

[EXT] School Psychologist rule change

Caron Inglis <c.inglis@laschools.net>

Tue 12/31/2019 2:01 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

Hello,

I am writing in support of the proposed changes to the licensure of School Psychologists in New Mexico. The proposed changes will allow qualified professionals that are currently unable to obtain Level 2 and Level 3 licensure to do so, increasing the level of support we can provide to the students of New Mexico.

I am thankful that the PED is taking steps to ensure that schools can provide much needed mental health supports in schools.

Sincerely,

Caron Inglis, MS BCBA
NM School Psychologist
Los Alamos Public Schools

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Caron C. Inglis, MS BCBA
Board Certified Behavior Analyst
NM Licensed School Psychologist
Los Alamos Public Schools

This email has been sent from a verified laschools.net user.

[EXT] School Psychology Licensure

djones4747@aol.com

Thu 1/2/2020 9:44 AM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

 1 attachment

School Psychology Licensure NM.docx;

Please find attached a copy of my comments on the proposed repeal and replace of 6.63.5. NMAC, Licensure for School Psychologists, Pre K-12. Thank you for your time and consideration.

Judy Miller
School Psychologist

6101 Imperata Street #2525
Albuquerque NM 87111
December 31, 2019

John Sena
Policy Division, New Mexico Public Education Department
300 Don Gaspar Avenue, Room 101
Santa Fe, New Mexico 87501

Dear Mr. Sena,

Thank you for the opportunity to comment on proposed changes to 6.63.5 NM, Licensure for School Psychologists, PreK-12. I am, however, concerned that the Public Education Department (PED) has given professionals and the public a little over a month to respond to these changes, a month that includes winter break in the schools. The proposed public hearing is on January 3, also during the break. It is unclear if there is widespread awareness and knowledge of these proposed changes. The PED may wish to consider additional time and input gathering before instituting such significant changes.

School psychologists already come highly trained with many undergoing year old internships with supervision before they enter the field. The proposed requirements would make school psychologists subject to additional requirements and supervision which would further encumber current practicing professionals and discourage others from pursuing a career in New Mexico. The state is facing a shortage of mental health professional including school psychologists. The proposed changes would leave school psychologists with requirements far and beyond those of other states and other related service providers. Removing barriers to recruiting and retaining school psychologists is essential to increasing the capacity to provide needed services in our schools. One of most useful changes would be granting experienced professionals from other states reciprocity without requiring additional supervision.

Below are some additional concerns with the proposed rule changes:

Does not allow for an equivalent degree to meet educational requirements; licensure applicants could have degrees in special education, education, etc.

Requires school psychologists to hold professional certificates/licenses (National Certified School Psychology certification or Psychologist /Psychological Associate license by the New Mexico Board of Psychology). These outside certificates/ licenses already require supervision and continuing education. Additional supervision is required for school psychologists in the school setting. Other groups such as school counselors, occupational therapists, physical therapists, etc., are not required to have additional supervision in the school setting to keep their educational licenses or to advance levels.

Diminishes our school psychology programs and licenses by keeping us perpetual interns, even the Level 3 "new" supervisor is supposed to pursue monthly guidance from a more experienced supervising school psychologist.

Does not allow for reciprocity of experienced psychologists, the department had previously discussed granting reciprocity. Teachers are allowed to come in at Level 2 and Level 3 with higher pay. Lack of reciprocity for school psychologists makes moving to and working in New Mexico unattractive.

Different levels of psychologists may be paid differently in various local education agencies; waiting three to six years for advancement may further inhibit recruitment and retention.

Many other states do not require additional post graduate supervision at all, accept professional degrees and licenses.

Very confusing language about prior and post graduate education and experience requirements at all levels makes for unclear interpretation.

No equivalency provision for part- time workers' supervision is included in the rules.

Utilizes valuable school psychologist time for supervision. One hour a week supervision may tax resources, even one hour a month in person may be difficult in some locations, tele-supervision could be option. In underserved areas, especially rural areas, there may be only one psychologist per several districts.

No provision for payment for providing supervision. School psychologists are required to take on liability and additional responsibilities. School psychologists at Level 2 may decide not to apply for Level 3.

Level 1 license is currently only for three years. Since all licenses start on July 1, the license term may be shorter than three years. How does this work if three full years are required? Educational diagnostician licenses are for five years.

The added three full years of school related service requirement before advancing levels may have been included to follow diagnosticians' rules. Our academic training, supervisory hours during internship, and the qualifications needed to obtain outside credentials/licenses are significantly higher.

Level 3 requirement changed from two full years of academic work to three to five years and 750 hours of supervised experience as reported by supervising psychologist. Is this a prior supervisor in graduate school and/or at Level 2?

Counselors are not required to have supervision, can renew in one year.

Three years requirement at Level 2 and Level 3 may make for fewer supervisors, not more, pipeline not opened up.

Level 3 supervision may not be of high quality, many current Level 3 psychologists have clinical training, not school background.

More productive work hours are lost in unnecessary supervision tasks for both supervisor and supervisee.

The National Association of School Psychologists only recommends one year mentorship or supervision for a newly credentialed National Certified School Psychologist (NCSP). A school psychologist with three years' experience is allowed to mentor or supervise.

Many incompatible and competing clauses are in the language throughout the document.

Possible Solutions for Consideration:

Write school psychologists' rules to reflect current best practice of school psychology

Grant reciprocity to experienced school psychologists from out of state without requiring supervision

Require one-year mentorship or supervision for new psychologists only

Change requirements to reflect and provide credit for having an outside licenses like the rules for occupational therapists, physical therapists, counselors, etc., which do not require additional school setting supervision

NCSPs and other psychologists with one-year school experience that included mentorship or supervision enter at Level 2 or Level 3 like teachers or enter at Level 1 without supervision

School psychologists with three year experience allowed to supervise

Reduce hours of required supervision, allow for group and tele-supervision

While one of the goals of these changes may be to provide more Level 3 psychologists, the current proposals need further modification to help advance this purpose. More importantly, the amount and length of supervision needed for school psychologists should be thoroughly reevaluated. Other states do not require and other related service providers are not subjected to these lengthy supervision requirements. A more comprehensive review of and update to our licensing rules to reflect current training standards and best practices in our increasingly interconnected world could be useful. Providing broader equity and standardization of requirements with equivalent professionals will help increase our supply of available psychologists. With additional input, study, and consideration, I believe we can indeed enhance the profession and delivery of psychological services to our students. Thank you again for your time and consideration.

Sincerely,

Judy Miller
School Psychologist

[EXT] Rule Feedback - 6.63.5 NMAC, Licensure for School Psychologists, Pre K-12

Elsa Arroyos <elsa.arroyos@gmail.com>

Fri 1/3/2020 11:56 AM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

To Whom it May Concern:

School psychologists already come highly trained with many undergoing year-old internships and supervision before they enter the field. The proposed requirements would make school psychologists subject to additional requirements and supervision, which would further encumber current practicing professionals and discourage others from pursuing a career in New Mexico. The proposed requirements would leave school psychologists with requirements far and beyond those of other related service providers. The PED has given professionals and the public a little over a month to respond to these changes, a month that includes winter break in the schools. The proposed public hearing is on January 3, also during break. Additional time and input should be considered by the PED before such significant changes are instituted.

Below is some feedback regarding the proposed rule change:

Does not allow for equivalent degree for educational requirements, says degree in school psychology, degrees could be in special ed, education, etc., if also have the appropriate training or experience to provide school psychological services (i.e., respecialization or retraining).

Requires school psychologists to have other licenses that already entail required supervision and paying for continuing education and license but does not respect the integrity of the licenses. Other groups such counselors, OT's, PT's do not have similar supervision requirements.

Diminishes our school psychology programs and licenses as the rule seems to maintain the practitioner at an "intern" level with the supervision requirements, even the Level III "new" supervisor is supposed to pursue monthly guidance from a more experienced supervising school psychologist. More independence, with experience and success in the field, should be the ultimate goal for all practitioners.

Does not allow for reciprocity of experienced psychologists, something that the department had discussed in the past, teachers are allowed to come in at Level II with experience, makes moving to NM uninviting.

Different levels of psychologists may be paid differently in various LEA's, waiting three to six years may further inhibit recruitment.

Language needs to be clarified to read more clearly/explicitly regarding prior and post graduate requirements throughout the document.

No provision for part time supervision requirements like diagnostician licensure states.

Due to the potential challenges with regards to the one-hour a week supervision (given shortages of supervisors), it would be important to consider including tele-supervision as a means to meet this requirement

Utilizes valuable school psychologist time in underserved areas, especially rural areas where there may be only one psychologist per several districts. Again, the need for flexibility in the rules will be critical (re: supervision and reciprocity) so as to not overburden the practitioners in the field at present.

Payment for supervision? This begs the question as to who will pay for this work and if districts have the budget to meet this requirement?

Level I license only is for three years and sometimes less due to being due in July, how does this work if three full years are required? Other licenses are for five years.

Level III changed from two full years of academic work to three to five years for level reported by supervising psychologist, who is this supervising psychologist for level II psychologist-is it referring to prior supervision? Language needs to be clarified.

Three years requirement at Level I and Level II may make for fewer supervisors, not more, if the pipeline is not opened up.

More productive work hours may be lost in supervision for both supervisor and supervisee. This may necessitate a change in the work schedule to accommodate these requirements. Are districts prepared to do this?

Additional Recommendations for Consideration:

Write school psychologist's rule to reflect best practices in school psychology

Allow for one-year supervision of new psychologists only

Given that school psychologists are also related service personnel, the changes to the rule, and subsequent requirements, should be comparable to those of OT, PTs, and counselors

Psychologists with one-year experience enter at Level II like teachers with reciprocity or enter at Level II – reciprocity for school psychologists coming from other states will be critical (especially in the case of these individuals bringing in the NCSP credential and/or licensure/certification from other states)

NCSP's granted full licensure at Level II and allowed to supervise with three year's experience

Thank you for your time and consideration of this feedback and recommendations.

New Mexico Association of School Psychologists, 2019-2020 Executive Board