and retain diverse school psychology professionals.

In sum, the committee supports amendment of statute to recognize department-approved school psychology programs as meeting the academic and preprofessional requirements for the 093 certificate, but strongly opposes striking Sec. 12. 20-A MRSA §13022, sub-§3, ¶B from statute. The committee recommends amending Sec. 12. 20-A MRSA §13022, sub-§3 to read:

3. Qualifications. State board rules governing the qualifications for a school psychologist certificate must require that a certificate be issued only to an applicant who has met the academic and preprofessional requirements established by the state board for the provision of school psychological services and who, at a minimum:

- A. Holds a graduate degree from an accredited program in school psychology that was approved by the National Association of School Psychologists, the American Psychological Association, or the department at the time the degree was awarded; or
- B. Holds a valid license from the State Board of Examiners of Psychologists with demonstrated competency in the area of school psychology through training and experience; or
- C. Holds a valid Nationally Certified School Psychologist certificate issued by the National School Psychology Certification Board; or
- D. Has completed a graduate preparation program that is determined to meet the minimum professional standards established by the National Association of School Psychologists.

Respectfully submitted by members of the Advisory Committee on School Psychologists,

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