



March 1, 2021

Department of Education
Office of the Secretary
Attn: Regulation Review
401 Federal Street, Suite 2
Dover, DE 19901

**RE: 14 DE Admin. Code 1583 School Psychologist Standard Certificate Regulation
(proposed changes)**

Dear Secretary Bunting:

The Delaware State Education Association (DSEA) has reviewed the Professional Standards Board (PSB) and Delaware Department of Education (DDOE) proposal to amend Regulation 1583 which delineates the requirements for obtaining the School Psychologist standard certificate. DSEA supports most of the proposed changes; however, we would like to share the following observations and recommendations:

1. We would like to propose increased clarification in section 4.1.1.1.

The language around “the equivalent of an Ed.S. degree” does not specify the Educational Specialist level of graduate training necessary to be entry-level in the position. In accordance with the 2020 NASP Professional Standards regarding credentialing, we propose that the language in section 4.1.1.1 include the following:

- a. 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:
 - i. A minimum of 3 years of full-time study at the graduate level or the equivalent, inclusive of structured field experiences
 - ii. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship.

This suggested language aligns with national standards on certification for school

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psychologists and allows clarity on what an Educational Specialist degree entails. Lack of clarity here may lead to the unintentional granting of certifications to ill-trained professionals with the school psychology certification.

2. We also have some concerns with the language proposed in section 3.1.2. While we agree that there is a current shortage of school psychologists nationwide and that Delaware school districts need to be able to fill school psychologist positions, it should also be noted that certification requirements vary significantly by state.

We recommend that more stringent requirements be reflected in section 3.1.2. Specifically, this could include inserting a clause regarding automatic reciprocity if there are similar requirements between Delaware and the other state certifications and/or requiring the applicant to submit a passing score on the Praxis Subject Assessment – School Psychology (ETS Code #5042) if they are within the first 5 years of practice and/or on an initial license in the applicant’s home state.

3. To address State and District concerns regarding a shortage of candidates for school psychologist positions, we propose that the PSB and DOE add language to the current regulation built around the concept of respecialization/retraining. This would provide a process for professionals in affiliated fields to acquire the necessary coursework/field experiences to become eligible to practice as school psychologists in Delaware. This would also require working with the University of Delaware to develop such a program. Similar language for such a process is currently included within Regulation 1522 Elementary School Counselor and Regulation 1545 Secondary School Counselor.

In closing, we would like to thank the Professional Standards Board and the Department of Education for their review and focus on this regulation and for considering our observations and recommendations. Please contact me should you have any questions.

Respectfully,



Stephanie Ingram
President
Delaware State Education Association