12/16/2020

To the Wyoming Board of Psychology;

 After being made aware of the public comment period for the Specialist in School Psychology credential, the Wyoming School Psychology Association (WSPA) proposes the following changes to the Wyoming Board of Psychology’s Rules and Regulations.

* In Chapter 3 (License, Certification, and Status classifications), Section 2, we propose the following changes,
	+ “Specialist in School Psychology – a person who has met the requirements of Board Rules Chapter 6, Section 2 and been issued a ~~certificate~~ license from the Board.”
* In Chapter 6 (Certification Requirements), we propose that all of the language related to “certification” be changed to “license” and moved to Chapter 5 (Licensure Requirements).
	+ “(a) “~~Certification~~  License Requirement. An individual must be ~~certified~~ licensed with the Wyoming State Board of Psychology before practicing as a specialist in school psychology.
	+ (b) “Any applicant who is NCSP certified, and who is certified as a School Psychologist by the Professional Teachers Standard Board in Wyoming shall be considered as having met the education, experience, and examination requirements for ~~certification~~ license as a Specialist in School Psychology.”
	+ (c) “Specialist in School Psychology. A ~~certified~~ licensed specialist in school psychology shall function under the supervision of a psychologist who has the appropriate training and experience to supervise individuals within the school psychology specialty scope of practice.”
	+ (i) “Supervision of the ~~certified~~ licensed specialist in school psychology is the responsibility of the supervising psychologist. Such supervision shall include live (face-to- face) or virtual (by phone or video conference) consultation as required by the nature of the work of the specialist in school psychology and which is consistent with accepted professional standards in school psychology. The supervising psychologist is responsible for ensuring that the extent, kind, and quality of services provided are consistent with the training and experience of the specialist in school psychology.”
	+ (ii) “The supervising psychologist shall provide a minimum of one hour of individual face-to-face supervision for every twenty (20) clock hours of service delivery. Additional supervision shall be provided as appropriate.”
	+ (iii) “Following ~~five (5)~~ Three (3) years of supervised experience as a ~~certified~~ licensed specialist in school psychology or one (1) year of supervision following 5 years of experience completed in a school setting. The required supervision by a psychologist may be discontinued, unless additional supervision is recommended by the supervising psychologist and approved by the Board.”
	+ (iv) “The specialist in school psychology shall submit to the Board a completed Supervision Agreement form provided by the Board. Such arrangements must be reviewed and approved by the Board before supervision begins. Any change in the supervision plan must be reported by the specialist in school psychology in writing on a Supervision Agreement form within ten (10) days to the Board for review and approval.”
	+ (v) “The specialist in school psychology must maintain records documenting supervision contacts and must make them available to the Board for review at any time considered necessary by the Board.”
	+ (vi) “The supervising psychologist shall maintain ultimate responsibility for the school psychological activities of supervisees, the welfare of every client served by the specialist in school psychology, and be fully accountable in the event that professional, ethical, or legal issues are raised.”
	+ (vii) “Clients shall be informed, during the supervision period, that the work of the specialist in school psychology is supervised and be provided with the name, address, and telephone number of the supervising psychologist. The supervising psychologist shall be listed on all correspondence and billings as shall be the specialist in school psychology. During the supervision period, all reports written by the specialist in school psychology shall be co-signed by the supervising psychologist.”
	+ (viii) “~~Irrespective of any other training which the~~ A specialist in school psychology may possess ~~have completed, or any~~ other certification or licensure ~~which the specialist in school psychology may possess, or any other professional title or label the individual may claim~~ that may allow them to provide specialized services. Anyone ~~certified~~ licensed as a specialist in school psychology is ~~bound~~ expected ~~by the provisions of the act and rules of the Board in~~ to provide ~~school~~ high quality psychological services in an ethical and responsible manner as described by the National Association of School Psychology (NASP) Standards and Policies.”
	+ (ix) “A psychologist may supervise and/or employ a maximum of three (3) specialists in school psychology.”

Overall, our goals and reasoning for recommending these changes are to increase opportunities for highly trained school psychologists to provide quality mental health services in Wyoming. This will not only benefit those with mental health needs in Wyoming, but it could also help address the shortage of school psychologists in Wyoming by providing an expanded role and work opportunities. By changing the wording from “certified” to “licensed” we join other states, like Texas and other states, to provide a more recognized title that should make it easier for specialists in school psychology to be accepted by insurance boards, enabling them to bill independently once their supervision period has ended. We recommend shortening the supervision period as it will better recognize the services and skills school-based practitioners are already trained to provide independently in the school setting, while still ensuring a needed period of time to transition and acclimate to a new professional setting. Finally, we recommend that specialists in school psychology operate within their trained scope of practice, but that they are not limited in their ability to learn, grow, develop and earn certifications/licenses in additional areas of expertise that they can then utilize as they provide services to the general public. (Please see the chart on page 4 and 5).

On behalf of the Wyoming School Psychology Association, we appreciate your time and consideration, and we would forward to continuing this dialogue concerning the possibility of revising the licensure options for school psychologists in the state of Wyoming.

Please feel free to contact us with any questions,

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| **Current Rule/Language** | **Proposed Changes** | **Reasoning for Changes** |
| Certification language for the specialist in school psychology credential is currently found in Chapter 6 (Certification Requirements) | Language related to “certification” should be changed to “license” and moved to Chapter 5 (Licensure Requirements) | -As the change from “certified” to “licensed” would make it a more recognizable title/credential for insurance board acceptance and billing, the language would need to be moved under licensure requirements. |
| Supervision of the certified specialist in school psychology is the responsibility of the supervising psychologist. Such supervision shall include face-to- face consultation as required by the nature of the work of the specialist in school psychology | Supervision of the ~~certified~~ licensed specialist in school psychology is the responsibility of the supervising psychologist. Such supervision shall include live (face-to- face) or virtual (by phone or video conference) consultation as required by the nature of the work of the specialist in school psychology | -To better meet the needs of supervisors and those supervised in meeting this requirement; particularly, under difficult situations like great distances and quarantine. |
| Following five (5) years of supervised experience as a certified specialist in school psychology, the required supervision by a psychologist may be reduced, as appropriate, to a minimum of one (1) hour of face-to-face individual supervision monthly. | Following ~~five (5)~~ three (3) years of supervised experience as a ~~certified~~ licensed specialist in school psychology or one (1) year of supervision following 5 years of experience completed in a school setting. The required supervision by a psychologist may be discontinued, unless additional supervision is recommended by the supervising psychologist and approved by the Board.” | -Shortening the supervision period will better recognize the services and skills school-based practitioners are already trained to provide independently in the school setting, while still ensuring a needed period of time to transition and acclimate to a new professional setting. School Psychologists practice independently, without supervision, within the school setting. Thus, the requirement that they perform these same tasks, only under supervision, outside of the school setting appears discriminatory. We support this change to align expectations with other states as well as to recognize that School Psychologists are trained and fully capable independent providers of services within their scope of practice. |
| Clients shall be informed that the work of the specialist in school psychology is supervised and be provided with the name, address, and telephone number of the supervising psychologist. The supervising psychologist shall be listed on all correspondence and billings as shall be the specialist in school psychology. All reports written by the specialist in school psychology shall be co-signed by the supervising psychologist. | Clients shall be informed, during the supervision period, that the work of the specialist in school psychology is supervised and be provided with the name, address, and telephone number of the supervising psychologist. The supervising psychologist shall be listed on all correspondence and billings as shall be the specialist in school psychology. During the supervision period, all reports written by the specialist in school psychology shall be co-signed by the supervising psychologist | -As with shortening the supervision period, these requirements should only be in place as long as supervision is in place. |
| Irrespective of any other training which the specialist in school psychology may have completed, or any other certification or licensure which the specialist in school psychology may possess, or any other professional title or label the individual may claim, anyone certified as a specialist in school psychology is bound by the provisions of the act and rules of the Board in providing school psychological services. | ~~Irrespective of any other training which the~~ A Specialist in school psychology may possess ~~have completed, or any~~ other certification or licensure ~~which the specialist in school psychology may possess, or any other professional title or label the individual may claim~~ that may allow them to provide specialized services. Anyone ~~certified~~ licensed as a specialist in school psychology is ~~bound~~ expected ~~by the provisions of the act and rules of the Board in~~ to provide ~~school~~ high quality psychological services in an ethical and responsible manner as described by the National Association of School Psychology (NASP) Standards and Policies | -Specialists in school psychology should operate within their trained scope of practice, but they should not be limited in their ability to learn, grow, develop and earn certifications/licenses in additional areas of expertise that they can then utilize as they provide services to the general public. Similar to professionals in other domains of practice, the focus of a School Psychologist’s training and areas of interest and expertise may vary. In line with expectations of other mental health and psychological practitioners, School Psychologists should be able to provide all services within their own scope of qualified training and experience. |