



Mr. Chairman, members of the Finance Subcommittee on State Government and Agency Review, my name is Erin Schaeffer and I am here today on behalf of licensed marriage and family therapists in Ohio as President of the Ohio Association of Marriage and Family Therapy.

I am a licensed IMFT-S and LPCC-S. She has been in the field since 1997. I serve as Director of Operations at Catalyst Life Services in Mansfield, Ohio, where I served in several positions for the past 17 years. I am a past director of Ashland Parenting Plus and a Clinical Fellow of AAMFT. I served on the AAMFT Board of Directors from 2011-2013 and have been a member of AAMFT and OAMFT for 20 years.

The Ohio Association of Marriage and Family Therapy is strongly opposed to the board consolidation provisions contained in HB 49.

As currently drafted, HB 49 would abolish the Ohio Counselor, Social Worker and Marriage and Family Therapist Board and transfer that boards' duties to a newly created State Behavioral Health Professionals and Social Work Board. The board would consist of two social workers one marriage and family therapist, one professional counselor, one non-school psychologist, one school psychologist, one chemical dependency counselor, one chemical prevention specialist and one public member. This proposed board would be the licensing and regulatory body for approximately 48,000 licensees and 16 license types.

This board consolidation proposal purportedly saves the state money and creates administrative efficiencies. It is important that I remind you that these boards receive no GRF money but instead are entirely self-supporting, relying on license fees paid by licensees to support the operations and activities of the boards. In other words, the Counselor, Social Worker and Marriage and Family Therapist Board is self-sustaining. No savings, financial or otherwise, will result from passage of this provision.

The CSWMFT Board and the others impacted by this legislation are operating efficiently at current staffing levels. On average, among the boards impacted, there is one investigator for every 8081 licensees. The CSWMFT Board has one investigator for every 12,000 licensees or three investigators for a total 37,000 licensees and registrants. Investigators with a specific knowledge and expertise in the field are critical. Current members of licensure boards lend their time and expertise in investigations. Consolidated boards result in less expertise to ensure licensees are practicing according to Ohio law and relevant practice acts.

The consolidation plan undermines the board's core duty to protect and enhance the health, safety and general welfare of the public. There are 5 unique professions represented on this proposed board. These include Psychology, Social Work, Professional Counseling, Marriage and Family Therapy and Chemical Dependency Counseling. Each profession has its own body of education & research, licensing exam, scope of practice and code of ethics. Each also

provides a unique contribution to mental health treatment for citizens of Ohio. The body of knowledge needed in order to make well-informed decisions concerning mental health regulations should not be reduced to one participant from our profession. One MFT may be working at Nationwide Children's Hospital in an eating disorders clinic, another in private practice, or working in a homeless shelter with homeless women. Different clients and practice settings require a different knowledge base.

By allowing individuals with no training or education in a certain field to determine the education, oversight and discipline of that field, practice standards in these fields could become unacceptable and therefore jeopardize consumer safety. The current board structure ensures the integrity of the healthcare professionals they regulate.

It is important to note that other states with consolidated board structures have experienced significant problems. Oregon and Colorado consolidated licensure boards only to later return to independent boards. This was due to slower response times to consumer inquiries under the Centralized Regulatory Agency. Consolidated boards in Florida, South Carolina and Illinois have countless problems with efficient administration and California, Maryland, Minnesota, Pennsylvania, Utah and Rhode Island have pursued efforts to consolidate their boards, only to drop those efforts and instead maintain the current board structure.

With term limits it may be important to remind members that consolidation language has been considered 7 times previously in Ohio and failed to become law. We see no failure in Ohio's board structure that would scream for the need for change. We also see no benefit, financial or otherwise to the state if consolidation is realized. **For this reason, I respectfully ask you to remove the consolidation provisions from HB 49.**

Mr. Chairman, thank you for the opportunity to testify today. I am happy to address any question that you or other subcommittee members may have.