

October 3, 2013

Florida Department of Health
Consumer Services Unit
4052 Bald Cypress Way
Bin C-75
Tallahassee, FL 32399-3275

RE: Licensed School Psychologists performing “school neuropsychological assessments”

Dear Sir or Madam:

The Inter Organizational Practice Committee (IOPC) is a coalition of representatives of all of the major Neuropsychology organizations in the US including the American Academy of Clinical Neuropsychology (AACN/ American Board of Clinical Neuropsychology), Division 40 of the American Psychological Association (APA), the National Academy of Neuropsychology (NAN), and the American Board of Professional Neuropsychology (ABN), as well as the American Psychological Association Practice Organization (APAPO). The IOPC is tasked with coordinating national neuropsychology advocacy efforts, and represents approximately 8,000 neuropsychologists in the United States. The APA Practice Organization is dedicated to advancing the professional practice of psychology and represents the interests of APA members who are doctorally-trained and licensed health care professionals. It is the companion organization to the APA, which is the largest membership association of psychologists with more than 137,000 members and affiliates engaged in the practice, research and teaching of psychology.

We are writing to provide feedback to the Florida Department of Health, relevant to the issue of defining who is qualified to conduct neuropsychological evaluations. We have concerns about master’s degree level Florida Licensed School Psychologists (LSPs) performing “school neuropsychological assessments.” We believe there is a strong need to provide clarity and to protect the public from receiving services from individuals who are not qualified to provide neuropsychological services. Consumers seeking neuropsychological evaluation of neurologically based disorders have no way of knowing that there is a difference in training between a masters level Licensed School Psychologist and a doctoral

level Licensed Psychologist, with specialized training and/or board certification in neuropsychology.

Clinical neuropsychology has evolved into a specialty area cutting across several fields, including areas that are generally viewed as more medically oriented, such as neuroanatomy and neuropathology, and requires extensive training in neurological disorders and brain behavior relationships pertaining to normal and abnormal brain function. As implied by the term, clinical neuropsychology involves the application of both neurological and psychological knowledge and clinical skills in the assessment, treatment, or intervention with individuals with known or suspected neuropathological conditions, brain injury, or disease. Neuropsychology differs from the general cognitive, perceptual, sensorimotor, intellectual or behavioral assessments carried out by clinical, counseling, school or industrial-organizational psychology. Its purpose is to make clinical judgments regarding the functional integrity of the brain and of the specific effects of known brain pathology based on assessment and analysis of these functions.

There are currently guidelines and definitions that have been developed by national organizations in neuropsychology, including the National Academy of Neuropsychology (NAN), Division 40 of the American Psychological Association (APA), the American Academy of Clinical Neuropsychology (AACN), the American Board of Professional Neuropsychology (ABN), and the Houston Conference (see attached). These define not only the minimal education and training requirements necessary for specialization in this area of clinical practice, but also clarify the minimum requirements for scope of practice necessary to perform the level of assessment typically associated with evaluations performed in this area of specialization.

We do not know of any training program in the country that offers this sequence of training to masters level school psychologists to prepare them to competently perform a neuropsychological assessment. Allowing neuropsychological assessment to be provided by practitioners not trained to perform the services (LSPs) will dramatically affect the quality and effectiveness of neuropsychological services for Florida citizens.

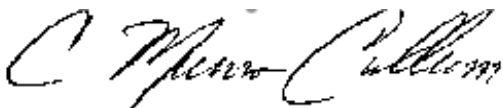
When unqualified providers conduct neuropsychological evaluations, serious errors ensue. Cognitive impairment can be attributed to a brain injury or genetic condition, when in fact the patient has a treatable condition (e.g., sleep disorders causing cognitive symptoms, normal pressure hydrocephalus, thyroid dysfunction, depression, etc.). In some cases, patients' symptoms have incorrectly been attributed to nonexistent or noncontributory conditions (e.g., concussion) when, in fact, there is a serious, potentially treatable condition, which if left untreated, can result in permanent brain damage or even death (e.g., normal pressure hydrocephalus, tumor, thyroid dysfunction, toxic exposures). The incorrect diagnosis or misattribution of symptoms results in failure to provide appropriate referral recommendations for further diagnostic work up and needed treatment. Intervention recommendations, including but not limited to those pertaining to rehabilitation, planning, and academic learning are also made incorrectly, potentially adversely impacting the patient's health and increasing unnecessary spending. Patients and families receive upsetting information that is incorrect, or they receive no information on a potentially treatable and/or reversible condition that is causing cognitive deficits.

Allowing Licensed School Psychologists to provide “school neuropsychological assessments” is misleading to consumers and will interfere with them seeking care from the type of highly trained licensed psychologist with advanced training in neuropsychology that is needed to assess and diagnose individuals with complicated medical, genetic and neurobehavioral disorders. We are also concerned about the cost to Florida consumers for “school neuropsychological assessments,” because Licensed School Psychologists will be not be reimbursed by Medicare, Champus, or any commercial insurance companies that we are aware of, regardless of their personal level of education and training in their field. In direct contract to this, neuropsychological services will be reimbursed by government and most private insurance companies when provided by an appropriately credentialed, doctoral level, Licensed Psychologist.

We propose that the Florida Department of Health limit the conducting of neuropsychological evaluations to those who meet established national guidelines regarding specialty training in neuropsychology.

Thank you for taking the time to review our concerns for neuropsychological services.

Respectfully submitted,



C. Munro Cullum, Ph.D., ABPP
President, Society for Clinical Neuropsychology (APA Division 40)



John Knippa, Ph.D., ABN
President, American Board of Professional Neuropsychology



Daniel C. Marson, J.D., Ph.D.
President, National Academy of Neuropsychology

Handwritten signature of Aaron Nelson, Ph.D. in black ink.

Aaron Nelson, Ph.D., ABPP
President, American Academy of Clinical Neuropsychology

Handwritten signature of Katherine Nordal, Ph.D. in black ink.

Katherine Nordal, Ph.D.
Executive Director, Practice Directorate
American Psychological Association