



Azita Kakvand
Illinois State Board of Education
100 North First Street
Springfield IL 62777-0001
217/782-6510

Dear Ms. Kakvand:

As representatives of the Illinois School Psychologist Association (ISPA) and current practitioners in school psychology, we would like to address the proposed change to the rules regarding short-term approvals of school psychologists. We are respectfully requesting a reexamination of the language of Section 25.235, subsection f, point 2 Endorsement for School Psychologists, (Page 18115) where the following text appears:

*The following experience shall be honored in lieu of an (School psychologist) internship: 1) one year of professional experience as a school psychologist on a valid, comparable out-of-state certificate or license that allows the holder to work as a school psychologist in that state's public schools a one-year, full time internship under the direction of an intern supervisor; or 2) **one year of full-time experience working as a school counselor on a short term approval and a proficient or higher evaluation rating.***

While it is strongly possible that this comment may be a typographical error, we would like our comment to be on record that the language to allow someone who has worked on a short-term approval as a school counselor to be accepted as a school psychologist would be highly inappropriate. School counselors do not have the same training or coursework as a school psychologist and would not have the necessary knowledge to perform the work of a school psychologist. ISPA and the Illinois School Counselor's Association have met and agree unanimously that the proposed rules for short term approvals must be an error in the document and **strongly encourage a revision to the underlined language to read:**

2) one year of full-time experience working as a school psychologist on a short term approval and a proficient or higher evaluation rating.

Our organization is well aware of shortages in all specialized instructional support personnel positions, including school psychologists, and wishes to work collaboratively with ISBE to address this critical need effectively. The Illinois School Psychologists Association (ISPA) is made up of practitioners, students, and university trainers in the field of school psychology and advocates for the best interests of students as well as the field of school psychology in our state. While we acknowledge there is a critical shortage of school mental health professionals in our state and across the nation, we do not support changes to credentialing that result in graduates who are inadequately prepared to work in school systems. Because of the unique

nature of the education system including the variety of types of schools, school systems, laws and policies, it is essential that school psychologists are trained and supervised by other school psychologists who have appropriate knowledge and background to instruct appropriately within this unique arena. It appears in this proposal that individuals with clinical or counseling degrees could potentially lead a school psychology program, and we fear this would lead to inadequate training in our profession.

ISPA opposes a reduction in the requirements for entry into the profession of school psychology and strongly encourages specialist level training requirements that align with the National Association of School Psychologists (NASP) model for training and practice; including the standard minimum of 60 graduate semester hours and 1200 hours of supervised internship training (with a minimum of 600 hours in a school setting) prior to entry into the field. Upholding these national training standards as minimal training for entry into the profession will serve to ensure that students are not being served by practitioners that have far less training than has long been deemed appropriate for the profession of school psychology. ISPA is not in support of measures that attempt to address shortages by reducing or removing existing coursework and/or fieldwork standards for the preparation of school psychologists. ISPA hopes that collaboration could occur between the associations and ISBE to address shortages of school mental health professionals while maintaining the integrity of school psychology as a profession.

ISPA strongly encourages requiring that a minimum of 1200 hour internship must be completed in a school setting as part of a school psychology training program, with a minimum of 600 hours in school settings. School counseling programs do not uphold this same extensive training or field experiences. Schools are unique systems, and school and district employees alike recognize the importance of true school based experience in preparation for the workforce. ISPA strongly encourages strengthening the language around supervision requirements. For example, supervision of students completing an internship in a school setting should require that they are supervised by someone who is specifically trained and credentialed to work within the school setting. A school setting is very, very different from a clinical or private practice setting. There are many variables that students need to experience such as working with teachers, understanding school systems, and critical differences between clinical diagnosis/treatment and diagnosis/treatment relative to special education law (e.g., medical/clinical eligibility versus educational eligibility).

There are critical differences in the training for school psychologists and other specialized instruction support personnel such as school social workers, school counselors, and other community mental health practitioners. School psychologists are specially trained in assessment practices, diagnosis, and special education protocols as well as school disability laws. School counselors and social workers do not receive this specialized training and would be ill-equipped to move into a school psychologist role. Such a placement would have deleterious effects on students. School psychology practitioners play a vital role in special education eligibility as part of special education evaluation teams. Without appropriate training and pre-service supervised field experiences, school systems may observe students being under-identified, over-identified, or incorrectly identified as students with disabilities, further

straining our already overburdened student support systems. Both ISPA and the Illinois School Counselor's Association remain steadfast in our commitment to addressing shortages in our fields in order to better serve students across Illinois. Please don't hesitate to reach out to our association if we can be of further assistance as revisions are considered.

Respectfully,



Michael Grenda (Dec 15, 2020 10:31 CST)

Michael Grenda, S.S.P., NCSP
President, Illinois School Psychologists Association
ilispapresident@gmail.com



Mary S. Satchwell (Dec 15, 2020 10:39 CST)

Mary S. Satchwell, Ph.D., NCSP
Immediate Past-President, Illinois School Psychologists Association
ilispapastpresident@gmail.com



Sharon Gwaltney (Dec 15, 2020 12:41 CST)

Sharon Gwaltney, Ed. S., NCSP
President-Elect, Illinois School Psychologists Association
ilispapresidentelect@gmail.com