

Hello Everyone,

My name is Shelly Skogstad, Ed.S. I am a practicing school psychologist in the State of South Dakota, and the public comment I am about to provide represents my own personal views as a practitioner and is not a representation of the organization in which I work for. I want to start by thanking the Board for the opportunity to comment. I am offering input in regards to the topic of school psychological examiners. I have supervised school psychological examiners in the past and have been directly impacted by the shortage of school psychologists in the state. Therefore, I have firsthand knowledge that the proposal to remove the school psychological examiner endorsement offered by the state is surrounded by much controversy, and the solution is not an easy one.

I believe that our ultimate goal should be to develop a plan for how we can increase the number of certified school psychologists we have in the state. There are many methods to be considered in accomplishing that goal including but not limited to offering paid internships, providing tuition reimbursement for those who stay and work in state after graduation, developing methods for re-specialization and retraining for professionals via the National Association of School Psychologist's guidance, as well as expanding the role of school psychologists so they can provide comprehensive and integrated school psychological services in order to promote consistency of practice and reduce practitioner burnout. Increasing the number of certified school psychologists in the state will better meet the needs of our students and schools by using limited dollars more effectively, which will subsequently improve school and student outcomes.

Unfortunately, increasing the number of certified school psychologists in the state is not an overnight one, and I believe a plan also needs to be developed in regards to how we are going to address the shortage of school psychologists by continuing to offer the school psychological examiner endorsement. Historically, school psychological examiners have helped fill a void, but there are many points to consider when determining the specifics of the endorsement. In order to adequately address those points, I believe a committee needs to be established that is comprised of key stakeholders, and that committee needs to address several issues and provide effective oversight.

One of the issues a committee needs to address is that there is no clear definition of what school psychological services are, as well as no clearly defined scope of practice for school psychologists or defined scope of practice for school psychological examiners. That has resulted in school psychological examiners and other random professionals engaging in activities that are outside of what is considered ethically appropriate. That means there are people who are practicing school psychology and they are not certified to do so, including people who are not even school psychological examiners. All other related service providers such as Physical Therapists and Physical Therapy Assistants, Speech and Language Pathologists and Speech and Language Pathology Assistants, and Occupational Therapists and Occupational Therapy Assistants have clear definitions regarding the practice and supervision within those fields. If someone were to practice those types of services without being licensed, it could be considered a Class 2 misdemeanor. School psychology should be no different. A clearly defined scope of practice will ensure that no one is practicing outside of what they are certified to do, and if they are, it should also be considered a Class 2 misdemeanor.

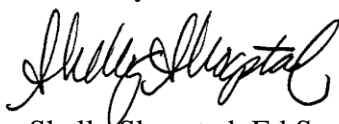
Another issue a committee needs to address is that all related service providers and assistants, including school psychologists, as well as teachers and administrators are required to successfully

complete the academic training requirements of their educational program and pass a national examination approved for their field, such as the Praxis. Even paraprofessionals are required to pass a state assessment. However, there are no requirements for school psychological examiners to do the same. Further, the courses that are required of psychological examiners to take are not clearly defined and offered from accredited training programs specific to school psychological examiners. That has resulted in people taking courses that may have met the titled requirements, such as taking a class that has the same name as what is required, like *Individual Psychological Evaluation*, yet they never learn to administer, score, and interpret psychological evaluations. Other times, individuals who are not even certified school psychologists have created continuing education courses and are named the teacher of record through a particular training institution, and they offer courses that are named as one of the courses that are required for endorsement as a school psychological examiner, yet those courses do not meet industry or national standards of practice. A course name should not delineate whether or not someone has met the course requirements for a particular course listed on the school psychological examiner endorsement. Rather, a detailed examination of the course syllabus needs to be analyzed by an appointed committee. The committee should be comprised of certified school psychologists, similar to the committee requirements other related service providers utilize to approve the qualifications of persons applying for a license to practice in the state in their respective fields. School psychology should be no different. Our most vulnerable students should not be being evaluated by persons who do not have adequate training or who have not passed a national examination to ensure they are qualified to do so.

Lastly, as the Board considers removing the ARSD 24:05:23:02 psychological evaluator definition, I believe it is essential that clarification be provided pertaining to the supervision requirement in regards to school psychological examiner reports needing to be co-signed by a certified school psychologist. We need to ensure that supervision requirements remain in place for school psychological examiners because some entities are incorrectly interpreting this removal of language as now allowing school psychological examiners to write psycho-educational evaluation reports without the oversight of a certified school psychologist, which is extremely concerning and unethical.

In closing, the state of Utah faced a similar shortage of school psychologists, and their Board of Education developed the *Handbook for the Special Education Eligibility Evaluator (SpEd-EE) Endorsement*, which is a 42 page document that I highly recommend be considered as a guide. Some may construe it to be somewhat overboard in length, but it is a very detailed document that I highly recommend be examined by a committee. It is imperative that we do our absolute best to address the shortage of school psychologists by developing a plan to recruit, train, and retain high quality school psychologists in the State of South Dakota. The students, families, and school districts that we serve deserve nothing less, and they should be assured that we are addressing all of the issues surrounding the topic of school psychological examiners including ensuring that students are being provided psychological services by adequately trained professionals.

Sincerely,

A handwritten signature in cursive script, appearing to read "Shelly Skogstad".

Shelly Skogstad, Ed.S.
School Psychologist