



WORKFORCE AND
HIGHER EDUCATION
COMMITTEE

Witness Form

Today's Date 11-29-22

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Organization Representing: Ohio Supervisors of School Psychologists

Testifying on Bill Number: HB509

Testimony: Verbal Written Both

Testifying As: Proponent Opponent Interested Party

Are you a Registered Lobbyist? Yes No

Special Requests: _____

November 22, 2022

Senator Dr. Terry Johnson
Chairman – Ohio Senate Workforce and Higher Education Committee
Statehouse
1 Capitol Square
2nd Floor
Columbus, OH 43215

Dear Senator Johnson,

I am writing in respectful opposition to key portions of House Bill 509, particularly those provisions which would eliminate the opportunity for school psychologists to be licensed by Ohio's State Board of Psychology in order to serve in independent ("private") practice.

I am writing to you in my capacity as the Chair of the Ohio Supervisors of School Psychologists, a former President of the Ohio School Psychologists Association, a former elected Ohio Delegate to the National Association of School Psychologists, an Adjunct Professor in school psychology for more than 20 years, and a School Psychologist licensed by the State Board of Psychology since 2001 who has been engaged in independent practice since that time.

There is a critical shortage of school psychologists in every state in our country, and the State of Ohio is no exception. Every year, supervisors in school settings struggle to fill a number of open positions in various school districts that exceed the number of licensed practitioners available to assume these positions. This critical shortage is *even greater* in private practice work.

Indeed, there are hundreds of active school psychologists who are licensed by the Ohio Board of Psychology to provide services in the private sector in communities around Ohio. At the same time, most counties in Ohio, including large counties like the one in which I live and work (Summit), have very little access to any of these school psychologists who can provide services independently. The language in HB509, as written, would completely eliminate access to this already modest workforce.

Please note that it is not the case that the State Board of Psychology license for school psychologists is somehow redundant with the licensure for school psychologists provided by the Ohio Department of Education. There are several private practice contexts that are not permissible with the Ohio Department of Education license. For example, I routinely have to enlist the help of school psychologists in private practice to provide Independent Educational Evaluations (IEEs), which are prescribed by federal and state guidelines under the Individuals with Disabilities Education Improvement Act. These "second opinion" evaluations typically are provided by school psychologists who work in private practice settings as IEE providers. By law, these providers must not be employed by the school district from which these evaluations are sought, making school psychologists in private practice a critical resource for parents and families to request second opinions.

School psychologists licensed by the State Board of Psychology practice in many other non-school settings, such as hospitals, clinics, and other agencies. As I previously indicated, I have personally been providing school psychological private practice services to clients since being licensed by the State Board of Psychology more than 20 years ago. For the past 15 years, I have been contracted to provide these

services to the Diocese of Cleveland as they request school psychological evaluations for all incoming seminary candidates. I have worked extensively with their seminary leadership and individual candidates to determine what psychological needs might be present as the candidates transition to collegiate learning environments, both at the seminary and John Carroll University. This type of service to the community (which I offer "at cost" at a deeply discounted rate) is simply impermissible with the school psychologist license offered by the Ohio Department of Education. Were HB509 to pass as written, I would need to cease providing this service immediately, with few (if any) professionals in our community to support this need going forward.

Finally, and by way of context, I will note here that I am a conservative Republican who has held elective office on the Summit County Republican Executive Committee for several terms up to the present day. As such, as a general rule, I am broadly supportive of various efforts to reduce redundancy across state agencies, streamline government functioning, and preserve taxpayer dollars whenever it is practical to do so. Respectfully, removing the option for school psychologists to be independent service providers does not accomplish any of these goals. Licensure fees more than offset the costs borne by the State Board of Psychology to provide the School Psychologist license option and, as I hope I've made clear, this is not a redundant/duplicative credential for professional practice. *Rather than reducing redundancy and costs, the existing language in HB509, if passed, would only serve to significantly worsen a critical shortage of qualified private sector practitioners who are already struggling to meet the growing mental health challenges faced by Ohio's youngest citizens.*

I respectfully urge you not to support the language in HB509 that would eliminate the private practice license for school psychologists with our State Board of Psychology. Should you require any additional information as you work to amend HB509, please feel strongly encouraged to call upon me anytime at 330-607-8936.

Thank you for your service to the State of Ohio and thank you for your consideration of this testimony.

Respectfully,



Dr. Robert J. Kubick, Jr.

Licensed School Psychologist – State Board of Psychology (SP.527)

Licensed School Psychologist – Ohio Department of Education (OH1201072)