



2/26/2021

On behalf of the Delaware Association of School Psychologists (DASP), we have reviewed the proposed revisions to the Professional Standards Board regulations pursuant to certification for School Psychologists (14 DE Admin. Code 1583). We appreciate the work that went into these proposed revisions, as well as the communication and involvement offered by the Professional Standards Board and Delaware Department of Education to include our voice in the preparation of the regulations.

When reviewing 4.1.1., we agree with the separation of programs approved by the National Association of School Psychologists (NASP) and the American Psychological Association (APA). This differentiation is understandable as it reflects current certification programs in school psychology and adds clarity for those applying for certification. However, we would like to propose increased clarification in section 4.1.1.1. The language around “the equivalent of an Ed.S. degree” seems vague and does not help to clarify the Educational Specialist level of graduate training necessary to be entry-level in the position. According to the 2020 NASP Professional Standards regarding credentialing, the language utilized includes the following:

- The minimum requirement for being credentialed as a school psychologist shall be a specialist-level program of study in school psychology (e.g., EdS, SSP, CAS, CAGS, PsyS), consisting of the following:
  - o A minimum of 3 years of full-time study at the graduate level or the equivalent, inclusive of structured field experiences
  - o At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship.

We would like to propose the addition of this language, or similar language, to indicate the other specific specialist level degrees listed, the minimum length of study of 3 full-time years at the graduate level, as well as the language indicating at least 60 graduate semester hours. This addition aligns with national standards on certification for school psychologists and allows clarity on what an Educational Specialist degree entails. Lack of clarity here may lead to unintentional granting of certifications to ill-trained professionals with the school psychology certification. This imprecision would increase challenges for districts differentiating between those with appropriate training, as well as allow these professionals to utilize a professional title with below entry-level training and qualifications.

In regards to 4.1.3, we are in agreement with the increased language regarding the nature of the internship requirement in comparison to the previous regulations. The numbers included, such as the 1200 hours, with 600 in a school setting, represent the minimum requirement for completion of a school psychology program.

We are also in support of the ability for those who hold a Nationally Certified School Psychologist (NCSP) Certificate to be automatically able to receive certification as a school psychologist in Delaware. This

national certification, used by multiple states, indicates the appropriate entry-level training necessary to perform the duties and responsibilities of a school psychologist.

We have some concerns with the language under 3.1.2., but understand the support behind its inclusion. There is a current shortage of school psychologists nationwide. The state and school districts want to ensure that we are able to fill our positions, with having the least amount of barriers to certification possible. However, as certification varies significantly by state, this may open the door to school psychologists without similar training levels. We feel that perhaps more stringent requirements should be reflected here. This may include a clause regarding automatic reciprocity as long as there are similar requirements between Delaware and the other state certifications and/or the requirement to submit a passing score on the Praxis Subject Assessment – School Psychology (ETS Code #5042) if within the first 5 years of practice/on an initial license in the applicant’s home state.

We recognize that a change like this may make it more challenging and less appealing for out of state school psychologists to come into Delaware. One thing we may suggest adding is language around respecialization/retraining. This could allow for a process for professionals in affiliated fields to acquire necessary coursework/field experiences to become eligible to practice as school psychologists in Delaware. However, there is no current mechanism for this to happen in our in-state university program.

Another way to help with the shortages would be to look at the current programs within the state to determine ways to support. We currently have one training program at the University of Delaware. Ensuring that this program continues will be vital to helping with shortages in Delaware. Looking at incentives/supports to develop additional NASP-approved programs in the state would also help in addressing the shortages problem and allow for Delaware to think about our regulations from a standpoint of what is necessary for entry level certification versus from the perspective of concerns with not having enough practitioners.

Overall, we thank the Professional Standards Board and the Department of Education for their review and focus on these regulations. Many of the changes included help to clarify the requirements of entry level positions. We feel that the main update required would be the above proposed addition around entry-level graduate training, as discussed in the NASP professional standards.

Sincerely,

The Delaware Association of School Psychologists

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