Thank you for the opportunity to provide testimony on this complex issue. The Executive Committee of the Kentucky Association for Psychology in the Schools (KAPS) has reviewed the proposed endorsement program for counselors entitled, "Individual Intellectual Assessment". We would offer the following comments and recommendations.

1. KAPS remains opposed to the concept of creating a special certification endorsement for intelligence testing for a variety of reasons, most of which we have specified in prior testimony in various related hearings. Attached please find this testimony, which details our concerns. We believe that the administration and scoring of intelligence tests are part of a broader cognitive and psychological assessment process which requires integrated training and supervised experience in a number of psychological and educational areas. We concur with prior Council on Teacher Education and Certification position statements which support this perspective (also attached).

2. Nevertheless, we do wish to respond to the specific proposal, and offer the following criticisms:

   a. Actually, the proposed endorsement reflects an addition of six (6) credit hours when compared to the current state of affairs.

      1. All counselors are currently required to take a course in tests and measures as part of provisional certification, so the inclusion of this requirement does not reflect any additional training.

      2. Counselors who now perform this function must take one course in intelligence testing, usually focusing on the Wechsler tests. This would be part of the nine (9) hours specified by the proposed regulation.

      3. Thus, the additional nine (9) hours of assessment/intervention is really only six (6) additional credit hours, which we see as grossly inadequate.

   b. These additional six hours of assessment/intervention are left unspecified as to content. We think there is a need for coverage of some very specific bodies of knowledge in order to perform this role.

   c. We remain concerned that there is no assurance in this proposal for an integrated training experience.

   d. We see no emphasis on the need for supervised experience in the form of practica and internship.
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e. There are no apparent assurances that pre-service or in-service training and supervision will be provided by qualified and experienced examiners.

f. There will continue to be confusion about roles and responsibilities under this proposal.

3. Despite our concerns about the creation of yet another certification category, we feel obliged to respond in a constructive manner to the content of the proposal, and offer the following as a set of recommendations for a minimally adequate training sequence for the purposes of the designated role:

a. That the endorsement requirements be expanded to include eighteen (18) hours of integrated training above the provisional certification level, to include the following:

1. Course in child exceptionality
2. Course in individual intellectual assessment — Wechsler administration, scoring, beginning report writing
3. Course in advanced individual assessment — other intelligence measures, interpretation, integration of assessment information
4. Course in special education remediation — intervention planning, serving on multidisciplinary teams
5. Course in school-based consultation
6. Supervised school-based practicum experience of 250 clock hours

b. Supervised internship in intellectual assessment, which could be served as part of the first year of employment.

1. Minimum of 500 hours of supervised experience in intellectual assessment.
2. Supervision by a qualified examiner.

c. Competency examination administered by the Kentucky Department of Education

1. School psychologists are presently required to pass an examination to demonstrate their minimum competency in skills which are directly relevant to their practice in the schools.
2. Such an examination would be developed by persons qualified to evaluate such competencies (i.e., qualified examiners), to include a cross-section of school-based practitioners and university trainers.
3. The focus of the examination would be on measurement, test interpretation, differential diagnosis and child exceptionality, integration of assessment information, and intervention design.

4. We believe provisions should be made for persons currently serving in the role of intellectual/psychological assessor to upgrade their skills to the above level over a reasonable period of time, as implied by the proposed regulation.