



March 21, 2020

Dr. Debra Heath-Thornton
Director, Bureau of School Leadership and Teacher Quality
Pennsylvania Department of Education - Office of Postsecondary and Higher Education
333 Market Street
Harrisburg, PA 17126

Dear Dr. Heath-Thornton:

We hope you, your colleagues, families, and friends are well and managing the many changes and challenges related to our current public health situation. Across the nation and the Commonwealth, we are all working hard to navigate the rapidly changing landscape of COVID-19. We are grateful for your leadership and diligence during this crisis.

We are writing as a group of school psychology deans, trainers, and supervisors, in collaboration with the Pennsylvania Psychological Association (PPA) and the Association of School Psychologists of Pennsylvania (ASPP), in order to represent the interests of graduate student trainees in the Commonwealth.

In light of the impact of COVID-19 on the educational system in the Commonwealth, we want to ensure our trainees are still able to receive high-quality preparation for their future careers in school psychology. With a national shortage of school psychologists, that is also present in the Commonwealth, our ability to train and prepare a competent and robust workforce is of the utmost importance.

The National Association of School Psychologists (NASP) typically requires 1,200 hours of internship for completion of a “Specialist Level” School Psychology Training Program as well as for certification as a Nationally Certified School Psychologist (NCSP). The Pennsylvania Department of Education requires 1,000 training hours for credentialing as a School Psychologist in the Commonwealth. In light of the current COVID-19 related school closures in Pennsylvania, many of our current interns may have difficulty accruing all of the 1,200 hours (NASP) or 1,000 hours (PDE) required for certification as school psychologists.

On March 18, 2020, NASP adjusted its training standards and suggested that trainees have more flexibility in *how* they meet the required 1,200 hours should K-12 schools remain closed. In their document titled, “**Guidance Regarding Graduate Intern Hours in Response to School Closures**” NASP further clarified these changes.

Essentially, NASP has indicated that $\frac{1}{3}$ of the total 1200 hours may be completed with flexibility in response to COVID-19. That is, 33% of 1200 hours (400 hours) may be completed through alternative activities, while the initial 800 hours (66%) are completed as direct field-based, supervised hours. Using this same formula, we suggest that $\frac{1}{3}$ of the PDE required training hours

(33% of 1,000 hours = 333 hours) may also be completed through alternative activities, at the discretion of the training program, in response to the COVID-19 public health crisis.

The NASP documentation further clarifies that **graduate training programs have discretion** as to how many non-school hours may be spent on other internship tasks and may be counted toward the 1,200-hour minimum. This flexibility suggests that interns will still be able to accrue training hours, even if in a non-traditional capacity and the same would be true for practicum student trainees as well. **NASP supports the autonomy of graduate programs to identify how students who complete the program will develop the required knowledge and skills that align with program goals and objectives.**

We are requesting that the Pennsylvania Department of Education also allow the remaining hours of the 1,000 required hours, to be completed with flexibility and at the discretion of the graduate training program.

As graduate educators and supervisors, we must ensure that our graduates meet the levels of competency needed to become effective school psychologists. We will do everything within our power to assist our students in meeting the training requirements needed to satisfy program completion and certification in Pennsylvania. We are hopeful that you will support the autonomy and expertise of graduate school training programs in ensuring that this goal is met.

Thank you for your consideration and support,



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